

TIED TO EXPLOITATION: The experience of migrant workers in Ireland

MRCI survey of over 1000 employment permit holders demonstrates changes urgently needed to the employment permit system



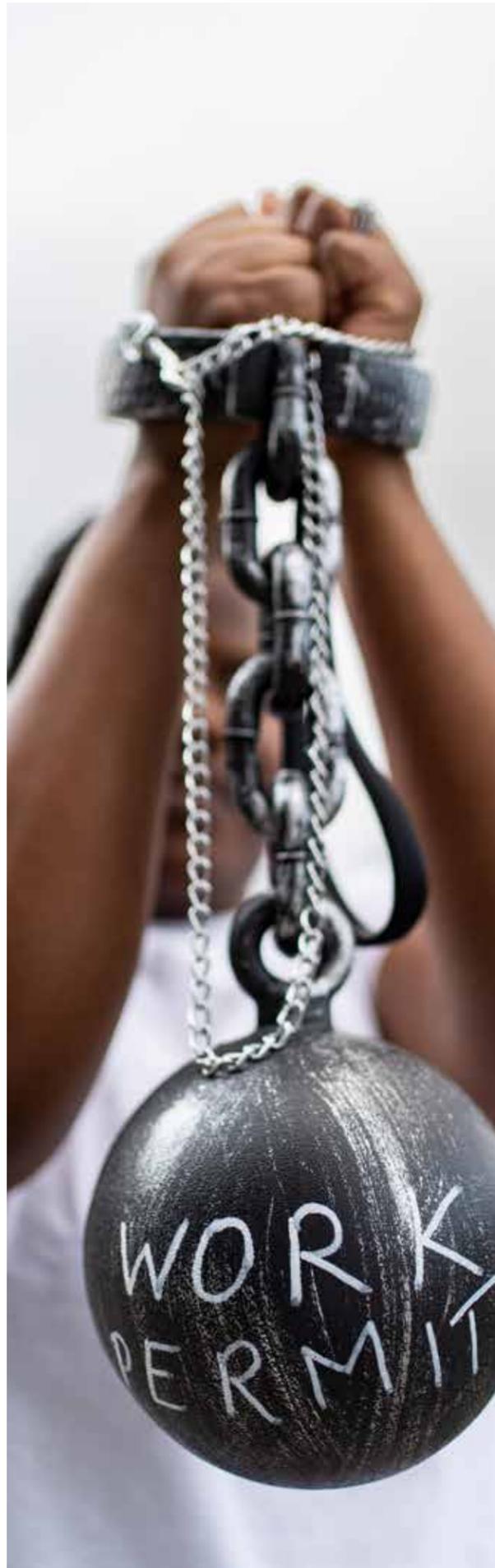
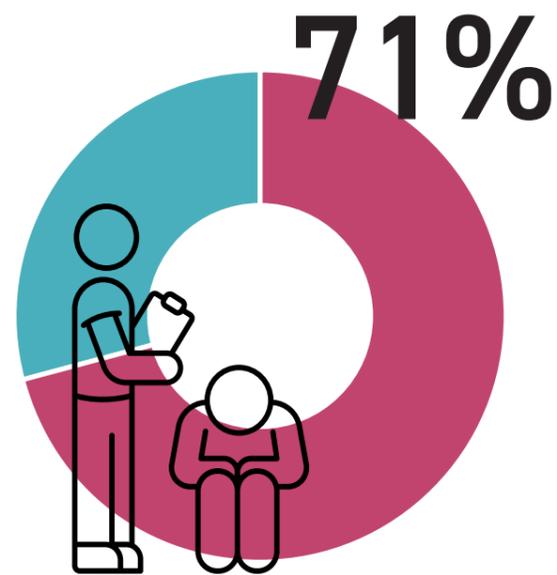


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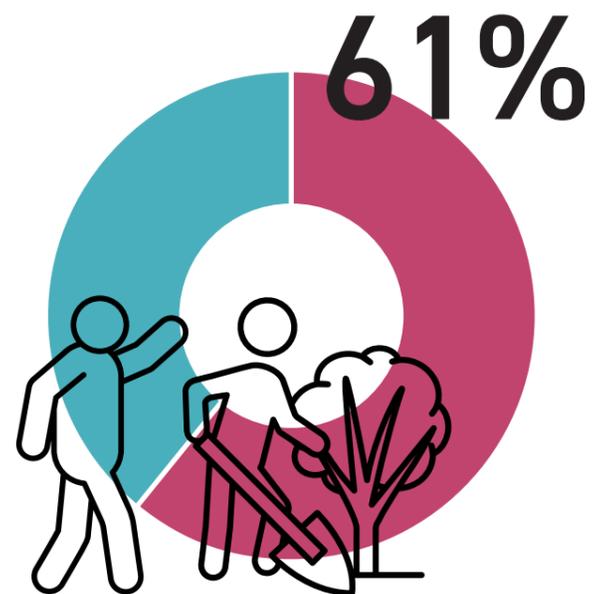
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EXECUTIVE SUMMARY

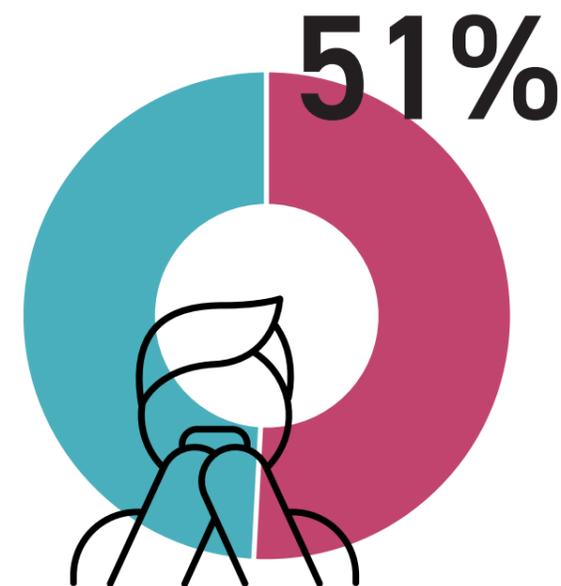
KEY FINDINGS:



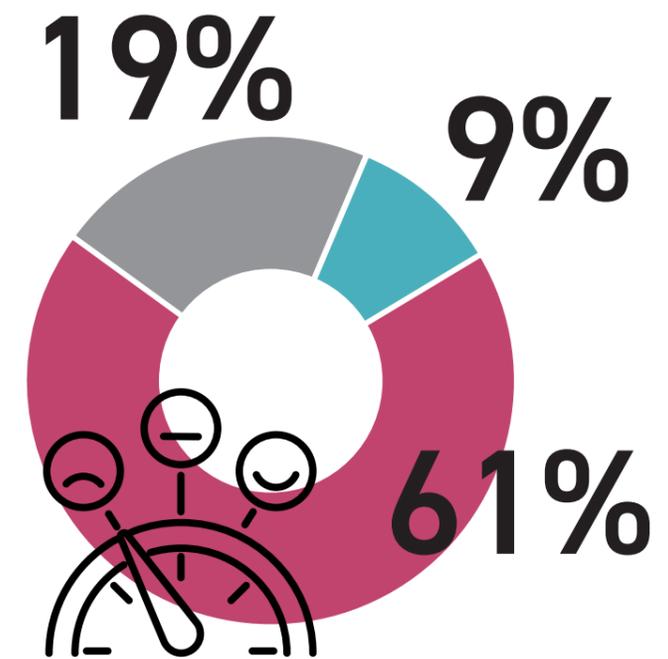
**71% OF PEOPLE EXPERIENCED
*EXPLOITATION**



**61% OF PEOPLE EXPERIENCED
*SEVERE EXPLOITATION**



**51% OF PEOPLE WHO WERE
EXPLOITED DID NOT REPORT IT**



Only 9% of those who reported had it resolved positively, 61% saying it was not resolved and 19% saying it resulted in significant negative consequences

The survey findings demonstrate that work permit holders are routinely exploited in the employment permit system. It is not isolated to a small number of employers. If you are a general employment permit holder in Ireland, then more likely than not you have been exploited at some point.

The findings also show that permit holders are fearful of reporting employment issues, they normally just put up with it, because they don't feel they have a choice and many are not aware of the options available to them. As such, the Irish government must do more to ensure all migrant workers are protected from exploitation.

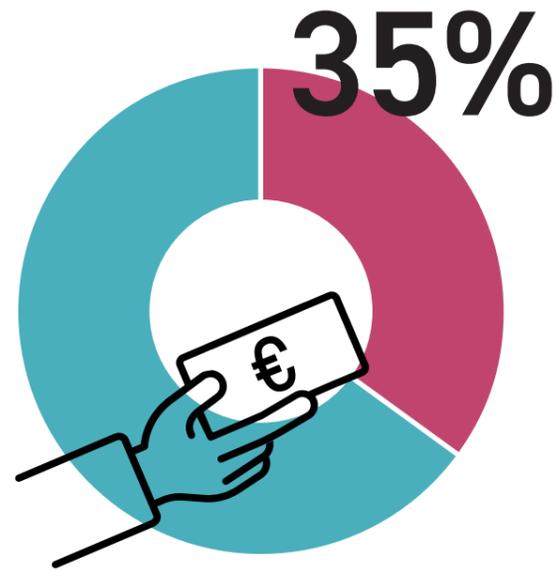
*Exploitation means at least one of the following substantial employment rights breaches. Severe exploitation means at least two or at least one on a repeated or consistent basis.

WHAT IS EXPLOITATION?

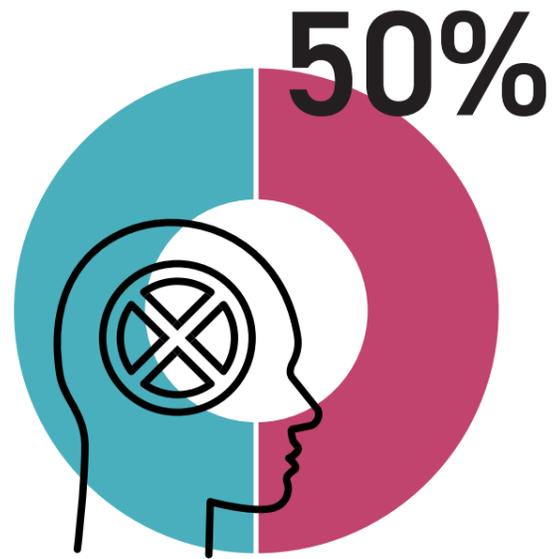
Exploitation means at least one of the following:

- Paid less than the minimum wage or the hourly wage listed on their permit.
- Not paid for all the hours they worked.
- Worked excessive working hours (consistently required to work more than 48 hours in a week).
- Not paid extra for working on Sundays.
- Not given proper breaks.
- Not given at least one day off in a week.
- Not given at least 4 weeks paid annual leave in a year.
- Consistently made to do work above and beyond what is normal for their role.
- Made to do different work than agreed in contract.
- Harassed or verbally or physically abused at work.
- Treated less favourably than other workers because they were on a work permit.

KEY FINDINGS:



35% PAID A FEE TO THEIR EMPLOYER OR TO AN AGENCY TO SECURE THEIR JOB



ONLY HALF OF PEOPLE WERE AWARE OF THEIR OPTIONS TO URGENTLY LEAVE EXPLOITATIVE EMPLOYMENT.

RECOMMENDATIONS:

- 1** The Irish government should grant all employment permit holders the freedom to work in any job after 2 years (instead of 5 years) as a means to help them stand up for their rights.
- 2** Introduce a new criminal offence for severe exploitation.
- 3** Ban exploitative employers from applying for future permits for migrant workers.

SURVEY REPRESENTATION

The survey of 1019 responses is representative of the general employment permit population in Ireland which is estimated at 38,000. 871 survey respondents currently held a general employment permit when surveyed and 148 previously held a general employment permit.

In terms of nationality, the survey had responses from 58 nationalities, including all the main nationalities that have general employment permits. The following are the top five nationalities surveyed: **Brazil: 32%, Philippines: 13%, India: 10%, Zimbabwe: 9%, South Africa: 5%.**

Many job sectors and job titles¹ are represented in the survey, including all the main job sectors in the employment permit system, such as:

- **Health care assistant & support workers 45%**
- **Chefs 8%**
- **Care workers 7%**
- **Truck drivers 4%**
- **IT workers 4%**
- **Meat food, drink process operatives and medical practitioners 2%**
- **Farm workers, playworkers, business and finance project 1%**
- **Mushroom and agriculture workers, carpenters, welding, business professionals, bus drivers, vehicle testers and technicians, metal workers, sales all 0.5% - 1%**
- **Butchers, carpenters, marketing, HGV/Bus mechanic, aircraft maintenance all below 0.5%**
- **Other sectors 14%**

Regarding gender, the survey has a good gender balance with 56% responses identifying as female and 43% identifying as male, prefer not to say 0.4%, non-binary 0.1% and not answered 0.6%.



1. 24 job sectors and 226 job titles

INTRODUCTION

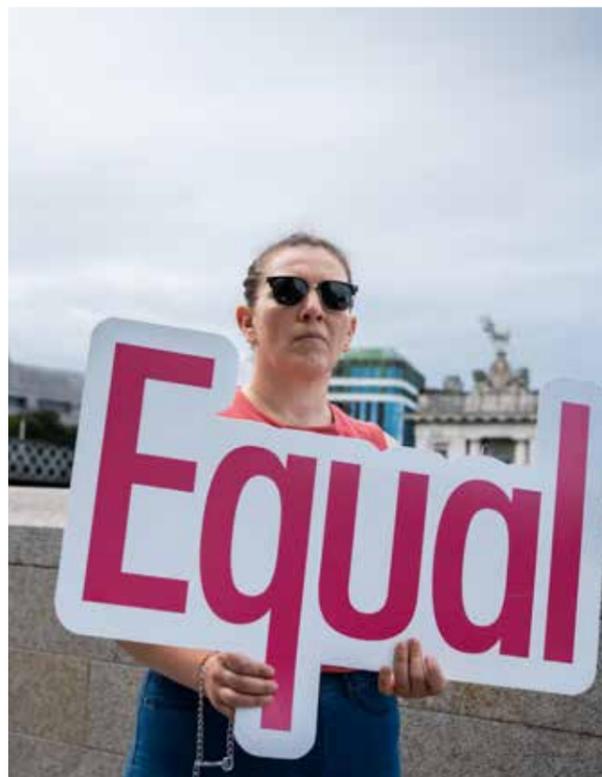
In the last 5 years we have seen a dramatic increase in the number of people coming to Ireland on employment permits. Migrant Rights Centre Ireland (MRCI) has seen a corresponding increase in cases of exploitation coming through our doors. This significant increase in reports of exploitation warrants in-depth research into the experiences in employment of general permit holders and their awareness of rights.

Relevant research

Exploitation arising from tying a worker to a single employer has been noted previously by research in Europe and further afield in Canada. The link between employment permits and exploitation has been widely documented. The below outlines three international examples.

A study of three EU countries into the experiences of migrant workers with a Single Permit, found employment rights breaches such as lower than agreed or non-payment of wages, unpaid overtime, and excessive working hours, deduction of illegitimate or (previously) undisclosed costs and exploitation in Belgium and the Czech Republic. It was also highlighted the importance of an 'unimpeded right to change employer on the existing single permit, that entails very minimal administrative requirements, is vital as it will minimise the risk of migrant workers finding themselves in a position whereby, they are over-dependent on their employer where the latter may exert undue control over their working and living conditions'.²

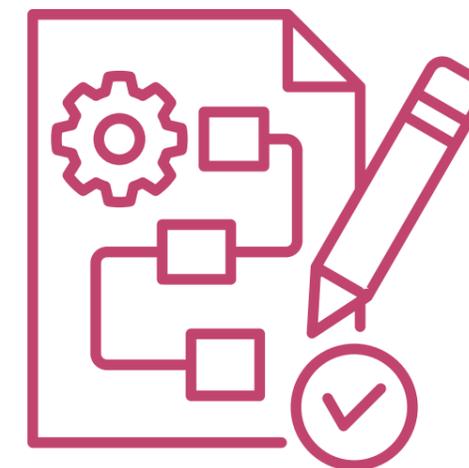
The EU Agency for Fundamental Rights (FRA), recognise this concern relating to the relationship between employers and workers on an employment permit.



'Work permit schemes which bind the worker to one specific employer and permits which are granted to employers and not to employees create a dangerous dependency between worker and employer and constitute a risk factor of severe exploitation. They can lead to situations in which the worker will accept working conditions that are unacceptable, assessed by the legal standards of the country of work'.³

Amnesty International found that human rights abuses such as wage theft, excessive working hours, racist abuse, gender-based violence are a systemic 'foreseeable result of tied visas.The tied nature of their visa exposes TFWP workers to a higher risk of labour exploitation, compared to both Canadian nationals and other migrant workers with open visas. On the other hand, both the tied nature of the visas and their temporary character make it difficult for workers to access the benefits they are entitled to and to obtain redress when they suffer labour exploitation and other human rights violations. Amnesty International therefore concludes that, in its current design, Canada's TFWP is inherently exploitative, in violation of Canada's international obligation to respect, protect and fulfil the right to just and favourable conditions of work enshrined, among others, in Article 7 of the ICESCR'.⁴

METHODOLOGY



The survey was open from 23 July 2025 to 25 February 2026. Respondents came from a range of sources and many of those who completed the survey were previously unknown to MRCI, demonstrated by the way in which survey respondents received the survey.

The respondents received the survey link via a variety of methods: via MRCI's email or phone: 405 responses, through a colleague or friend: 358 responses, via social media: 189 responses, other: 40 responses, and from MRCI's Information and Support Centre: 22 responses. There were 6 responses who did not answer this question. Therefore, a large proportion received the survey through non-MRCI channels.

The survey link was shared on MRCI's social media, with MRCI's community group of general employment permit holders, and MRCI's community group shared the survey with others in their community and friends. MRCI also invited several organisations to share the survey⁵ and to network groups of migrants.⁶

This analysis is based on 1019 survey responses, those who have a general employment permit 871 and who had a general employment permit previously number 148.

According to best practice quantitative research methodology,⁷ for a population of 38,000 GE holders, (a rough estimate from the DETE), a sample size of over 653 has a confidence level of 99% and a sample size of 1013 has a margin of error of 3.04%. We also were cognisant to have the main nationalities and job sectors associated with general employment permits represented.

The survey respondents self-identified whether they currently held or previously held a general employment permit. Duplicate responses were removed from the survey. The survey responses were filtered and checked to make sure the respondents were as accurate as possible. Those who indicated nationalities and job sectors which were not eligible for a general employment permit were removed.

Indicator of exploitation and definition of exploitation

There is no internationally recognised definition of labour exploitation. For the purposes of this report MRCI sees exploitation as 'the action or fact of treating someone unfairly in order to benefit from their work'.⁸

The International Labour Organization (ILO) defines "unacceptable forms of work" as "work in conditions that deny fundamental principles and rights at work, put at risk the lives, health, freedom, human dignity and security of workers or keep households in conditions of poverty."

In this research we use the following to measure the level of exploitation:

EXPLOITATION	SEVERE EXPLOITATION
At least one substantial employment rights breach	At least two or at least one on a repeated or consistent basis

2. Amy Weatherburn 'The Lived Experiences of Migrants in the EU with a Single Permit - Business and Human Rights Centre' https://equalitylawclinic.ulb.be/images/documents/The_Lived_Experiences_of_Migrants_in_the_EU_with_a_Single_Permit38.pdf accessed 11 February 2026 pg 39.

3. FRA - European Union Agency for Fundamental Rights Severe labour exploitation: workers moving within or into the European Union States'

obligations and victims' rights' <https://fra.europa.eu/en/publication/2015/severe-labour-exploitation-workers-moving-within-or-european-union> Accessed on 11 February 2026 pg 44

4. Amnesty International "Canada has destroyed me": Labour exploitation of migrant workers in Canada' International [https://www.amnesty.org/en/documents/amr20/8807/2025/en/accessed on 11 February 2026](https://www.amnesty.org/en/documents/amr20/8807/2025/en/accessed%20on%2011%20February%2026)

5. AkiDWA, CWU, Cultúr Migrant Centre, Doras, NASC Ireland, SIPTU, Unite

6. 56 Facebook groups of migrant communities

7. See this website for details: Sample Size Calculator by Raosoft, Inc. <http://www.raosoft.com/samplesize.html> Accessed 25 February 2026

8. Oxford Languages: dictionary definition of exploitation

ANALYSIS OF EMPLOYMENT RIGHTS BREACHES

Survey respondents were asked to indicate if they experienced any of the below employment rights breaches and to provide details of their experiences in employment. The following outlines the level of breaches experienced by survey responses.

Employment issues:

27%

27% of people worked excessive working hours (consistently required to work more than 48 hours in a week).

6%

6% of people were not given at least one day off in a week.

22%

22% of people were made to do different work than agreed in contract.

18%

18% of people were paid less than the minimum wage or the hourly wage listed on their permit.

27%

27% of people were not paid extra for working on Sundays.

13%

13% of people were not given at least 4 weeks paid annual leave in a year.

23%

23% of people were harassed or verbally or physically abused at work.

17%

17% of people were not paid for all the hours they worked.

27%

27% of people were not given proper breaks.

24%

24% of people were consistently made to do work above and beyond what is normal for their role.

35%

35% of people were treated less favourably than other workers because they were on a work permit.

Each employment rights area is further described and analysed below.

Paid less than the minimum wage or the hourly wage listed on the permit.

	Number of survey responses	187
	Percentage	18%

Nearly a fifth of people surveyed were not paid the minimum wage or their contractual/ listed permit wage.

This ranged from some respondents receiving below the minimum permit rate to others receiving below or well below minimum wage.

One person only received €13 for their entire first year of employment. Another survey respondent indicated that their employer *'don't pay my wage'*.

An example is *'When I first arrived, my salary was €500 per week. The first week I received no pay. After seven months, it increased to €580, and after another ten months, it rose to €600.'*

Another survey participant received only minimum wage as opposed to the employment permit stipulating 30,000 annual salary. One participant expressed that *'they receive only extremely low salaries'*.

Ultimately, these pay issues as described made one respondent, feel *'unimportant at work'* and made it harder to pay rent and meet living costs.

A participant expressed a wish that *'gov could do more about truck drivers not getting paid right'*.

Unequal pay

Several survey respondents also raised the issue of unequal pay, where people on general employment permits are paid less than other workers as described by one survey participant.

'Wages are lower than those who are not on a working permit even when I am more qualified for the job. Holding the work permit over our heads for us to agree to do something that it's not according out contract.'

In one example, the employer justified the lower level of pay due to the cost of the employment permit:

'Unfortunately, the company pays less to people who are on a work permit, and for many reasons, they justify not increasing the salary due to the cost of the visa.'

One respondent did not receive their contractual pay rises because they have an employment permit: *'Many other European staffs get pay rise but not the ones under work permit European/Irish manager tends to look down on foreigners workers from third countries'*.

This unequal pay is a significant indication of discrimination faced by general employment permit holders.

The current National Minimum Wage is €13.50 per hour⁹ as stipulated by the National Minimum Wage Act. Minimum wage for some sectors are set out by Sectoral Employment Orders and Employment Regulation Orders. In addition, the DETE sets out employment permit salary thresholds.

Not been paid for all the hours worked.

	Number of survey responses	173
	Percentage	17%

Many people did not receive payment for overtime and had often not been paid for all the hours worked.

For survey respondents from the home care sector it was commonly indicated that they do not receive overtime pay as one respondent described: *'[Employer] never ever paid us overtime rates even when we queried we was told it was against company policy an if we did not like it we must give back home.'*

In addition, people also had issues such as salary not paid, a tax refund was withheld, a person was not paid at all for a period of 6 months, but later reimbursed and a person did not receive all their pay or holiday pay. There were also incidents of underpayment of wages.

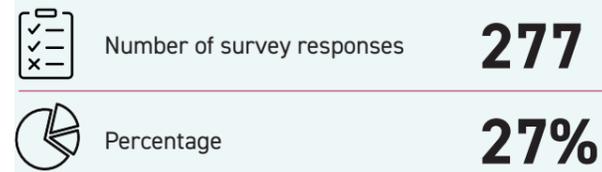
⁹ National Minimum Wage was €13.50 per hour until 31 December and increased to €14.15 euro on 1 January 2026.

'We actually work 38.25 hours, but the company only pays us for 36.5 hours.'

There is also an example of an employer withholding wages. *'They paid me 100 euros per day, but after taxes, I only received 79 euros per day for 8 hours of work. They didn't pay me monthly; they only gave me a small amount for basic living expenses, holding onto my wages. I repeatedly asked for my wages without success.'*

The Payment of wages act 1991 aims to ensure that employees receive their wages in a fair and transparent manner, including ensuring against unlawful deductions.

Excessive working hours (consistently required to work more than 48 hours in a week).



Survey respondents reported working staggering hours. 27% of respondents were working more than 48 hours in a week, some respondents were working higher than 50 hours, and some were even working 70 to 80 hours. Some people also reported very long shifts of 12 to 14 hours.

'More than 12 hour shift for five day and sometime six days for same money as if you would worked a 48 hours shifts weekly.'

'They didn't give us work base on the contract and we stay outside 14 hrs but they paid only 4 hrs...'

Some respondents also reported they are obliged to work over 48 hours but did not receive adequate compensation or extra pay for the work, just receive a normal rate.

Described by one person, *'I felt like I am slave by their system'*.

'We as truck driver doesn't get paid from 39 or 40 hours we only start getting paid from 50 hours overtime which is very unfair to us on a working permit as we all are human beings to be treated equally as there's drivers getting paid properly and when we working on Saturday we don't even getting paid like we should.'

Some people working as HCAs (Healthcare assistant) have to be available for 50 hours per week. In this example the person has to be available for 98 hours per week. *'Making to much stress in job specially employer who r in Work permit I've to available 5 days 7:30 Am to 9:30 pm but I get Payment only for 8 hours per day.'*

Because they have a permit, some survey respondents remarked they felt obliged to work these excessive hours and that extra hours and excessive hours were given to those on an employment permit.

'I was constantly given more work more than others in the team Not given any extra money during the working hours in a storm!'

'After I got my work permit they started to given me excessive over work.'

People also reported difficult work schedules.

'Too much workload especially if some staffs are absent. They can afford taking carers from agencies but they don't want to spend money. In return staffs are suffering too much.'

For example, people reported being given late tasks, working late at night and then expected to work the next day and do impractical shifts.

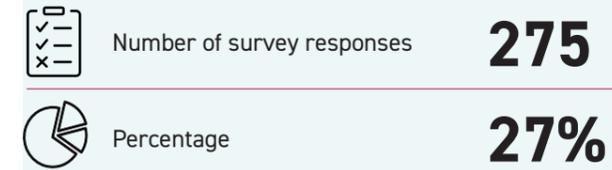
'Not paying for the hours we wait from one call to another, not giving enough time to get from one client to another, very exhausting shifts, starting work at 8 in the morning and finishing at 8 at night because the contract says we have to be available within that time, but we end up working 12 hours because during breaks we can't go home and rest.'

The impact of excessive hours was also reported, *'Provoked a bur-out [burnout] for the excess of work.'*

Staff are expected to be available for schedule changes. *'Whereas those who don't possess a work p ermit have more flexibility in terms of choosing their schedule e.g mornings and afternoons or afternoons and evenings.'*

Organisation of Working Time Act 1997 stipulates that the maximum number of hours that an employee should work in an average working week is 48 hours. This working week average should be calculated over a 4-month period.¹⁰

Not paid extra for working on Sundays.



There is a high rate of respondents not paid extra for Sunday work. Some respondents were not paid a Sunday rate as it was not stipulated in their contracts.

It was surmised this is because they have an employment permit. *'At the nursing home where I work, they pay more every Sunday for everyone who works, with the exception of carers who have a work permit.'*

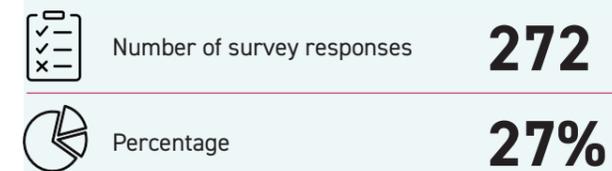
Bank and public holiday pay was also a widely cited issue and there was often no night pay differential.

'We only got one day off per year—Christmas Day—for all public holidays in Ireland, including bank holidays. While we received our regular pay, we didn't receive the holiday pay stipulated by Irish labor law.'

The Organisation of Working Time Act¹¹ also requires employees who perform Sunday work are entitled to an additional premium. The premium can be in the form of an allowance, an increased rate of pay, paid time off, and a combination of the above.¹²

For work on Public/Bank Holidays, a worker is entitled to either a paid day off on the holiday, a paid day off within a month or an extra day's annual leave or an extra day's pay should the employer decide to do so.

Not given proper breaks.



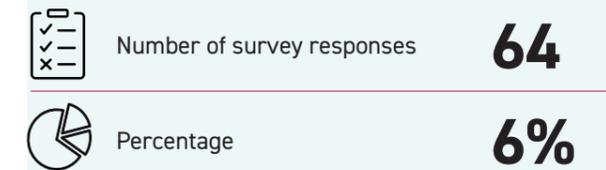
27% of survey respondents reported not getting no proper breaks during the day. Some people had to be available for the whole shift. They had to explicitly asks for breaks and one respondent remarked *'I worked 70 to 80 hours a week with no proper breaks if you took a 15 mins break you would be in trouble'* and another person had to work 8/10 hours days without a break and *'He told some of the company's senior foremen that he wouldn't give me my breaks.'*

For example, *'home care workers could have 11-12 calls without break' and another respondent explained, 'There were no the 11 hour rule between the last and first call. No breaks sometimes or just tiny ones.'*

No breaks were directly linked to having a permit. *'The company I worked for was always bringing up the fact I hold a work permit to force me to do all sort of illegal things, such as 12 hours shifts with no break.'*

Entitlements under the Organisation of Working Time means a worker is entitled to a minimum of 15 minutes break for working more than 4 hours and 30 minutes and an employer should not require a worker to work for more than 6 hours without a break of at least 30 minutes.

Not been given at least one day off in a week.



A smaller number of survey respondents said they did not receive at least one day off per week. One person indicated that they have to work *'14 days to get one day off'*.

A worker is entitled under the Organisation of Working Time, to a rest daily period of at least 11 consecutive hours between shifts, and a worker is entitled to at least 24 consecutive hours rest period in each period of 7 days.

10. See the Workplace Relations Commission website: Working Hours - Workplace Relations Commission https://www.workplacelrelations.ie/en/what_you_should_know/hours-and-wages/working_hours/

11. Sunday premium is legislated under Section 14 of the Organisation of Working Time Act 1997.

12. See the WRC website at https://www.workplacelrelations.ie/en/what_you_should_know/hours-and-wages/sunday%20premium%20entitlement/

Not received at least 4 weeks paid annual leave in a year.



Number of survey responses

134



Percentage

13%

13% of survey respondents did not receive at least 4 weeks paid annual leave. The comments made by survey participants ranged from not getting any annual leave, not paid for annual leave and not receiving the full entitlement of leave or leave pay.

For example, one survey respondent described, *'I only received two weeks of paid annual leave each year, never four.'* and another said *'I was only given 3 weeks of annual leave instead of 4 weeks.'*

The ability to take annual leave when required by the worker was constrained. For example, The employer said that *'I should take my days randomly, not four weeks in a row. So I've tried two weeks, but it's still not good for the company.'*

A worker is entitled to annual leave calculated at 8% of the hours an employer works in a leave year.

Consistently made to do work above and beyond what is normal for their role.



Number of survey responses

252



Percentage

25%

A quarter of survey respondents indicated that they had to go above and beyond what is normal. Much pressure was exerted on migrant workers to work under pressure and complete burdensome tasks.

'I constantly received insinuations that I should work more because I had the visa.'

'...In order to prepare replacements for the Irish workers deboning meat on the tables. Permit workers were

trained in deboning vertically, using a conveyor belt. This would force the workers to work at their limits. It's a conveyor, after all, and as soon as the supervisor turns the speed up, the workers will work. Fast, very fast, faster, as fast as possible.'

This pressure to work above and beyond had impacts on the workers.

For example, one respondent explained the impact, *'We are in risks psychology, health. Companies which give us contracts to work permit use it as force staffs to work under pressure, we are slaves, always afraid to loose ours job.'*

An employer should furnish a worker with the terms of the employment within four weeks of the employment and must provide a worker with notice when there is a change to the terms of his/her employment.

Made to do different work than agreed in contract.



Number of survey responses

226



Percentage

22%

Some responses described working in a different role than agreed in their contract; for example working as a social care worker but a health care assistant is listed on the employment permit, and another respondent said they were employed as steel worker but instead working in masonry. People also worked at a higher level but were contracted at a lower level, for example had a manager level workload but contracted as a coordinator level.

Some respondents described completing different tasks than described by their contract.

'Every year I was assigned to work at music festivals, beyond the scope of kitchen duties, for varying lengths of time.'

In addition to taking care of residents, there were examples of HCAs being made to mop the floor, clean the kitchen and do the laundry. There were examples of meat processors having to complete cleaning tasks and jobs they were not hired for and not in the job description.

This was not a once-off experience for several respondents, for example *'We are regularly instructed to perform tasks that fall outside our job descriptions.'*

One respondent was obliged to do different tasks than in contract. *'The owner always tell me that I owed him my work permit so I need to do anything that he ask me even if it's not on my job description.'*

An employer should furnish a worker with the terms of the employment within four weeks of the employment and must provide a worker with notice when there is a change to the terms of his/her employment.

Harassed or verbally or physically abused at work.



Number of survey responses

233



Percentage

23%

Nearly a quarter of survey respondents experienced harassment, verbal or physical abuse.

Survey respondents reported threatening and disrespectful behaviour because they have an employment permit. Some threats concerned losing the visa/employment permit or being fired. For example, one respondent said, *'Employer constantly threatened to cancel the work permit.' Manager treat[ened to] cancel my work permit if I don't do what they want.'*

One person's access to accommodation was threatened. *'My employer is always telling that our accommodation is temporary anytime he can tell us to leave in our mobile home. Because we don't always meet our target job. Which they don't want to listen to us why. It feels like we workers here should only listen to them and we don't have the right to complain. Thats how I feel, based on how he talk or communicate.'*

Several respondents experienced unfavourable treatment by their managers. They reported being belittled by them, shouted at and undermined. Here are a few examples: *'yelled at in meeting unlike other Irish nationals,'* and called *'lazy and paranoid,' 'constantly undermined'* and one respondent eventually left Ireland due to *'subtle abuse,'* and *'insulted'* by managers and by their colleagues, and it was *'disguised in form of jokes.'*

Bullying was frequently described by survey participants. For example, *'I have been bullied by my director of nursing calling disgrace in-front of all the residents being always seen everyday, tailing in everything i do. Mentally stressed about this. Sometimes it's hard for me to sleep thinking i will work and see her again afraid to work',*

Some respondents reported experiencing racist verbal abuse. *'Was told that in this country even if you bath everyday, you can never be as clean as people from Europe and neither will what you do at work, and that was by a supervisor.'*

The below explicitly linked having an employment permit as a central factor in this mistreatment.

'The senior manager talking me like I'm nothing but doesn't talk like that with EU staff because they know they can loose them anytime with us on general permit they know we are stuck with them there is nothing we can do.'

'People screaming with me, treating me as I was them slave, threatening me because of the work visa etc Because we need a work visa, people think they can treat us however they want. This includes managers, supervisors, and coworkers.'

A way to resolve these issues was not clear for some survey participants. *'My experience is traumatic ...I received a lot of abuse, accusations, threats and all kinds of harassment from me... I felt trapped by the law, and now the company unfairly dismissed me, and I suffer from bureaucracy and laws that prevent me from working for another company.'*

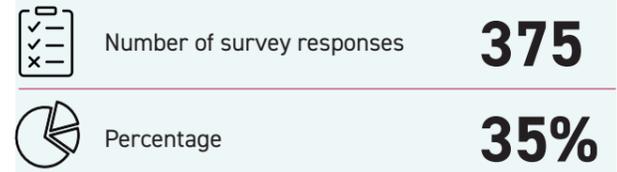
Complaints were not taken seriously. Here are some examples, *'Told to learn to deal with the bully'. 'I reported the things that happened many times, but it never got resolved, it would only get worst with the retaliation.'*

There were also reports of sexual harassment and sexism, *'hug without consent', 'not listened or my opinion is considered also the most capable and studied than others!'*

Discrimination covering all aspects of work on any of the nine prohibited grounds is covered by the Employment Equality Acts.¹³

13. See Employment Equality and Equal Status - Workplace Relations Commission at https://www.workplacelrelations.ie/en/what_you_should_know/equal-status-and-employment-equality/employment%20equality%20and%20equal%20status/

Been treated less favourably than other workers because you are on an employment permit.



The largest proportion of survey respondents, over a third, reported that they were unfavourably treated because they are on an employment permit.

'At work people who needs work permits has different treatment and less opportunities to growth in their career than others.'

Several survey participants said that they were discriminated against because they have an employment permit.

This discrimination was described by one participant as, *'My immediate manager makes it difficult for me to have a peaceful mind to work. I am constantly discriminated against because I am on general work permit.'*

One survey participant described, *'Constantly being reminded that I am on a permit thanks to them and that I had to go to work as much as possible, I was getting more hours than the people paid by hours becauseI am cheaper.'*

There was a prevailing sense that workers had no choice as one person said, *'Everyone working under permits was made obedient and obeyed all orders without question.'*

The following account highlights the importance in the ability of workers to change job to protect their employment rights and conditions. *'On my first General Permit in a Nursing Home I felt that treat us like a slaves, always with short staff we had to hoist clients on our own what is forbidden, they used to given unfair working hours, some months they used to put us to work all weekends with no break, sometimes work 7 days a week, it was a nightmare, thank God now I'm working for a Homecare company.'*

Unsurprisingly, migrant workers on employment permits felt disrespected. As one person said, *'Feeling no worthy no matter how much you do and no appreciation for what you do.'*

'The experience is frustration. We leave or country looking for better life, and seems with the work permit employer treat us in disrespectful manner that is not the same as they treat a national workers. Discriminatory behaviour experiencing every day.'

One person remarked that *'I have been feeling anxious every time my phone rings because of the way they treat us.'*

The period that someone is on an employment permit and the experience of exploitation was also considered important by survey respondents. For example, one survey respondent said,

'I experienced it because the management knows that we have a 5-year contract (2+3 years) and a work permit under the same company, making it challenging for us to find another job '. As a result, the management tends to give us less care than others.'

And another survey respondent said, *'I really wish I couldn't wait so long to apply for my stamp 4'.*

This wish links to MRCI's recommendation below to ensure that migrant workers can freely move jobs after two years, which would enable them to stand up for their rights.



Other unfavourable treatment and issues faced by migrant workers reported in the survey

The following issues were also reported by survey respondents.

- **Dismissal and redundancy:** There were reports that people on employment permits were dismissed over others due to having an employment permit. Employers also were reported to have cancelled permits without notice to the survey respondents.
- **Renewals:** On the renewal of their employment permit, several respondents were dismissed. Some people's permits were not renewed due to new salary levels. Some renewal applications were delayed.
- **Discrimination:** Discrimination, racism, xenophobia and homophobia were reported. Explicit racism and homophobia were highlighted such as verbal abuse. There were reports of favouritism. It was also reported that it was difficult to report discrimination.

- **DETE and Department of Justice (DOJ) operations and policy:** Long delays, a stressful process, and no possibility of family reunion were highlighted by survey respondents.
- **Not enough work or hours:** Several workers were not given the hours stipulated on their permits. Some people had no job on arrival.
- A lack of **opportunities for progression** in their jobs was reported.
- **Undue working pressures:** Several respondents said they had huge work pressures and they had no work life balance.
- **Inadequate accommodation:** Concerning living conditions were reported by some participants.
- **Health and safety concerns:** A lack of tools and equipment, compliance with safety requirements, forced to do risky jobs were some health and safety issues reported.

SEVERITY OF EXPLOITATION

The majority of survey participants indicated that they experienced multiple employment rights breaches.

As outlined above, this report uses the following measure of exploitation.

Exploitation means at least one of the substantial employment rights breaches outlined above. Severe exploitation means at least two or at least one on a repeated or consistent basis.

Number of employment issue	Survey responses	Percentage
0 issues	262	26%
1 issue on a once off basis	108	11%
1 issue but on a repeated/consistent basis	104	10%
2 issues	104	10%
3 issues	101	9%
4 issues	103	10%
5 issues	67	7%
6 issues	47	5%
7 issues	30	3%
8 issues	22	2%
9 issues	21	2%
10 issues	21	2%
Not answered	28	3%
Experience exploitation	727	71%
Experience severe exploitation	620	61%



Frequency of employment issue

The majority of employment issues (72%) reported occurred on a regular or consistent basis. Only 9% occurred once. This is another indicator of the severity of exploitation.

19% did not answer this question.

Exploitation interaction with other indicators

Job sector: Exploitation and severe exploitation were present in each job sector contained in the survey. The level of exploitation and severe exploitation was higher in some job sectors.

For example, health care assistants, the largest job sector surveyed had a 78% rate of exploitation and a 64% rate of severe exploitation. The smaller group of farm workers, (13 responses) had an 88% rate of exploitation and severe exploitation. These examples show the prevalence of exploitation regardless of the type of job.

Nationality: there are indications of exploitation and severe exploitation in most nationalities featured in the survey.

There was a high degree of exploitation and severe exploitation amongst respondents from Brazil, the largest proportion surveyed, of 81% experiencing exploitation and 73% experiencing severe exploitation.

Exploitation was found in entries from the vast majority of nationalities and was not present in some countries that just had one or two respondents.

Gender: The experience of exploitation is higher for females. 76% of females experience exploitation and 64% of females experience severe exploitation in contrast to 66% of males experiencing exploitation and 58% of males experiencing severe exploitation.

RECRUITMENT FEES

Total percentage who paid recruitment fees	35%
Paid an agency	20%
Paid or continuing to pay recruitment fees to their employer	15%
Paid for permit themselves	0.5%
Did not pay any recruitment fees	63%
No answer	5%

Over a third of people surveyed paid either a recruitment fee to their employer or agency or paid directly for their permit or other costs.

Further analysis of the amounts that survey participants outlined revealed that some survey respondents paid substantial amounts to both agencies, their employer and their travel and other costs. The average amount paid was €5476 to both employers and agencies.¹⁴ Amounts paid to agencies ranged from €250 to €20,000. Amounts paid to employers ranged from €100 to €21,175.

In another example the employer asked to be repaid if the person leaves the employment, *'if I don't finish the 3 year contract with them, I will pay €1250 (that they paid for my employment permit.)'*

Employers also asked for substantial amounts (for example, €4100, deducted €50 per week) for training costs, fees to cover accommodation and the employment permit application. One respondent paid for the cost of the permit, but when it was declined, they did not get refunded. One person refused to pay the employer recruitment fees when they requested. One person said they faced consequences after the employer paid for the permit such as missed bank holiday, extra days not paid, while others had to repay their employer when they originally paid for the permit.

14. The average paid to agencies was €5808 and the average paid to employers was €4665.

15. Recruitment fees: Payments for recruitment services offered by labour recruiters (public or private); payments made in the case of recruitment of workers with a view to employing them to perform work for a third party; payments made in the case of direct recruitment by the employer; and payments required to recover recruitment fees from workers. These fees may be one-time or recurring.

Related costs: Related costs are expenses integral to recruitment and placement. When initiated by an employer, labour recruiter or an agent acting on behalf of those parties; required to secure access to employment or placement; or imposed during the recruitment process, the following costs should be considered related to the recruitment process: such as Medical costs Insurance costs; Equipment costs; Costs for training and orientation; Travel and lodging costs; Administrative costs; Costs for skills and qualifications tests

'I was made to refund the money my employer used to process for me a work permit, that was 1000 euros.'

Guided by international labour standards, the International Labour Organisation (ILO) approach¹⁵ is that 'workers shall not be charged directly or indirectly, in whole or in part, any fees or related costs for their recruitment'. Irish legislation prohibits employers making any deductions from remuneration or seeking to recover any charge, fee arising from application for an employment permit or renewal, the recruitment and travelling expenses to take up employment.¹⁶ Agencies are also not allowed to charge fees concerning employment.¹⁷

High recruitment fees result in high level of debt and this can lead to people feeling they have no choice but to stay and work, even in situations of extreme exploitation. Much of the amounts indicated by survey respondents are considered unlawful and unreasonable.

MRCI believe recruitment fees are a significant risk factor for exploitation. 85% of people who paid recruitment fees faced exploitation and 74% experienced severe exploitation.

People from 31 nationalities paid recruitment fees demonstrating the widescale nature of this issue. 63% of people from China paid recruitment fees and 40% of people from India paid recruitment fees.

Job sector: Several job sectors had a high percentage of workers surveyed paying recruitment fees, **80% of carpenters and joiners, 62% of chefs** paid recruitment fees, **50% of mushroom and agricultural workers, 50% of business and financial project management professionals, 44% of farm workers, 31% of health care assistants, 27% of care workers**, and **29%** of other sectors which includes a wide array of job roles.

Illegitimate, unreasonable and undisclosed costs: Extra-contractual, undisclosed, inflated or illicit costs are never legitimate. Source: ILO Fair Recruitment Roadmap: A guide for national implementation. (2024)

16. Employment Permit Act 2024 Section 55: 'The employer shall not make any deductions from the remuneration of, or seek to recover from, the holder of the employment permit concerned any charge, fee or expense arising out'

17. The Protection of Employees (Temporary Agency Work) Act 2012: 'An employment agency shall not charge an individual a fee in respect of the making of any arrangement for the purpose of that individual's being employed, subsequent to the conclusion of his or her assignment with a hirer, under a contract of employment with that hirer.'

REPORTING EMPLOYMENT ISSUES

Of those who experienced an employment issue: 727
51% did not report an employment issue(s) to their employer or an external body
41% reported the issue to their employer/ or an external body.
Did not answer 8%.

Non-reporting employment issue

A majority of people who experienced issues in their employment did not report to their employer or an external body.

The following demonstrates the sense of fear of reporting by permit holders. As one survey participant explained, *'As a WP holder we always afraid to speak up about our rights as we depend of the WP. My manager use that few times against me.'*

Another participant expressed concern about retaliation after reporting an issue: *'We feel unsafe and vulnerable about filing a formal complaint due to our status as immigrants. Many of us fear retaliation or negative consequences that could affect our work permits or immigration status. This creates a difficult and unfair situation where we are afraid to speak up, even when our rights are being violated.'*

Another survey participant said, *'You just cant complain, yet those who are not on work permit can complain.'*

The most prevalent reasons for not reporting issues were because the respondents were afraid to lose their job or permit (53 survey responses).

The need to keep your job was expressed by this survey participant, *'Being on a work permit makes you tolerate things for the sake of keeping a job because you're an immigrant and sponsorship is not easy to get.'*

Some people did not report due to being threatened by their employer that their permit would be cancelled or deported. (6 survey responses).

For example, *'I was told if you say out your concerns your permit will be cancelled and you will be deported.'*

There was a prevailing fear expressed of retaliation, reprisals and punishments for people who report employment issues. (13 survey responses).

One person was told *'They mentioned I was in work permit and they were making a favor'*

Internal reporting an employment issue

Those that did report an employment issue(s) mostly reported the issue(s) internally. However, the vast majority did not have that issue resolved and in fact many experienced negative consequences.

48% raised an issue internally
Of those who provided information on the outcome of internal reporting: 9% had the issue resolved positively 61% of people said the issue was not resolved 19% experienced negative consequences (threats, dismissal, and retaliation)

Most of those who gave a description in the survey said nothing was done and that there was no resolution to the employment issue. (78 people said nothing was done, denial of issue, refusal by management, changes did not last, ignored)

For example, *'When I asked for a proper desk and chair, I started suffering retaliation from the member of staff, that then started bullying me and complaining of things like 'you didn't use to sit so much', or 'you used to be good to work with', and when reported to the management, they told me to learn how to 'deal' with the bully, because they had been like that for a long time. So I*

was being asked for more and more, while being pointed at by the 'protected' work colleague..'

'This is the way that us are treated everywhere in Ireland. We are not getting justice and if we complaint or report, we are not getting any response. This shows that we are not valuable.'

A survey participant said when they reported an issue the 'Hr already laugh saying that I need the visa to work' or told to accept' and another participant was told when they reported: 'I spoke with the director, and I was told that nothing could be done and that I was expected to be completely flexible.'

Following reporting of an issue, some people (24 people) reported experiencing a negative outcome, such as threats, dismissal, retaliation, their contract was not renewed, the situation got worse and there was subsequent bullying as a result of the reporting process. For example, 'if I complained about something, I'd be reminded that I was under a work permit, and I could lose it.'

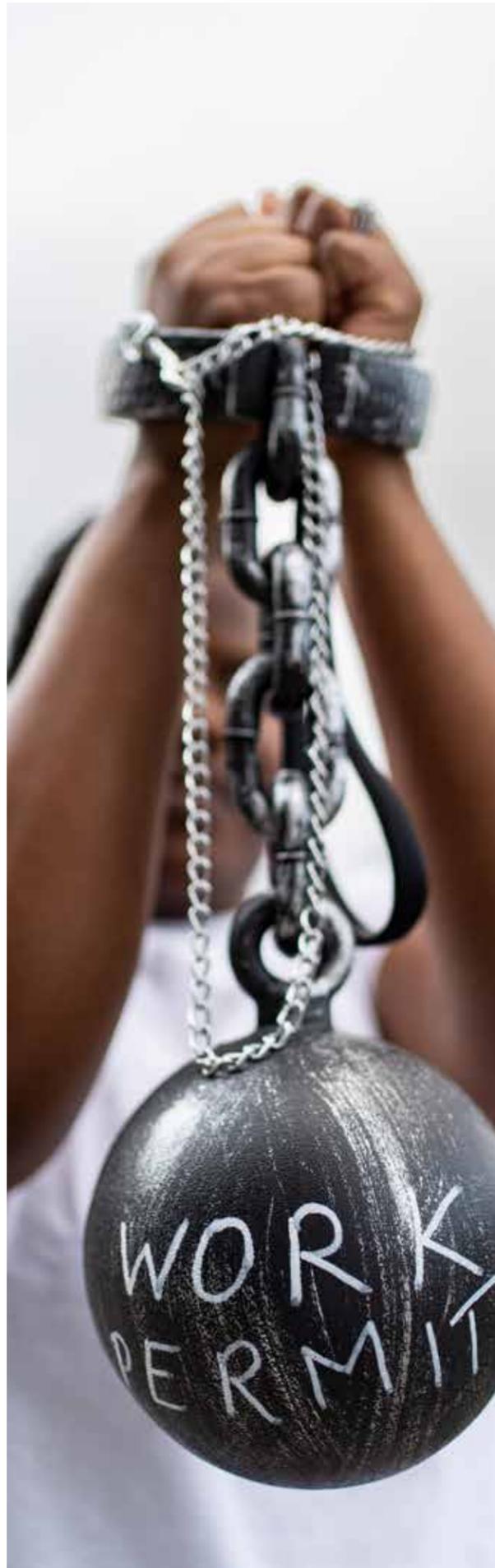
However, a very small amount resulted in a partial or full resolution of the matter. (11 people said there was something done in response to their report or partial or full resolution).

Reporting employment issues externally

Several survey respondents reported the issue externally. Several reported the issue(s) to Workplace Relations Commission (WRC) (18 survey responses), therefore only a tiny/negligible percentage 3% of those that experienced employment issues stated they sought formal redress at the WRC and 4 survey responses related to the Labour Court. The same number of people stated they reported to MRCI (18 survey responses). Others reported the issue to unions (11 survey responses).

This survey participant describes their decision to report to the WRC. 'I was left to do 2 people's jobs. When I decided to leave, my father in law received a phone call from my employer threatening to tell all restaurants not to give me a job, the employer claimed to be influential and well connected and said he was going to kill me. As a result of this call I decided to make a complaint to the WRC'

Two people remarked they faced repercussions for reporting to an external body.



AWARENESS OF RIGHTS

Workers are simply unaware of their options to leave exploitative employment.

45% of people are not aware that they can change employer at any point if they have been exploited.

Did you know that prior to 9 months you can change employer if you have been mistreated at work?

Yes	51%
No	45%
Not answered	4%

50% of people are not aware of the reactivation permit if they lose their job through no fault of their own.

Did you know that if you lose your job through no fault of your own that there is a special scheme where you can apply to get a new permit provided that you can find another job within 6 months?

Yes	47%
No	50%
Not answered	3%

A good majority of employment permit holders are aware that they can change employer after 9 months.

Did you know that employment permit holders can change their employer after 9 Months?

Yes	76%
No	21%
Not answered	3%

This lack of knowledge limits workers ability to respond to the exploitation they experienced, escape exploitative conditions and end up enduring bad working conditions as they believe that there is no other option.



CONCLUSION AND RECOMMENDATIONS

RECOMMENDATIONS:

We make the following recommendations in light of the survey findings.



PRIMARY RECOMMENDATION

1. The Irish government should grant all employment permit holders the freedom to work in any job after 2 years (instead of 5 years) as a means to help them stand up for their rights.

This would provide the most significant impact in protecting migrant workers from exploitation.

The Department of Enterprise, Tourism and Employment (DETE) can implement this change by amending the Employment Permits Act to enable all permit holders' access to a permit which grants them the ability to work in any job upon renewal after 2 years on their original permit.

OTHER RECOMMENDATIONS

2. Introduce a new criminal offence for severe exploitation.
3. Ban exploitative employers from applying for future permits for migrant workers.
4. Increase the redress available to migrant workers by enabling compensation under the Payment of Wages Act and the National Minimum wage Act.
5. Increase the time allowed for migrant workers to lodge claims against their employer (in recognition that migrant workers are tied to their employer making it more likely for them to experience long-term breaches)
6. Allow criminal and civil proceedings for all employment rights breaches.
7. Tackle unlawful recruitment fees, including by upholding the principle of the 'Employer pays.'
8. Greater efforts should be made by DETE to proactively communicate with migrant workers on an ongoing basis about their rights and experiences at work.

The survey findings demonstrate that employment permit holders are routinely exploited in the employment permit system. It is clear that migrant workers face significant exploitation due to their employment permit status. The nature of the employment permit system means that it is very difficult to escape exploitative situations.

The scale of exploitation indicates that it is a systemic issue and clearly needs to be addressed urgently. It is not isolated to a small number of employers. If you are a general employment permit holder in Ireland, then more likely than not you have been exploited at some point. It also shows they are fearful of reporting employment issues, they normally just put up with it, because their options are limited and they do not feel they have a choice.

To conclude, we will examine the current framework for protection of migrant workers.

Change of employer

In June 2024, a new “change of employer” provision was introduced in the Employment Permits Act 2024. This provision enables people, for the first time, to change employer while remaining on their existing permit. While it is a significant positive development, it is extremely restrictive in terms of the type of job to which a general employment permit holder can move.

The current change of employer only allows a person to change only to the exact same type of job for the full 5 years of their permit and is indeed the most restrictive option possible. There were some examples in the survey responses of people unable to change employer due to not having the same 4-digit SOC code for the job they wish to move to. For example, a carer in a nursing home cannot move to a new job as a carer working for a home care agency. In addition, someone cannot stop working with the previous employer before the change of employer process is completed therefore preventing them from escaping exploitative conditions.

The challenges with the current change of employer process are further reflected by the high awareness of this as an option but the continued high rates of exploitation and relative minimal use of this option to improve the situation.

We conclude that change of employer is far too restrictive to be a protection for everyone. For example, someone who wishes to change employer as outlined above has to find the exact same job near to where they live or else you need to find new accommodation and find an employer that meets the 50/50 rule, minimum salary thresholds and understand the change of employer process. In addition, those on a reactivation employment permit cannot use change of employer.

This is extremely limiting as it restricts the options available that enable workers to protect themselves and move away from exploitation.

Reactivation

The reactivation permit acts as a safety net for people who lose their job and/or immigration permission through no fault of their own. This may be due to exploitation or a sudden cancellation/non-renewal of the employment permit that was in no way related to the workers performance.

The reactivation permit allows people get back into the permit system and they can work in any job.

There are however problems with the process. It involves two steps, firstly applying to the DOJ for immigration permission and secondly, applying to DETE for the reactivation permit. This process can take several months and the person cannot work during the application process.

There is also a high cost of a reactivation permit (€1,000 for 24 months), given it is a very vulnerable cohort of people. It is particularly challenging for people out of

work to pay this high cost and given their vulnerability we strongly urge that the DETE waive the fee for reactivation given its importance for those who have experienced exploitation.

While the reactivation permit is a very positive practice, it does not adequately protect migrant workers from exploitation during their employment. Most people only enter this process as an absolute last resort as it requires a period of enormous hardship and uncertainty where you are often left undocumented and without income for several months before getting back into the system.

Proposed changes to the employment permit system Primary recommendation

The Irish government should grant all employment permit holders the freedom to work in any job after 2 years (instead of 5 years) as a means to help them stand up for their rights. This is the most important change recommended and would significantly protect migrant workers from exploitation.

The Irish government cannot rely on the WRC to ensure all workers are protected from exploitation. One of the primary causes of poor conditions and exploitation is the fact that workers on general employment permits are tied to their employer and find it extremely difficult to change employers for up to 5 years. This creates a power imbalance and means people cannot stand up for their rights. The only way to protect workers is to give them rights and the ability to stand up for themselves.

To this end a commitment was made in the Programme for Government to “Examine ways to facilitate people who are on work permits to move jobs more easily and legally, while protecting the integrity of the immigration system”

Policy Proposal

The proposal below maintains the economic migration model of the State, and it will be transformational for the rights of workers.

The proposal aims to bring general employment permit holders in line with the rights already afforded to critical skills permit holders which will promote equality in the system.

GENERAL EMPLOYMENT PERMIT HOLDERS SHOULD BE GRANTED THE FREEDOM TO WORK IN ANY JOB AFTER A PERIOD OF 2 YEARS (CURRENTLY 5 YEARS).

This can be done by granting all permit holders a stamp 4 after 2 years (requires collaboration with DOJ) or DETE can implement this immediately by granting a further employment permit after 2 years which grants the permit holder the ability to work in any job.

We urge the Irish government to bring the greatest flexibility possible and become a leader in the international context in addressing exploitation in the employment permit system and protecting worker’s rights and human rights of migrant workers. New legislation required to enact the Single Permit Directive permit offers this opportunity to bring great freedom to migrant workers in the labour market and protect them from exploitation.

Other EU countries offer flexibility in change of employer which go beyond the Single Permit Directive requirements and limits the extent workers are tied to their employers. Thus, the below table offers examples of approaches the Irish government can take to bring the necessary changes to the employment permit system.

PICUM asserts that *'Permits should not be tied to one employer. People should be able to change employer, including the type of job and sector, and work for more than one employer, on the same permit, without permission from the employer or labour intermediary.'*

Country	Change of employer rules	Procedure
Portugal (General work permit system – Residence permit for employed workers)	A worker can move to any job while staying on their existing permit from day 1	There is no specific procedure for the worker to follow to notify the authorities of their change of employer
Finland (General work permit system TTOL - A permit)	A worker can move to any job in the same field of work, or to a declared national labour shortage field, from day 1	There is no specific procedure for the worker to follow to notify the authorities of their change of employer
Spain (General work permit system – Single permit for gainful employment)	A worker can move jobs in same occupation/geographical area, after 3 months. If the new job involves a different occupation, sector, or geographical area, the worker must request a modification of the authorisation. It is also possible to move jobs in the first 3 months in specific situations.	There is no specific procedure for the worker to follow to notify the authorities of their change of employer, after 3 months of employment

Redress and compensation for employment breaches

Alongside the necessary changes to the employment permit system, improved redress is required for migrant workers who have faced exploitation. There is little compensation available to people not paid properly and essentially the best they can hope for is to get back their salary owed to them by their employers.

Improved compensation will provide not only increased awards for workers but would also act as a deterrent to exploitative employers. Provision for additional compensation should be added to the National Minimum Wage Act and enhanced in the Payment of Wages Act as the current provision in that legislation is limited in its scope for providing compensation.

Penalties against exploitative employers

Employers who severely exploit their workers are not sufficiently held to account to deter others from doing the same. There are effectively no deterrents in place to deter employers from exploitation.

The criminal provisions in the National Minimum Wage Act prevent civil proceedings such as making a claim to the WRC at the same time. Workers should be allowed to bring claims on all employment breaches alongside criminal prosecutions.

Another significant penalty that could be levied on exploitative employers is their ability to apply for employment permits. Exploitative employers should be permanently banned from the employment permit system and from applying for new employment permits only to continue to exploit people.

Criminal penalties contained in the Criminal Law (Sexual Offences and Human Trafficking) Act 2023 do not criminalise severe exploitation. MRCI recommends the introduction of a new criminal offence for severe exploitation and forced labour. Irish Human Rights & Equality Commission (IHREC) has also called for a stand-alone offence of labour exploitation and forced labour,¹⁸ which *'has consistently been highlighted as a serious gap in the law. Labour exploitation is only classified as a criminal offence once it forms part of a trafficking offence under the 2008 Trafficking Act. This absence of a standalone offence of forced labour contributes to the blurring of the line between forced labour and trafficking for forced labour. A standalone offence of forced labour would ultimately provide greater protection to victims as forced labour would be prosecuted as a separate and distinct offence separate to that under the 2008 Act, which requires different evidential burdens to be satisfied.'*

MRCI views the definition of forced labour in the Act to be an extremely high bar equating to servitude. *'Forced labour' means a work or service which is exacted from a person under the menace of any penalty and for which the person has not offered himself or herself voluntarily.*¹⁹ Severe exploitation as outlined in the report must be criminalised. Employers are free to severely exploit their employees without consequence.

Recruitment fees

Tackling recruitment fees are complicated by the international dimension and the fact that fees are often paid overseas to a variety of agencies and intermediaries. The scale of recruitment fees is very high and a significant issue in the employment permit system. MRCI recommends the employer pays principle is introduced. This is an employer commitment to pay the full costs associated with recruitment.²⁰ This will hold employers accountable for any fees paid in the recruitment of their employees and ensure there is due diligence for the supply chain and all aspects of the recruitment process. Agencies should be vetted by employers or DETE.

Recommendations:

The MRCI makes the following recommendations in light of the survey findings.

Primary recommendation

1. Grant all employment permit holders the freedom to work in any job after 2 years (instead of 5 years) as a means to help them stand up for their rights.

Other recommendations:

2. Increase the redress available to migrant workers by enabling compensation under the Payment of Wages Act and the National Minimum wage Act.
3. Increase the time allowed for migrant workers to lodge claims against their employer (in recognition that migrant workers are tied to their employer making it more likely for them to experience long-term breaches)
4. Allow both criminal and civil proceedings to take place for all employment rights breaches.
5. Introduce a new criminal offence for severe exploitation.
6. Ban exploitative employers from the employment permit system.
7. Tackle unlawful recruitment fees, including by upholding the principle of the 'Employer pays.'
8. Greater efforts should be made by DETE to proactively communicate with migrant workers on an ongoing basis about their rights and experiences at work.

PICUM 'Designing labour migration policies to promote decent work Policy recommendations' https://picum.org/wp-content/uploads/2023/08/Designing-labour-migration-policies-to-promote-decent-work_Policy-recommendations_EN.pdf Accessed 10 March 2026

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