

Heritage and Immigration Brexit Briefing



The Heritage Alliance is England's biggest coalition of heritage interests, bringing together c.140 mainly national organisations supported by over 7 million members, friends, volunteers, trustees and staff. From historic buildings and museums to canals, historic vehicles and steam railways, the Heritage Alliance's diverse membership owns, manages and cares for the vast majority of England's historic environment.

There are significant numbers of non-UK EU citizens that work in the heritage sector in England in a variety of capacities, and UK companies and citizens who work in heritage in other EU countries. This two-way exchange of expertise and labour is extremely important to the sector.

Restrictions on access to EU labour adds to a larger Brexit impact on the sector. For instance, as set out in our [Brexit Briefing](#), in 2017 Historic England published a EUCLID report on the impact of Brexit on heritage sector funding. That report found that Heritage focused or related projects in England received a minimum of £450m in EU funding in the period from 2007-2016, and this is likely to be an underestimate. The Arts Council has released its own EUCLID reports on the impact of leaving the EU on the cultural sector which found that the EU's contributed £345m to the arts, museums and creative industries in England between 2007-16, equating to £40m each year. Over a ten-year period, the figures taken together would approach £1 Billion in England alone. This research demonstrated that the heritage sector is especially vulnerable to a loss of EU funding, the effect of which will be compounded by a lack of access to EU labour.

[Analysis](#) of the report from the Migration Advisory Committee released on 18th September 2018 highlighted significant concerns for the heritage sector's ability to access skilled and seasonal workers following our departure from the EU and we are pleased to see this being revisited in a further consultation.

The heritage sector will be greatly affected by restrictions on skilled EU workers entering the UK. The Migration Advisory Committee's recommendations on a minimum salary of £30k for a visa would be deeply damaging to our highly skilled but low paid sector. Relevant heritage occupations should be placed on the UK skills shortage list and the heritage equivalent of Tier 1 and Tier 2 visas developed. If Government are going to proceed with this approach to visas, it is important to mitigate against these proposals. Further exemptions and considerations are set out in this document.

In December 2018 [we responded](#) to the Migration Advisory Committee consultation with evidence of shortages within the heritage sector (some of which is set out at the Annex of this briefing).

Between 2018 and the beginning March 2019 we carried out a brief survey to add to the evidence we already hold on how immigration restrictions might affect the heritage sector. 66 organisational responses were received, which highlight rather starkly the potentially damaging effect of a visa regime based on salary levels as recommended by the Migration Advisory Committee. Respondents were from both inside and outside the Heritage Alliance's membership and ranged from local groups

and businesses through charities, commercial units to museums and national organisations. Most responses came from buildings, architecture and archaeology. The major findings include:

- Nearly 29% of respondents employ over 20% of non-UK EU nationals;
- Over 15% of respondents employ over 50% non-UK EU nationals. Respondents also noted that they employ additional EU nationals as subcontractors;
- In contrast to the figures for EU nationals, 83% of respondents employ less than 10% of non-UK nationals from outside the EU;
- Well over 50% of respondents say that a restriction on access to EU workers would negatively affect their organisation. One respondent noted that posts in their organisation might have otherwise remained unfilled;
- If a salary level of £30,000 were required as minimum for a visa for EU nationals 48% of respondents reported that over 50% of the jobs in their organization would not meet this criterion, with 45% saying that this salary requirement would affect over 60% of their job roles. Some organisations even said that with these restrictions, as many heritage sector jobs pay less than this figure, no one would meet this criterion.
- Nearly three quarters of respondents anticipate their workload increasing in the future, exacerbating an existing skills gap, with half of respondents believing that the UK does not have enough labour at present to meet this increased need without access to EU nationals. Some respondents working in Museums and Conservation said that the loss of skilled EU workers would mean a huge loss of knowledge and expertise. They also noted that it would take extra time and money to train new members of staff from scratch, which would put a huge strain on already limited resources for small organisations.
- Many tourism-based heritage organisations rely on some form of foreign seasonal staff. An [ONS report published in August 2019](#) showed that c.16% of workers in the tourism industry are non-UK nationals (10% EU nationals) and of them 64% are EU nationals. In London the percentage of EU nationals is higher, reaching nearly one in every five workers.
- A recent provisional Historic Houses survey showed that 25% of their members indicated that they employed 5 or more EU nationals in the businesses on their properties. For over 17% of respondents to our survey, seasonal workers made up 10-40% of their total workforce in peak seasons.

A further survey carried out by our organisation in June 2019 collected 17 responses. The major findings include:

- The sectors that are more likely to be affected by Brexit are, in the opinion and experience of the respondents, Archaeology (c.63% of responses), Building conservation (c.36%), Heritage advocacy and education (c.27%).
- The average salary for the main occupation in the surveyed organisations is £25,700.
- Specific skill gaps were identified particularly in the archaeological sector. The sector also employs temporary workers and large infrastructure projects can have a high rate of migrant labour to supplement the UK workforce.
- More than half of respondents indicated the potential to use a Tier 1 Visa to attract employees / workers. One of the respondents suggested using, for the archaeological sector, the grades of accreditation set by the Chartered Institute for Archaeologists (CifA).

Our key asks for Government are to ensure:

- continued access to skilled labour from EEA countries;
- exemptions for accredited heritage experts and academics;
- any new visa system should allow the UK to export its archaeological, buildings conservation and museum expertise and, where necessary import skills from the EEA where they are not available in the UK;
- any new visa system should not be dependent on income levels;
- swift access to visas or the research equivalent of a diplomatic passport;
- Government commitment to support training and apprenticeships in the UK;
- Construction-related occupations facing high demand, including heritage craft and building skills (e.g. stonemasonry) and archaeology, placed on the UK Shortage Occupations List; and
- Free movement of accredited archaeologists and other heritage specialists across the Irish Border.

Why thinking about heritage in relation to immigration matters:

- The historic environment is geographically diverse, spreading the benefits of skills, jobs, investment and engagement across the UK, in rural and urban environments;
- Heritage can provide social cohesion, rootedness and identity;
- Heritage drives beneficial change (e.g. regeneration in a way that embraces character and authenticity, alongside positive environmental outcomes). It is not a barrier to growth;
- Heritage creates economic value through skills and products exchange as well as through its contribution to inbound tourism;
- Time is needed to develop and put in place measures that replace and improve on those resulting from EU funding and regulation. This needs to be planned for;

There are shortages of some heritage skills and arrangements may be needed to ensure continued access to key skills. It may be impossible, or very time consuming, to fill current and future shortfalls solely from within the UK.

Construction

Data from the [Migrant Labour Force within the UK's Construction Industry](#) in August 2018 revealed that:

- Non-UK nationals accounted for 13% (109,000) of workers in the UK's construction of buildings sub-sector: 8% were born in EU accession countries (EU countries who joined in 2004 and 2007), 3% non-EU nationals and 2% EU15 (from countries who joined the EU before 2004) and EU Other nationals (excluding the UK).
- In London and the South East, the percentage of the workforce made up of EU nationals is considerably higher. Non-UK nationals accounted for 40% (70,000) of the construction of buildings workforce in London; 28% were EU accession countries nationals, 8% were non-EU nationals and the remaining 5% were from the rest of the EU.

Given the severity of the skills shortages we already face, the retention of these workers is a critical concern for the industry. [£6.6bn¹](#) in GVA was generated by heritage-related construction activities in England in 2016.

	Thousands		
	Construction of buildings (%)	Civil engineering (%)	Specialized construction activities (%)
All nationalities	832 (100)	339 (100)	1,053 (100)
UK	724 (87)	313 (93)	973 (92)
Non-UK	109 (13)	25 (7)	80 (8)
EU (excluding UK)	84 (10)	18 (6)	62 (6)
EU15 (excluding UK) and EU Other	14 (2)	9 (3)	14 (1)
EU8 and EU2	70 (8)	9 (3)	49 (5)
Non-EU	24 (3)	7 (2)	18 (3)

Source: ONS Annual Population Survey (APS) (three-year pooled dataset, 2014 to 2016)

Notes:

1. See section 4 of the report for further information on migrant definitions and country groupings used.

Figure 1 UK's construction workforce by sub-sector and nationality, 2014 to 2016. Source: [Migrant Labour Force within the UK's Construction Industry](#).

Historic/ traditional (pre-1919) buildings require a labour force with traditional skills. There are c5.5million traditional buildings in England. The 2012 spend (latest calculated figures) was £3.8billion, down from £5.3 billion in 2008. Over the last 10 years² the skills gap to meet demand has ranged from about 85,000 to 110,000, with a significant proportion of the gap related to contractors using traditional materials. There is an ageing demographic in the traditional heritage skills workforce. The possible difficulty in obtaining EU workers after Brexit would cause delays and cost issues.

We will continue to need to draw on skilled labour from EU countries. Further developing training measures and apprenticeships within the UK is another way to help meet this need but this would require both a commitment to investment and time for the skills to be developed. Construction, including heritage craft skills and archaeology, should be placed the UK Shortage Occupations List. The jobs that we highlighted in our response to the MAC Review of the Shortage Occupation List are set out in the annex.

¹ This figure only includes SICs directly pertaining to construction and specialised construction activities (compared with previous heritage counts figures). Further information can be found in Cebr's forthcoming report for Historic England on the skills gaps and shortages that exist within the Heritage Sector.

² As assessed in 2018.

Archaeology

There is a shortage of heritage skills for development-led work in the UK and while there are efforts to address these shortages would be made worse by restricting the number of EEA nationals able to work in the UK. The sector has struggled to respond quickly enough to an increased demand for archaeologists following on from the skills losses experienced during the recession. It continues to experience difficulties in planning for its future skills needs for a number of reasons including fluctuating market conditions. [A 2016 Historic England study](#) found that the sector is already working at or near capacity as evidenced by existing skills shortages. There aren't enough archaeologists now to meet predicted future demand and we need an increase in capacity building, supplemented by continued access to skilled non-UK EU archaeologists, to meet the need. There are over 40 major infrastructure projects planned across the UK over the next 17 years.

The latest [State of the Market for Archaeological Services report](#), published in January 2019 by Landward Research on behalf of CifA (Chartered Institute for Archaeologists), FAME (Federation of Archaeological Managers and Employers) and Historic England, gives the following figures relating to the nationalities of UK-based staff. 13% of people working in UK applied archaeology in 2018 are non-UK EU citizens; a further 2% of the archaeological workforce are neither from the UK nor the EU. Overall, the number of archaeologists employed in the UK has increased from the previous year. This is a significant figure, which will need to be carefully monitored as future demand for skilled archaeologists to work on major infrastructure projects such as HS2/ A303 is expected to rise significantly over the next 15 years.

	Archaeological Market Survey 2018 March 2018		Archaeological Market Survey 2017 March 2017	
British (UK subjects)	2,321.64	85%	1,744.05	83%
Nationals of other EU states	361.16	13%	305.6	15%
Nationals of other countries (non-UK, non-EU)	63.91	2%	40.2	2%
total	2,746.71		2,089.85	

2018 n=47.

At the time of the *Profiling the Profession 2012-13* survey, the last time comparable data were gathered, 3% of the entire archaeological workforce's countries of origin were European Union states (other than the UK). A further 4% of the workforce in 2013 were originally from countries in the rest of the world. This suggests that demand for EEA skills has increased significantly in the last 5 years.

To illustrate: workforce numbers on A14 road project indicate c. 70% field staff from overseas. HS2 enabling works programme had an assumption that organisations in the supply chain could/would look to recruit EU and other overseas archaeologists as part of their strategy.

Data published in 2018 by CifA and FAME in the table above, showed that transport became the second largest market sector, in large part fuelled by preparatory work ahead of the High Speed 2 railway line from London to Birmingham and work on the A14 Cambridge-Huntingdon road upgrade. Energy also became more significant as a market sector in 2017-18, particularly through work for the EA One array.

The most important market sector continued to be residential development, which provided 36% of income (a decline from 42% in 2016-17), followed by transport, representing 14% of income (up from 6% in 2016-17 and considered to be reflecting the start of work for HS2 and A14), energy (including work on EA One) and commercial and industrial development.

If labour movement is restricted, home grown talent will become increasingly important. We will need to create and fund new routes to skills. Some new routes are already being created but employers may need support in their use. Some of the requirements around the Trailblazer apprenticeships make it difficult for SMEs to engage and the lack of predictability in the market is a real factor for employers who will need to commit to minimum 12-month contracts for apprentices. Diminished focus on arts subjects in the school curriculum (and stopping subjects such as archaeology A-level) is counter-intuitive in this context.

Archaeology is recognised as a construction skill by the Construction Skills Certification Scheme. In order to ensure economic growth, we will require common solutions for construction and archaeology. The size of the workforce we need in the UK fluctuates considerably in line with the construction cycle and pulling in EU archaeologists is one way that employers cope with the peaks in demand.

Free movement of archaeologists and other accredited heritage specialists across the Irish Border is of particular importance as cross-border working is the norm.

Conservation

An interesting example given by a Heritage Alliance Member shows that all 6 of their painting restorers are Italian where skills are plentiful and currently work is less available. Other organisations cite the fact that crucial members of staff who are EU nationals are intimately acquainted with our planning system – which takes time to develop – making them indispensable and difficult to replace.

According to another Alliance member, the Institute of Conservation (ICON), the average salary for a professional conservator is £28,102, while the median salary is £26,000 - despite the fact that 78% of professional conservators hold at least one degree and 46% hold postgraduate qualifications³. This proves once again that the proposed £30k salary threshold for Tier 2 visa applications would thus exclude the majority of conservators.

Any future restriction in the number of EEA workers must consider forthcoming large heritage and infrastructure projects supported by the Government which will further increase the UK's shortage of skills. These not only include the archaeology projects listed above, such as HS2, road building projects including upgrades to the A303 at Stonehenge and the Government's drive for more housebuilding, but also large conservation projects such as the restoration of Buckingham Palace, Westminster Palace, Wentworth Woodhouse and Clendon Park which will increase demand for already scarce heritage skills.

Skills exchange

If a visa system were developed in the future, it would need to work both ways. **Exemptions for accredited experts and academics in the field should be considered.**

³ https://icon.org.uk/system/files/documents/conservation_labour_market_intelligence_2012-13_0_0.pdf

We want to be able to export our archaeological, buildings conservation, and museum expertise. We may also need to import significant training from Europe as we have in electrochemistry, acoustic emission and reflectance FTIR applied to cultural heritage when the knowledge was absent in UK. One particular challenge could arise if movement across borders is dependent on income levels. Conservation and archaeological expertise are not necessarily highly paid but are highly skilled. This needs to be taken into account in the design of any visa regime.

The UK has, and can make more of, its world leadership in conservation and heritage science skills. Access to heritage science specialists/researchers will be an important issue for the UK. Swift access to visas or the research equivalent of a diplomatic passport would help. Bilateral agreements between countries are of limited value as it would be difficult to identify any one country in preference to another in the European context. A sectoral approach to free movement is what is needed to support heritage science.

Research

Freedom of movement for researchers is crucial. Bilateral agreements with individual countries would have limited value to heritage science research. A sectoral approach would protect the acknowledged leadership that the UK has in heritage science and other areas.

Horizon 2020 and its predecessor schemes have invested significant sums of money in transnational historic environment research. The share of funding obtained by English research institutions over the last ten years⁴ is at c£90m. If this funding was lost it is likely that research would take place outside of, or exclude the UK from partnerships and access to these skills may be lost.

The loss of freedom of movement and the accompanying restrictions and costs will have a large impact on UK academic institutions. Without ready access to travel across EU countries without visas, UK academics are less likely to be invited to meetings and academic activities in institutions in Europe, meaning that academics and students will be more excluded from trans-EU collaboration. Even within the UK, strict controls on 'right to work' is an academic impediment that places a huge burden on administrative staff. In addition to all the costs of expensive work visas and medical insurance will deter academic applicants from the EU, including postdoctoral fellows and students.

A leading English academic institution within our membership has reported a decrease in the awarding of Marie Skłodowska-Curie individual Fellowships to support young researchers in archaeology and heritage from around the world, with no fellowships awarded in 2018. Previous award holders have been recruited to lectureships in departments of archaeology and heritage across the UK and this source of highly trained specialist researchers and educators is now at risk of being permanently lost. Approximately 75% of the overall grant income for archaeology and heritage at this institution comes from Europe. These concerns are corroborated by other academic institutions in the UK.

Another leading academic institution has stated that EU membership has enabled it to the UK to participate in pan-European collaborations and has guaranteed the opportunity to access EU research funding (of some £78m for one leading academic institution for 2017/2018).

⁴ As assessed in 2017/2018.

Some members have expressed concern that a decline in student study and funding opportunities would serve to undo some of the expansion and success that has been built up in archaeology, being a small discipline, over the past 50 years. A [2017 Technopolis group report](#) showed that the EU funds c.38% of academic archaeology research in the UK, which is a vital source of funding for the discipline. Although the UK Government have said that they will match-replace EU funding, there have never been any concrete proposals to do this. Alliance members have raised concern over the loss of funding for more “blue skies” research, which is currently given by the ERC panels, when it is taken over by more restricted UK Research Councils.

However, it is not just the funding, but also the collaborations that are funded by trans-EU projects. Brexit may (and in some cases, already has) lead to a decline in the spirit of collaboration and thus international partnerships, especially with no funding to back large-scale projects and limited access for UK academics to facilities across Europe. Institutions are further concerned about the hostility Brexit represents to other EU countries. The fear is that after Brexit the attractiveness of UK universities will be severely diminished, not only by the reduction of the funding pool, but from the impression that the UK is no longer a welcoming and accepting place in which to live or study for EU nationals.

Seasonal labour

Many tourism-based heritage organisations rely on some form of foreign seasonal staff. The August 2019 [ONS report on migrant labour force within the tourism industry](#) estimated 238,000 temporary workers in the tourism sector (and this is likely to be an underestimation), 11% of them are non-UK national.

A recent provisional Historic Houses survey showed that 25% of their members indicated that they employed 5 or more EU nationals in the businesses on their properties. For over 17% of respondents to our survey, seasonal workers made up 10-40% of their total workforce in peak seasons.

One UK charity organisation working in conservation reported that due to Brexit, their non-UK office has ceased to collaborate with their UK office on managing EU funds for international heritage projects. It now chooses to work through other affiliate partners instead. For example, their latest EU initiative was managed through Spain.

ANNEX

A list of jobs included in MAC Review of the Shortage Occupation List

1

Job title	Conservation architect
Closest ONS job title	Conservator
Closest ONS occupation code (4 digit)	2452
Sector(s) most affected	Historic building conservation

2

Job title	Building conservator
Closest ONS job title	Conservator
Closest ONS occupation code (4 digit)	2452
Sector(s) most affected	Historic building conservation

3

Job title	Conservation structural engineer
Closest ONS job title	Structural engineer
Closest ONS occupation code (4 digit)	2121
Sector(s) most affected	Historic building conservation

4

Job title	Millwrighting
Closest ONS job title	Builder
Closest ONS occupation code (4 digit)	5319
Sector(s) most affected	Historic building conservation

5

Job title	Traditional plasterer
Closest ONS job title	Plasterer
Closest ONS occupation code (4 digit)	5321
Sector(s) most affected	Historic building conservation

6

Job title	Tuck pointing specialists
Closest ONS job title	Bricklayer
Closest ONS occupation code (4 digit)	5312
Sector(s) most affected	Historic building conservation

Job titles (1 per line)

Archaeologist
Assistant Archaeologist
Supervisor (Archaeology)
Project Officer (Archaeology)
Project Manager (Archaeology)
Archaeological Surveyor
Archaeological Scientist
Archaeological Consultant

Closest ONS job title

Archaeologist (Social and Humanities Scientists)

Closest ONS occupation code (4 digit)

2114 (Social and Humanities Scientists)

Sector(s) most affected:

Archaeology, Construction

(Not submitted in our MAC response)

Job title	Conservator (interventive)
	Serious or significant shortages reported in following specialisms:
	<ul style="list-style-type: none">- Clocks, watches, scientific instruments- Furniture and wood- Gilding and decorative surfaces- Metals- Paintings- Photographic materials- Stained glass- Textiles
	Time-based media
Closest ONS job title	Conservator
Closest ONS occupation code (4 digit)	2452
Sector(s) most affected	Conservation; museums, archives & libraries

10

Job title	Conservator (preventive)
	Significant shortages reported in following specialisms:

- Clocks, watches and scientific instruments

Closest ONS job title Conservator
 Closest ONS occupation code (4 digit) 2452
 Sector(s) most affected Conservation; museums

11

Job title Conservator (scientific/analytical)

Serious or significant shortages reported in following specialisms:

- Digital media
- Furniture and wood
- Gilding and decorative surfaces
- Metals
- Modern materials
- Paintings
- Paper
- Photographic materials
- Stone and wall paintings
- Archaeological materials

Closest ONS job title Conservator
 Closest ONS occupation code (4 digit) 2452
 Sector(s) most affected Conservation; museums, archives & libraries

12

Job title Stone Mason
 Closest ONS job title Mason, stone
 Closest ONS occupation code (4 digit) 5312
 Sector(s) most affected Conservation

Job title Glazier
 Closest ONS job title Glazier
 Closest ONS occupation code (4 digit) 5316
 Sector(s) most affected Construction, building; conservation

Specialisms:

- Stained glass makers
- Stained glass conservators

13

Job title Engineer
 Closest ONS job title Civil Engineer
 Closest ONS occupation code (4 digit) 2121

Sector(s) most affected	Construction, building; conservation, maintenance of historic buildings and structures.
Job title	Engineer
Closest ONS job title	Engineer, Mechanical
Closest ONS occupation code (4 digit)	5223
Sector(s) most affected	Repair and maintenance of heritage vehicles (planes, trains and automobiles)
Job title	Shipyards Repair Foreman
Closest ONS job title	Welder-Fitter
Closest ONS occupation code (4 digit)	5215
Sector(s) most affected	Shipyards repair; skilled repair labour (historic ships)

ANNEX B

In its response to the Migrant Advisory Committee on Shortage Occupation List the Creative Industries Federation published data in January 2019 highlighting the concerns and views of different organisations within the industry:

- The Federation's recent survey revealed that around 51% of respondents stated that they are in favour of abolishing the salary threshold of £30,000 and 26% were in favour of significant changes to the threshold
- Around 67% of respondents said that they currently experience difficulties recruiting for certain roles, compared to 21% who said they face no challenges and 12% unsure.
- 81% of respondents said that they would face challenges if they were unable to hire high skilled EEA permanent workers on salaries below £30,000, whilst just 6% said they would face no challenges.
- Around 73% of those surveyed said that they were experiencing difficulties with the current sponsorship system. 60% of the reasons given as to why organisations were struggling with the system related to both the cost and time of obtaining a sponsorship licence.
- Around 54% of respondents were in favour of removing the resident labour market test and no one surveyed was clearly in favour of retaining it (the remainder of respondents said that they were unsure).
- Two-thirds of respondents agreed that employees on Tier 2 visas face challenges when moving between different employers with no one disagreeing and the remaining third being unsure
- These roles are highlighted in the table below. Only 17 of these, 41%, are on the shortage occupation list. Moreover, of the 9 sub-sectors that indicated that they were experiencing shortages, 5 of them had no representation of their roles at all on the list.

- Around 32% of respondents said that over 75% of their international staff earn under £30,000. 20% of respondents said that this applies to less than 10% of their international staff whilst 35% were unsure.
- Respondents identified the following highly skilled roles which do not command a salary of £30,000. Many of these are identical to those in the table above which face shortages.

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Full Brexit Briefing: <http://www.theheritagealliance.org.uk/tha-website/wp-content/uploads/2017/07/Brexit-and-Heritage-Briefing-FINAL-with-Royal-Society-Report.pdf>