

MAC -call for evidence EEA-workers in the UK labour market: Response

11 October 2017



1. The Heritage Alliance is England's biggest coalition of heritage interests, bringing together well over 100 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.
2. 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. The nature of the sector – comprising many different skill levels in many different job types makes it difficult to provide all the figures we would wish for this call to evidence. We have attempted instead to highlight areas of concern for the sector.
3. Our key asks for Government are to ensure that the heritage sector has:
 - 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 skills 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 archaeologists and other heritage specialist across the Irish Border.
4. The Migration Advisory Committee (MAC)'s [call for evidence](#) is intended to advise the Government on the economic and social impacts of the UK's exit from the European Union and on how the UK's immigration system should be aligned with a modern industrial strategy. The Heritage Alliance has already [submitted a response](#) on the modern industrial strategy and is working on a heritage sector specific deal.
5. The MAC has stated that its analysis will exclude Republic of Ireland nationals and has requested that stakeholders' evidence also does. However, we would stress that free movement of archaeologists and other heritage specialists across the Irish Border is of particular importance as cross-border working there is the norm.

EEA Migration Trends

Please provide evidence on the characteristics (e.g. types of jobs migrants perform; skill levels, etc) of EEA migrants in your particular sector/local area/ region. How do these differ from UK workers? And from non-EEA workers?

6. The heritage sector has an extremely wide variety of job types and this is therefore reflected in the jobs carried out by EEA workers in England. Jobs range from seasonal hospitality work through traditional crafts and skills to highly skilled professionals.
7. There are skills shortages in the UK in many areas of the heritage sector notably in heritage building skills and archaeology.
8. Research shows that approximately 15% of the archaeological labour force is drawn from the EU. 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.
9. An interesting example given by a Heritage Alliance Member shows that all 6 of their painting restorers are Italian as these skills are plentiful in Italy 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 – knowledge which takes time to develop – making them indispensable and difficult to replace.
10. If a visa system was developed for citizens of EEA countries in the future, exemptions for accredited experts and academics in the field should be considered. We may 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.
11. The Government should also ensure we remain able to export our archaeological, buildings conservation, and museum expertise.
12. Movement across borders should not be dependent on income levels. Conservation and archaeological expertise are not necessarily highly paid but are highly skilled. This needs to be considered in the design of any visa regime. For example, the current restrictions on Tier 2 visas pose serious problems from archaeologists, many of whom are skilled workers but who fall below the current salary thresholds.
13. The UK has, and can make more of, its world leadership in, for instance, 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.

To what extent are EEA migrants seasonal; part-time; agency-workers; temporary; short-term assignments; intra-company transfers; self-employed?

14. High skilled professionals may be self-employed.
15. Many tourism-based heritage organisations rely on some form of foreign seasonal staff. A recent provisional Historic Houses Association survey showed that 25% of their members indicated that they employed 5 or more EU nationals in the businesses on their properties.
16. There may be agency workers/ temporary workers among heritage tourist attractions.

What information do you have on their skill levels? To what extent do these differ from UK workers and non-EEA workers?

17. There is a shortage of heritage skills for development-led work in the UK and while there are efforts to address these by, for example, the National Heritage Training Group [Alliance member] these shortages are not likely to be resolved in the near future and would be made worse by restricting the number of EEA nationals able to work in the UK. [A 2016 Historic England study](#) found that the sector is already working at or near capacity as evidenced by existing skills shortages. It considered that even before any EEA restrictions are factored in there will not be enough trained archaeologists to do excavations and other investigations required on the over 40 major infrastructure projects planned across the UK over the next 17 years.
18. 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 include HS2, road building projects including upgrades to the A303 at Stonehenge and the Government's drive for more housebuilding which will require more Archaeological expertise. Large projects such as the restoration of Buckingham Palace, Westminster Palace, Wentworth Woodhouse and Clandon Park will also increase demand for already scarce heritage skills.
19. To illustrate: workforce numbers on A14 road project indicate c. 20% field staff from overseas. HS2 enabling works programme had intended to recruit from overseas. If labour movement is restricted, home grown talent will become increasingly important. We will need to create and fund new routes to skills. Archaeology is recognised as a construction skill by the Construction Skills Certification Scheme. To ensure economic growth, we will require common solutions for construction and archaeology.
20. Repair and maintenance of historic buildings directly generated £9.7bn in construction sector output in 2015. Recent figures ONS statistics suggests about 10% of the UK construction industry labour force is from outside the UK.
21. 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 years 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.

22. The heritage sector could be said to be more advanced/ extensive in Europe than elsewhere so heritage skills may be more readily available there than from outside the EEA. Workers may also be more willing to relocate to the UK for short term projects from EEA countries as they can relatively easily return home at weekends etc. This is not the case for a migrant from say Australia or South Africa.

Are there any relevant sources of evidence, beyond the usual range of official statistics, that would allow the MAC to get a more detailed view of the current patterns of EEA migration, especially over the last year?

23. Not that we are aware of.

Have the patterns of EEA migration changed over time? What evidence do you have showing your employment of EEA migrants since 2000? And after the Brexit referendum? Are these trends different for UK workers and non-EEA workers?

24. The latest State of the Market for Archaeological Services report, completed by Landward Research on behalf of HE, ClfA and FAME is due to be published shortly. Draft figures relating to the nationalities of UK-based staff are below:

	Archaeological Market Survey 2017	
	March 2017	
British (UK subjects)	1744.05	83%
Nationals of other EU states	305.6	15%
Nationals of other countries (non-UK, non-EU)	40.2	2%
total	2089.85	

n=45

15% of people working in UK applied archaeology in 2017 are EU citizens; a further 2% of the archaeological workforce are neither from the UK nor the EU.

25. At the time of the *Profiling the Profession 2012-13* survey^[1], 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.

Have you conducted any analysis on the future trends of EEA migration, in particular in the absence of immigration controls?

26. As mentioned above there are multiple major heritage projects forthcoming which will lead to the demand for skills increasing. If the Government agrees that the sector should continue to be able to access the skills it needs then this may see some short-term increase in EEA migration. This is necessary as the UK is not able to meet demand itself currently and to do so will take a prolonged period of investing in training.

Have you made any assessment of the impact of a possible reduction in the availability of EEA migrants (whether occurring naturally or through policy) as part of your workforce?

27. A lack of available skills may cause delay in the Government's projects whether this is archaeology along the route of HS2 or on work on restoration of the Houses of Parliament. Delay caused by a lack of available skills will cause a rise in Government costs. A lack of skills would also cause delay and increase prices for the private sector which looks after most of the UK's heritage putting it at increased risk of decay/ loss.

What impact would a reduction in EEA migration have on your sector/local area/region? How will your business/sector/area/region cope? Would the impacts be different if reductions in migration took place amongst non-EEA migrants? Have you made any contingency plans?

28. The impact would be as above. The sector is working to ensure better skills training and apprenticeships. However, these plans cannot deliver the right level of skilled labour in the required timescale. Ultimately, in addition to work which is being undertaken within the sector, this may require long term thinking and investment from the Government – better career advice and an apprenticeship scheme which works for the many small employers in the heritage sector.
29. Diminished focus on arts subjects in the school curriculum (and stopping subjects such as archaeology A-level) is counter-intuitive in this context.

Recruitment Practices, Training & Skills

Please provide evidence on the methods of recruitment used to employ EEA migrants. Do these methods differ from those used to employ UK and non-EEA workers? What impact does this have on UK workers? Have these methods changed following the Brexit referendum?

30. We have not seen evidence of this from our members. As we have said there is a skills shortage within the sector so recruitment of non- UK workers is unlikely to have an impact on the employment of UK workers but is likely to increase UK productivity.

Do recruitment practices differ by skill-type and occupation?

31. This will vary from employer to employer and profession to profession.

What are the advantages and disadvantages of employing EEA workers? Have these changed following the Brexit referendum result?

32. A key advantage of employing EEA workers compared to non- EEA workers is the ease and simplicity of the current system. Many heritage organisations are small. Complex legal hoops to employ EEA workers post Brexit may cut off access to these key skills.

To what extent has EEA and non-EEA migration affected the skills and training of the UK workers?

33. These have not necessarily been connected. However, access to EEA skills has meant that ongoing Governments have not addressed the lack of appropriate training for UK workers to provide the necessary skills. The heritage sector is diverse with many charities, not for profits and small organisations and consequently cannot easily address structural lack of skills and without support from the Government. Any such changes will take a long time to develop so restrictions on EEA employment should not be introduced in the medium term.

How involved are universities and training providers in ensuring that the UK workforce has the skills needed to fill key roles/roles in high demand in your sector? Do you have plans to increase this involvement in the future?

34. This varies within different areas of the sector. 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 years 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.

How well aware are you of current UK migration policies for non-EEA migrants? If new immigration policies restrict the numbers of low-skilled migrants who can come to work in the UK, which forms of migration into low-skilled work should be prioritised? For example, the current shortage occupation list applies to high skilled occupations; do you think this should be expanded to cover lower skill levels?

35. It is important that restrictions on low-skilled work do not exclude skilled heritage workers. For example, someone with vast experience of heritage woodwork.
36. Therefore, [the shortage occupation list](#) should be expanded to cover heritage skills to ensure that all aspects of the heritage sector can be added if necessary. Construction, including heritage craft and building skills and archaeology, should be placed the UK Shortage Occupations List.
37. It is important to stress that any framework should not be based around salary. The heritage sector is generally highly skilled but low paid. An arbitrary salary cap could exclude many skilled people that the sector needs.

Economic, Social and Fiscal Impacts

What are the economic, social and fiscal costs and benefits of EEA migration to the UK economy? What are the impacts of EEA migrants on the labour market, prices, public services, net fiscal impacts (e.g. taxes paid by migrants; benefits they receive), productivity, investment, innovation and general competitiveness of UK industry?

38. The UK's heritage sector is in many respects world leading and a vital part of our soft power abroad. The Heritage Alliance's newsletter alone was read in 34 countries in September. We are currently arranging visits from two Chinese delegations and our CEO will be speaking in Delhi in December.
39. However, the heritage sector is reliant on access to EEA skills. Removing or heavily restricting access to these in one go post Brexit could dramatically affect our global standing and tourist industry and destabilise the sustainability of our planning system. If reductions are to be made these must be made over the long term with proper resourcing for UK skills training and education to offset any reduced access to EEA skills.

Do these differ from the impact of non-EEA migrants?

40. Yes, as there are established relationships with EEA countries and professionals and it is not known whether sufficient numbers of non-EEA would be available to fill the gap or willing to travel the further distances.

Do these impacts differ at national, regional or local level?

41. There will be some areas in which there is more demand than others where more projects are focused but the impact will be the same in all regions.

Do these impacts vary by sector and occupation?

42. Some areas of the heritage sector will be more affected than others. For example, those relying on seasonal labour at heritage attractions are likely to be more affected than those with staff focusing on planning issues.

Do these impacts vary by skill level (high-skilled, medium-skilled, and low-skilled workers)?

43. As set out above. All types of skill levels could be affected, and it is important to ensure that access to specialist heritage skills is not hindered. As stated above key factor to avoid is the imposition of a salary level in the design of a visa as the heritage sector has relatively high skills but low pay.

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