

Migration Advisory Committee
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27 October 2017

RE: Response to MAC call for evidence on EEA workers in the UK labour market

Dear Madam or Sir,

Thank you for the opportunity to supply evidence to inform the Government's understanding of EEA workers in the UK labour market and the potential impacts of the UK's exit from the EU. Our response concerns evidence from the archaeology sector. The largest part of the archaeology sector is the 'commercial' sector, which provides specialist services to the development planning and construction sector. Archaeology thus is part of the procurement process in planning development and plays an important role in the design and delivery of housing and infrastructure projects.

The issue of access to EEA labour is particularly significant in archaeology due to an increased demand for housebuilding and both current and planned major infrastructure projects which are contributing to a developing skills crisis in the sector and which is expected to continue for the next 15 years¹.

Our answers to the consultation questions are set out below, but our key asks for Government are as follows:

- Maintain access to skilled archaeological labour from EEA countries;
- Ensure immigration exemptions for accredited heritage professionals and academics;
- Develop a visa system that allows 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;
- Put in place a visa system which is not dependent on income levels and recognises accredited skills;
- Ensure swift access to visas or the research equivalent of a diplomatic passport for academics;
- Maintain Government commitment to support training and apprenticeships in the UK;

¹ <https://content.historicengland.org.uk/images-books/publications/national-infrastructure-development-and-capacity-2015-33-assessment/national-infrastructure-development-and-archaeological-capacity-shortages.pdf/>

- Ensure that construction-related occupations facing high demand, including archaeology, are placed on the UK Shortage Occupations List; and
- Protect free movement of archaeologists and other heritage specialists across the Irish Border

About ClfA

The Chartered Institute for Archaeologists (ClfA) is the leading professional body representing archaeologists working in the UK and overseas. We promote high professional standards and strong ethics in archaeological practice, to maximise the benefits that archaeologists bring to society, and provide a self-regulatory quality assurance framework for the sector and those it serves.

ClfA has over 3,500 members and more than 80 registered practices across the United Kingdom. Its members work in all branches of the discipline: heritage management, planning advice, excavation, finds and environmental study, buildings recording, underwater and aerial archaeology, museums, conservation, survey, research and development, teaching and liaison with the community, industry and the commercial and financial sectors.

Consultation questions

EEA Migration Trends

1. 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?

1.1. The Archaeology sector is varied, with migrants filling roles across the spectrum of the profession. Currently around 15% of the archaeological workforce are from non-UK EU countries. This figure has increased in recent years due to current demand for archaeological work which is driven by a proliferation of major infrastructure projects and housing growth which are expected to continue for the next 15 years. It is estimated that the archaeological profession will need to grow by at least 25% by 2021.

1.2. There are however, two areas where non-UK EU labour is particularly important; in entry-level field archaeology roles in commercial firms undertaking development-led contract work; and research and teaching posts in academic institutions.

1.3. Only 2% of the workforce is from outside the EU. This reflects the increased difficulty of employing archaeologists through current Tier-2 visa routes and not that there is necessarily any greater similarity in archaeological techniques and systems in other European nations, where there are often very different systems in place. This means that, in theory, it is possible that non-EEA migration could rise after Brexit if access to fulfil UK skills shortages are opened to non-EEA labour.

2. To what extent are EEA migrants seasonal; part-time; agency-workers; temporary; short-term assignments; intra-company transfers; self-employed? What information do you have on their skill levels? To what extent do these differ from UK workers and non-EEA workers?

- 2.1. Cifa regards all those who have achieved accredited grades of membership of the Institute to be skilled professionals. The majority of accredited members are educated to at least degree level and many roles require years of training or experience to be able to undertake. Cifa members are rigorously vetted for technical and ethical competence and its registered practices are regularly inspected to assess compliance with the Cifa Code of Conduct.
- 2.2. Despite this, the market for archaeological jobs is relatively poorly paid comparative to some of these similar sectors. To give an idea of this, Cifa publishes salary minima which are set at;
 - £18,000 for PCifa
 - £21,000 for ACifa
 - £27,100 for MCifa
- 2.3. As a comparison, [in 2007 Cifa conducted a study](#) to benchmark the starting salaries of roles with similar competence and responsibility in comparable professions and map these onto the Cifa membership grades. The outcome of this research was that equivalent starting salaries for comparable posts were calculated at an average of;
 - £19,853 for PCifa equivalent posts
 - £29,123 for ACifa equivalent posts
 - £36,552 for MCifa equivalent posts
- 2.4. [In 2012/13](#) the average salary for jobs in UK archaeology was £27,814. The median salary was £26,000.
- 2.5. This means that, compared to average salaries of other sectors, EU/EEA archaeologists are likely to be heavily impacted if salary minima were imposed on EEA/EU nationals travelling to the UK to work after Brexit. Currently it is acknowledged to be very difficult to employ archaeologists from outside the EU for these reasons.
- 2.6. Examples of recently advertised posts show that many roles beneath manager-level roles in commercial archaeological companies and below senior academic positions in universities would be unlikely to exceed a £30,000 salary threshold. Many wider heritage sector jobs would also not reach the threshold.
- 2.7. [In 2012/13](#) 20% of all archaeologists held a Doctorate or post-doctoral qualification, a total of 47% held Masters degree or higher, and 93% of archaeologists held a Bachelors degree or higher. For those under 30, 95% of archaeologists were graduates.
- 2.8. Whilst this means that many archaeologists would be deemed to be undertaking roles rated at NFQ level 6 or above, some system for measuring experience would be useful to provide an assessment of equivalent skill levels, as not all entry routes into the profession

require degree qualification, with vocational training also able to yield highly skilled candidates in many areas of the profession.

2.9. Some EEA migrants working in archaeology may be self-employed or on short-term contracts. However, we are unaware of any separate data for EEA workers and have no evidence to suggest that EEA workers differ from UK workers.

2.10. In the academic sector, the world-class nature of UK institutions in teaching and research contribute to the attractiveness of non-UK talent to jobs and research positions in UK universities. ClfA does not have exact figures on how many non-UK citizens work in the academic sector, but expects this number to be significant.

3. 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?

3.1. We are not aware of any such sources.

4. 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?

4.1. An annual survey of the archaeological market is undertaken on behalf of ClfA and the Federation of Archaeological Managers and Employers. This survey only began asking about the nationality of workers after the EU referendum.

4.2. The latest report, currently in publication, reveal that 15% (305.6 FTE) of the UK workforce are nationals of non-UK EU states, and 2% (40.2 FTE) are nationals of other non-UK non-EU countries. Comparable figures from a 2012/13 report show that 3% of the archaeological workforce originated from non-UK EU nations, indicating a significant growth over this period.

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

5.1. A survey of members of the Federation of Archaeological Managers and employers in 2016 found that 67% of respondents stated that they currently employ non-UK EU staff, 85% had employed non-UK EU staff in the past, and 85% stated that continuing access to non-UK EU staff is important to their organisation.

6. 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? 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?

6.1. The UK archaeology sector is committed to improving domestic training provisions, diversifying entry routes into the profession, and improving skills retention in the workforce. However, it is also acknowledged that these efforts cannot produce the volume of

archaeologists required to meet demand in the short term, which, as noted above, anticipates to be at least 25% greater than current capacity by 2021.

6.2. A lack of available skills in this context would likely cause costly delays in construction projects and/or lead to a decline in the quality of archaeological work, contributing both to increased likelihood of harm to heritage assets, and a decrease in the public benefit of undertaking archaeological work.

6.3. There are no obvious contingency plans which can be made beyond these current actions.

Recruitment Practices, Training & Skills

7. 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?

7.1. Archaeological employers largely utilise openly advertised posts for recruitment. This has not changed following the Brexit referendum.

8. Do recruitment practices differ by skill-type and occupation?

8.1. No.

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

9.1. There are no obvious advantages to employing EEA workers over UK workers. There are some difficulties in employing archaeologists from overseas, in general, even those within the EU, as regulatory frameworks, archaeological practices, and archaeological material can be very different.

9.2. This means that UK workers are often at an advantage over non-UK workers due to experience or education in the UK system, in addition to any other factors such as language.

9.3. The advantage of employing EEA workers over non-EEA workers is that Tier 2 visas require additional time and effort to negotiate and this can be a significant obstacle for employers. Additionally, it is often easier for EEA workers to demonstrate similar academic and professional skills comparable to those of UK workers.

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

10.1. We are not aware of any causal link between EEA and non-EEA migration and the skills gap and shortage issues in the UK labour market, although it is possible that there are connections. However, we would not expect that the availability of EEA labour has drastically affected UK training provision.

10.2. This is inferred from the extreme variance in figures for EU workers between 2012/13 (3%), when the archaeological jobs market was relatively depressed following the 2008

economic crash, and current figures (15%) which show a change due to rapid increase in demand. In this sense, EEA labour has acted to prevent market failure as a result of the rapid change in the market since 2008 and has helped to mitigate the loss of (primarily UK) archaeological workers by acting to temporarily ease the pressure on domestic training programmes.

11. 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?

- 11.1. The role of universities in helping to meet demand in the profession is well recognised in the sector. However, there a number of existing problems which are hampering the effectiveness of vocational training as part of higher education courses. These issues are part of ongoing work between professional bodies and the higher education sector.
- 11.2. There are plans to increase collaboration between the professional sector and higher education institutions in the future. For example, ClfA is currently developing a system for accrediting UK universities which deliver a certain standard of vocational training to students. However, the results of this type of engagement is likely to take a number of years to impact the labour market.
- 11.3. There is also an Archaeological NVQ in place with plans for graduate and Level 3 non-graduate apprenticeships well advanced. In addition, archaeological employers are now increasingly operating more formal internal training schemes and ClfA has a scheme to accredit these.

12. 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 list2 applies to high skilled occupations; do you think this should be expanded to cover lower skill levels?

- 12.1. Current Tier-2 visa restrictions make it very difficult to employ low-skilled migrants into archaeology jobs. Even high skilled workers are restricted by the nature of current salary caps.
- 12.2. ClfA have recommended a number of responses to Brexit labour market challenges: (a) an EU exit settlement which retains free movement of labour within the EU, or (b) a points based system – or similar – which recognises a need for skilled and semi-skilled archaeologists from the EU and makes it easy for them to come to the country to work.
- 12.3. We recommend that the UK shortage occupation list included archaeology (possibly as a subset of a constructions skills sectoral occupations category) as an area of need for both high and low skilled workers.
- 12.4. Another potential solution would be for professionally accredited archaeologists to be recognised as meeting necessary threshold for visas in lieu of salary thresholds.

Economic, Social and Fiscal Impacts

13. 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?

- 13.1. EEA migration helps to support the UK's world-leading archaeological sector, drawing in talented individuals to enhance. Their work also contributes to the high standard of heritage we have in the UK, by protecting valued assets and conserving the rich British heritage offer, which is one of the major reasons for foreign and domestic tourism and contributes to vibrant local economies across the entire country.
- 13.2. Access to EEA labour keeps the price of archaeology down by providing short term relief during periods of high demand, and prevents market failure by relieving efforts to train, recruit, and retain UK archaeologists.
- 13.3. This prevents archaeology causing delays to construction and infrastructure development projects due to lack of capacity to meet demand.

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

- 14.1. No. In theory, there is potential to open up access to the UK labour market for non-EEA migrants who would be able to contribute to the UK's reputation for world-class archaeological work and contribute to protecting and enhancing the UK's tourist economy in the same way as EEA labour. This is prevented at the moment by the greater restrictions placed on non-EU migrants, such as salary caps.

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

- 15.1. There are regional and local variations in the demand for and investment in archaeology and it is possible that some regional variation in demand for EEA workers will exist as a result.
- 15.2. We would not anticipate these regional differences being applicable to the academic sector.

16. Do these impacts vary by sector and occupation?

- 16.1. Yes.

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

- 17.1. As stated, all skill levels are affected, but there may be a particular pressure on entry-level field archaeology roles in commercial firms undertaking development-led work.

If you have any questions or would like further information, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Rob Lennox', with a stylized, cursive script.

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