

Northern Ireland evidence relevant to the UK Government's Immigration White Paper

Summary

1. Following publication of the United Kingdom Government (UKG) White Paper on Immigration¹ the Department for the Economy (DfE) has been providing regular evidence-based submissions to UKG and to Northern Ireland (NI) stakeholders in order to support consideration of related policy proposals. The evidence that has been provided to date includes analysis of:
 - the profound importance of migrant workers to the NI economy across the skills spectrum;
 - earnings levels in NI in the context of UKG proposals on salary thresholds for migrant workers; and
 - the unique position of NI including its land border with Ireland in the context of immigration.

Evidence will continue to be submitted to the Home Office during the White Paper's twelve-month engagement period which will end in December 2020.

2. This paper provides a summary of that evidence. It does not represent the Northern Ireland Civil Service's (NICS) views on matters of policy around EU Exit which would be for Ministers to determine.
3. The analysis highlights the disproportionate impact that restricting the flow of EEA migrant labour would have on the NI economy. This is due to its heavy reliance on EU26 (i.e. excluding Republic of Ireland) migrants, particularly in a number of key sectors such as agri-food, social care, manufacturing and hospitality.
4. It points to what is already a significant reduction in EU nationals working in the NI labour market. According to the Labour Force Survey (LFS), the number of EU26 migrants in NI decreased from 53,000 in 2016 to 44,000 in 2018, a fall of 17% over the 2 year period. Looking at the more recent quarterly data this shows further reductions whereby the number of EU26 migrants in NI decreased by 26% between Quarter 2 2016 and Quarter 2 2019².

¹<https://www.gov.uk/government/publications/the-uks-future-skills-based-immigration-system>

² [NISRA Labour Force Survey](#)

5. Despite this decrease, the overall migrant worker population stands at 82,000 and represents just over 9% of total employment in NI (Q2 2019). The NI labour market continues to tighten which is a major concern for employers in NI, with access to skills and labour identified consistently as a critical EU Exit issue during stakeholder engagements.
6. At £24,000 per annum, NI has the lowest median private sector salary of all UK regions for full time workers. This disparity would immediately put NI at significant disadvantage compared to all other UK regions when seeking to attract migrant workers in the context of the proposed £30,000 minimum salary threshold. Due to the skill requirements and salary threshold proposed for the skilled worker route, NI would be particularly reliant on the short-term temporary worker route at both low and medium skill levels.
7. However, given that the land border is shared with an EU member state, there is the very real risk that businesses will relocate across the border to Ireland in order to open up the pool of potential employees. It is therefore important that the UK's future immigration system takes account of NI's position in a context where many of its businesses trade and compete on an all-island basis.

Introduction

Background

8. In December 2018 the Home Office published its White Paper proposals on migration, *'The UK's future skills-based immigration system'*. The Home Office committed to undertake an intensive twelve-month engagement process on the proposals across all regions of the UK. It also committed to work with the Devolved Administrations (Scottish Government, Welsh Government and NI Executive) to understand their unique perspectives and challenges. The White Paper seeks to ensure that employers have the flexibility they need and that individuals are able to visit, live and work in all parts of the UK.
9. As part of the engagement process, NICS officials have worked with counterparts in the Home Office to ensure meaningful engagement on the key issues, supplemented by evidence-based submissions to further inform the Home Office's consideration of immigration in the context of NI. The aim has been to provide UKG with evidence on those aspects of the White Paper which NI stakeholders have raised as being important to NI society and to its economy.
10. DfE has and will continue to provide UKG with thematic evidence on a range of areas including:
 - the applicability of possible salary thresholds in the NI context;
 - the importance of access to skills at all levels in order to support achievement of NI's economic ambitions;
 - the need for a migration system that can be navigated in the most effective way;
 - the relevance of the land border in the context of immigration; and
 - the importance of immigration to the wider social fabric of NI.

Evidence gathering

11. In order to provide robust evidence in response to proposals, DfE has cohered the main statistical information relating to migration issues in Northern Ireland. It has drawn together information from sources including the LFS, the Office for National Statistics (ONS), official migration flow estimates and the Annual Survey of Hours and Earning (ASHE).

12. The analysis has also taken account of the relevant research and reports from organisations such as the Northern Ireland Chamber of Commerce and Industry (NICCI) and the Confederation of British Industry (CBI) NI.
13. In addition to the evidence and research gathered, DfE has submitted evidence to the Home Office from local employers, industry representatives and organisations presented as case studies. These case studies have sought to further illustrate the potential real world impacts of the proposals in the White Paper, providing an assessment of how employers will be impacted by reduced access to the EU migrant labour. Due to the commercially sensitive nature of the content of those case studies, the full detail is not included in this document. However, reference to themes emerging from the range of NI case studies has been included to provide readers with the context of the most frequently raised issues and concerns.

Links to the Draft Industrial Strategy, Economy 2030

14. *'Economy 2030: A Consultation on an Industrial Strategy for Northern Ireland^β* seeks to benchmark NI against best-in-class small advanced economies, with the ambition to become one of the most globally competitive economies. To achieve the aims set out in *Economy 2030*, there is a need to ensure that NI is an attractive destination to those with the skills to contribute to our economy and in particular, the priority areas for growth that have been identified. However, as NI transitions further along the pathway to a knowledge- based and export focused economy it is recognised that there continues to be a demand for skills across all levels.
15. NI employers have been clear that a sustained and seismic reduction in access to labour will damage NI's trajectory towards these aspirations. It is imperative that the evidence from NI and the needs of local stakeholders is given appropriate weight as the future UK Immigration system is shaped.
16. This is particularly pertinent given UKG's "no deal" tariff proposals, whereby goods entering NI from the Republic of Ireland would not be subject to tariffs, customs or Export Health Certification checks. The continued free movement of goods into the NI market that would be available to businesses located in the Republic of Ireland in a no deal scenario, added to their ongoing full access to the EU labour market would likely mean that NI businesses would be operating under imbalanced trading

³ <https://www.economy-ni.gov.uk/consultations/industrial-strategy>

conditions post-EU exit. There are very real concerns that businesses, in seeking to maintain competitiveness, would choose to relocate to the Republic of Ireland.

Key Messages relating to immigration, the NI Economy and the UKG White Paper

Northern Ireland's "Euro-Centric" migration experience has enabled the Economy to grow after a time of recession

17. The local economy relies heavily on migrant workers and it should be noted that, for NI, migrants are significantly more likely to originate from an EU26 country (excluding Ireland). At Q2 2019 there were 40,000 EU26 migrant workers in employment in NI.
18. In broad terms, the data indicate that international inward migration to NI has been more European based compared to the rest of the UK, with a more limited proportion of workers coming to NI from outside the EU. In 2018 for example, 65% of migrant workers in NI were from EU26 countries - the equivalent figure for the UK as a whole was just 40%.

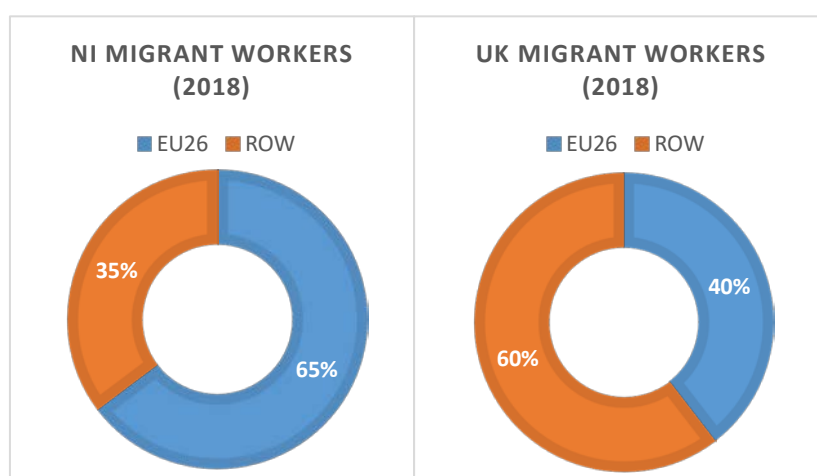


Table 1: Break down of Migrant workers EU26 (i.e. RoI not included) against RoW

Source: Labour Force Survey (2018), NISRA ⁴

19. It is therefore clear that NI's labour market, even at the most fundamental structural level, is more exposed to policy changes that impact on the flow of EU workers. Given the point of development of the NI economy, the level of exposure would be amplified if the flow is managed via salary threshold levels, as evidenced in this paper.

⁴ [Labour Force Survey 2018](#)

20. Employment of both indigenous and migrant workers has expanded over the last decade and a half – helping NI businesses grow. As detailed in its “*EEA-worker in the UK labour market: Interim Update*”⁵ which published in March 2018, the MAC acknowledged the role that EEA migration has played in the expansion in employment in the UK:

“The expansion of the EU in 2004 marked a qualitative and quantitative change in EEA migration. Workers from the older member states have been, and remain, more likely to work in high-skilled jobs than the UK-born but this is not the case for those from the new member states. After 2004, employers in some sectors, especially the lower-skilled, found they now had, through free movement, access to a new well-qualified and highly motivated labour force. These sectors then had a ‘tail-wind’ which formed the basis for expansion in employment.”

21. As can be seen below since 2014 the employment recovery in NI has been primarily driven by EU26 nationals.

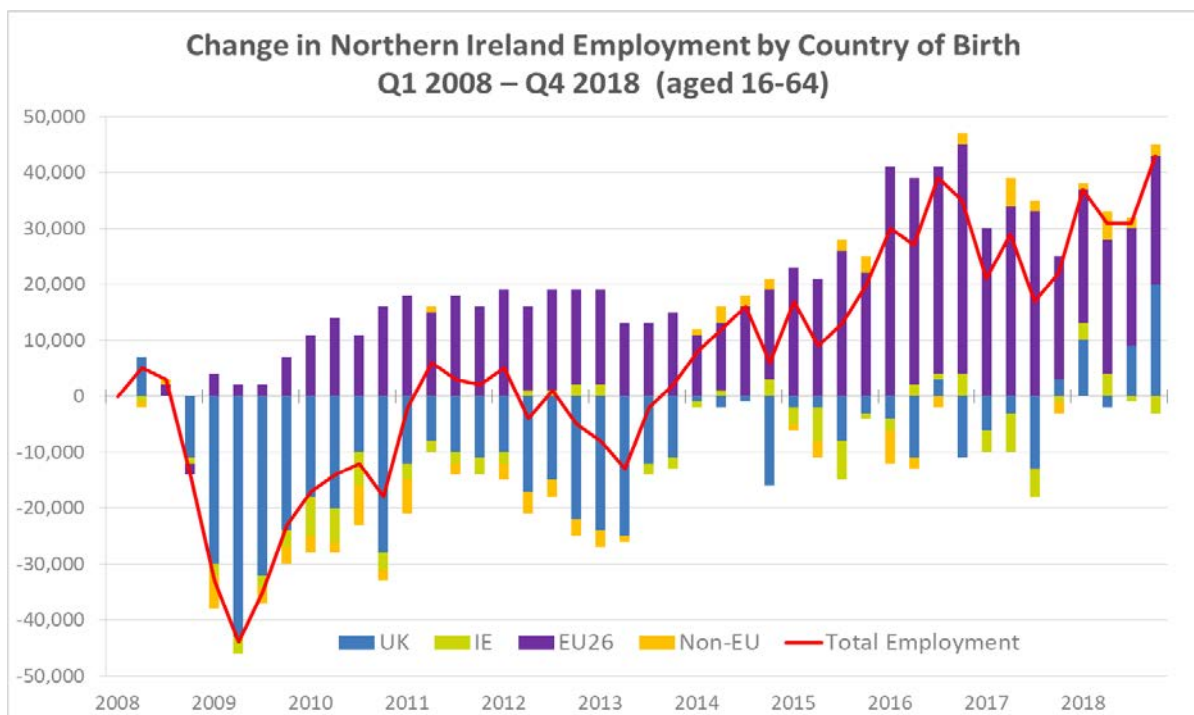


Table 2: Change in NI Employment by Country of Birth.

Source: Labour Force Survey 2007-18 NISRA

⁵ <https://www.gov.uk/government/publications/eea-workers-in-the-uk-labour-market-interim-update>

22. The LFS estimates show that from 2004 to 2018 there has been an increase of 28,000 UK born people aged 16-64 who are living and working in NI in higher skilled jobs (to 371,000 in 2018) and an increase of 16,000 in lower skilled jobs (to 353,000 in 2018).
23. There has also been an increase of 22,000 Non-UK born (excluding Ireland) people aged 16-64 who are living and working in NI in higher skilled jobs (to 32,000 in 2018) and an increase of 29,000 in lower skilled jobs (to 36,000 in 2018). This demonstrates that the current immigration rules, combined with freedom of movement of people within the EU, have allowed access to migrant labour across all skills levels.

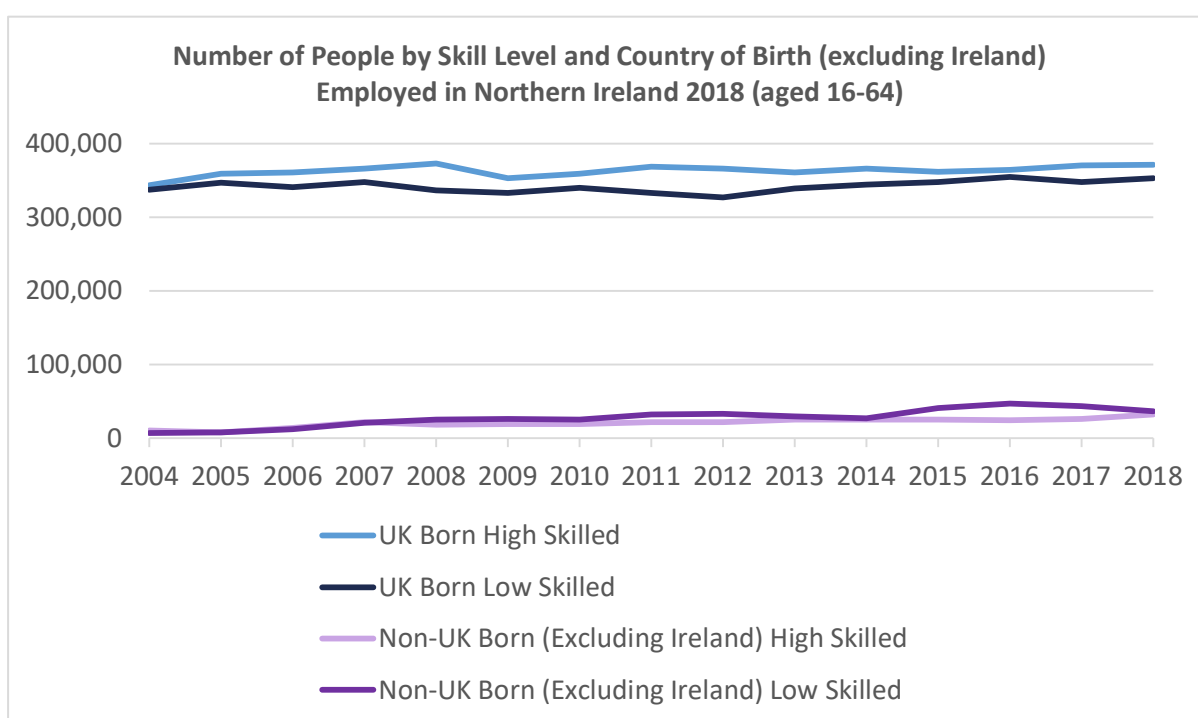


Table 3: Number of People by Skill Level and Country of Birth employed in NI.

Source: Labour Force Survey 2007-18 NISRA

24. According to the LFS, the sectors with the highest share of EU workers are manufacturing, distribution and hotel and restaurants. In 2018 these sectors accounted for over half (54%) of EU26 jobs. In addition, the ONS Annual Population survey data for 2018/19 showed NI had the second highest share of EU workers in the manufacturing sector, after London, compared to the other UK regions.

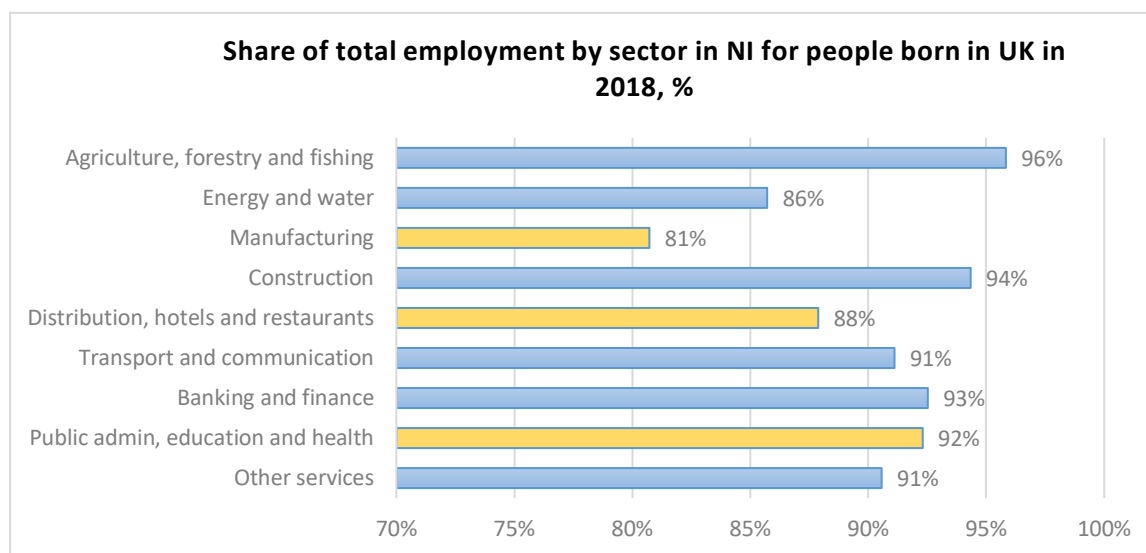


Table 4: Share of Total Employment by sector in NI for people born in UK.

Source: Labour Force Survey (2018) NISRA

25. It is evident that key sectors in NI rely on migrant labour, although access to those skills is already contracting⁶. The Manufacturing (including food processing) and Distribution, hotels and restaurants sectors have the lowest proportions of UK-born in employment. On an annual basis, both sectors are seeing sharp declines in the number of EU26 migrants in employment. The other relevant sector to this paper is Health where the figures of migrant workers are somewhat masked by its statistical grouping with Public Administration and Education.

⁶ We are confident that the reduction in EU migrant labour employment applies across a number of other key sectors, as defined in the Northern Ireland draft Industrial Strategy, with a reliance on lower skilled labour including agri-food, life and health sciences (including health and social care). Unfortunately it is not possible to provide a full sectoral breakdown of the data as the sample is too small to provide a reliable estimate.

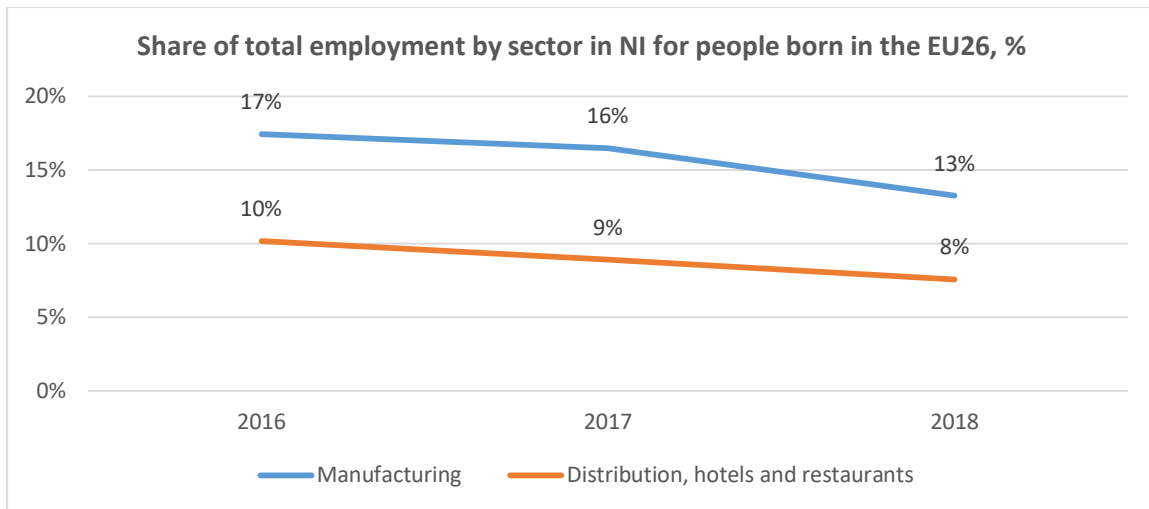


Table 5: Share of Total Employment by sector in NI for people born in EU26.

Source: Labour Force Survey (2018) NISRA

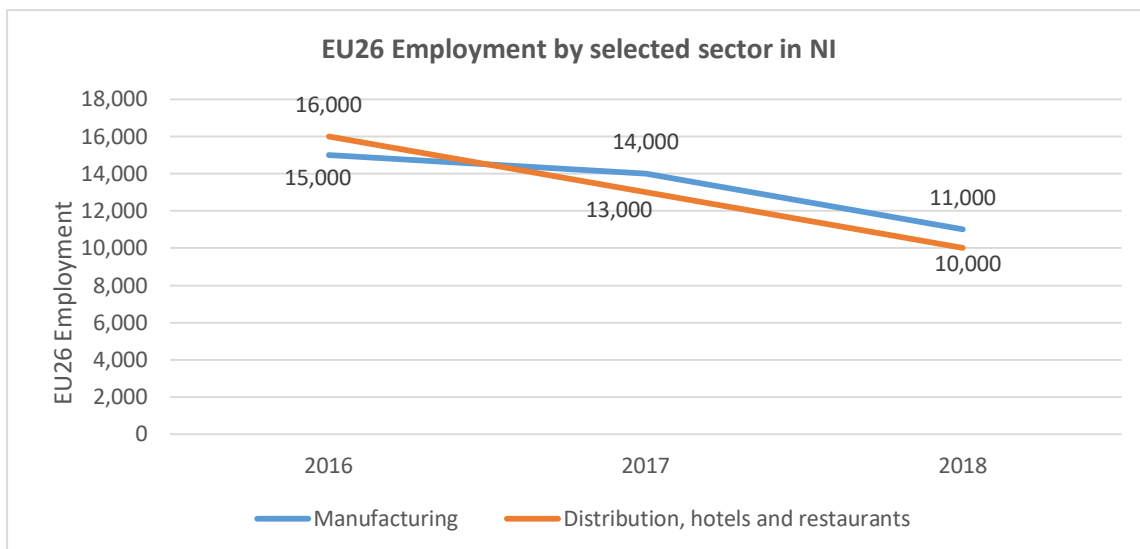


Table 6: EU26 Employment by selected sector in NI.

Source: Labour Force Survey (2018) NISRA

Overview of Northern Ireland's migrant labour composition, and the contribution to the growth of the economy

26. Migration has been key to the recovery of the NI economy since the economic downturn, with the broad consensus of the business and wider community across NI reporting that migration is an essential ingredient in meeting the region's future economic growth ambitions.

27. Evidence shows migrant labour has contributed greatly to the growth of NI industries such as Food and Live Animals, Manufactured Goods and Machinery and Transport Equipment which accounted for £2.0bn (63%) of all exports to NI's largest export market, the RoI⁷. In addition, forecasts to 2028 illustrate that these jobs will be required for the longer term to sustain growth and achieve our economic vision.
28. However, businesses in NI continue to report recruitment and retention issues. In December 2018, a survey of businesses in the manufacturing industry was published by Manufacturing NI / Tughans⁸. The survey identified that 37% of business owners reported a decrease in the number of migrant workers employed within their business over the last 12 months.
29. In Quarter 4 2018, the AIB Brexit Sentiment Index⁹ noted the Managing Director of the Beannchor Group, one of NI's largest employers with over 750 employees, expressed concern over the impact of Brexit on staffing and supplies. The group has one of the highest staff retention rates in the hospitality industry.
30. Numbers of EU26 migrants employed in NI have already dropped significantly and stakeholders here are expressing major concerns that the short-term temporary worker route (combined with the proposed salary threshold for the skilled worker route) will not meet the needs of the Northern Ireland economy. Feedback from stakeholders has been clear that the proposed 12-month period that workers will be able to stay in the UK under the temporary worker route will cause significant difficulties, primarily around the time and cost of training staff.
31. Furthermore, NI has unique issues and risks arising from the land border including competition within the all-island economy and the potential for business to relocate in RoI to retain access to EU skills and labour through freedom of movement of people.

⁷ [Broad Economy Sales and Exports Statistics, NISRA](#)

⁸ <https://www.tughans.com/wp-content/uploads/2019/01/Manufacturing-NI-Jan-2019.pdf>

⁹ [AIB Brexit Sentiment Index Q4 2018](#)

Salary Levels in NI

Northern Ireland private sector pay is the lowest in the UK

32. Evidence demonstrates the risks that the NI private sector, which currently has the lowest median salary of any UK region, would face under a salary threshold that does not reflect the economic realities in NI.
33. At £24,000 per annum, NI has the lowest median private sector salary of all UK regions for full time workers. The equivalent UK median salary in 2018 was £28,800, some 20% higher.
34. This disparity would immediately put NI at significant disadvantage against all other UK regions when trying to compete for migrant workers in the context of the proposed £30,000 salary threshold.

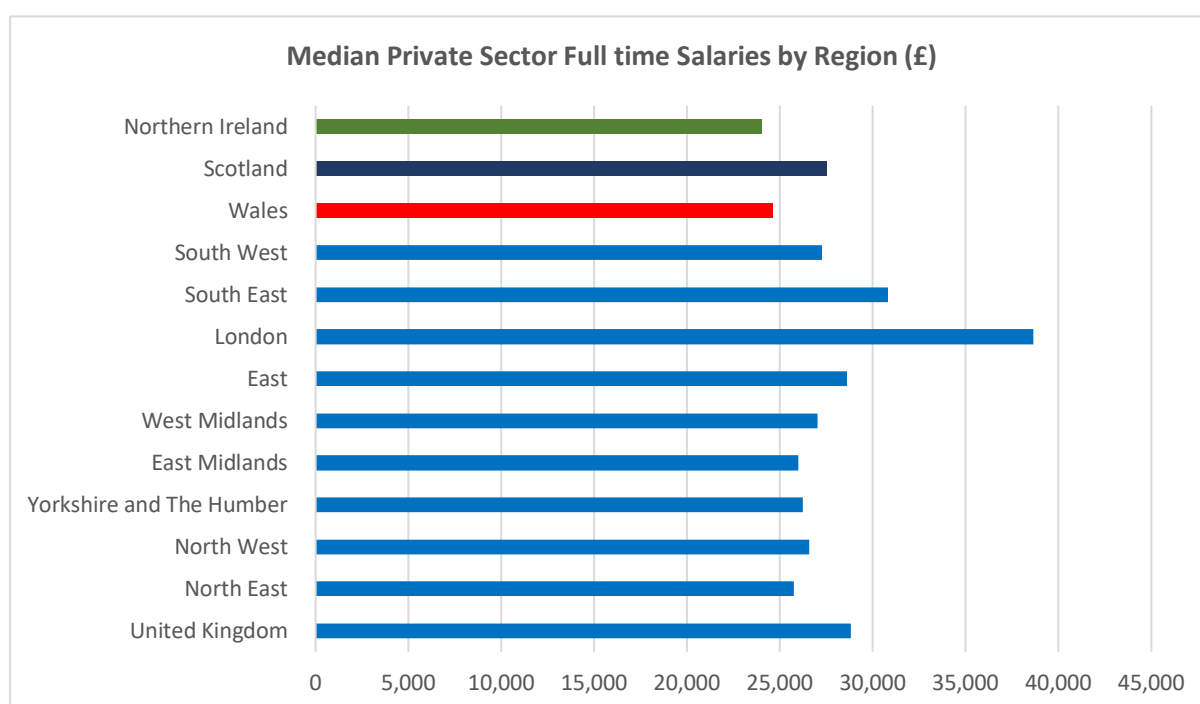


Table 7: Median Private Sector Full time Salaries by Region

Source: Annual Survey of Hours and Earnings (2018), Office for National Statistics¹⁰.

¹⁰ [ASHE Private sector median salaries by region](#)

35. In terms of share of employment, NI has the smallest private sector employment - accounting for 75% of employment in the region - again the lowest of all UK regions. However, NI is also the region with the largest pay differential between public and private sector median salaries.

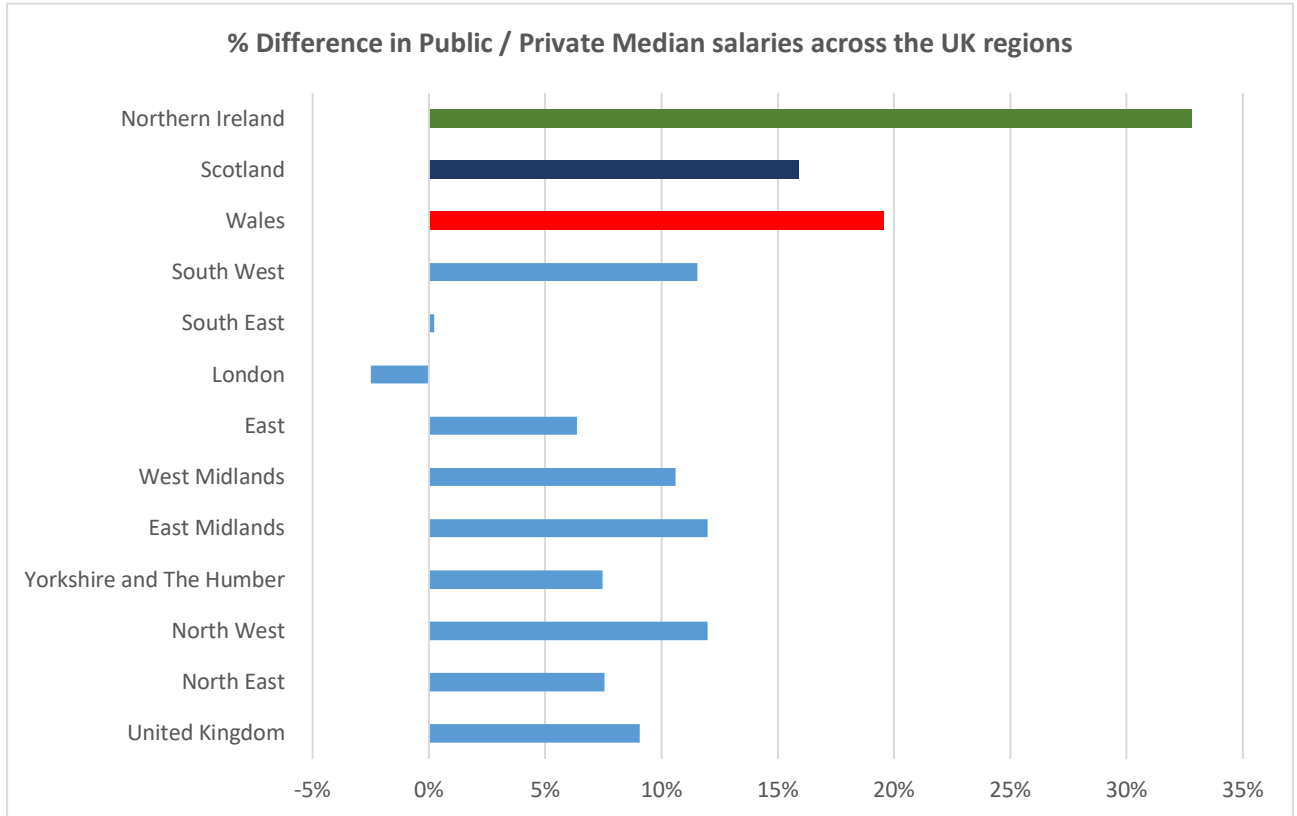


Table 8: % Difference in Public/ Private Median salaries across the UK regions
 Source: Annual Survey of Hours and Earnings (2018), Office for National Statistics¹¹.

36. The draft Industrial Strategy for NI, ‘*Economy 2030*’¹² contains an aim to rebalance the economy so that the private sector is significantly stronger and there is, as a result, less dependence on the public sector.

37. As part of this, the strategy has a strong focus on skills, aiming to have:

- a high quality, efficient and responsive system for delivering professional and technical skills;
- a pipeline of graduates who have the skills, knowledge and capabilities to excel; and
- a strong and relevant supply of skills for economic growth.

¹¹ [ASHE Public and Private sector median salaries by region](#)

¹² [Economy 2030, a consultation on an Industrial Strategy for Northern Ireland](#)

38. Programmes are in place to achieve these outcomes, linking the public sector, schools and colleges and local employers. However, as people continue to move up the skills ladder, it is clear that labour and skills shortages remain.
39. It is important that UK future immigration system is designed to address these shortages in a manner that reflects the needs of the NI economy and allows businesses to grow, enter new markets and assist in the transformation the region's economic competitiveness.

Northern Ireland salaries lag behind UK salaries in all but one of its key economic sectors.

40. Delving deeper into NI key economic sectors and sub-sectors, median salaries are lower than the UK median in 29 of 30 sectors and while UK median salaries exceed the proposed £30,000 threshold in 18 of the 30 sectors, NI median salaries only exceed the proposed threshold in seven out of the 30.

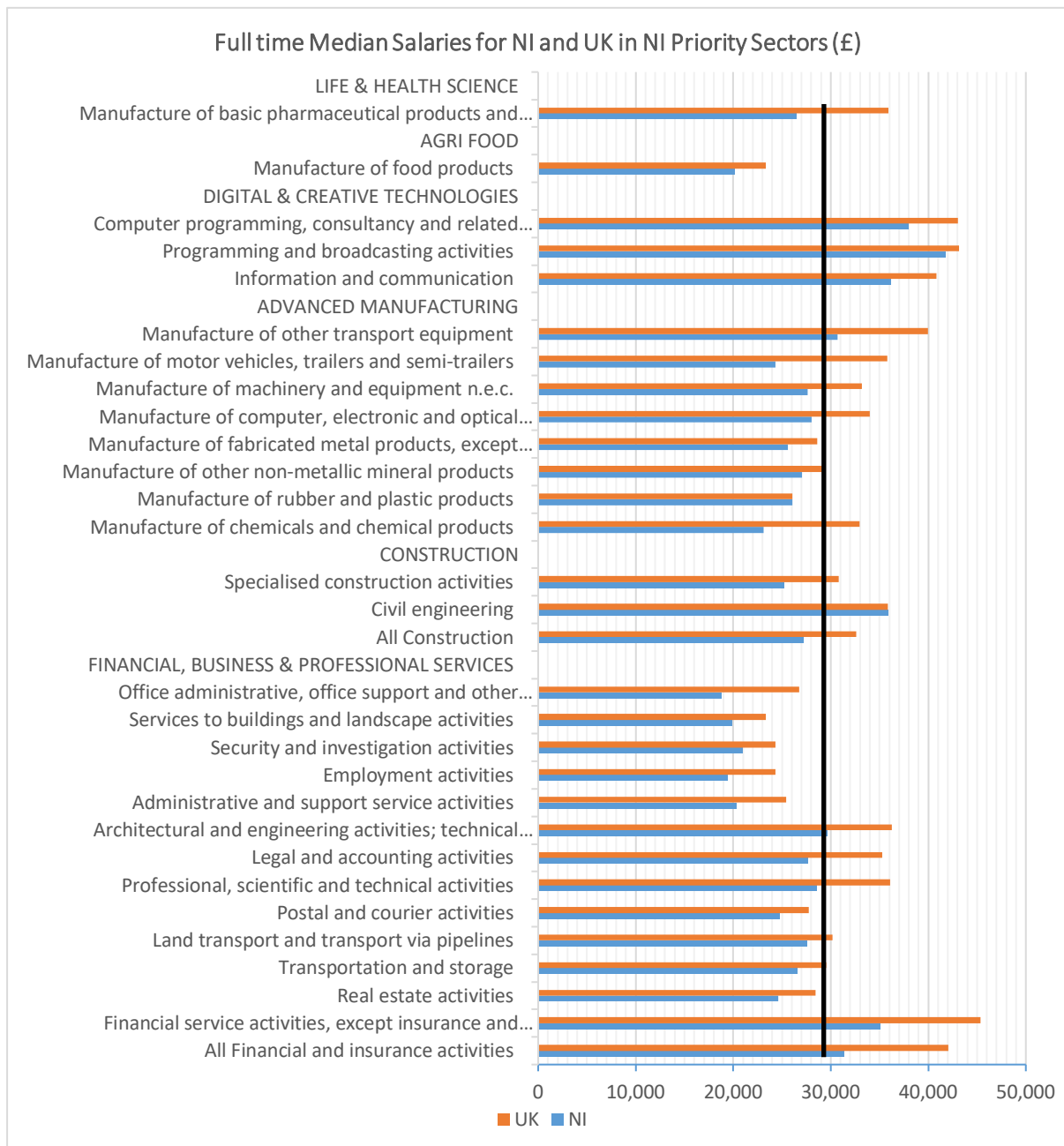


Table 9 Full time Median Salaries for NI and UK in NI Priority Sectors

Source: Annual Survey of Hours and Earnings (2018), Office for National Statistics

Even where NI sectoral salaries meet the proposed £30,000 threshold, the distribution of those salaries still poses challenges.

41. The graphics below demonstrate some of the challenges that remain even where NI incomes meet the proposed threshold. In sectors, such as those outlined below, there is a material disparity between NI and UK salaries, with the majority of the salary distribution in NI sectors below the £30,000 mark while the majority of the UK distribution sits above it.

Distribution of NI Gross Yearly Income for NI Priority Sectors (£)

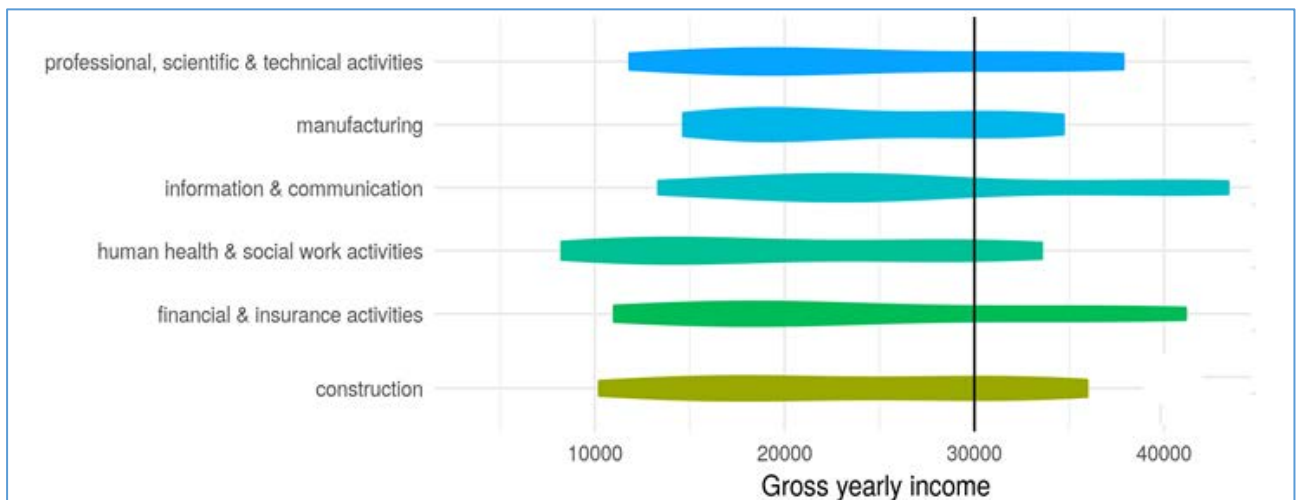


Table 10: Distribution of NI Gross Yearly Income for NI Priority Sectors (£)

Source: CBI (NI) based on Annual Survey of Hours and Earnings (2018), Office for National Statistics.

Distribution of UK Gross Yearly Incomes in NI Priority Sectors (£)

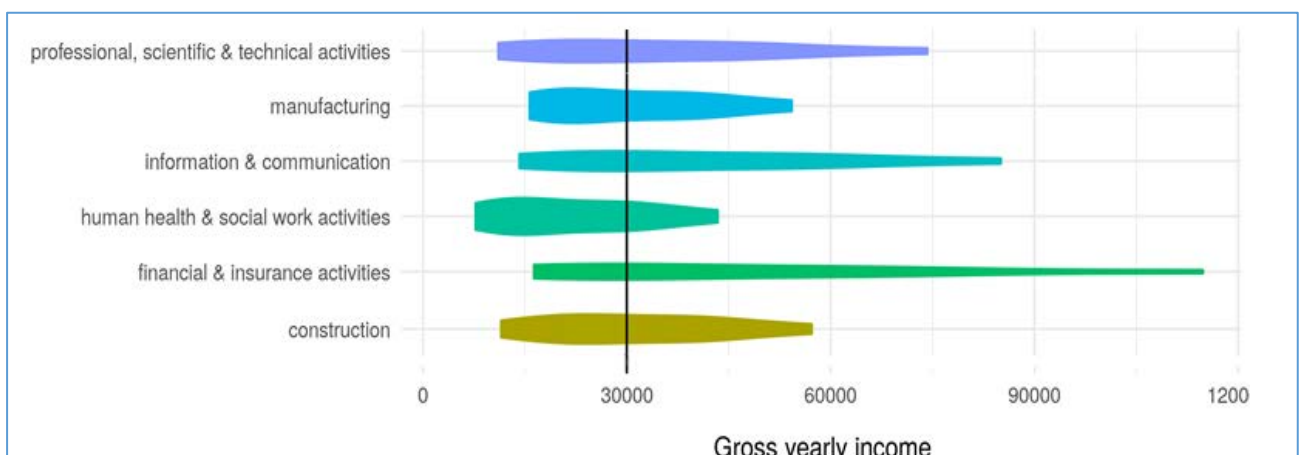


Table 11: Distribution of UK Gross Yearly Incomes in NI Priority Sectors (£)

Source: CBI (NI) based on Annual Survey of Hours and Earnings (2018), Office for National Statistics.

Short-term Temporary Workers Scheme

Salary levels in Northern Ireland mean that the Temporary Worker route is likely to be of particular importance to employers here

42. NI has a heavy reliance on EU migrant labour in a number of key sectors such as agri-food, social care, manufacturing and hospitality. Due to the salary threshold and skill requirements proposed for the skilled worker route, NI will be particularly reliant on the Temporary Worker route at both low and medium skill levels.
43. The temporary route does not propose a minimum salary threshold and the White Paper proposes to expand the skilled worker route to incorporate medium level skills. Evidence highlights that NI employers will have particular challenges in achieving the salary threshold to avail of the skilled worker route. That, in turn will increase the importance of the temporary route not only for lower skill levels but also at medium and potentially high level skills.
44. The proposal to include intermediate skills (NQF 3-5) as qualifying via the skilled worker route is helpful in context, but there are concerns that the application of salary thresholds that do not reflect the economic realities in NI will mitigate against the region addressing these skill needs in the short to medium-term.

45. The diagram below details the median salary across NQF Skill levels, and highlights the skill levels at which NI has supply deficits¹³. It can be seen that the NI median salaries at these skill levels fall below the £30,000 threshold in the two categories with the most pronounced supply gaps:

46. Lower skilled salaries (NQF Level 2) are approximately 40% lower than the newly proposed salary threshold of £30,000 - thus there is no realistic expectation in the short to medium term of reaching this threshold.

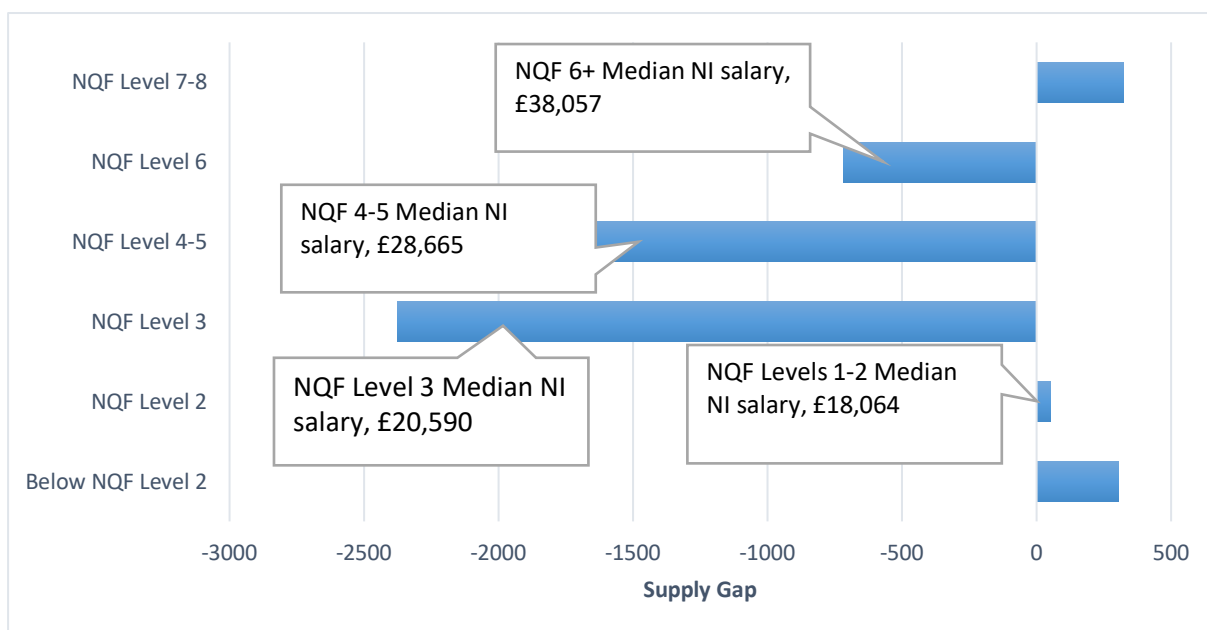


Table 12 NI skill levels with supply deficits

Source: Northern Ireland Skills Barometer (2017) / DfE Analytical Services Division 2018¹⁴

¹³ Median salary information is available for ASHE Skill Levels 1 – 4 but not by NQF level, the median salaries above have therefore been assigned to the NQF level(s) which most closely align to the relevant point on the ASHE 1-4 scale.

¹⁴ NI Skills Barometer 2017

47. The MAC's analysis shows that only 10% of existing employees in NI with NQF2 or lower would reach the proposed £30,000 salary threshold. This analysis also highlights that despite opening the skilled worker work to RQF levels 3-5, the impact in NI will be reduced as the majority of jobs at level 3 (70% - highest of all UK regions) and levels 4-5 (52%) will not satisfy the proposed skilled worker salary threshold.
48. Stakeholders report that this constraint on access to skills will be most acutely felt by the private sector. As stated above, in terms of share of employment NI's private sector accounts for just 75% of employment in the region, the lowest of all UK regions. NI is also the region with the largest gap between public and private sector median salaries.

Percentage of existing employee jobs with salaries greater than or equal to the 25 th percentile of their occupation or £30,000 (whatever is greatest) grouped by RQF level of the occupation and region ¹				
Region	RQF level			
	6+	4-5	3	<3
Whole UK	72	51	37	17
Wales	69	39	31	12
Scotland	70	52	36	15
Northern Ireland	69	48	30	10
UK excluding London & South East	67	45	33	15
North East	63	37	32	14
North West	66	46	33	14
Yorkshire and The Humber	65	42	32	14
East Midlands	65	41	33	14
West Midlands	69	45	35	17
South West	66	46	31	15
East	71	50	37	17
London & the South East	79	61	47	24
London	83	67	53	29
South East	73	53	40	18

Table 13 Notes: Calculations using ASHE (2017). SOCs matched to RQF skill levels Immigration Rules Appendix J. Sample restricted to full-time employees on adult rates who have been in the same job for more than one year. Employees who do not have a valid work region, who are less than 16 years old or with missing or zero annual gross salaries are excluded.

Continued access to migrant skills will be required to fuel Northern Ireland's longer term economic growth

49. The *Northern Ireland Skills Barometer* (2019)¹⁵ has developed a high growth scenario which is consistent with NI achieving its economic ambitions. In this scenario NI achieves an employment rate of 74% amongst the 16-64 population by 2028, from a base of 70% in 2018. This will narrow the gap in the employment rate between NI and the UK, where the 16-64 employment rate stood at 76% in the UK in 2018. The scenario also assumes higher growth in higher value added areas of the economy identified in '*Economy 2030*' such as professional services and ICT.
50. In this scenario, employment in NI will grow from 885,290 in 2018 to 970,670 in 2028. The annual average gross demand for labour, forecast by the Skills Barometer is approximately 76,000 per annum as detailed in the chart below by skills level.

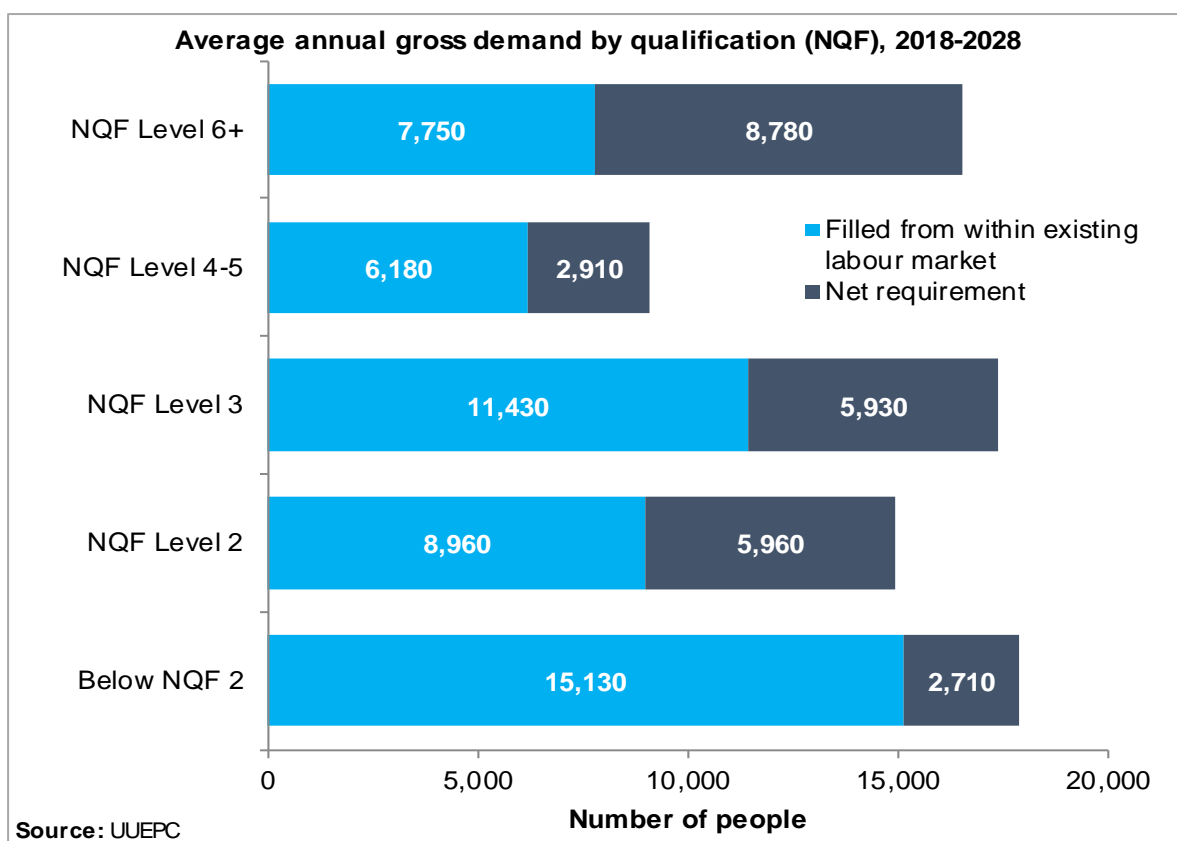


Table 14: Annual Average gross demand by qualification (NQF), 2018-2028

Source: UUEPC

¹⁵ <https://www.economy-ni.gov.uk/publications/northern-ireland-skills-barometer-2019-update>

51. Research estimates that demand for higher skills will increase proportionately over the period. Nevertheless, there will remain a large overall demand for lower level skills (NQF L2 and below).
52. Looking solely at the net requirement (i.e. those jobs that will not be filled by churn in the existing labour market) to be filled from education and migration, under the current immigration system the skills barometer indicates that there will be a significant undersupply of labour at the medium skill levels (NQF 3-5). It forecasts that there will be balance at NQF level 2 and an oversupply below NQF level 2.
53. However, changes to the current immigration system which limit access to migrant workers are likely to have a negative impact on the forecast supply exacerbating the significant undersupply at levels 3-5 and potentially creating an undersupply at level 2 and lower.

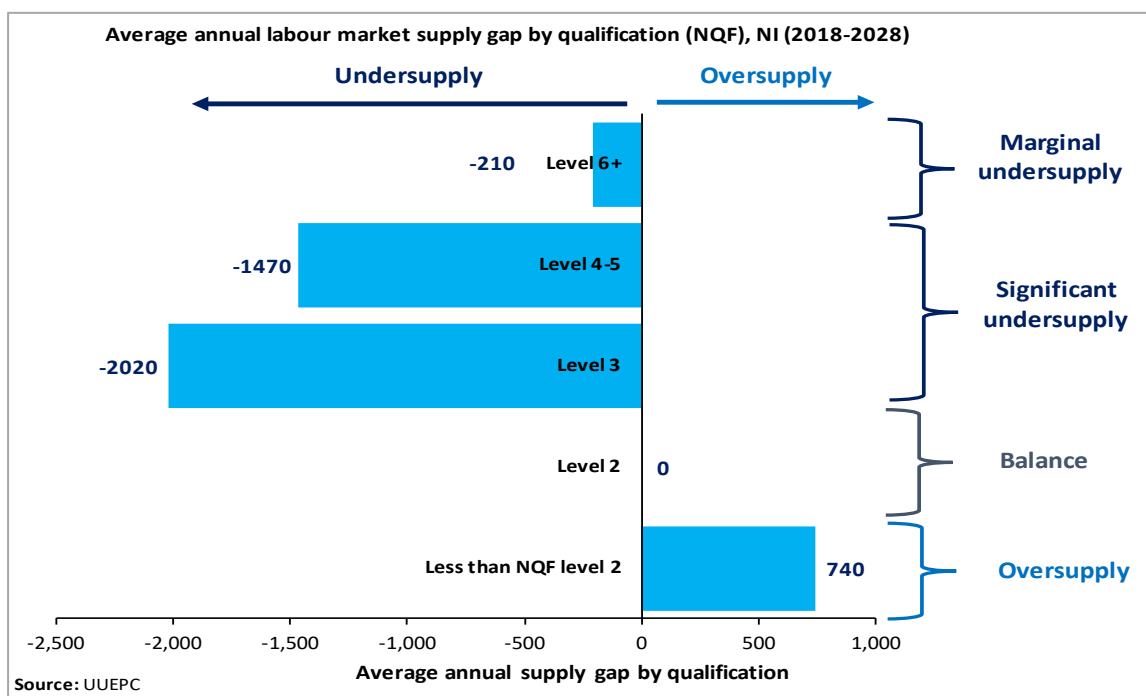


Table 15: Average annual labour market supply gap by Qualifications (NQF) NI 2018 -2028

Source: UUEPC

54. Breaking the net requirement down to sectoral level, the research estimates that the wholesale and retail sector will require the largest quantum of NQF level 3 and below qualifiers, accounting for 17% of the total net requirement. This is followed by manufacturing, including manufacturing of food products, (14%), restaurants and hotels (12%) and health and social work (10%).

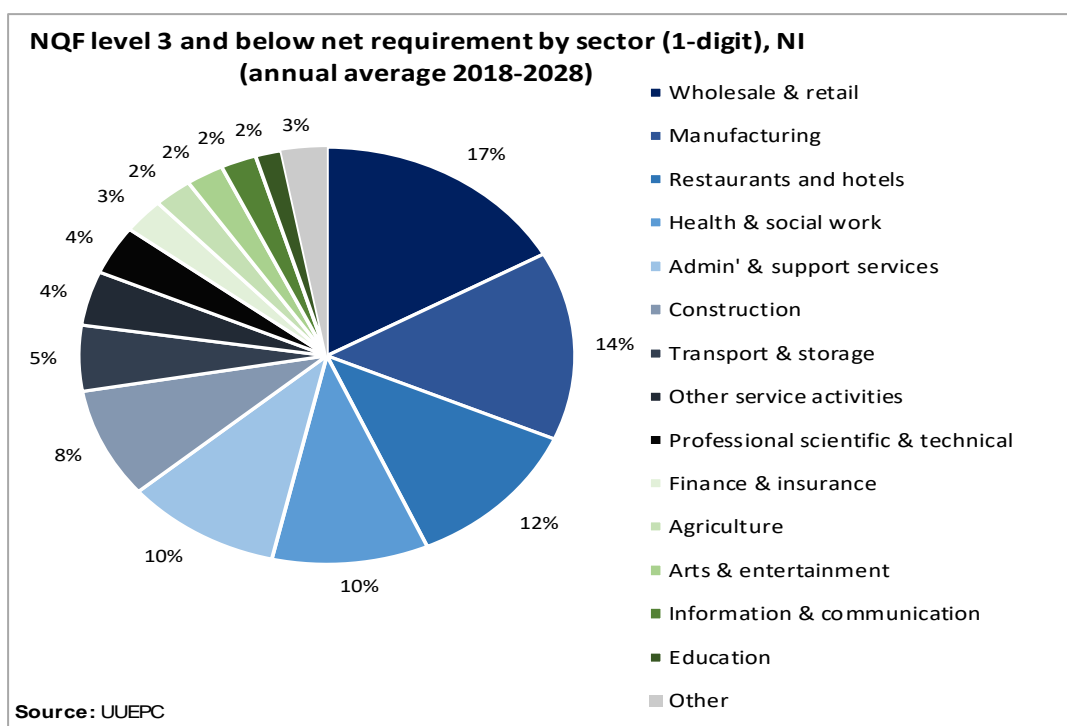


Table 16: NQF Level 3 and below net requirement by sector (1-digit) NI (annual average 2018-2028)

Source: UUEPC

Competitiveness within the All-Island Economy

55. The commitments to support the all-island economy within the Joint Report from the EU and UKG¹⁶ in December 2017 remain relevant. As detailed in the NICS responses to the MAC¹⁷ ¹⁸ the following was raised, and remains a concern:

“Were Northern Ireland employers to find themselves in a scenario where they had access to skills and labour on a more constrained basis than their Republic of Ireland counterparts there is a very real risk of Northern Ireland employers being forced to relocate activity south of the land border to maintain their competitive advantage.”

¹⁶ [Joint Report](#)

¹⁷ [HOCS letter to Professor Alan Manning 2/11/17](#)

¹⁸ [HOCS letter to Professor Alan Manning 9/05/18](#)

56. As the only UK region sharing a land border with the EU, this provides an attractive route for EU migrant workers to move to the Republic of Ireland which will retain freedom of movement. The Republic of Ireland also does not carry the currency fluctuation risks of NI's sterling based economy, is the only other English speaking EU member state and has higher average wages than NI.
57. Proposed immigration restrictions will potentially incentivise EU26 migration to Ireland, providing a competitive advantage on access to labour and skills within the all-island economy and increasing the risk of NI business relocating in the Republic of Ireland. This is supported by the findings of the recent NICCI survey¹⁹ which shows that to mitigate the potential impacts of EU Exit, 21% of businesses are expanding investment plans outside of NI and 14% have scaled down recruitment plans within NI.
58. In addition, since Q2 2016 NI has exhibited a sharp decline in the numbers of EU26 migrants in employment (from 54,000 to 40,000 in Q2 2019) whilst equivalent numbers in Ireland have increased (201,000 to 222,000). There is therefore a material risk that the proposed salary threshold, and other restrictions, will serve to rebalance the push-pull factors facing EU workers in NI, leading them to seek employment and a higher return for their labour in the Republic of Ireland.
59. In fact, it may be that the proposed restrictions further compound a problem that has already started to materialise:
- Between Q2 2016 and Q2 2019, the number of EU26 workers in NI (excluding ROI) fell by 14,000 to 40,000 workers – a drop of 26%.
 - Over the corresponding period in the Republic of Ireland, employment of EU workers (excluding UK) increased by 21,000 workers²⁰.
 - The most recent NICCI Quarterly Economic Survey indicates growing issues with recruiting migrant labour with the proportion of companies reporting this as a challenge having grown from 5% in 2016 to 14% in 2017 and rising to almost a third in 2019.

¹⁹ [NI Chamber of Commerce Quarterly Economic Survey Q3 2019](#)

²⁰ [Central Statistics Office Labour Force Survey](#)

Case Studies

60. As discussed, to further illustrate the potential impacts of the proposals in the Future Skills-Based Immigration System White Paper, DfE has submitted evidence to UKG from local employers presented as case studies.
61. Due to the sensitive nature of the content, the case studies have not been made available publically, however, the detail seeks to provide real world assessments of NI employers, and how businesses believe they will be impacted by restricted access to low and mid-level skills.
62. Key themes that emerge from case studies provided to date, and raised during ongoing stakeholder engagement are:
- A proposed £30,000 salary threshold is not achievable by many NI employers
 - The temporary worker route is not compatible with allowing staff to develop and progress.
 - Companies will not be able to recoup training and development costs through increased skills and efficiencies due to an increased level of churn.
 - Reduced labour pool as the temporary route is unattractive to migrants.
 - Additional recruitment costs.
 - The proposed period of 12 months is too short.
 - A preference for a pathway to the Skilled Worker Route.

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Table 7	Median Private Sector Full time Salaries by Region	Annual Survey of Hours and Earnings (2018), Office for National Statistics
Table 8	% Difference in Public/ Private Median salaries across the UK regions	Annual Survey of Hours and Earnings (2018), Office for National Statistics
Table 9	Full time Median Salaries for NI and UK in NI Priority Sectors	Annual Survey of Hours and Earnings (2018), Office for National Statistics
Table 10	Distribution of NI Gross Yearly Income for NI Priority Sectors (£)	CBI (NI) based on Annual Survey of Hours and Earnings (2018), Office for National Statistics
Table 11	Distribution of UK Gross Yearly Incomes in NI Priority Sectors (£)	CBI (NI) based on Annual Survey of Hours and Earnings (2018), Office for National Statistics
Table 12	NI skill levels with supply deficits	Northern Ireland Skills Barometer (2017) / DfE Analytical Services Division

Table 13	% of existing employee jobs with salaries greater than or equal to the 25th percentile of their occupation or £30,000 (whatever is greatest) grouped by RQF level of the occupation and region	Calculations using ASHE (2017)
Table 14	Annual Average gross demand by qualification (NQF), 2018-2028	UUEPC
Table 15	Average annual labour market supply gap by Qualifications (NQF) NI 2018-2028	UUEPC
Table 16	NQF Level 3 and below net requirement by sector (1-digit) NI (annual average 2018-2028)	UUEPC