



Llywodraeth Cymru  
Welsh Government

---

# Wales position paperon migration

---

## **Introduction**

The UK's future migration policy is of profound importance to Wales. It will have significant impacts on our future, economy, communities and culture. Any reform must take into account the needs of Wales.

This position paper sets out a united Welsh position on a number of key issues. These priority issues have been agreed by representatives of various sectors, including manufacturing, higher education, tourism, retail, steel, agri-food and public services, including Local Government, the NHS and social care, and Welsh Government. A list of signatories can be found at the end of this paper.

## **Position paper**

### **Reduce or remove the £25,600 salary threshold**

Setting the threshold for eligibility to apply for a work visa at an annual salary of £25,600 for a full-time employee would still severely constrict labour supply in many sectors in Wales. These include manufacturing, higher education, tourism and hospitality, culture and the arts, health and social care.

If a salary threshold must be set, then it would be far simpler to set one threshold of £20,000. This would go a long way to protecting public services and businesses in Wales from the shock which ending free movement of labour will cause. It would also reflect the proposed reduction in skill level for a Tier 2 visa to RQF 3 and above as outlined in the UK Government's policy statement on the points-based immigration system published 19 February.

Finally, but significantly, it will also be important that any future threshold can be calculated on a pro-rata basis. Without a pro-rata allowance, part-time workers – predominantly women - will face discrimination under the new immigration system.

### **The new Immigration system must be at low cost and administrative burden**

We are concerned that the new visa based migration system could significantly drive up costs and exacerbate recruitment difficulties in future, particularly for the many businesses who have exclusively recruited employees in the past from within the EU. We are particularly concerned about the level of cost associated with the Immigration Skills Charge, Immigration Health Surcharge and the investment that will be required to upskill in-house teams to deal with the volume of immigration applications or the additional costs of employing immigration consultants. The new system must be simple and easy to use, and should not create significant and costly financial and administrative burdens on businesses. It should also be accessible to start-ups and small and medium sized enterprises and businesses, who may not have the financial resources, or robust human resources systems and policies in place to apply for (or maintain) a sponsor licence.

### **An unsponsored route which provides a permanent route to settlement**

The Welsh economy continues to need a range of international workers from across the skills spectrum. The seasonal agricultural workers scheme will have a limited effect in Wales because there is little demand for seasonal workers; the demand in Wales is for workers all year round.

We ask the UK Government to provide for an unsponsored visa with a route to settlement if an individual is able to upskill to RQF 3+ during this time. This would be consistent with the proposed idea of a points-based system in which having a job offer would be only one criterion.

We also believe that a future immigration system should not be implemented on the basis of criteria which deter people who are intending to work on a self-employed basis.

## **Demographically different**

The population of Wales is projected to decrease in the longer-term and, with the working age population projected to grow more slowly than in England. This would give rise to a specific risk to the future workforce and Welsh tax base and would also have broader implications for future Welsh relative economic performance and for Welsh society. We believe there is a case for the future migration system, particularly if points-based, to reward potential migrants who wish to move to Wales and other parts of the UK facing similar demographic challenges.

## **Transition Period**

Employers, both private and public sector, need certainty about migration rules with a reasonable level of notice before they come into force. We do not believe that the UK Government can design and implement a new system of future migration which recognises the needs of the whole of the UK, including Wales, in the time available. We need to allow businesses and other organisations time to prepare which means that the UK Government must allow for a realistic transition period to the new system.

## **Ensure migrants are aware of their rights and have them upheld**

The risks of exploitation faced by migrant workers is well-documented. Any changes to the migration system must seek to redress this, including by making sure that migrant workers are aware of their rights in the UK and how they can be enforced. Governments should also work with social partners to address this exploitation through strategic intervention, to tackle the exploitation of workers and recognise the fact that these practices disadvantage good employers.

New migration requirements must not lead to an increase in discrimination, further strains on public services or shortages in vital jobs. We need an approach that ensures that nobody's rights at work are undermined and everyone has access to decent public services.

## **List of organisations signed up to the Wales position paper on migration**

- Arts Council Wales
- Care Forum Wales
- Federation of Small Businesses
- Food and Drink Wales Industry Board
- Race Council Cymru
- Royal College of Nursing Wales
- Social Care Wales
- South Wales Chamber of Commerce
- TUC
- Universities Wales
- Wales Council for Voluntary Action
- Welsh Local Government Association
- Welsh NHS Confederation
- Wales Tourism Alliance