ADDRESS

Date

Dear xxxx

**UK’s future skills-based immigration system**

In response to the White Paper UK’s future skills-based immigration system, representatives of Scotland’s culture sector (through working with Culture Counts) have come together and produced eight clear recommendations for the Home Office. The recommendations (enclosed) refer to both the current and proposed immigration systems and are outlined with a view to enabling the culture sector to sustain and develop the UK’s global outlook at this crucial time, while minimising industry damage to the cultural economy as a result of Brexit. I hope they are taken forward as a matter of urgency.

The UK’s creative industries are a global success story, and the contribution of the culture sector in stimulating flows of talent, ideas and investment between market and non-market segments of our creative ecosystem must not be underestimated. By enabling us to express ourselves and share ideas, culture allows us to understand each other, connect with people all over the world and imagine new futures. Despite this difficult time in UK political history - which is eroding our reputation as a creative partner of choice throughout the EU and beyond - we as a sector are doing our best to maintain relationships, to collaborate, and to share experiences and stories as widely as we can. Culture Counts are calling on the UK Government to ensure that the future immigration system continues to enable cultural life to thrive with international collaboration as an integral part.

Culture Counts members are not affiliated to any political party, the recommendations are purely practical. Throughout our collaborative working on the specific recommendations enclosed, a number of broader themes came up from Culture Counts members which need to be taken into account in the design of the UK’s future skills-based immigration system.

* In policy development it will be important for the UK Government to **take into account economic, social and cultural benefits to the UK from international mobility**: focusing purely on economic benefit in the traditional sense of direct contributions to GDP is short-sighted. The UK is number one in the Portland Soft Power Index; enterprise, digital and cultural assets make the UK an attractive place to start a business, to visit, to live, work or study. By listening to and supporting the culture sector to produce high quality work and increase innovation, the government will improve the likelihood of attracting business, visitors, students and workers to the UK.
* The culture sector is made up of SMEs for whom the **administrative costs of working with employees or freelancers from outside the UK can easily be prohibitive,** so a good level of service and transparency should be available to all as standard. This innovative sector is driven by the exchange of new ideas, but the boost to the UK’s reputation and quality of life does not translate directly into increased turnover, so cultural organisations cannot make the case to pay £8000 to access premium services with a named case-handler. Furthermore, the lack of the ability to track an application often means that potential issues are not raised until it’s too late for evidence to be submitted as a solution.
* The proposed immigration system must have a **viable route for mobility of freelancers**, who make up 35% of the creative industries workforce overall, often in specialist areas where international careers are standard. Culture Counts supports the Creative Industries Federation recommendation for the introduction of a [Freelancer Visa](https://www.creativeindustriesfederation.com/sites/default/files/2018-11/Fed.%20Freelance%20Visa%20Proposal.pdf) which would streamline requirements and enable arms-length industry bodies to provide assurance.
* The **evidential requirements of the current system are unnecessarily onerous and lack understanding of global cultural norms**. For example, performers from India are often paid in cash and therefore don’t have bank statements that prove their salary status.
* Future **evidence requirements should be based on a data-driven risk assessment of the likelihood of abscondment** for cultural business visitors rather than being over-engineered. The Home Office must recognise the economic impact of reputational damage caused to the sector: for example, when high-profile artists due to appear at festivals and events fail to secure visas at short notice. The international culture community watch these incidents on social media, causing further disincentives to international collaboration with UK producers and distributors.
* UK policy should be flexible enough to **recognise the dynamics of international mobility across all nations and regions**. International flows are more important for cultural, social and economic development in Scotland because we are further away from international travel routes, less urbanised and less ethnically diverse than England.

Yours sincerely,

Name

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02/04/2019

**Call to Action to the UK Home Office:** In response to the UK’s future skills-based immigration system, Scotland’s culture sector came together and produced eight clear recommendations for the Home Office. The recommendations refer to both the current and proposed immigration systems and are outlined with a view to minimising industry damage to the cultural economy as a result of Brexit. We hope they are taken forward as a matter of urgency.

**Key recommendations:**

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| **1** Improve motivation to come to the UK as a cultural entrepreneur. Our innovative sector is driven by new ideas; we benefit from diversity in the sector for example in mainly self-employed disciplines like producer, graphic or sound design. **Remove the requirement for £50,000 of investment funds under the Tier 1** (Entrepreneur) route, this is unrealistic and prohibitive, or introduce flexibilities to other routes that take account of the freelance workforce in creative industries. Reciprocal agreements for cultural entrepreneurs are also vital for the UK cultural sector to export their services, as they rely on a global market. | **2** **Introduce a competent body with knowledge and expertise of culture in Scotland, such as the Royal Conservatoire of Scotland,** to provide endorsements for Exceptional Talent, Start-up and Innovation Visas. Endorsement of cultural value should not be made outside of Scotland as interpretation is key to decision making. |
| **3** **Secure the ability of Cultural Services Specialists to move around** within the EU (45% of the current UK creative industries service exports go to the EU) and where possible internationally; within any Mode Four GATS agreements.  Cultural entrepreneurs require access to provide services in a similar way to specialist lawyers and accountants. | **4 Expand the Youth Mobility Scheme** to include EEA as well as countries who lead in areas where the UK have an industrial skills shortage. This will improve innovation in the UK; increase peer to peer learning and will provide opportunities for young UK cultural entrepreneurs; who will benefit from reciprocal agreements. |
| **5** **Extend Permitted Paid Engagement to three months.** PPE is a useful tool for the sector though one month is too restrictive. For example, one month would not cover a performer’s rehearsal time and 25-day run at the Fringe Festival followed by another engagement beyond Edinburgh to make their UK visit viable. Allowing people to stay longer benefits the diversity and attractiveness of UK cultural products; particularly for the sector outside London which struggles to attract people more regularly. | **6 Expand Permit Free Festivals list to include EEA, reduce the number of international performers to five, reduce audience numbers to ten-thousand.** This allows more festivals to benefit including many rural festivals; which may feature only four to five headline acts from out-with the UK. |
| **7** Distinguishing ‘high-risk’ and ‘low-risk’ by nationality is too simplistic, damages soft-power and reduces the productivity of SMEs with added overheads. **Data collection and analysis of the actual flight risk for cultural workers should inform the level of checks applied to future applications.** | **8** The salary threshold of £30,000 does not work for the UK cultural sector; particularly within the regions outside London. **Lower the salary threshold outside London.** |