

Evidence Submission by Fashion Roundtable to the Migration Advisory Committee in response to the open consultation on the Shortage Occupation List

24 June 2020

Executive Summary

In this document, Fashion Roundtable, the secretariat of the [All-Party Parliamentary Group \(APPG\) for Textiles and Fashion](#), and of the [APPG for Ethics and Sustainability in Fashion](#), submits evidence received from the fashion industry between 1-22 June 2020 to advocate for textiles, garment, footwear and other fashion occupations on the Shortage Occupation List, as a result to the call for evidence launched by the Migration Advisory Committee, appointed by the Government. The evidence added by the 21 participants in the Fashion Roundtable survey represents an estimated min. 2,500 employees from fashion design, manufacturing, trade and other related fashion services, with operations in the UK and overseas. The results of the survey show a highly-skilled industry with a shortage of occupations. The businesses require governmental recognition of both of these aspects. This evidence submission is meant to help for a better-informed decision in regards to the inclusion of fashion occupations, as described in this document, on the Shortage Occupation List. Fashion Roundtable welcomes any support to and engagement with the Migration Advisory Committee for a comprehensive Shortage Occupation List scheduled in September 2020.

[Fashion Roundtable](#) advocate for long term strategic and sustainable growth for the entire fashion industry in the global marketplace. The unique team of experts drawn from fashion, business, economics and politics consult on transformative solutions and strategies. Fashion Roundtable supports the diverse voices of the industry, creating the potential for long-term, inclusive, sector growth through policy, political intelligence, consultancy and events. Fashion Roundtable is a non-partisan, independent voice and [a recognised business representative organisation](#) for the support to the fashion industry through Covid-19 crisis.

Migration Advisory Committee call for evidence on the Shortage Occupation List

In March 2020, the Home Secretary has commissioned [the Migration Advisory Committee \(MAC\) to compile the UK Shortage Occupation List \(SOL\)](#), which will cover all occupations in

the RQF3-5 bracket (medium skills). As a result, the MAC has launched the "Shortage Occupation List: Call for Evidence" open until 24 June 2020, end of the day, to hear organizations' views on:

- The roles that are being filled by migrant workers;
- The salaries they are paid;
- The implications of the potential changes.

The MAC will report their recommendations to the Government in September 2020 and it will be for the Government to decide on the SOL following the MAC recommendations.

Fashion Roundtable advocacy for fashion occupations on the SOL

[Fashion Roundtable and the All-Party Parliamentary Group \(APPG\) for Textiles and Fashion have urged the fashion industry](#) to submit answers to the MAC consultation on the SOL, thus to highlight the importance of the EU migrant workers for the UK businesses and the need to include fashion industry's job profiles on the SOL.

The UK has left the EU and in consequence, from January 2021, EU-citizens willing to work in the UK will have to comply with the [new points-based immigration system](#). Adding textiles, garments, footwear and jewellery occupations on the SOL will enable the development of the fashion sector in the UK through more flexible access to the skilled-workers for occupations in shortage in the UK when the transition period ends in December 2020.

Submission of evidence by Fashion Roundtable to the Migration Advisory Committee

From the 1st of June to the current date, the 22nd of June 2020, [Fashion Roundtable and the APPG for Textiles and Fashion have launched a survey to gather evidence from the fashion businesses and professionals](#) in support to advocate for adding the fashion occupations on the SOL. The survey is meant to facilitate adding fashion's voice for this matter in a short survey that covers the main points from the original MAC call for evidence:

- The rate of turnover in the employment of garment workers;
- The numbers of workers who are from the EU and EEA;
- The time needed to train workers and typical salaries (workers will not qualify for sponsorship without being on the SOL);
- Salary information, since the quota to obtain 20 points in the point-based immigration system is £25,600;
- What actions were taken to meet shortages by training domestic workers and to give an indication to the MAC of an expected timeline for shortages being able to be potentially met with domestic labour after a role has been added to the SOL.

The 21 [responses](#) to the current date, the 22nd of June 20202, to Fashion Roundtable and the APPG for Textiles and Fashion survey on the SOL survey are summarised below and are meant to serve as evidence from the fashion industry for the MAC consultation on the SOL:

Q1: What does best describe your business?	
43% of respondents are fashion designers 19% do all the following: fashion designer, manufacturing and trade 19% offer other fashion-related services 14% do only trade with fashion products 5% of respondents do solely fashion manufacturing	
Q2: Are you a UK textile, garment, footwear and fashion manufacturer?	
29% responded they are a UK manufacturer 9.5% are both and UK and overseas manufacturer 1% responded that are solely an overseas manufacturer	
Q3: How big is your organisation?	
62% are 0-10 employees 19% are 10-100 employees 9.5% are 100-500 employees 9.5% are more than 500 employees	
Q3: Would you consider sourcing workers from the EU from 1st of January 2021, under the new points-based immigration system, at a starting salary rate of £25,600 per year?	
43% have responded YES 38% have responded NO 19% don't know	
Q4: Would you consider sourcing workers from the EU from 1st of January 2021, under the new points-based immigration system, if workers are on the SOL, and therefore at a starting salary rate of £20,480 (minimum)?	
71% have responded YES 14% have responded NO 14% don't know	
Q5: Which of the following occupations you think should be on the Shortage Occupation List? *The survey used SOC2010	
Vote of participants:	Examples of occupations:

86% SOC 5419 Textiles, garments and related trades <i>*marked RQF3/lower-skilled in Immigration Rules</i>	Clothing manufacturer, Embroiderer, Hand sewer, Sail maker, Upholstery cutter
81% SOC 5414 Tailors and dressmakers <i>*marked RQF3/lower-skilled in Immigration Rules</i>	Cutter (hosiery, knitwear mfr), Dressmaker, Fabric Cutter, Tailor, Tailoress
71% SOC 5413 Footwear and leather working trades	Cobbler, Leather worker (leather goods mfr), Machinist (leather goods mfr), Shoe machinist, Shoe repairer
67% SOC 8113 Textile process operative <i>*marked lower-skilled in Immigration Rules</i>	Hosiery worker, Machinist (rope, twine mfr), Process worker (textile mfr), Spinner (paper twine mfr)
52% SOC 5411 Carpet weavers	Carpet weavers, Knitter, Knitwear manufacturer, Weaver
52% SOC 3422 Product, clothing and related designers	Design consultant, Fashion designer, Textile designer
43% SOC 8137 Sewing machinists <i>*marked lower-skilled in Immigration Rules</i>	Overlocker, Seamstress, Sewing machinist, Stitcher, Upholstery machinist
38% SOC 5412 Upholsterers	Curtain fitter, Curtain maker, Soft furnisher, Trimmer (furniture mfr),
38% SOC 7125 Merchandisers and Window Dressers <i>(closest for Fashion Stylist found on SOC2010 by ONS)</i>	Fashion Stylist, Personal Fashion Stylist
29% SOC 5449 Other skilled trades	Diamond mounter, Engraver, Goldsmith, Silversmith, Wig maker

Q6: What is the number of workers who are from the UK, EU and EEA in your organisation?

Range: 0-5 employees
13 have UK employees in this range
15 have EU employees in this range
19 have EEA employees in this range

Range: 5-20 employees
3 have UK employees in this range
2 have EU employees in this range

Range: 20-100 employees
3 have UK employees in this range
4 have EU employees in this range
2 have EEA employees in this range

Range: 100-500 employees
0 responses

Range: More than 500 employees
2 have UK employees in this range

Q7: From 1 to 5 how would you rate the skills-level required for textiles, garment, footwear and fashion workers? (1 being lower-skilled and 5 being high-skilled)

57% have responded highly-skilled
38% have responded skilled
5% have responded medium-skilled

Q8: Is it rather difficult or easy to recruit talent in your organisation for the occupations mentioned above? (Difficult being more than 6 months for recruitment)

Recruiting designer workers
11 have responded it is difficult finding talents
6 have responded it is easy finding talents

Recruiting footwear workers
5 have responded it is difficult finding talents

Recruiting tailors and dressmakers
8 have responded it is finding talents
3 have responded it is easy finding talents

Recruiting textiles and garment workers
11 have responded it is difficult finding talents
3 has responded it is easy finding talents

Recruiting other skilled trade (jewellery) workers
1 has responded it is difficult finding talents

Recruiting textile process operative
7 have responded it is difficult finding talents
3 has responded it is easy finding talents

Recruiting sewing machinists
5 have responded it is difficult finding talents
1 has responded it is easy finding talents

Recruiting fashion stylists
4 have responded it is difficult finding talents
10 has responded it is easy finding talents

Q9: How many months are needed to train a worker at the required skills level in your organisation? Please mention the occupation (job).

Answers without specifying the occupation:

1 month, 2 months, 3-6 months, 12 months, 12+ months, 18+ months, 36-48 months.

Answers specifying occupation:

36 months: textile machinist

6-12 months: young stylist assistant

6 months: designer developer

3 months: machinist from basic to a high standard

Several years for any role - especially workers making products, it requires a lot of practice and the exposure to all the different types of skill needed to fully be able to manufacture even just a few different products in a specific category to the required standard.

Q10: How do you manage recruitment challenges in your organisation?

76% Keep the vacancy open until finding the right person

14% Employ someone that does not have skills for the job

9.5% Other

Q11: Do you feel your costs for training new staff have increased due to a lack of skilled workers?

71% have responded YES

19% have responded YES

9.5% don't know

Q12: Yearly salary rate per ENTRY-level worker in your organisation? (without bonus)

43% up to £20,480

29% up to £18,500

14% between £23,480 to £23,039

14% between £23,040 to £25,599

0% for £25,600 or above

Q13: Yearly salary rate per EXPERIENCED-level worker in your organisation? (without bonus)

57% for £25,600 or above

24% between £23,040 to £25,599

14% up to £20,480

Q14: Would you like to add anything else?

Responses quoted below:

We are also based in the south of the UK which has even less Skilled garment machinists.

The fashion industry also includes skilled PRs, marketing, branding and consultants at an advisory level none of whom are listed here but are very important to the industry. Gaining experience at big European houses often means that these people themselves are European. A creative industry thrives on global collaboration and a skilled, experienced workforce.

Observations from the Survey

Most of the respondents 43%, are from the design segment which reflects the UK fashion industry's reality overall and fashion in the education system. There are world-famous fashion design courses in the UK but not sufficient talent development in textiles and fashion manufacturing.

Most of the respondents 62%, are micro-enterprises with 0-10 employees meaning they are less resilient to the increasing training costs of new employees that lack the necessary skills, which was felt by 71% of the respondents in the survey.

The majority of respondents 71%, would employ EU workers in the new points-based immigration system if the salary rate is at £20,480 (SOL route salary threshold to gain 20 points), compared to 43% of participants if the salary rate is at £25,600 per year (skilled-worker route salary threshold to gain 20 points). If the occupations are not on the SOL, it could risk decimating the fashion industry development opportunity by almost half.

The majority of respondents 57%, consider their workers as highly-skilled to be fit-for-purpose in their job. This observation highlights disparities with the [Immigration Rules Appendix J](#) understanding of the skills needed in the fashion occupations.

The majority of respondents 76%, would keep a vacancy open until finding a worker with the required set of skills, compared to 19% that would employ a worker not having the required set of skills. This demonstrates the existent limitations for development and scaling-up of most businesses in the fashion sector, to which the constraints to access workers in the new points-based immigration system would add additional challenges.

Quoted evidence from the fashion industry informs that it takes between several months to several years to train textile machinists and workers making products. The industry's insights demonstrate that textile, garment jobs are skilled and require long-term training.

Recommendations in line with the Observations from the Survey

Skills-related

Recommendation 1

To acknowledge the shortage of occupations in the fashion industry, as demonstrated by the survey's sought jobs on the SOL by the fashion industry:

86% voted for SOC 5419 Textiles, garments and related trades,

81% voted for SOC 5414 Tailors and dressmakers,

71% voted for SOC 5413 Footwear and leather working trades,

67% voted for SOC 8113 Textile process operative,

52% voted for SOC 5411 Carpet weavers,

52% voted for SOC 3422 Product, clothing and related designers,

43% voted for SOC 8137 Sewing machinists,

38% voted for SOC 5412 Upholsterers,

38% voted for SOC 7125 Merchandisers and Window Dressers (closest for Fashion Stylist)

29% voted for SOC 5449 Other skilled trades.

Recommendation 2

To acknowledge the burden of lack of candidates and training-costs felt by businesses due to lack of skills in the fashion industry demonstrating the need for these occupations on the SOL.

Recommendation 3

To acknowledge the fashion industry's evidence submitted and as a result to add ALL (not in part) occupations under the following SOC2010 in the RQF3 skills-level bracket. This will enable occupations enrolment for skilled-worker route and be considered for the SOL. Current status in the Immigration Rules Appendix J and in the [MAC Guide to shortage occupation list](#):

SOC 5414 Tailors and dressmakers (RQF3/lower-skilled in Immigration Rules)

SOC 5419 Textiles, garments and related trades (RQF3/lower-skilled in Immigration Rules)

SOC 8113 Textile process operative (lower-skilled in Immigration Rules)

SOC 8137 Sewing machinists (lower-skilled in Immigration Rules)

Recommendation 4

To consider adding fashion manufacturing occupations on the SOL to maintain equilibrium on the labour market between the domestic offer of fashion design jobs and access to fashion manufacturing occupations.

Salary-related

Recommendation 5

To acknowledge that the fashion businesses are urging the Government to add textiles, garment, footwear occupations on the SOL list, allowing them to access workers, domestically in shortage, at a rather feasible salary rate threshold of £20,480/year.

Fashion Industry's contribution to the UK economy and conclusion

The UK fashion manufacturing and retail businesses generated about 83,9bn turnover in 2019 and [according to 2019 ONS data](#) there were remarkably about 36,850 fashion manufacturing and retail businesses employing about 630,700 people across the UK in 2019. The influential fashion industry is an important part of the UK economy with [exports in 2019](#) worth £14.5bn in clothing, footwear and jewellery goods. The textile and fashion industry has always proved resilient, and in light of Covid-19, the discussions for onshoring have intensified. Hence, the UK leaving the EU and the implementation of the new points-based immigration system are needed to create an accommodating environment to welcome the opportunities for further development in the fashion industry.