

CEO Council

Energy & Utility Skills Partnership (EUSP)

Venue:	Online
Date:	Wednesday 7 October 2026
Time:	13:30 – 14:30
Co-Chairs:	Nicola Connelly and Andrew Findlay
Please Read:	The enclosed papers
Desired Outcome(s):	As stated in the recommendation(s) of each cover paper.
Attendees:	CEO Council members
Apologies:	TBC

Agenda:

No:	Time:	Agenda item:	Responsible:	Purpose:
1	13:30 – 13:40	Welcome and introductions of new Council members	Co-Chairs	
2	13:40 – 14:20	Critical Workforce and Migration	Paul Cox	Consider and decide
3	14:20 – 14:30	Decisions, actions, delegated authority and timelines	Co-Chairs	Approve

Critical Workforce and Migration

EUSP CEO Council Meeting:	07.10.26
Agenda Item:	2
Author:	Paul Cox
Purpose:	1. To consider the UK, sector and member risks and opportunities arising from critical workforce and migration policy. 2. Decide how the Energy & Utility Skills Partnership (EUSP) will deliver the 2026/27 P2 priority. 3. Confirm how EUSP will respond to the Home Affairs Committee inquiry into work-based immigration.
Appendices:	1. 2026 Migration Advisory Committee recommendation outcomes. 2. First draft (and pre-October EUSP CEO Council meeting) Home Affairs Committee inquiry response.
Recommendations:	That the EUSP CEO Council: 1. Notes the 2026 Migration Advisory Committee recommendation outcomes. 2. Approves either option 2 or 3 for delivery of the 2026-27 EUSP P2 priority. 3. Tests and informs the development of the EUSP Home Affairs Committee inquiry response. 4. Commits members to provide first-hand testimony, case studies, company evidence and data to test, evidence and strengthen the EUSP Home Affairs Committee inquiry response. 5. Delegates final approval of the EUSP response to the Group Chief Executive of Energy & Utility Skills Group, following assurance by the EUSP CEO Council Co-Chairs.

Executive Summary:

1. The Migration Advisory Committee (MAC) was established in 2007 to provide independent advice to Government on migration policy. Over a number of years, Energy & Utility Skills Group (EUSG) has led and represented the workforce interests of Energy & Utility Skills Partnership (EUSP) members through engagement with MAC.
2. The policy framework has become materially more demanding. Assessment now extends beyond evidence of occupational shortage to consider an occupation's strategic importance, the strength of the evidence of current and future shortage, and whether credible plans exist to increase the domestic workforce and reduce reliance on overseas recruitment. This represents a material change from past approaches and creates a higher evidential threshold for sectors seeking future access to international recruitment.
3. **June 2026:** Recognising this change in approach and the higher evidential threshold being applied, the EUSP CEO Council proactively approved this as a [P2 priority for 2026/27](#), ensuring that the sector could develop the evidence and workforce plans required to make a credible case in the future.
4. **July 2026:** [MAC recommended 28 occupations](#) for inclusion on the Temporary Shortage List (TSL), following assessment of shortage, domestic workforce plans and their relevance to Government priority sectors and critical infrastructure. These remain recommendations for Government rather than changes to the Immigration Rules.
5. **September 2026:** The Home Affairs Committee launched a [new inquiry into work based immigration](#), with written evidence due by 27 October 2026. The inquiry will examine the Skilled Worker route, how occupations are selected for work visas, the relationship between immigration and skills policy, and when migration should form part of the response to labour shortages.
6. Decisions taken at the October CEO Council meeting will therefore be consequential. EUSP represents employers who collectively employ more than 200,000 people, support hundreds of thousands more across their supply chains and turnover more than £120 billion annually. Council is therefore well placed to shape how future critical workforce decisions are evidenced. The opportunity is to connect workforce demand, domestic recruitment and training, routes to competence and the residual case for targeted international recruitment. The Home Affairs Committee inquiry provides an immediate opportunity to test this against direct employer evidence and present a credible sector position to Parliament.

2026 Migration Advisory Committee recommendation outcomes:

7. Appendix 1 shows the 2026 Migration Advisory Committee recommendations. This appendix lists all 82 occupations considered by MAC at Stage 2. A blank cell indicates that the stated criterion did not apply. EUSG evidence may relate either to the complete occupational group or to specified roles within that group. The table below summarises the appendix 1 information.

Total occupations considered	82
Occupations covered by government jobs plans	46
MAC recommended for TSL Note: all within those covered by jobs plans	28
MAC recommendations as a proportion of total occupations considered	34%
MAC recommendations as a proportion of occupations covered by Jobs Plans	61%
EUSG occupation evidence provided	21
EUSG occupations recommended by MAC	15
Proportion of EUSG-evidenced occupations recommended by MAC	71%

8. The outcomes demonstrate the increased evidential threshold. All 28 occupations recommended by MAC were among the 46 covered by Jobs Plans, reinforcing the importance of combining robust shortage evidence with credible plans to strengthen domestic workforce supply.

9. The EUSG evidence also performed strongly: 15 of the 21 occupations for which EUSG provided evidence were recommended by MAC, representing 71% of the occupations supported by EUSG evidence. This provides a positive indication that the partnership is identifying and evidencing critical workforce pressures effectively, while the occupations not recommended highlight where stronger evidence and workforce action may be required in the future.

Priority P2 delivery options:

Option	1. As current	2. Expand Delivery Board remit	3. Introduce specific Group
Summary	Ad hoc and reactive to MAC calls for evidence and process	Add critical workforce and migration to the Delivery Board terms of reference. CEO Council retains final strategic approval.	Specific and focused group to systematically gather evidence, recognise investments and work on a rolling 24-month cycle.
Leadership	None	Delivery Board Co-Chairs and Director of Membership & Strategic Engagement	Group Chief Executive supported by dedicated post
Strengths	No new governance, resource or cost.	Uses existing EUSP governance and avoids creating another group. Provides greater structure than the current approach.	Dedicated senior focus and clear accountability. Creates a continuous evidence base rather than responding periodically. Connects workforce demand, employer evidence, domestic interventions, routes to competence and migration. Maintains readiness for future MAC activity.
Weaknesses	Reactive rather than systematic. No clear accountability or continuous evidence cycle. Does not deliver the structured approach approved under P2.	Adds a significant strategic priority to an existing delivery forum. Critical workforce and migration would compete with wider Skills Strategy delivery priorities. Less dedicated capacity to maintain a continuous evidence and intervention cycle.	Creates an additional governance group and requires senior employer participation. Requires dedicated capacity and additional funding.
Cost	None	None	Indicative £60,000 for dedicated specialist capacity, of which EUSG will fund the first £15,000.
Recommendation	Not recommended, inconsistent with P2 priority	Recommended. Provides a structured approach through existing EUSP governance.	Recommended. Provides a structured approach through a dedicated, focused capability.

First draft of the Home Affairs Committee inquiry response:

10. Appendix 2 provides the first draft EUSP response to the Home Affairs Committee inquiry. It has been prepared ahead of the October CEO Council meeting to enable members to test, challenge and strengthen the proposed sector position before submission.

11. The central proposition is that immigration should form part of a wider critical workforce system, rather than operate as a standalone response to shortages. The draft seeks to connect evidenced workforce demand, domestic recruitment and training, routes to occupational competence, employer action and the residual requirement for targeted international recruitment. This is consistent with the critical workforce approach previously developed, in which EUSG workforce intelligence identifies constraints, employers validate their scale, timing, geography and causes, and EUSP determines the appropriate intervention.

12. In policy terms, the proposed direction is to:

Move immigration policy from blunt national thresholds and periodic shortage assessments towards a dynamic, occupation-led critical workforce system that links evidenced demand, domestic workforce action, time to competence and targeted international recruitment.

13. Council members are asked to test this proposition and provide first-hand testimony, case studies, company evidence and data that can substantiate or challenge the draft response. In particular, evidence is sought on:

- Current and emerging occupational shortages;
- Domestic recruitment and workforce investment;
- Time and infrastructure required to achieve occupational competence;
- Constraints on training, assessment and workforce supply;
- Impact of infrastructure and regulatory investment cycles;
- Competition for occupations across sectors;
- Productivity and technology interventions;
- Where international recruitment remains necessary after domestic interventions are considered; and
- Treatment, retention and protection of internationally recruited workers.

14. Council members are asked to send evidence to collaborate@euskills.co.uk with the Subject: Evidence - Critical Workforce and Migration – EUSP Home Affairs Committee inquiry response

15. The final response will therefore distinguish between policy proposition and employer evidence. Where significant claims cannot be supported through EUSG research, published evidence or direct member evidence, they will be qualified or removed before submission.

16. Subject to recommendation 5, the final response will be approved by the Group Chief Executive following assurance by the EUSP CEO Council Co-Chairs and ahead of the 27 October deadline.

END

Occupations that MAC considered (for Stage 2)	Covered by jobs plans	MAC recommended for TSL	EUSG recommended role(s) within occupation group	EUSG names job titles within SOC
5249: Electrical and electronic trades n.e.c.	Yes	Yes	Yes	Overhead Lines Worker role only
3112: Electrical and electronics technicians	Yes	Yes	Yes	Whole occupation is recommended for the TSL
3113: Engineering technicians	Yes	Yes	Yes	Whole occupation is recommended for the TSL
3544: Data analysts	Yes	Yes	Yes	Whole occupation is recommended for the TSL
5213: Welding trades	Yes	Yes	Yes	Whole occupation is recommended for the TSL
5221: Metal machining setters and setter-operators	Yes	Yes	Yes	Whole occupation is recommended for the TSL
5241: Electricians and electrical fitters	Yes	Yes	Yes	Whole occupation is recommended for the TSL
5242: Telecoms and related network installers and repairers	Yes	Yes	Yes	Whole occupation is recommended for the TSL
5313: Bricklayers	Yes	Yes	Yes	Whole occupation is recommended for the TSL
5314: Roofers, roof tilers and slaters	Yes	Yes	Yes	Whole occupation is recommended for the TSL
5315: Plumbers & heating and ventilating installers and repairers	Yes	Yes	Yes	Whole occupation is recommended for the TSL
5316: Carpenters and joiners	Yes	Yes	Yes	Whole occupation is recommended for the TSL
5321: Plasterers	Yes	Yes	Yes	Whole occupation is recommended for the TSL
5322: Floorers and wall tilers	Yes	Yes	Yes	Whole occupation is recommended for the TSL
5330: Construction and building trades supervisors	Yes	Yes	Yes	Whole occupation is recommended for the TSL
5319: Construction and building trades n.e.c.	Yes	Yes		Building Envelope Specialists and Curtain Wall Installer roles only
3114: Building and civil engineering technicians	Yes	Yes		Whole occupation is recommended for the TSL
3116: Planning, process and production technicians	Yes	Yes		Whole occupation is recommended for the TSL
3120: CAD, drawing and architectural technicians	Yes	Yes		Whole occupation is recommended for the TSL
3133: Database administrators and web content technicians	Yes	Yes		Whole occupation is recommended for the TSL
3512: Ship and hovercraft officers	Yes	Yes		Whole occupation is recommended for the TSL
5211: Sheet metal workers	Yes	Yes		Whole occupation is recommended for the TSL
5212: Metal plate workers, smiths, moulders and related occupations	Yes	Yes		Whole occupation is recommended for the TSL
5214: Pipe fitters	Yes	Yes		Whole occupation is recommended for the TSL
5223: Metal working production and maintenance fitters	Yes	Yes		Whole occupation is recommended for the TSL
5235: Boat and ship builders and repairers	Yes	Yes		Whole occupation is recommended for the TSL
5323: Painters and decorators	Yes	Yes		Whole occupation is recommended for the TSL
8113: Chemical and related process operatives	Yes	Yes		Whole occupation is recommended for the TSL
3541: Estimators, valuers and assessors	Yes		Yes	Estimator role only
5246: Electrical service and maintenance mechanics and repairers			Yes	Industrial Maintenance Electrician role only
3543: Project support officers			Yes	P6 Planner role only
5250: Skilled metal, electrical and electronic trades supervisors	Yes		Yes	Whole occupation is recommended for the TSL
5312: Stonemasons and related trades			Yes	Whole occupation is recommended for the TSL
8143: Routine inspectors and testers			Yes	Whole occupation is recommended for the TSL
1243: Managers in logistics	Yes			
3111: Laboratory technicians	Yes			
3115: Quality assurance technicians	Yes			
3414: Dancers and choreographers	Yes			
3415: Musicians	Yes			
3429: Design occupations n.e.c.	Yes			
3533: Financial and accounting technicians	Yes			
3549: Business associate professionals n.e.c.	Yes			
3552: Business sales executives	Yes			
3554: Marketing associate professionals	Yes			
3556: Sales accounts and business development managers	Yes			
3581: Inspectors of standards and regulations	Yes			
5225: Air-conditioning and refrigeration installers and repairers	Yes			
5231: Vehicle technicians, mechanics and electricians	Yes			
5234: Aircraft maintenance and related trades	Yes			
5245: Security system installers and repairers	Yes			
1257: Hire services managers and proprietors				
1258: Directors in consultancy services				
3119: Science, engineering and production technicians n.e.c.				
3131: IT operations technicians				
3132: IT user support technicians				
3213: Medical and dental technicians				
3411: Artists				
3412: Authors, writers and translators				
3413: Actors, entertainers and presenters				
3417: Photographers, audio-visual and broadcasting equipment operators				
3421: Interior designers				
3422: Clothing, fashion and accessories designers				
3520: Legal associate professionals				
3532: Insurance underwriters				
3534: Financial accounts managers ‡				
3571: Human resources and industrial relations officers				
3573: Information technology trainers				
3582: Health and safety managers and officers				
4121: Credit controllers				
4122: Book-keepers, payroll managers and wages clerks				
4129: Financial administrative occupations n.e.c.				
4132: Pensions and insurance clerks and assistants				
4159: Other administrative occupations n.e.c.				
4214: Company secretaries and administrators				
5224: Precision instrument makers and repairers				
5243: TV, video and audio servicers and repairers				
5244: Computer system and equipment installers and servicers				
5311: Steel erectors				
5441: Glass and ceramics makers, decorators and finishers				
8133: Energy plant operatives				
8134: Water and sewerage plant operatives				
9249: Elementary sales occupations n.e.c.				

Call for Evidence

Work Based Immigration – Inquiry Submission

September 2026

The link between immigration policy and investment in skills, training and domestic recruitment

1. What impact does immigration policy have on investment in domestic skills and training by employers?

Immigration policy can influence employer investment, but it is not the only factor determining investment in domestic skills and training.

In practice, employers will assess the available options against the need to secure competent people as quickly, reliably, safely and cost-effectively as possible. The decision to recruit domestically, invest in training or recruit internationally will therefore reflect the urgency of demand, the time and investment required to achieve occupational competence, the operational risk of leaving roles unfilled, and commercial performance.

EUSP members invest significantly in workforce development, with a number receiving external recognition for their employment and skills practices.

This investment is fundamental in safety-critical industries, where workers must have the right technical knowledge, practical experience and assessed competence. Restricting international recruitment will not automatically and immediately create an equivalent increase in domestic workforce supply. Employers cannot recruit people who are not available, and the training system cannot immediately produce experienced technicians, engineers, trainers or assessors.

These considerations vary by occupation. For some high-demand roles with shorter training requirements, immigration policy may affect the balance between international recruitment and domestic training. For highly specialised, niche or

project-based roles, however, the quickest credible route to competence may be to recruit people with experience gained on comparable projects overseas, particularly where the UK cannot safely develop that expertise at the scale or within the timeframe required.

If migration routes are restricted without corresponding action to expand domestic training and recruitment capacity, the likely results include delays to infrastructure projects, increased pressure on existing workers and greater competition for a limited pool of skilled people.

Immigration policy should therefore reinforce domestic workforce investment. Where employers or sectors seek access to international recruitment, they should demonstrate credible action to:

- Recruit and train people already living in the UK.
- Invest in apprenticeships and recognised routes to competence.
- Support sector entry and retraining programmes.
- Improve workforce retention.
- Increase trainer and assessor capacity.
- Actively engage in partnerships that focus on addressing the underlying causes of persistent shortages.
- Proactively build the conditions required for the future workforce.

2. Is there more the Home Office could do to encourage skills investment through immigration policy?

Yes. The Home Office should assess requests for access to international recruitment alongside the relevant sector's workforce strategy and evidence of domestic workforce investment.

The system should be sufficiently agile to respond to robust research identifying emerging demand, anticipated growth and shortages in specialist roles. Where there is an evidenced immediate or short-term requirement, immigration policy should enable industry to access the necessary workforce. That support should be reviewed and, where appropriate, tapered as domestic recruitment, training and progression demonstrably increase supply.

Through its work with over 70 member organisations, Energy & Utility Skills Group (EUSG) has an established view of current and emerging workforce requirements across the sector. Its Skills Strategy brings this employer evidence together through four connected pillars: Research, Attract, Develop and Retain, to identify demand, widen workforce supply, provide clear routes to occupational competence and retain the people already working in the sector.

This provides a practical, employer-led basis for distinguishing between shortages that can be addressed through domestic workforce investment, those requiring targeted international recruitment while a domestic pipeline develops, and specialist requirements for which access to global expertise is likely to remain necessary. The No.10 Global Talent Taskforce has recently engaged EUSG to explore how EUSP's employer network and workforce evidence could support international talent to move to and succeed in the UK.

The Home Office should use established sector mechanisms such as EUSG and EUSP to assess evidence, recognise credible employer action and monitor progress, rather than create duplicative reporting requirements.

The Home Office could encourage skills investment by recognising:

- Employer participation in credible sector led workforce plans.
- Investment in UK-wide apprenticeships, qualifications and occupational standards.
- Support for sector entry and retraining programmes.
- Action to recruit people who are unemployed or economically inactive.
- Investment in trainers, assessors and workplace mentors.
- Activity to improve retention and progression.
- The sharing of appropriate workforce evidence.
- The celebration and promotion of excellence.

The Home Office should work with other government departments, the Migration Advisory Committee, Skills England, devolved governments and employer-led sector bodies to draw on existing evidence and reporting wherever possible.

3. To what extent – and over what time frames – can skills policy influence the scale of international recruitment by employers?

Skills policy can significantly influence the scale of international recruitment, but its impact depends on the occupation, the time required to develop competence and the devolved status.

Some early career, Sector Entrant and entry-level roles can be supported through relatively short pre-employment and sector entry programmes. These programmes can help people acquire initial skills, safety awareness and move into employment where there are identified vacancies and participating employers. Where entrants already have relevant transferable skills, the route to initial competence may take several weeks or months.

Other occupations require apprenticeships, technical qualifications, workplace experience and formal competence assessment. In these cases, it can take several years before a new entrant is able to work independently and fulfil the complete requirements of the role. This is where a task and role based competence approach can bring speed and operational benefit, this thinking featured in the recent EUSP submission and engagement with the Apprenticeship APPG.

Depending on the occupation, technical development may take one to two years, while apprenticeships and safety-critical roles can require three to five years or more before full competence is achieved. These timeframes also depend on the availability of qualified trainers and assessors, workplace mentors, suitable training facilities and equipment, funded provision and opportunities to gain and demonstrate workplace competence.

Government should therefore consider three broad timeframes:

1. Immediate: targeted international recruitment may be needed to manage an evidenced and urgent shortage.
2. Medium term: apprenticeships, retraining and sector entry programmes can increase domestic recruitment and progression.

3. Long term: detailed and industry led workforce planning, careers activity, technical education, workforce planning, occupational standards and improved retention can create more sustainable workforce supply.

A single deadline should not be applied to every occupation. Workforce plans should include occupation-specific milestones covering recruitment, training facility build (where needed), assessor and trainer capacity development, mentor recruitment, worker training, completion, progression to competence and retention.

Access to international recruitment should be reviewed against progress towards these milestones and the remaining gap between forecast demand and competent domestic supply, rather than being reduced simply because training activity has begun.

4. What impact could sector level workforce strategies have on international recruitment? What is necessary to make these plans successful?

Sector-level and industry led workforce strategies can provide the practical link between immigration policy, employer demand and domestic skills investment. Working across EUSP members Workforce Demand Estimates are produced by EUSG Energy & Utilities Skills Group every two years.

Used effectively, these strategies already distinguish immediate, emerging and structural shortages, identify where international recruitment is genuinely required and support occupation-specific review periods, with access tapered as competent domestic supply increases. These estimates have already underpinned industry investment and shared focus. This industry led approach combined with evidence of need enabled EUSG to represent the sector positively through recent Migration Advisory Committee engagement and consideration.

A credible sector workforce strategy can identify:

- Current and future workforce demand.
- The occupations in shortage.
- The causes of those shortages.
- The geographical distribution of demand.

- Existing training and recruitment capacity.
- Routes to occupational competence.
- Actions being taken by employers and government.
- The period required for those actions to produce results.
- Productivity and new technology sensitivity analysis.

For highly specialised technical roles, the strategy should map the complete route to competence and the associated lead times. This should include the knowledge, skills, behaviours, practical experience and assessment required, together with the contribution of universities, further education colleges, specialist training providers, employers and professional bodies. The availability of trainers, assessors, mentors, facilities, equipment and workplace opportunities must form part of this assessment.

To be successful, plans require sustained employer ownership, clear actions and accountable owners, measurable milestones and regular review. They must also be supported by investment in trainers, assessors, workplace mentors, facilities and placements, and by alignment between the Home Office, Skills England, the Department for Education and the devolved governments. EUSG's engagement with over 70 member organisations, aligned through the Skills Strategy's Research, Attract, Develop and Retain pillars, provides an established evidence base for this work.

International recruitment should complement rather than displace a viable domestic workforce route. Where people within the UK could realistically be attracted, trained and progressed into these roles, workforce strategies should identify and address the barriers preventing this. Temporary and targeted international recruitment may still be required while that capacity develops, or where specialist expertise is not available domestically within the required timeframe.

This allows international recruitment to be used as a targeted workforce intervention rather than a stand-alone response to vacancies.

The EUSP CEO Council's Year Two priorities include establishing a more structured relationship with the Migration Advisory Committee and building on existing relationships. This is intended to ensure that decisions are informed by current and

future employer evidence whilst also continuously improving the development of the UK workforce.

5. How, if at all, should the approach the government takes to linking immigration and skills policy vary depending on the level of training required for different jobs?

The underlying principles should be consistent, but the evidence, expectations and timeframe should reflect the nature of each occupation. In all cases, the approach should prioritise a viable domestic route to competence, with international recruitment used where domestic supply cannot meet evidenced demand within the required timeframe.

For jobs with shorter training periods, sectors should be expected to demonstrate relatively rapid progress on domestic recruitment and training.

For technical and safety-critical occupations, government must recognise the time required to complete formal learning, gain workplace experience and demonstrate competence. It must also consider whether sufficient trainers, assessors, facilities and work placements are available. For highly specialised roles, this may require coordinated and sustained investment across employers, universities, further education colleges and specialist training providers, alongside sufficient trainers, assessors, mentors, facilities and workplace opportunities.

Qualification level alone is not a complete measure of occupational skill, complexity or value. Some roles classified at lower qualification levels require specialist technical competence, involve demanding or hazardous working conditions and carry significant responsibility for public and workforce safety. Industry-led systems can also provide evidence of competence and workforce mobility. The Energy & Utility Skills Register is a UK-wide register containing more than 800,000 externally quality-assured training records for over 300,000 workers.

Decisions should therefore be informed by the actual requirements of the role, including knowledge, competence, experience and working conditions, rather than relying solely on academic or qualification-level measures. It is important to equally

consider Ofqual regulated training as well as training that is designed and externally quality assured to meet industry standards.

Assessment should consider the complete route to competence: knowledge, skills, behaviours, practical experience and occupational assessment, and the realistic time and infrastructure required to develop these domestically. Immigration arrangements should reflect these occupation-specific circumstances rather than apply a uniform training threshold or timeframe.

6. Are there mechanisms the Home Office could use to incentivise domestic recruitment?

Yes. Access to temporary international recruitment could be linked to participation in a credible sector workforce plan and evidence of meaningful domestic workforce action.

This could include:

- Offering apprenticeships and recognised training routes.
- Supporting sector entry and retraining programmes.
- Recruiting people who are unemployed or economically inactive.
- Widening access for groups currently underrepresented in the workforce.
- Providing workplace mentors, trainers and assessors.
- Investing in occupational standards and routes to competence.
- Sharing appropriate workforce evidence.
- Supporting employer-led or shared apprenticeship training academies, particularly where specialist facilities and equipment cannot be sustained by individual employers.
- Embedding meaningful social value commitments in publicly funded and regulated projects, including apprenticeship starts, completion, progression to competence and recruitment from local communities.
- Using procurement, project funding and regulatory settlements to incentivise investment in apprenticeships and workforce development across clients, contractors and supply chains.
- Developing a UK model that captures the true level of employer investment in training and skills.

Major infrastructure programmes should provide sufficient visibility and certainty for employers to invest. Project incentives should recognise the full cost of developing people, rather than focus only on apprenticeship starts.

Incentives should be informed by credible workforce forecasts and should maintain a healthy balance between supply and demand. Undersupply risks vacancies, project delays, pressure on the existing workforce and in turn reduced worker safety; oversupply can leave trained people without suitable employment and weaken confidence in sector career pathways. Training volumes should therefore reflect forecast growth, replacement demand from an ageing workforce, expected completion rates and the movement of workers between sectors.

Incentives should reward demonstrable workforce investment and collaboration, within a balance of regulated and non-regulated training and assessment, apprenticeships (both units for task based competence and standards for full occupation competence) should form a central part of long-term domestic workforce renewal.

Where additional revenue is collected through the immigration system, government should consider how it can support training capacity in occupations and sectors experiencing evidenced shortages. However, demographic change, workforce ageing and the scale of planned infrastructure investment mean that domestic recruitment may not meet every requirement. Government should maximise sustainable domestic recruitment and progression while retaining proportionate access to international workers where forecast demand exceeds the competent workforce supply that can realistically be developed in the UK.

7. What evidence is there for the effectiveness of resident labour market tests in encouraging domestic recruitment?

The current immigration system does not include a general Resident Labour Market Test requiring employers to demonstrate that they have unsuccessfully attempted domestic recruitment before sponsoring an overseas worker. Current controls operate principally through occupational eligibility, skill requirements, salary thresholds and occupational going rates.

Energy & Utility Skills Group has not identified robust contemporary UK evidence demonstrating that a formal advertising test, by itself, materially increases domestic recruitment or employer investment in training. An employer can comply with an advertising requirement without addressing the underlying causes of shortage, which may include insufficient training capacity, lengthy routes to occupational competence, unattractive employment conditions, geographical constraints or rapid increases in demand.

The appropriate test is therefore not simply whether a vacancy has been advertised domestically. Government should assess whether:

- The shortage is evidenced at the appropriate occupational and geographical level;
- Pay and employment conditions are fair and competitive;
- Employers have taken reasonable steps to recruit people already living in the UK;
- A credible domestic training and workforce development route exists;
- Employers are investing in that route;
- The time required to produce competent domestic workers is understood; and
- International recruitment is proportionate to the remaining workforce gap.

The Temporary Shortage List framework provides a stronger basis for this approach because it considers evidence of shortage alongside the credibility of sector plans to maximise use of the domestic workforce. The Migration Advisory Committee's assessment combines quantitative indicators, Jobs Plan evidence and sector engagement rather than treating any single labour-market indicator as decisive.

A modern approach should therefore focus on evidenced employer behaviour and measurable workforce outcomes, rather than recreate a largely procedural advertising requirement. The objective must be to increase sustainable domestic workforce capacity while retaining targeted access to international recruitment where a genuine shortage cannot be resolved within the required timeframe.

Addressing shortages

8. To what extent should addressing labour shortages be prioritised in immigration policy?

Addressing evidenced labour shortages should remain a high priority, where leaving roles unfilled would materially affect public safety, continuity of essential services, delivery of critical infrastructure or nationally significant investment. It should not, however, provide automatic access for every vacancy or remove the requirement for credible domestic workforce action.

The appropriate approach is targeted and time-limited access to international recruitment, supported by:

- Independent evidence of shortage.
- A clear explanation of the role's economic or strategic importance.
- Evidence of domestic recruitment and training activity.
- Fair pay and employment conditions.
- A credible plan to increase domestic workforce capacity.

The duration of access should reflect the nature of the shortage, forecast demand and the time needed to develop competent domestic supply. Reviews should consider progress against occupation-specific workforce milestones, including training capacity, progression to competence and retention, while recognising that some specialist requirements may continue to depend on international expertise. This would allow employers to maintain delivery while longer-term workforce interventions take effect.

9. When, if at all, should international recruitment be allowed to meet labour shortages in lower-paid jobs, and jobs that require less training? How can the skill level of occupations in shortage be accurately and fairly determined?

International recruitment should not be determined by salary or qualification level alone.

Some lower-paid roles or occupations below current qualification thresholds may still be technically demanding, safety critical or essential to infrastructure and public

services. Recruitment difficulties may also be influenced by location, working patterns, physical conditions or unusually rapid growth in demand.

Lower pay should not be assumed to indicate low skill or low value, particularly where an occupation is essential to maintaining infrastructure, service continuity or public safety.

International recruitment should be considered where:

- There is credible evidence of a genuine shortage.
- The role supports an essential service or strategically important programme.
- Employers have prioritised and undertaken reasonable domestic recruitment efforts.
- The pay and conditions are fair.
- A domestic training or competence route exists or is being developed.
- Access forms part of a wider workforce plan.

International recruitment should complement rather than displace a viable domestic workforce route. Access should be considered where domestic recruitment and development cannot produce sufficient competent workers within the required timeframe, or where the shortage reflects an immediate or specialist requirement.

The assessment of skill should consider the actual requirements of the occupation, including the knowledge, skills, behaviours, practical experience and occupational assessment required to achieve competence, together with the level of responsibility, working conditions and safety implications.

10. What has been the experience of sectors with labour shortages that have historically been able to recruit internationally? Has this led to a reduction in shortages?

The experience of the energy and utilities sector suggests that international recruitment can help employers respond to immediate workforce pressures, but it does not remove the underlying causes of persistent system level shortages and supply side challenges with the UK education and skills systems. This is particularly noticed by employers working across UK borders

It is important to recognise that employers do not always set out specifically to recruit from overseas. In many cases, an individual applies through an employer's normal recruitment process and, if they are the strongest candidate, is sponsored to work in the UK. Alternatively, an individual may already be working in the UK and apply to move to a different sponsoring employer. This should be distinguished from recruitment models designed primarily around sourcing workers internationally.

The workforce requirements of the energy and utilities sector are also affected by regulatory investment cycles. New price control settlements can create significant changes in the scale and timing of investment. Asset owners may have some advance visibility, but detailed requirements can reach contractors and the wider supply chain much later. This creates sharp demand peaks that cannot always be met through domestic recruitment and training within the available timeframe.

Investment cycle cliff edges are being smoothed by asset owners increasingly adopting a framework and partnership work to working with their large and complex supply chains. Longer term investment signals and commitments enable asset owners to increasingly operate with greater confidence over the medium to long term.

This is particularly relevant because developing people for technical and safety-critical roles takes time. Internal workforce planning has identified lead times of more than three years for some Level 3 roles and five to seven years for some Level 6 roles, while suitably qualified overseas workers can provide more immediate capacity where the immigration system operates efficiently.

Access to international recruitment has not necessarily reduced shortages permanently because demand is not static. Short-term workforce gaps may be filled, but new investment cycles, replacement demand and competition for shared occupations can create further pressures. For example, current industry led electricity networks analysis indicates that workforce demand is concentrated heavily at the beginning of the forecast period because of transmission investment, while replacement demand continues after the initial growth peak has passed.

11. What evidence is available on the effectiveness of shortage lists as a mechanism for using the immigration system to respond to labour shortages?

Shortage lists can provide a focused mechanism for responding to labour shortages where they are based on independent evidence, regularly reviewed and sufficiently precise.

Broad occupational classifications can make it difficult to distinguish specialist roles experiencing serious shortages from other roles within the same category.

Government and the Migration Advisory Committee should make greater use of occupational profiles, employer evidence and role-level information.

The recent consideration of overhead line workers demonstrates the value of examining shortage evidence alongside domestic action. The sector has also been developing relevant apprenticeships, qualifications and specialist training provision. Temporary migration and domestic workforce investment should therefore be considered as connected rather than competing approaches.

12. How long should sectors with shortages be allowed access to the Temporary Shortage List? What should happen if shortages remain unresolved after this period?

Modern economies are dynamic and the global economy is increasingly connected, complex and volatile. The UK operates within these conditions and to thrive must be able to compete, challenge and win at a global level. This global context is reflected across UK society, as such there should not be a single fixed period for any occupation.

The Temporary Shortage List (TSL) should be dynamic and flexible enough to respond to new and changing workforce pressures as they emerge. A fixed review cycle, such as once every three years, risks being too slow for sectors impacted by global headwinds and where government policy, regulatory settlements or major investment decisions can create rapid and significant changes in workforce demand. TSL access should reflect the length of time reasonably required for agreed domestic workforce interventions to produce people who are competent in the relevant roles. For technical and safety-critical occupations, a short period may expire before apprentices or new entrants can complete their training and workplace development.

In the energy and utilities sector, five-year price control periods can create sharp increases in workforce demand. Asset owners may have some advance notice of investment plans, and despite increased partnership working and framework approaches the supply chain often has much less time to prepare. A shortage may therefore emerge more quickly than the domestic skills system can respond, particularly where roles take several years to reach full competence

This challenge will be particularly acute over the next five years, as the substantial investment programmes arising from PR24/AMP8 and RIIO-3 accelerate workforce requirements across water and energy at the same time. These programmes will create concurrent demand across asset owners, contractors and shared supply chains for many of the same technical, engineering, construction and project-management occupations. Even where employers are increasing apprenticeships and domestic training, the scale and pace of investment may outstrip the rate at which people can be developed to full competence. Access to the Temporary Shortage List should therefore reflect the timing and workforce impact of confirmed regulatory investment, rather than expire while demand is reaching its peak.

Where progress has been made but demand continues to exceed supply, access should be capable of continuing. Where little credible domestic action has been taken, additional conditions or removal from the list may be appropriate.

13. How can the government effectively assess whether sectors are taking adequate steps to address shortages? What approach should be taken when the causes of labour shortages may be due to factors outside of employers' control?

Government should assess sectors against an agreed evidence framework linked to the relevant sector specific jobs plans and industry led plans that have been developed in partnership by sector experts, tested, scrutinised and published through mature and established sector governance.

Indicators could include:

- Domestic recruitment.
- Apprenticeship and training participation.

- Completion and progression to competence.
- Recruitment from unemployed or economically inactive groups.
- Investment in qualifications and occupational standards.
- Growth in trainer and assessor capacity.
- Workforce retention.
- Collaboration with education and training providers.
- Delivery against agreed sector actions.

The assessment must distinguish between matters employers can control and wider system barriers.

Factors outside an individual employer's control may include:

- Insufficient local or national training provision.
- Shortages of trainers and assessors.
- Delays in qualification development or approval.
- Fragmented or inflexible skills funding.
- Regional labour market constraints.
- Changes to government infrastructure programmes.
- Uncertainty and often short investment decision timeframes.
- Rapid increases in demand across several sectors for the same occupations.
- Domestic labour supply resulting from declining and low UK birth rates.

Employers should be held accountable for credible action but not penalised for barriers that require government or system-wide intervention.

14. What rights and conditions should apply to visas for immigrants coming to work in occupations on the Temporary Shortage List?

Workers recruited through the Temporary Shortage List should receive the same fundamental employment rights, health and safety protections and access to workplace training as UK-based workers. Immigration status must not create a second tier of employment.

Internationally recruited workers should receive no less favourable basic pay and conditions than those undertaking materially comparable work for the same employer, allowing only for objective differences such as experience, responsibility, location, working patterns and allowances. Salary requirements should operate as a floor, not as a target or justification for paying below the employer's normal rate.

The current Skilled Worker system generally applies both a salary threshold and an occupational going rate, with eligibility normally determined by whichever requirement is higher. For Temporary Shortage List occupations, those protections should be accompanied by clear expectations covering:

- Written information on pay, hours, deductions, accommodation and visa conditions before recruitment;
- Transparent recruitment practices with no inappropriate transfer of sponsorship costs to workers;
- Equal access to health and safety training, personal protective equipment and competence assessment;
- Effective routes for raising concerns without retaliation;
- Access to trade union representation and independent advice;
- Proportionate freedom to change sponsor within an eligible occupation;
- Reasonable protection where employment ends through no fault of the worker; and
- Active monitoring and enforcement against exploitation.

All workers in Great Britain are protected by health and safety law and have the right to a workplace in which risks are properly controlled. These protections must be practically accessible to internationally recruited workers, including where English is not their first language or where their immigration status makes them more dependent on an individual employer.

Fair and consistent treatment protects the worker, prevents the undercutting of domestic employment and supports safe, competent and productive delivery.

15. Should workers in these roles be permitted to bring dependants, and if so what conditions should apply to dependent visas?

Decisions about dependants should balance the government's wider immigration objectives with workforce retention, individual wellbeing and the ability of employers to recruit people into essential roles.

Separating workers from their immediate families may make the UK less attractive to skilled people and may reduce retention, particularly where roles require relocation for more than a very short period.

16. When, if at all, are strictly temporary visas appropriate?

Strictly temporary visas may be appropriate where the workforce requirement is genuinely short term, clearly defined and linked to a specific project, period of exceptional demand or urgent shortage.

They are less suitable where:

- The shortage is structural rather than temporary.
- The work is part of an ongoing essential service.
- Employers require workers to develop detailed organisational or technical knowledge.
- The route to full competence is lengthy.
- Frequent workforce turnover would undermine safety, productivity or service continuity.

Temporary routes should not create a permanently rotating workforce for roles where long-term employment is required. The duration and conditions should reflect the nature of the work and the time required for workers and employers to receive meaningful value from recruitment.

17. How important is immigration to responding to shortages in the public sector, and what role does immigration have in workforce planning in sectors such as health, education and justice?

Although Energy & Utility Skills Group does not represent the health, education or justice sectors, the same broad workforce planning principles apply.

International recruitment can help public services manage immediate and specialist shortages, but it should form part of a wider workforce plan covering domestic recruitment, training, workforce development and retention.

Public sector workforce planning should:

- Identify current and future occupational demand.
- Understand the causes of persistent vacancies.
- Assess the time needed to train people domestically.
- Address retention and working conditions.
- Consider regional differences.
- Establish where targeted international recruitment remains necessary.

Government should also consider the interdependence between public services and critical infrastructure. Energy, water, waste and environmental services are essential to the effective functioning of public services and should be recognised within cross-government workforce planning.

18. Should there be different immigration rules for jobs that deliver essential services – such as prison guards or health and care workers? If so, how should rules be different for these jobs?

There is a case for immigration policy to recognise occupations that are essential to public safety, critical infrastructure and continuity of essential services.

Any different treatment should be based on transparent criteria and evidence rather than broad or inconsistent exemptions. Criteria could include:

- The consequences of the role remaining unfilled.
- The availability of domestic workers with the required competence.
- The time required to train replacements.
- The role's contribution to public safety or essential services.
- The scale and persistence of the shortage.
- The domestic workforce action already being taken.

Government should adopt a consistent definition of essential and strategically important occupations across departments. This should recognise that the delivery of essential services depends not only on directly employed public sector workers but also on energy, water, waste, environmental services and their supply chains.

Implementation

19. What objectives should the Home Office seek to achieve when setting salary thresholds?

Salary thresholds should protect workers, prevent undercutting, support domestic recruitment and remain proportionate to evidenced occupational shortages. Internationally recruited workers should be paid fairly and should not be employed on less favourable terms than people already undertaking the same or comparable work.

Where reliable data is available, the threshold should aim to reflect the median salary for the specific job within the relevant employer and industry. Where that cannot be measured robustly, the threshold should be based on the median salary for the relevant four-digit Standard Occupational Classification code within that industry.

20. To what extent does the current approach to setting salary thresholds achieve these objectives?

The current approach provides an important safeguard against the use of immigration to access lower-cost labour, but it does not fully capture differences between occupations, industries, regions or individual roles.

Using a general salary threshold alongside occupational going rates establishes a clear minimum and provides greater protection than a single economy-wide figure. Under the Skilled Worker route, a job will usually need to pay at least £41,700 or the applicable occupational going rate, whichever is higher, although different provisions and limited reductions apply in specified circumstances.

However, this approach has three material limitations.

First, broad occupational codes can include roles with different technical requirements, responsibilities, working conditions and market rates. A national occupational median may therefore be too imprecise for a specialist role concentrated within a particular industry.

Second, qualification level and salary are not complete measures of occupational skill or value. Some technical and safety-critical roles classified below degree level carry substantial responsibility for essential services, critical infrastructure and public safety.

Third, a threshold can prevent obvious underpayment without ensuring parity within the employing organisation. A sponsored worker could satisfy the immigration requirement while still receiving less favourable pay or conditions than a directly comparable colleague.

Salary thresholds should therefore form part of a wider assessment. Government should consider:

- The salary for the specific occupation and industry;
- The employer's normal rate for materially comparable work;
- Hours, shifts, allowances and location;
- The competence and experience required;
- The strategic and safety significance of the role; and
- Evidence that pay and conditions are not contributing to the shortage.

The objective should be a transparent salary floor that protects workers and domestic labour-market standards without excluding strategically important occupations simply because national classifications fail to reflect their true competence, responsibility or market value.

21. What impact does changing rules on eligibility for work visas have on businesses, employers and workers?

Frequent or sudden changes make workforce and project planning more difficult. Complexity and inconsistency increase cost, delay recruitment and weaken confidence.

Employers in the energy and utilities sector plan recruitment against long-term infrastructure, regulatory and investment programmes. Changes to visa eligibility can affect recruitment already under way, project delivery, workforce costs and the position of workers currently living in the UK.

For workers, unexpected changes can create uncertainty about their employment, family arrangements and ability to remain in the country.

Government should provide:

- Clear implementation timetables.
- Sufficient notice of significant changes.
- Appropriate transitional arrangements.
- Protection for workers recruited under previous rules.
- Accessible guidance for employers and individuals.

The cumulative effect of successive changes should also be assessed. Even where an individual reform is justified, repeated changes can reduce confidence in the stability of the system.

22. Is it more important to have a responsive or consistent approach to work migration policy?

The system needs to be both responsive and consistent. It should respond to credible evidence of changing workforce demand, emerging occupations and urgent shortages. However, responsiveness should not lead to instability or frequent policy changes that prevent employers and workers from planning effectively.

This balance could be achieved through:

- Clear and predictable review cycles.
- Transparent evidence requirements.
- Structured engagement with sectors between formal reviews.
- Defined arrangements for urgent cases.
- Published implementation dates.
- Appropriate transitional protection.

A consistent framework with responsive evidence-based decisions would provide greater confidence than either a rigid system or one subject to frequent unexpected changes.

23. What improvements could be made to the work visa system to ensure that migrant workers are treated fairly, with dignity and respect?

Fair treatment requires the system to reduce the imbalance of power that can arise when a worker's immigration status is closely tied to a single employer.

The work visa system should ensure that every worker clearly understands the job, pay, conditions, deductions, visa restrictions and routes for seeking help before travelling to the UK. Employers should be accountable for the accuracy of this information and for the conduct of recruitment agents acting on their behalf.

Improvement should focus on six areas:

1. **Transparent recruitment:** Workers should receive a clear written offer setting out the employer, role, workplace, salary, hours, deductions, accommodation arrangements and applicable visa conditions.
2. **Fair recruitment costs:** Workers should not bear inappropriate sponsorship or recruitment charges that create debt, dependency or increased vulnerability to exploitation.
3. **Employment mobility:** Workers should have a practical and proportionate route to move to another approved employer in an eligible role, particularly where there is evidence of mistreatment, redundancy or sponsor failure.
4. **Accessible protection:** Guidance, complaints processes and independent advice should be readily accessible, including appropriate language support. Raising a legitimate concern should not place a worker at greater immigration risk.
5. **Effective enforcement:** Sponsor compliance should include meaningful scrutiny of pay, conditions, recruitment practices, working hours, competence arrangements and the treatment of workers, supported by proportionate sanctions where standards are breached.

6. Equal workplace treatment: Internationally recruited workers should receive the same health and safety protections, access to training, competence assessment and opportunities for progression as comparable UK-based workers.

Government guidance already places compliance duties on licensed sponsors, while British health and safety protections apply to all workers. The priority should be to ensure that those rights are understood, enforceable and accessible in practice.

A fair system protects individual workers, responsible employers and the integrity of the domestic labour market. Dignity and respect should be treated as core design principles of the immigration system, not as additional compliance considerations.

24. What mechanisms are needed to support migrants who lose their jobs after they arrive in the UK, through no fault of their own?

A migrant worker who loses employment through redundancy, business failure, sponsor licence loss or another circumstance outside their control should have a reasonable and clearly defined opportunity to secure alternative eligible employment.

The system should include:

- Timely written notification explaining the worker's immigration position and available options;
- A reasonable period in which to find another approved sponsor;
- Access to a recognised service matching displaced workers to eligible vacancies;
- Independent immigration and employment advice;
- Protection of outstanding pay, notice, redundancy and other contractual entitlements;
- Safeguards against recruitment charges or exploitation when seeking a new sponsor;
- Continuity arrangements for dependants while the worker regularises their position; and
- Funded repatriation assistance where the worker chooses or is required to leave the UK and cannot reasonably meet the cost.

Where the worker remains occupationally competent and the occupation continues to experience an evidenced shortage, it is inefficient for the economy, the worker and the immigration system to require departure before reasonable efforts have been made to secure alternative eligible employment. This is particularly important where the worker has already completed sector-specific induction, safety training or occupational assessment.

Employers should remain responsible for meeting their legal and contractual obligations. Where appropriate, sponsorship arrangements could also require provision for reasonable repatriation costs when employment ends through no fault of the worker. However, repatriation should not be the only response. The first objective should be to protect the worker from sudden insecurity and, where lawful and economically sensible, retain their skills within the UK workforce.

Support should be funded and administered in a way that does not reward irresponsible employers or transfer avoidable costs to the worker.

Cross-government working

25. How could the Home Office work more effectively with other government departments to develop a work migration system that achieves its aims – such as growing the economy and delivering essential services – while reducing net migration?

It should work systematically with departments and bodies responsible for education, employment, welfare, infrastructure, energy, business, regulators, economic growth, public services and the devolved skills systems.

This should include:

- A shared assessment of current and future workforce demand in line with departmental investment objectives and timetables.
- Consistent use of labour market evidence.
- Alignment between immigration decisions and sector workforce plans.
- Consideration of training capacity and routes to competence.

- Recognition of infrastructure and regulatory investment cycles.
- Coordinated action to address barriers outside employers' control.
- Joint monitoring of domestic workforce outcomes.

The Home Office should also establish structured relationships with employer-led sector bodies. These organisations can provide occupational evidence, coordinate employer commitments and help government understand how shortages affect supply chains and infrastructure delivery.

A cross-government approach should distinguish between reducing avoidable long-term reliance on international recruitment and removing targeted access in areas where shortages are genuine, immediate and strategically important.

26. How effective is the Labour Market Evidence Group in supporting joined up, cross-departmental policy making?

The Labour Market Evidence Group appears to have strengthened the recent Temporary Shortage List process, but there is not yet sufficient publicly available evidence to assess its wider effectiveness, accountability or impact across government.

The Migration Advisory Committee reports that the Group made a substantial contribution to the evidence-base discussion for the Temporary Shortage List review. Its members helped shape the evidence process, contributed sector and skills expertise and commented on provisional recommendations. This is a positive indication that the Group can bring together evidence and perspectives that would otherwise remain distributed across departments.

The test of effectiveness, however, is not participation alone. It is whether the Group enables government to:

- Establish a shared assessment of current and future occupational demand;
- Reconcile different departmental datasets and policy assumptions;
- Identify where shortages are national, regional, temporary or structural;
- Connect immigration decisions to domestic skills, employment and infrastructure policy;

- Distinguish barriers employers can address from those requiring government intervention;
- Make timely recommendations when labour-market conditions change; and
- Publish sufficient evidence to explain how conclusions have been reached.

The Group should operate within a transparent framework setting out its membership, remit, evidence standards, outputs and relationship with the Home Office, Migration Advisory Committee, Skills England, devolved governments and sector bodies.

It should also engage systematically with established employer-led bodies capable of providing validated occupational evidence and tracking delivery. In energy and utilities, the intended model is to combine workforce intelligence, aggregated employer evidence, routes to competence and measurable domestic interventions before identifying where targeted and time-limited migration remains necessary.

The Labour Market Evidence Group therefore has the potential to improve joined-up policy materially. Its effectiveness should be judged through published outcomes, including whether evidence is shared more consistently, decisions are taken more quickly, cross-government actions are aligned and domestic workforce commitments are subsequently delivered.

27. How does the government assess the economic and fiscal impact of work migration, and how does this inform decisions about immigration policy? How could the evaluation of economic impact be improved?

The assessment of work migration should consider wider economic value as well as immediate fiscal contributions.

For essential services and critical infrastructure, the value of a worker cannot be understood solely through salary, tax receipts or visa numbers. Assessment should also consider:

- The economic activity enabled by the role.
- The consequences of infrastructure delays.
- The continuity of essential services.

- The effect on business investment and productivity.
- The interaction between migrant and domestic workforce capacity.
- The cost of persistent vacancies.
- The worker's contribution over time.
- The investment employers make in training and competence.

Government should assess the economic impact of filling a role against the cost and consequences of leaving it vacant.

The evaluation should also distinguish between the short-term use of international recruitment and long-term dependency. A sector using targeted recruitment while investing in domestic skills should be assessed differently from one relying on overseas recruitment without credible workforce action.

28. How is reliance on international recruitment considered in workforce planning and policy formation across government departments?

Reliance on international recruitment should be considered explicitly within every relevant sector workforce plan.

Departments should identify:

- Which occupations depend significantly on international recruitment.
- Why that reliance has developed.
- Whether it is temporary or structural.
- The consequences of reducing access.
- The domestic interventions required.
- The time required for those interventions to take effect.
- Any continuing need for targeted migration.

This analysis should inform decisions on education, apprenticeships, employment support, infrastructure investment, regulation and procurement, as well as immigration policy.

Government should use a consistent framework across departments while allowing for sector and occupational differences. It should also recognise cross-sector competition for common occupations. Training people for one sector will not resolve a shortage if they are subsequently recruited into another sector facing the same demand.

Employer-led sector bodies can support this process by bringing together workforce evidence, occupational information and practical commitments from employers.

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