



House of Keys
Legislative Buildings
Douglas
Isle of Man
IM1 3PW
British Isles

Y Chiare as Feed
Oikyn Slattyssagh
Doolish
Ellan Vannin
IM1 3PW
Ny Ellanyn Goaldagh

Tel: 01624 651513
Email: rob.callister@gov.im

Our Ref: RC/2023/32

Mr. Andrew Stewart
Policy & Strategy Directorate, Department for Enterprise
1st Floor, St George's Court
Upper Church Street
Douglas
Isle of Man
IM1 1EX

29th April 2023

Dear Andrew

Further Reform to the Island's Work Permit System

I note that the Department is considering further reform to the island's work permit system, in order to support a commitment in the Island Plan to create and fill 5,000 new jobs across new, enabling and key sectors by 2032, which could in turn deliver an island population of around 100,000 by 2037.

Please take this correspondence as my submission to the consultation that closed on Friday 28th April 2023, and please also accept my sincere apologies for the slight delay in making this submission on behalf of my constituents in Onchan.

As a member for the Department for Enterprise over a six year period, I have always supported the creation of new sectors that deliver long term employment opportunities for the people of this island, along with investing in new skills and infrastructure that help deliver a strong and diverse economy.

At the same time I have always been very nervous about any wholesale or major changes to the island's work permit system, which I think most people would describe as a "*comfort blanket*", in order to protect the rights and employment opportunities for Isle of Man workers.

In fact the Isle of Man has had some form of regulation around employment rights on the island since the early 1950's, in which "*no person shall engage for employment any male person between the relevant age who has not had five years' continuous residence within the Isle of Man*".

Even that legislation back in 1952 had a list of exemptions relating to agriculture, fishing, emergency services and other professional and administrative work etc, so I do feel that the island's work permit system or regulation around employment has been very successful over the years, especially during those periods of high unemployment on the island in the 1980's.

Further changes have been made over the years, and I am not against removing more of the complexity around our work permit and immigration systems, but any major or significant changes to our work permit system have to be done sympathetically, in order to help protect Isle of Man workers now and in the future.



I know I speak on behalf of many from within my own Constituency of Onchan when I say that I am against any proposal that would “temporarily remove the need for work permits to apply across all sectors and all occupations, enabling the Department to provide unconditional five year confidence to potential workers looking to migrate to the island”.

I do seriously question if the proposed changes will actually deliver the confidence that the Department is looking to achieve. Back in 2017 when I was a Department member, we undertook a consultation in order to help simplify and streamline the island’s work permit system, which successfully created a far easier system for both the employer and prospective employees.

We also introduced a single application form and moved the application process online, along with introducing a single fee of £60 regardless of the length of the permit applied for, in order to help encourage an increase in 5 year permits.

This was in addition to introducing an extension of automatic 1 year permits for spouses and civil partners of Isle of Man workers, together with a broader definition of our immigration documents.

I think we can both agree that we introduced some significant changes back in 2017 that made the whole process far easier, but without “flipping” the work permit system, and therefore protecting Isle of Man workers but still fully respecting the general principles that were laid down back in 1952.

In the Department’s consultation document dated March 2023 they confirm that around 70% of all applications considered by the Department were approved the same or the next working day after submission, and that the remaining applications are approved within 3 days.

Therefore, I don’t believe the island’s work permit system is the main reason why we continue to have a critical labour shortage across most, if not all, of the Island’s economic sectors, but I would support other potential changes to the system.

For example, I would support “automatic permits” for spouses, civil or cohabiting partners and dependants of Isle of Man workers, and for that work permit to match the primary work permit holder for up to five years.

I would also consider providing the work permit to the individual rather than applying it to a particular job or role, which would help address any concerns around loss of employment, displacement or redundancy.

In addition I would consider extending any work permit to include secondary employment opportunities, which would help reduce the need to apply for a second work permit, and therefore making the process and system easier.

The current exemption list covers an extensive range of temporary and permanent economic sectors that allows the island to “turn on or turn off” any particular sector based on the economic condition at any given time, and again this has been very successful over the years.

Before the Department temporarily seeks to remove the need for work permits, I would encourage DfE officers and the political members to look again at the island’s immigration rules and regulation around the entry into the Isle of Man.

Since the UK left the European Union in January 2020, our immigration rules and regulation that closely follows those in the UK have become a greater barrier and an obstruction for vital key workers, especially for our Health and Hospitality sectors.



I would also encourage the Department to seriously look at the concerns around the retention of key workers such as teachers, doctors, nurses, along with other health service providers who have been encouraged to relocate or move to the island over the past few years, but have left within a couple of years due to the costs of housing, rental and the general cost of living here on the island compared to our counterparts in the UK.

In my recent written question to the Department, it was confirmed that around 320 work permits were declined over the past 10 years. Just over 200 of these rejections were due to the likelihood of there being suitable Isle of Man workers available in the trade, industry or profession.

What protection will the Department give to Isle of Man workers in the future, in order to ensure that these 200 individuals with the right skills and qualifications to undertake a particular role do not suddenly find themselves unemployed or replaced by new workers coming to the Isle of Man?

Conclusion

Although I acknowledge the difficulties in filling some vacancies at the moment in key sectors, you do have to seriously question if the Isle of Man is fully prepared for even a modest increase in our population at the moment. I would argue strongly that the majority of the island's population would say that the Isle of Man is not ready for a sudden increase in our population via changes in the work permit system, especially in respect of infrastructure, housing, schools and health cover.

Just looking at the island's rental market for example, there are very few properties available for less than £1,100 per calendar month, and I have been contacted by various constituents over the past 18 months who are unable to find suitable rental accommodation or those properties that are being listed with estate agents are simply outside their financial reach.

Even the island's first-time buyers or mid-term rent properties are outside of the reach of most people, and the island is still yet to put in place "*key worker*" housing provision, in order to attract more teachers, nurses and frontline staff, to help reduce annual agency and bank staff costs.

We are also losing around 50% of all students that go off island to University, and therefore surely the Department and the Manx Government should be doing everything possible to create the right environment to encourage these newly qualified students to return to the Isle of Man first, and before we start look at removing the work permit requirements.

I could raise so many other points on this very important topic, but I do thank you for taking the time to read through my submission to this public consultation.

If you require any further information, then please do not hesitate to contact me.

Yours sincerely

Rob Callister CMgr, FCMI, FICA, Dip.(ITM), MHK
House of Keys Member for Onchan

Mobile: 07624 457511
Home: 01624 664475
Website: [https:// www.robcallister.im](https://www.robcallister.im)