



Independent Higher Education evidence to the Migration Advisory Committee commission on international students

January 2018

About Independent Higher Education

1. Independent Higher Education is the UK's representative body for independent providers of higher education, professional training and pathways. Our members teach UK, EU/EEA and Non-EU students across a range of specialist courses, innovative delivery models and collaborative partnerships. Several of our members teach international students exclusively or have higher than average numbers of EU/EEA and non-EU students. In 2017 we published the results of the first Independent Higher Education Survey, with 111 providers responding from across the sector. This data provides a valuable insight into the students, missions and ambitions of independent higher education providers in the UK including vital information on those providers teaching international students.¹

Independent Higher Education Providers teaching international students

2. Independent Higher Education providers are commonly but not always listed on the register of Tier 4 sponsors as 'Private Providers' and/or are referred to by the Department for Education for the purposes of designation for student funding as 'Alternative Providers'.
3. There is no definitive list of independent higher education providers in the UK as regulation is not mandatory to teach students and the regulation which currently exists is split between the Department for Education for the purposes of student loans and the Home Office, through its UK Visas & Immigration division (UKVI) for those who hold a Tier 4 sponsor licence. Both of these regulatory bodies require a type of quality review or 'educational oversight' from the Quality Assurance Agency for Higher Education (QAA) for the majority of higher education provision². The QAA listed 219 'private' or 'alternative' providers as having a current review in 2017.

Regulated Providers

4. Independent higher education providers can teach UK and EU/EEA students outside of any regulation from government but must undergo rigorous regulatory processes to access a Tier 4 sponsor licence and/or have their courses designated as eligible for student loans. Both processes require a quality assurance review completed by QAA. This review assesses providers against the UK Quality Code for Higher Education in the same way as publicly funded universities were before the end of cyclical review in 2016, and produces a publicly available report. In addition, both the Home Office (for Tier 4)

¹ <http://independenthe.com/2017/07/13/the-independent-higher-education-survey-2017-full-report/>

² Some Overseas institutions and study abroad providers are exempt from educational oversight requirements for

² Some Overseas institutions and study abroad providers are exempt from educational oversight requirements for a Tier 4 licence.

and the Department for Education (for student loans) have their own application and annual review processes.

5. Independent providers accessing student loans are not required to cap their fees and so are not subject to regulations which stipulate which students can be charged which fees. They are, however, capped for the amount of loan their students can access at the lower loan limit (currently £6,000 for those without the inflationary uplift provided by TEF).
6. For providers in England, this will be changing in 2018-19 as the new Office for Students (OfS) will take over responsibility from QAA for providing educational oversight for Tier 4 purposes, as well as administer a single 'registration' system for all higher education providers which will provide equal access to student loan funding under equal conditions and expectations.
7. Beyond those who have undertaken a review from QAA for Tier 4 or student loans purposes, there are a number of providers who teach international students under different arrangements:

a) Franchise Provision:

Providers partner with an awarding university to offer higher education qualifications which are academically managed by the awarding university. Students are enrolled with the awarding body and the teaching provider follows and integrates with the policies, procedures and structures of the awarding university. Where students are enrolled with the awarding university they will normally be issued with a CAS for their Tier 4 visa from the awarding university and will be counted in central data returns to the Higher Education Statistics Agency (HESA) submitted by the awarding university. If no students are enrolled with the teaching body, the awarding body is usually responsible for the quality assurance of provision.

Example: UCFB Wembley/Etihad

UCFB operates as a college of Buckinghamshire New University (Bucks New). While they are a separate corporate entity, their student systems and structures are integrated fully with the Bucks New model and the students are all enrolled as Bucks New students. Student loans are paid to Bucks New, and the University issues the CAS for any international students requiring a Tier 4 visa. The student attends the campus at Wembley or Etihad stadiums and is taught by UCFB staff.

b) Embedded Colleges:

These providers operate on or near the main premises of a university and support pathway courses, integrated programmes or joint ventures primarily for international students. In some cases they will have their own Tier 4 licences and will enrol students, but in others students will come through the licence of the university partner and the Embedded College will be listed as a "site" of the university.³ Student information will be collected centrally for those students studying at level 4 and above who are enrolled with the university partner.

³ See Tier 4 Sponsor Guidance, Document 1, Applying for a Sponsor Licence, pages 46-48 for more information: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673135/Tier_4_Sponsor_Guidance_-_Doc_1_-_Applying_for_a_licence_2018-01.pdf

c) Unregulated provision:

Some providers offer higher education courses but do not have a Tier 4 licence and are not designated for student loans. These providers may have partnerships with universities or other awarding/accrediting bodies to deliver qualifications from the Framework for Higher Education Qualifications (FHEQ), the Regulated Qualifications Framework or similar, or they might offer their own unregulated qualifications which derive value and recognition from their own national or international reputations. At present they are able to recruit UK and EU/EEA students, and some are also able to recruit non-EU students on courses which qualify for the UK's Short Term Study (STS) route.

Example: Interior Design School

The Interior Design School in London teaches a small number of students on a Professional Diploma programme that they match to a level 6 provision on the FHEQ in its design and intended student achievements, and a number of shorter courses. The Professional Diploma and other Design Certificates are accredited by the British Accreditation Council and involve extensive work and projects with the interior design industry. The courses have less than 20 places but are often oversubscribed due to the reputation of the School in the industry.

d) Study Abroad Providers:

There are over 70 American universities and colleges offering study abroad only through campuses in the UK and a further 20 (approx.) providers offering study abroad programmes to multiple North American Universities and Colleges in one centre.⁴ The majority of these providers are exempt from the educational oversight requirements of a Tier 4 licence as the Home Office recognises that their quality assurance is conducted entirely in the 'home' institution overseas. Some of these providers, however, offer work placements or study abroad opportunities in a centre independent from the student's 'home' university, and these providers are required to successfully complete a QAA review for their Tier 4 licence.

8. All of the above providers are able to recruit and teach UK students and, at this time, EU/EEA students. However, only those with a Tier 4 licence can recruit and teach non-EU students on longer courses who require a visa to study, and only those with the required accreditation can teach non-EU students on shorter courses which meet the criteria for the STS route.

Data on international students in independent providers of higher education

9. Many of the above models have been driven by the development of regulation, both in the Home Office and the Department for Education (initiated by the former Department for Business, Innovation and Skills, or BIS). It is regulation which has driven the data sets collected on international students and the difference between regulatory models has resulted in a complex and incomplete data landscape. Below we outline the available data sets, and explore the ones used to measure impact in this evidence.

⁴ <http://www.aasapuk.org/members.php>

Data as part of regulation for student loans

10. All 'alternative providers' with courses designated for student loans by the Department for Education must return student-level data to HESA through the Higher Education AP (HEAPS) return. This annual return was completed for the first time for the 2014/15 academic year and included only 63 providers. In 2017 the provider pool was expanded to include 97 providers but the results are still considered 'experimental'. We expect the data for 2016/17 students to be published in February 2018.
11. The students included in this record are limited. The students included in 2014/15 were only those on courses designated for student loans. For the 2015/16 record, providers were asked to include those students studying on courses not designated for student loans. Only 605 students were returned. When compared to previous data published by BIS in 2016⁵ on 2014 students, this number seems somewhat low. Further work needs to be done to clarify which students are currently and should in future be included in the student return to HESA. If HESA are confirmed as the Designated Data Body working with the Office for Students, they will have a much larger and more diverse group of independent higher education providers returning data to them in the future. Some of these new providers may find the current data field definitions (such as those that define a student or course) challenging in the context of very different models of delivery.
12. The HEAPS return does not include all the data fields of the return undertaken by publicly funded higher education institutions. For example, the record does not return data based on nationality by country, and does not include postgraduate students. For this reason it has limited utility for understanding the international students at independent providers.
13. The HEAPS data set forms the population both for the National Student Survey (NSS) undertaken in publicly funded HEIs and 'alternative providers' each year and for the Destination of Leavers from Higher Education (DLHE), a survey undertaken twice a year to support a greater understanding of what students do after finishing on their course. DLHE for alternative providers was completed for the first time with the 2014/15 population and results published in July 2017. Among the AP student record there were 970 non-EU leavers in the DLHE population, and 580 responded. This is an overall response rate of 60%, much higher than the 34% response rate of non-EU leavers from publicly funded providers.
14. Data from the 2015/16 student record shows that 2665 EU/EEA students and 3575 Non-EU students were enrolled in alternative providers in undergraduate programmes. There is no data for postgraduate programmes from the 2015/16 record.

Data as part of regulation for a Tier 4 sponsor licence

15. The Home Office has a very different approach to the collection of data. Students and changes to student activity are recorded in the Sponsor Management System throughout the course but this is not a central collection and is not considered a central database of students. The Home Office does not publish any data on enrolments, progression or completion centrally but does use the data submitted as part of a Basic Compliance

⁵ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/524453/he-alternative-providers-2014.pdf

Assessment (BCA) each year. This data is evaluated to ensure providers meet thresholds around visa refusals, enrolments and continuation/completion metrics.

16. The Home Office also works with QAA to ensure that some student data is collected as part of an annual monitoring process which is applied to providers categorised as 'private providers' on the Tier 4 register. This data is specific to the provider and included to assist with the quality assurance process. It is not intended to be collected as part of a central database of student information. QAA and HESA have different definitions of the students who must be returned as part of the different regulatory requirements and so the two data sets are not comparable.
17. The Office for National Statistics (ONS) provides data on applicants for study visas by different segments of the education sector, but in doing so it groups FE, independent HE and other 'tertiary' colleges together. 2016 saw 14,586 applications across Tier 4 sponsors in this grouping, a 9% decline from the previous year.⁶ There is no comprehensive data on enrolments resulting from visa applications in this category of sponsor.

Other data

18. For the 2016 BIS report mentioned above, the government commissioned IFF Research to do a survey of private HE providers as part of a review which identified over 700 independent providers of 'higher education'.⁷ Some of these providers had access to student loans for some of their courses in 2014/15. For the report IFF undertook a review of 2014 student data from the SLC as well as surveys with providers and students. The provider survey asked for a return of data on students from 276 private providers and concluded that 27% of the known student population were from outside the EU/EEA, compared with 13% from the publicly funded HE population. Only 17-20% of their students were in receipt of student loans.
19. In March/April 2017 we conducted the first Independent Higher Education Survey of providers from across the sector. 111 providers responded to a range of questions which included student numbers by UK/EU/EEA/Non-EU status and length of course, as well as information about missions, qualifications, regulations and future growth and ambitions. Some of the survey data will be included in this return but we are happy to work with the MAC to identify other data from the survey that you may find useful. We will be undertaking this survey again in spring 2018 for publication in the summer.

Future Data

20. Proposals for the new OfS registration system suggest that all English providers of higher education who are Tier 4 sponsors will return the same student-level data as providers who receive student loans or government funding (all of whom will be required to register with the OfS in one of the two Approved categories). This new data set will combine data from independent and traditionally publicly funded providers as well as

⁶ <https://www.gov.uk/government/publications/immigration-statistics-october-to-december-2016/study#sponsored-study-visa-applications-by-education-sector>

⁷ For the purposes of the report BIS defined 'private provider' as an institution which is run privately and: are not in receipt of recurrent funding from HEFCE (or equivalent body in the devolved administrations); do not receive direct recurrent public funding (for example, from a local authority, or the Secretary of State for Education); and are not a Further Education College.

expanding the data collected from independent providers. This will be the start of a much richer data set on international students being collected from a greater number of higher education providers in the future.

21. We remain concerned, however, that this data set will not include international students studying courses which are designed to articulate into higher education, which are primarily taught at the equivalent of RQF level 3 in England. These courses are often taught by higher education providers, on their own or in a collaborative partnership. As such they are not considered further education qualifications and are not counted in any further education data. With neither the OfS or Ofsted collecting any data on these students, it will be impossible to have an accurate picture of enrolment in this vital part of the international student journey. These level 3 qualifications are one of the fastest growing areas in international education. The UK must ensure that it is able to properly understand the number, characteristics and outcomes of international students who study these courses.

Data used in this evidence

22. To understand the benefits and costs of EU/EEA and Non-EU students at independent higher education providers we chose to use the HEAPS data set as the primary resource for student numbers as it had more robust data with a higher level of detail than the other available data sets. It was also based on 2015/16 student data, making it more comparable to the data sets of publicly funded providers than the data collected by IFF in 2014. The limitations to this data set are:
 - a. It only has data for undergraduate students
 - b. It does not give a break-down of nationality of the student beyond UK, EU/EEA, Non-EU
 - c. It is not part of a time series so we cannot analyse more than one year of data
 - d. It does not include all students at all independent higher education providers.
23. To give a broader perspective on the types of providers not included in the HEAPS data, we used a small sample from those who responded to The Independent Higher Education Survey 2017. This data is not comparable to the HESAPS data set as we did not ask for student level data. Student numbers were collected based on estimates from providers of UK, EU/EEA, and Non-EU students by length of course (under 6 months, 6 months or greater), not by level. We do include some overall information on the shape and overall student numbers from the sector but used a sample for the analysis of cost and benefit. For this sample we started with the 111 providers who responded and removed responses from providers who:
 - a. Were included in the HEAPS return
 - b. Provided no student data at nationality level (UK, EU/EEA, Non-EU)
 - c. Had no EU/EEA or Non-EU students
 - d. We could not find publicly available information on fees for courses longer than 6 months.

We did not include data from the five biggest pathway providers (Study Group, Cambridge Education Group, INTO, Kaplan International and Navitas) as they have separately contributed to this call for evidence with more recent data.

The sample included 22 providers offering a broad spectrum of courses including study abroad, degrees, regulated and unregulated diplomas and certificates and overseas awards.



Discrimination in the Tier 4 rules by 'Form'

24. The Home Office rules and guidance for Tier 4 apply different rules for sponsors and students by the corporate 'form' of the provider. Those sponsors which are labelled 'private provider' in the Tier 4 register are subject to different rules from those labelled 'Higher Education Institution', and their students have different rights. This differentiation in the rules is founded on a Home Office-defined 'form' and not related to a provider's individual risk, even though this risk profile is available to UKVI through BCA metrics, more detailed compliance assessments and audits. This has resulted in providers being forced to limit the courses and opportunities available to non-EU students and in many non-EU students not being able to study at certain providers at all. Below is a list of some the key areas which have had a great impact on both the number of international students, and their ability to contribute to the UK economy. This impact will be demonstrated in the data provided later in this response.

- a. Non-EU students at 'private providers' are not able to work while on a Tier 4 visa, either in term time or in the holidays. This means that they cannot contribute to the UK economy through national insurance or other income related tax and they cannot undertake any volunteering activities which may be considered 'unpaid work'. This includes internships which are an increasingly important part of the appeal of international education.
- b. Only 30% of a course at a 'private provider' can be work experience which is integrated into the course and assessed. 50% of a course at a 'higher education institution' can be work experience.
- c. Non-EU students at 'private providers' (except for Embedded Colleges) are not able to extend their stay in-country. This includes extending to complete their existing course, for retakes, to take a new course or progress onto a course at the next level, or to transfer to a Tier 2 or other visa. These students must return to their home country to make any such application and cannot take advantage of any of the benefits of applying in-country such as continuing to study, maintaining their accommodation and specific rules which apply to in-country extensions or transfers.
- d. Students at 'private providers' must undertake a secure English language test (SELT) available only through the IELTS exams and only at a limited number of test centres around the world, before making their Tier 4 visa application. 'Higher Education Institutions' are able to assess a student's English in relation to the course they are undertaken and make their own judgements on whether it meets the requirements for the course level and/or if they should make an exemption which must be approved by the Home Office. These students can satisfy their university with any number of possible English language tests depending on the university's requirements.
- e. Non-EU students at 'private providers' cannot bring dependants into the UK. This can mean long periods away from families and is a significant deterrent for non-EU postgraduate students.
- f. Non-EU students at 'private providers' cannot switch courses in country. Where a student at a 'private provider' wishes to study a course other than the one

indicated on their visa, they must complete a new visa application which, as set out above, must be done from outside the UK. Students at universities can switch courses on the same visa provided they can complete the new course within the same amount of leave that they currently have left.

- g. Non-EU students at 'private providers' are not eligible for the post-study work schemes for PhD, MBA or Master's students. Nor can private providers endorse students for the Tier 1 (Graduate Entrepreneur) visa, which is required if the student wishes to apply for the visa.
 - h. If a 'private provider', Further Education College or an overseas HEI does not apply for a Tier 4 educational oversight inspection in time, or fails to pass a statutory education inspection or Tier 4 educational oversight inspection, they will be made a 'legacy sponsor' and must re-apply for their licence once they have successfully completed their educational oversight inspection. However, if a university does the same they will retain their licence and their CAS allocation will be reduced to 0, making them unable to recruit non-EU students for a time until the Home Office decides to reinstate their CAS allocation.
25. The impact of this discrimination under the immigration rules has been to significantly reduce the number of visa applications to study at private providers and further education colleges. Between 2011 and 2012, when much of this differentiation was introduced, visas issued to students to study at private colleges and public further education colleges dropped by 48%.⁸ This decline has continued.
26. The consultation issued by the Department for Education on behalf of the new HE regulator for England – the Office for Students – suggested that this differentiation by form would end in 2019. The consultation document states:

As part of the wider consideration of the relationship between Tier 4 requirements and the new higher education regulatory framework, the Home Office is proposing that all providers registered in the Approved categories who have a track record of immigration compliance will benefit from the full privileges of Tier 4, including the ability of their students to work and for eligible post-graduate students to bring their dependants.⁹

To ensure that all international students have the opportunity to make meaningful and long-lasting positive contributions to the UK, and to ensure that all educational institutions and their local economies are able to benefit fully from having international students, immigration rules should no longer discriminate on the basis of risk profiles defined by the 'form' of provider. Should individual providers be assessed to pose a particular risk, UKVI should address this with the provider and take appropriate action. Some immigration rules will naturally vary according to the age of students, the level of study and the model of delivery, but providers should not be grouped by their form for the purposes of differentiation, as this does not reflect their commitment to immigration compliance.

⁸ http://exeduk.independentthe.com/wp-content/uploads/2017/05/ExEdUK_Parthenon-EY_Supporting_International_Education_062016_WEB.pdf

⁹ <https://www.gov.uk/government/consultations/office-for-students-regulatory-framework-for-higher-education>



27. The OfS will create a single register which will regulate both quality and access to all government funding, focusing not on form of provider but on the risks and responsibilities of individual providers. While we welcome this move, and the opportunity to end differentiation in immigration rules for English providers, there is still no proposal for providers in the devolved nations, or providers in England which do not meet the precise OfS definition of 'English Higher Education Provider,' to do the same.

Impact of international student fees

28. From the 97 providers who submitted 2015/16 student data to HESA in the HEAPS return, 45 report having some Non-EU students, 31 report having some EU/EEA students and 28 have both Non-EU and EU/EEA students. For those that do recruit them, Non-EU students make up between 1% and 50% of their total reportable student body, with an average of 12%. For those that recruit EU/EEA students, this group make up between 1% and 65% of their reportable student body, with an average of 18% of all students. This data considers undergraduate students only.
29. A review of available undergraduate fee data suggests that these providers would have received £52 million in 2015/16 from non-EU students and £31 million from EU students..
30. If we make use of the most recent multipliers available for higher education providers, as found in the analysis by Oxford Economics (2017) on the combined impact of the UK HE sector¹⁰, and apply a fee output multiplier of 2.5 to these fees it would mean that non-EU undergraduate students at independent providers in the HESA AP population contribute £130 million from their fees to the UK economy. EU students at these institutions contribute £78 million.
31. By using the Oxford Economics report but applying the calculations from the recent HEPI/Kaplan/London Economics Report (2018) *The Costs and Benefits of International Students by Parliamentary Constituency*¹¹, we calculated the amount of jobs created by fee income from international students at providers in the HESA AP return. With international students generating 21.1 jobs for every £1 million generated by fees, non-EU undergraduates in this population support 2743 jobs. EU undergraduates support 1645 jobs.
32. Data from the 111 providers who responded to the Independent Higher Education Survey 2017 suggests that this number is higher across a greater diversity of providers. The responding providers teach a total of 101,087 students on courses which vary in length and level of qualification. 17% of these students are from the EU/EEA and 26% are non-EU students. 57% are UK students.¹²

¹⁰ Oxford Economics (2017). 'The economic impact of UK universities, 2014-15'. www.universitiesuk.ac.uk/policy-and-analysis/reports/documents/2017/the-economic-impact-of-universities.pdf

The Oxford Economics report calculated multipliers as [(Direct output + Indirect output + Induced output)/Direct Output]

¹¹ <http://www.hepi.ac.uk/wp-content/uploads/2018/01/Economic-benefits-of-international-students-by-constituency-Final-11-01-2018.pdf>

¹² <http://independenthe.com/2017/07/13/the-independent-higher-education-survey-2017-full-report/> ; This data is from all 111 providers. The sample used in calculating costs and benefits is from 22 providers.

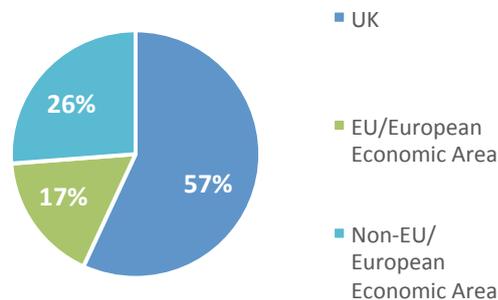


Figure 1. Student distribution by nationality (The Independent Higher Education Survey 2017)

Three quarters of the students from the responding institutions are enrolled on courses longer than 6 months, and the distribution of nationalities remains the same for both long and short courses.

33. To understand the impact of international student fees to providers who do not offer student loans to UK and EU students we looked at those in the survey respondents who were not found in the HESA return.¹³ Of the sample, 22 taught international students and had available fee data, with approximately 2000 EU and 3500 non-EU students between them.
34. The direct fee contribution of these students was £30 million (EU) and £52 million (non-EU). When we apply the same multiplier as above, these students contribute £74 million (EU) and £130 million (Non-EU) to the UK economy per year.
35. This fee contribution supports 2743 jobs from non-EU students, and 1645 jobs from EU students.

International student and visitor spending

36. Spending associated with international students at independent higher education providers is analysed in two parts – student expenditure and the expenditure of their visitors. Our analysis is conducted across the same two data sets as above.
37. For student spending we used London Economics' (as used in the HEPI 2018 report) adjustment to the housing and living costs from The Student Expenditure Survey (2013)¹⁴, which when adjusted for inflation to reflect 2015/16 prices, and including the indirect and induced effects was £22,000.¹⁵ We included the same multiplier from the

¹³ Only providers with courses designated for student loans by the Department for Education are required and eligible to submit data to HESA.

¹⁴ Department for Business, Innovation and skills (2013). 'Student Income and Expenditure Survey 2011/12'. https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/301467/bis-14-723-student-income-expenditure-survey-2011-12.pdf

¹⁵ We selected the £22,000 contribution which is attributed to the 'other undergraduate' group of students in the HEPI (2018) report as we are only calculating the annual contribution and not the contribution over the course of study. The 'other undergraduate' assumes a course of study of one year. This is because we do not know the course length for most of the students within either data set.



HEPI (2018) of 2.1 (indirect and induced effects) within this value, as obtained from the recent Oxford Economics (2017) report. The analysis suggests that the total expenditure of international students at HESA AP providers was approximately £137 million.

38. Of this £137 million student expenditure total, EU/EEA students contributed just under £59 million and non-EU students contributed just under £79 million.
39. Using a similar methodology to the HEPI (2018) report, we assessed the impact of visitor income from international students at independent higher education providers. The methodology entailed estimating the number of 'student-related visitors', using the total number of, and expenditures made by, all visitors to the United Kingdom in 2016. We assigned a value of £1000 per student spent by their visitors, as this reflected the annual contribution and impact approach we intended to apply. This £1000 includes a multiplier of 1.9, to reflect the direct and indirect impacts of visitor spending. Visitors to international students studying at HESA AP providers were found to contribute a total income of approximately £6 million.
40. Of this £6 million visitor expenditure total, visitors to EU/EEA students were found to contribute £2.7 million. Visitors to non-EU students contributed £3.6 million.
41. The same student expenditure analysis was conducted on our survey group, producing a total expenditure for international students of approximately £122 million.
42. Of this £122 million student expenditure total, EU/EEA students contributed £45 million and non-EU students contributed £77 million.
43. Our analysis indicates that visitors to international students studying at providers in our survey group contribute a total of approximately £5.5 million. This calculation was undertaken using identical visitor income values (£1000 including multiplier) as for the HESA AP provider group.
44. Of this £5.5 million visitor expenditure total, visitors to EU/EEA students were found to contribute approximately £2 million. Visitors to non-EU students contributed approximately £3.5 million.

Table 1. International student and visitor expenditure associated with independent higher education providers in the HESA AP return.

| Type of benefit | EU | Non-EU | Total |
|-----------------|---------------------|---------------------|---------------------|
| Fee income | £78,129,850 | £129,948,550 | £208,078,400 |
| Expenditure | £58,630,000 | £78,650,000 | £137,280,000 |
| Visitor income | £2,665,000 | £3,575,000 | £6,240,000 |
| Total | £139,424,850 | £212,173,550 | £351,598,400 |



Table 2. International student and visitor expenditure associated with independent higher education providers in the IHE survey data.

| Type of benefit | EU | Non-EU | Total |
|-----------------|---------------------|---------------------|---------------------|
| Fee income | £73,745,625 | £129,020,000 | £202,765,625 |
| Expenditure | £45,100,000 | £76,516,000 | £121,616,000 |
| Visitor income | £2,050,000 | £3,478,000 | £5,528,000 |
| Total | £120,895,625 | £209,014,000 | £329,909,625 |

45. Within the independent higher education sector there are a greater number of institutions which serve international students only. Study Abroad providers and pathway colleges specialise in providing a student experience which reflects the desire of their students to explore their local areas and the UK more broadly. Many of these providers offer regular excursions for students, or run courses specifically on local or national culture and perspectives. This provision is a regular part of their offer, and ensures that these students are more likely to have a positive impact on local and national tourism income.

Example: ACCENT London Study Center

ACCENT offers study abroad opportunities for students at specific American universities. Students take courses arranged and designed to fit the needs of their home institution alongside London-based work placements and courses designed specifically to teach students about UK culture, history and politics. As part of these courses students visit key sites across London and beyond to both experience and study the course content. In this, students contribute to tourism income through the activity on their course.¹⁶

Fiscal impact of international students

46. The fiscal impact of international students at independent higher education providers was analysed, taking into account regional variations in costs and number of dependants. We applied this analysis to both the HEAPS data set and the sample from The Independent Higher Education Survey 2017. The analysis for the HEAPS data is applicable to undergraduate students only.

47. We used the London Economics methodology from the HEPI (2018) report which calculates the fiscal impact by region. For EU/EEA students in full time education, a region-specific value of costs of ‘other’ public service provision per student per year was applied, along with the associated number of adult and child dependents based on the number of students in the specific data set. The costs of ‘other’ public service provision included housing, health, social security and education.

¹⁶ <https://accentintl.com/london/excursions-and-cultural-activities/>



48. Non-EU international students in 'private providers' are not permitted to bring any dependants under the current immigration rules. We have therefore not attributed any fiscal impact for dependants of non-EU students in either data set.
49. Where providers receive designation for their courses to attract student loans, this is an annual re-designation process and does not apply to all courses. As such we have limited our analysis of fiscal impact to an annual summary, rather than over the full duration of a course and only the HESA AP data set for designated courses is included in our analysis of student loan costs.
50. The total fiscal impact of EU/EEA undergraduate students at independent higher education providers in the HESA AP return was calculated to be approximately £18 million. This value is comprised of a total cost of 'other' public service provision associated with those students (£13 million), and the total cost of administering their student loans (£5 million). The fiscal impact per EU/EEA student is approximately £7,000.
51. The total fiscal impact of the adult dependants associated with those EU/EEA undergraduate students is approximately £913,000, while the total impact of their child dependants is £3 million. Per student, adult and child dependants cost approximately £5,000 and £10,000, respectively.
52. The total annual fiscal impact of non-EU undergraduate students at independent higher education providers in the HESA AP return was calculated to be approximately £16 million. Per student, non-EU students have a fiscal impact of £4,500 per year.
53. The total fiscal impact of EU/EEA undergraduate students at independent higher education providers in our survey sample was calculated to be approximately £13 million comprising total public service provision costs of £9 million and loan administration costs of £4 million. As was the case for providers in the HESA AP return, the fiscal impact per EU/EEA student in our survey is approximately £7,000.
54. The total fiscal impact of the adult dependants associated with those EU/EEA undergraduate students in our survey is approximately £648,000, while the total impact of their child dependants is £3 million. Per student, adult and child dependants cost approximately £5,000 and £10,000, respectively.
55. The total annual fiscal impact of non-EU undergraduate students at independent higher education providers in our survey sample was calculated to be approximately £14 million. Per student, non-EU students have a fiscal impact of £4,000 per year.



Table 3. Total annual fiscal impact of international students studying at independent higher education providers within the HESA AP return.

| Level of study ¹⁷ | Students | | | | Dependants | |
|------------------------------|-------------|------------|--------------|-------------|--------------|--------------|
| | EU/EEA | Loan cost | EU/EEA Total | Non-EU | EU/EEA adult | EU/EEA child |
| Undergraduate | £13,046,765 | £5,330,000 | £18,376,765 | £16,268,175 | £913,274 | £3,477,520 |

Table 4. Annual fiscal impact per international student studying at an independent higher education provider within the HESA AP return.

| Level of study | Students | | | | Dependants | |
|----------------|----------|-----------|--------------|--------|--------------|--------------|
| | EU/EEA | Loan cost | EU/EEA Total | Non-EU | EU/EEA adult | EU/EEA child |
| Undergraduate | £4,896 | £2,000 | £6,896 | £4,551 | £4,896 | £10,038 |

Table 5. Total annual fiscal impact of international students studying at independent higher education providers within the IHE survey data.

| Level of study ¹⁸ | Students | | | | Dependants | |
|------------------------------|------------|------------|--------------|-------------|--------------|--------------|
| | EU/EEA | Loan cost | EU/EEA Total | Non-EU | EU/EEA adult | EU/EEA child |
| Higher Education | £9,266,041 | £4,100,000 | £13,366,041 | £13,947,298 | £648,623 | £2,526,352 |

Table 6. Annual fiscal impact per international student studying at an independent higher education provider within the IHE data.

| Level of study | Students | | | | Dependants | |
|------------------|----------|-----------|--------------|--------|--------------|--------------|
| | EU/EEA | Loan cost | EU/EEA Total | Non-EU | EU/EEA adult | EU/EEA child |
| Higher Education | £4,520 | £2,000 | £6,520 | £4,010 | £4,520 | £9,480 |

¹⁷ The HESA AP student record only collects undergraduate student data.

¹⁸ The Independent Higher Education Survey data only collected student numbers by UK/EU/non-EU, and so does not have separate values for level of study.

56. We have not included teaching grant as a fiscal impact of international students as has been done in other analysis focused on publicly funded HE providers. None of the providers in either of our data sets receive any public funding through teaching or research grant.

Employment supported by international students

57. Most independent higher education institutions have a similar, although scaled down, staff profile to publicly funded universities. There are two key differences in staff profile:

- a) Independent providers are more likely to offer courses linked to a single industry or subject area. Their staff are more likely to work part-time in that industry and teach part-time in the institution. For example, all tutors and technicians at City and Guilds of London Art School must be practising artists or professionals/practitioners in their field.¹⁹ These staff will have a part-time contract with the institution as well as employment elsewhere or self-employed work.
- b) Some independent providers cater specifically to international students. Their staff profile is therefore reflective of this student characteristic and involves more support staff in key areas such as language, academic and professional skills, pastoral care, and immigration support.

58. Some independent higher education providers also operate a multi-campus model, and with each campus much smaller than a large university, may share key administrative staff across institutions.

59. As mentioned above, across our two data sets international student contributions from fee income alone support 8776 jobs in institutions and across local economies.

Impact on educational opportunities

60. Many students from independent higher education providers participated in the NUS survey of UK students' perspectives on international students, published in the 2017 report *Student Perspectives on International Students*. The report looked at the potential impact on courses and the student experience of possible reductions in international student numbers.²⁰ The NUS survey found that UK students felt there would be a significant impact on their experience and even their course if there were a 50% drop in international student numbers:

- a. Over 60% of undergraduates and over 70% of postgraduates felt they would have less diverse cultural experiences as a student.
- b. 30% of undergraduates and over 40% of postgraduates felt there would be less finance for course resources.

¹⁹ <http://www.cityandguildsartschool.ac.uk/about-us/team/>

²⁰ [https://nusdigital.s3-eu-west-](https://nusdigital.s3-eu-west-1.amazonaws.com/document/documents/33506/1b61a398a92fec01fa2b0e3a0fa7286b/Student_perspectives_on_international_students.pdf?AWSAccessKeyId=AKIAJKEA56ZWKFU6MHNQ&Expires=1517655060&Signature=DjZoDERgZRIrxZ3OO%2Fk6govrEFg%3D)

[1.amazonaws.com/document/documents/33506/1b61a398a92fec01fa2b0e3a0fa7286b/Student_perspectives_on_international_students.pdf?AWSAccessKeyId=AKIAJKEA56ZWKFU6MHNQ&Expires=1517655060&Signature=DjZoDERgZRIrxZ3OO%2Fk6govrEFg%3D](https://nusdigital.s3-eu-west-1.amazonaws.com/document/documents/33506/1b61a398a92fec01fa2b0e3a0fa7286b/Student_perspectives_on_international_students.pdf?AWSAccessKeyId=AKIAJKEA56ZWKFU6MHNQ&Expires=1517655060&Signature=DjZoDERgZRIrxZ3OO%2Fk6govrEFg%3D)

- c. 20% of undergraduates and almost 40% of postgraduates felt the removal of 50% of international students would lower the quality or value of their course.
- d. More than 10% of undergraduates and more than 20% of postgraduates felt their course would have too few students to run with just a 50% reduction in international student numbers.

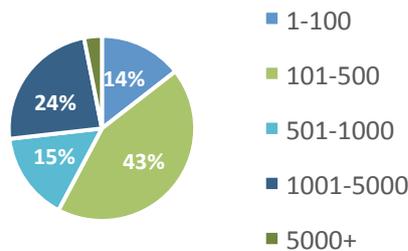


Figure 2. Student numbers in independent higher education providers (IHE 2017).

- 61. Many of our institutions are micro in size, with 53% of providers in the Independent Higher Education Survey 2017 having fewer than 500 students.
- 62. Their size and specialisation often means that recruitment must come from a global student population in order for their specialist courses to reach the numbers to remain viable. We looked at the prevalence of international students at institutions in the HESA AP population to understand the scale of this issue.
- 63. From the HESA AP student data, 5 of the 97 providers had more than 25% non-EU students and 7 had more than 25% EU/EEA students. 3 providers had more than 50% EU/EEA students with one institution having 64% of all students from the EU/EEA. 10 providers had a combined EU/EEA and non-EU student population of over 50%. With the UK leaving the European Union there is likely to be a significant drop in EU/EEA student numbers, with a combination of funding and immigration changes making the UK less attractive for this group. The risk to these small and specialist providers is significant if they experience a drop in either EU/EEA or non-EU student numbers, as 6 of the 10 providers had less than 150 students and some teach highly specialist courses in skills shortage areas.
- 64. Several independent higher education providers report that a significant amount of their charity income relies on having EU/EEA students. Providers such as the Royal Drawing School, the Royal Academy of Art and City and Guilds of London Art School work closely with organisations and individuals around the EU/EEA to advance art and art conservation education, many of whom donate significant funding to the institutions to support projects such as facilities upgrades, community and industry projects and scholarships for students. The Royal Drawing School's programme remains free to students on the basis of these donations. This relationship is highly dependent on the movement of EU/EEA students (and staff) between EU/EEA countries, and the potential threat to that mobility from Brexit is very concerning for the institutions involved, who fear a disconnection from their donors and increasing obstacles to engaging new donors across the EU/EEA.

Local impact

65. The delivery of courses at independent providers of higher education is far varied than in publicly funded universities. Independent providers tend to be smaller and more specialist, and to deliver in a model adapted to their industry or student characteristics. 39% of students at independent providers in the HESA AP data set started their course over the age of 30, leading more independent providers to deliver accelerated (2 years or less) degrees than publicly funded universities. A recent report from the Department for Education suggested that 70% of all students studying accelerated degrees do so at independent providers.²¹ Some institutions deliver entirely on a blended learning model, with students dividing their studies between online and on-campus delivery.
66. These unique course designs mean that the local impact from students at independent providers can be very different from those at traditional providers. Students are less likely to be studying a three-year traditional undergraduate degree, and more likely to be studying in different locations – industry placements, campus or online. Unfortunately, HESA does not collect data on mode of delivery for independent providers, and there is no comparable data set to show how often students are on campus or even in the UK.
67. The Independent Higher Education Survey 2017 showed that almost 50% of responding providers offer some part-time and flexible learning, and approximately 40% operate some online, distance and blended learning options. The provision of apprenticeships and accelerated two-year degree courses is more specialised, with 10% and 16% of responding providers offering these modes of teaching, respectively. Nearly half of respondents indicated that they operate industry-accredited courses, suggesting strong partnerships with the industries they serve and more off-campus employer engagement.
68. The estimated fiscal impact of international students in both of the data sets was based on the impact of students undertaking traditional models of higher education, full-time and on-campus as more precise data was not available for independent higher education students. To understand impact more data needs to be collected on mode of delivery and these data definitions need to go beyond a simple division between full and part time students as is now included in the HESA return.

International students' impact on the labour market

69. Non-EU students at private providers are not permitted to work during their time in the UK and must return home to apply for entry as a worker in any of the options available to them. 'Private providers' are not permitted to offer their PhD students extended visas for working under the PhD Doctoral Extension Scheme scheme or to endorse students for the Tier 1 (Graduate Entrepreneur) Visa. The impact of non-EU students on the labour market during study is therefore minimal.
70. EU/EEA students may work while studying without restriction, but there is no data set which can show how many EU/EEA students in independent providers are working or in what occupations. While we cannot say definitively we can make some assumptions from what is known of the European student workforce and the EU/EEA student

²¹ https://consult.education.gov.uk/higher-education-accelerated-degree-courses/widening-student-choice-in-high/supporting_documents/Consultation%20document%20on%20accelerated%20degrees%20publication%2011%20December.pdf

population at independent providers in the UK.

71. The HESA AP student return suggests that 39% of all students at independent providers start their study over the age of 30, compared with just 6% in publicly funded universities. Mature learners are more likely to work in similar jobs and sectors to university graduates while learning, and are more likely to be in roles near the higher end of the occupational hierarchy.²²
72. 48% of students in the HESA AP return studied business and related courses. Students who work during study are more likely to be studying business, social science, law, teaching, and health and welfare. With such high numbers of students studying business, it is more likely that EU/EEA students at independent higher education providers are working while studying.
73. After graduation, non-EU students at private providers must return home to apply for any other visa to work or continue studying in the UK due to visa rules which treat them differently from a student doing the same course at a publicly funded institution. This greatly limits the number of non-EU students who remain in the UK, regardless of discipline or intended industry.
74. We do not yet have comprehensive data to show how many non-EU students from independent providers return to the UK to work after study, but we are aware that the recent first release of the Destination of Leavers of Higher Education (DLHE) survey from 'Alternative Providers' includes some data on graduate destinations, including those who remain in the UK. In this release HESA stated that data for non-EU leavers was excluded from the student record, in order to align with the Statistical First Release on the [Destinations of Leavers from publicly funded providers](#), which excludes all non-EU students due to poor response rates. However, HESA also said that 580 of the 970 non-EU leavers in the target population for 'Alternative Providers' in 2015/16 responded, giving an overall response rate of 60%. This is far higher than the 34% response rate of non-EU leavers from publicly funded providers. For the purposes of this evidence we have requested this data from HESA, although we accept that with such a small sample, some of the data may not be able to be released. HESA has approved our request for a number of aspects of the data set, including the number of students who have remained in the UK, what their original course of study was, and what type of job they are currently undertaking. We will send this data to the MAC once received from HESA.
75. We do have some information on the destinations of EU/EEA students from 'Alternative Providers' in the DLHE AP data set released in July 2017. This data includes students from the 2015/16 population who were surveyed 6 months after graduation. Of the 470 EU/EEA students who responded to the DLHE survey (FT and PT), 42% remained in the UK for work following study. 20% were working overseas, 5% were doing a combination of work and study and 20% were undertaking further study. Only 20 students (9%) were unemployed 6 months after graduation and it is not known where they were resident at this time. The DLHE AP data release does not break down EU/EEA students who are working by industry or role but we have asked for this data to be made available to the MAC.²³

²² Beblavý and Fabo (2015) *Students in Work and their impact on the Labour Market*
https://www.ceps.eu/system/files/WD410%20Miro%20%2B%20Brian%20on%20Education_0.pdf

²³ <https://www.hesa.ac.uk/news/13-07-2017/sfr246-ap-destinations-of-leavers>

76. While we do not know the areas of work that EU/EEA or non-EU students go into following study, we do know the subject areas taught by the providers from both the HESA AP student data and the Independent Higher Education Survey 2017 data. In the HESA AP student data set 23 of the 97 providers taught in skills shortage areas including several specialist institutions in IT and Technology, Engineering, and 8 providers who teach visual effects and 2D/3D computer animation for the film, television or video games sectors. From the group responding to the Independent Higher Education Survey 2017, another 4 providers taught specialist courses training graduates for jobs from the shortage occupation lists including high-level culinary roles, ballet, computer animation and graphic design.

The decline in international student numbers in the independent higher education sector and its cost

77. Since 2010 independent higher education providers have seen a sharp decrease in international student numbers. According to a survey completed for the Department of Business, Innovation and Skills in 2013 over 53,000 students were studying at independent colleges in 2010/11,²⁴ but visa statistics indicate a significant decrease in student numbers over the following two years, falling by 72% to less than 15,000 students. The table below from the *Supporting International Education in the UK* report by Exporting Education UK shows the decline relative to other education sectors in the UK.

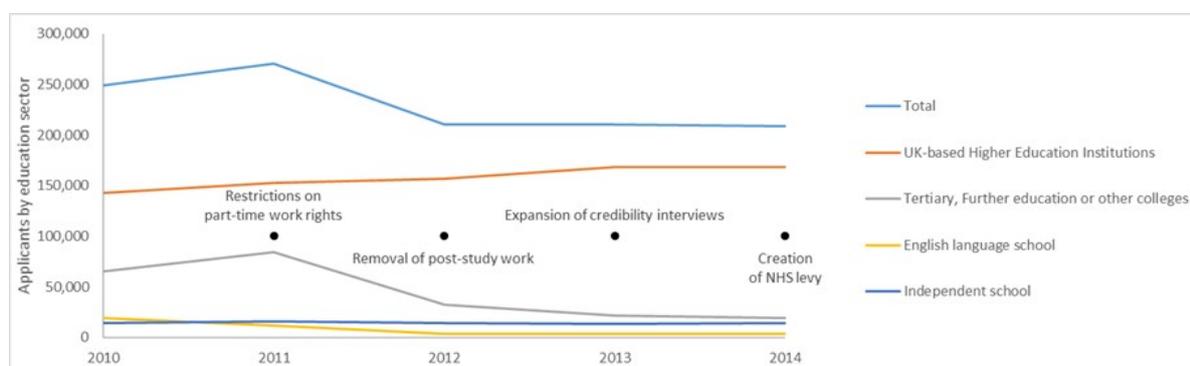


Figure 3. Changes to international student numbers in the context of major policy changes.

78. There remains no definitive data set to show enrolments across all independent higher education providers in the UK but data from migration statistics shows that visas granted in the Other Tertiary Education sponsor category continue to decline.²⁵

79. The decline in international student numbers at independent higher education providers has come at a time when the UK is experiencing falling market share. Internationally mobile student numbers are growing at a rate of up to 8%, but the UK has not reached more than 4% growth in enrolments at publicly funded universities since 2010, with several years recording declines during that period.

²⁴ BIS (2016) Privately Funded Providers of Higher Education in the UK.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/207128/bis-13-900-privately-funded-providers-of-higher-education-in-the-UK.pdf

²⁵ <https://www.gov.uk/government/publications/immigration-statistics-july-to-september-2017/why-do-people-come-to-the-uk-3-to-study>

80. The report by Exporting Education UK calculated the total loss to GDP due to the decline in international student numbers experienced by both the independent higher education sector and the publicly funded Further Education Colleges. The report estimated cumulative losses of approximately £1.1 billion, almost all of which came from independent higher education institutions and further education colleges as the only sectors experiencing a prolonged decline in student numbers. This report also calculated the additional opportunity cost to the UK from not capitalising on the growth of the tertiary education market internationally.

Table 7. Losses to the UK economy from the decline in international students.²⁶

| (In £ millions) | 2011/12 | | 2012/13 | | 2013/14 | |
|------------------------------|----------|--------|----------|---------------|----------|-----------------|
| | Students | X | Students | X | Students | X |
| Independent Higher Education | 53,000 | £1,509 | 22,912 | £687 | 14,669 | £505 |
| Further Education | 10,601 | £184 | 9,494 | £185 | 6,774 | £132 |
| Cumulative Loss | | | (32,820) | (£817) | (42,170) | (£1,137) |

Losses from opportunity cost

81. The report also calculated the opportunity costs, the revenue foregone due to the UK not matching the growth found in the international market. Whilst growth in the UK has stagnated, competitor countries such as Canada, the US and Australia have all seen significant rises. As a result, the UK's market share had fallen from 13% in 2012 to 10% in 2013 whilst the US's share had grown from 16% to 19%. The report suggested that the total cost of declining international student numbers since 2011/12, including opportunity costs is approximately £4.6 billion. It also estimated that a further £2.2 billion would be lost by lack of growth in 2015/16 and £3 billion in 2016/17. By 2016/17 the report estimated that failure to grow at the global rate of the market expansion in international students would have cost the UK economy almost £8 billion.

²⁶ http://exeduk.independentthe.com/wp-content/uploads/2017/05/ExEdUK_Parthenon-EY_Supporting_International_Education_062016_WEB.pdf Page 22

Table 8. Total Losses to GDP from opportunity cost.²⁷

| (In £millions) | 2011/12 | 2012/13 | 2013/14 | 2014/15 | 2015/16 |
|----------------------------|-------------|-------------|---------------|---------------|---------------|
| Higher Education | £210 | £426 | £798 | £1,421 | £2,095 |
| Independent HE | £120 | £250 | £390 | £541 | £704 |
| Further Education | £21 | £44 | £69 | £96 | £124 |
| Pathway Providers | £0 | £21 | £42 | £79 | £118 |
| Independent Schools | £0 | £14 | £38 | £63 | £90 |
| Total Losses to GDP | £351 | £755 | £1,336 | £2,200 | £3,131 |

82. The decline in international students at independent higher education providers has had a significant impact on these institutions, their local areas and the industries they serve. The loss of revenue has been significant and many providers have not been able to replace this revenue with students from the UK or EU/EEA because of the natural market limits of their niche but important subject areas.

Post-Study Work Options - *The Tier 5 (Graduate) visa route*

83. We believe that the existing Tier 5 route could be an option for a post-study work route which matches international students' desire for a short UK work experience, as it can provide the sponsorship model which allows government its desired control mechanisms but is not found in the erstwhile Tier 1 (Post-Study Work) visa. Tier 5 sponsorship is offered by overarching bodies, who are the sponsors rather than the employers. These bodies then manage the immigration compliance for companies or charities and work with the student to obtain their visa. Several routes within Tier 5 are already designed for graduate internship opportunities; however, when surveyed by NUS, over 65% of international students were unaware of any of these offers. A Tier 5 visa category aimed specifically at international graduates of UK universities and colleges applying for post-study internships would increase opportunities for students and employers. It would also be much easier for students to understand than other current options, so would address the damaging perception that the UK no longer offers a post-study work visa.

- a. The visa would be for one year, renewable for one additional year, and would follow the existing Tier 5 model.
- b. Tier 5 sponsors would be responsible for ensuring opportunities were at a graduate level commensurate with the area of study as they currently do for existing Tier 5 offers.

²⁷ http://exeduk.independenthe.com/wp-content/uploads/2017/05/ExEdUK_Parthenon-EY_Supporting_International_Education_062016_WEB.pdf Page 23



- c. Sponsors with expertise in non-traditional graduate fields such as the digital and creative industries would allow a flexible route for those 'portfolio' careers which do not follow traditional, Tier 2-style working patterns.
- d. The visa would offer solutions to current challenges posed for international students by Tier 2 graduate salary requirements, salary regionalisation and internship programmes that do not offer a salary.

Multi-year, multi-sponsor visas

84. Another possible new visa option could support students who progress between levels of education, such as school and university or foundation courses and university. A multi-course visa which is a partnership between several sponsors would offer students security throughout their route of study and would encourage students to come to the UK earlier in their educational journey. This model is currently offered in New Zealand, and maintains a focus on key assurances within the country's immigration rules while offering the student the ease of one visa application.

- a. A multi-year, multi-sponsor visa could be offered to those students who are intending to undertake a series of study courses in the UK, from school to pathway programmes to university, with a range of sponsors.
- b. Students would be required to provide evidence at each stage that they complied with rules on academic progression.
- c. Students would be required to have all offers in place (conditional on progression) before applying for the visa, and all sponsors would be required to agree to a co-sponsorship arrangement.
- d. Students awarded the visa would be granted the rights of a student at the highest level provider (e.g. the university), including working rights, from the beginning of their study path.

85. Student's confidence in the security of the journey they want to make is a key issue for prospective international students and their parents. This visa would reassure both groups that the conditions of their stay in the UK would not change during the course of their education and so would better support legitimate progressions and transitions.

Recommendations

Data

- i. The creation of the Office for Students in England will bring more students into a unified data landscape by requiring all Tier 4 providers to join the register and submit data. However this must include all courses which meet the existing length of study criteria at higher education level, not simply courses designated for student finance. This will increase the number of international students counted in the data.
- ii. The OfS must also include in its data requirements all level 3 courses designed as articulation routes to higher education and taught by higher education providers.

These students are not counted in any other data set and enrolments are not recorded in a centralised system.

- iii. The government should seek a more efficient and consistent evaluation of education as an export. The data derived from across the education sector shows that the value of international education would place the sector in one of the top exporting industries in the UK. For this sector to develop and reach its full potential, the government needs an accurate picture of the value from education exports.
- iv. Non-EU and EU/EEA students should be published separately from other migration categories within the migration statistics. A generic net migration target is not helpful, and the publication of international student numbers separated out from other categories would facilitate a coherent policy across government of promoting growth where it is beneficial to the UK.

EU/EEA

- v. The government should maintain a post-EU-exit immigration policy which ensures that EU/EEA students remain outside of the Tier 4 visa system, due to the large number of smaller institutions who rely on these students but are not in a position to apply for and maintain a Tier 4 licence due to the associated administrative and cost burden.
- vi. The UK must work to achieve bilateral solutions with EU countries which will allow their students to access funding to study in the UK. Many EU nations do not give students access to adequate funding levels when they study outside of their home country, and a failure to address this would make the UK HE system unattainable to many after Brexit.

Visa Nationals

- vii. The Home Office should adopt Tier 4 policy which ends differentiation in the immigration rules by form of provider. While some rules may need to be differentiated by level of study and age of student, providers should be evaluated on their own risk.
- viii. The Tier 4 sponsor system should be reviewed to ensure that it remains cost efficient and fair for smaller and specialist providers. The use of percentage thresholds in the Basic Compliance Assessment unfairly discriminates against low-volume sponsors, creates a market distortion and leads to disproportionate levels of burden and uncertainty for providers who by definition pose a minimal risk to immigration control.
- ix. The essential elements of the Premium Sponsor service should also be made available to smaller sponsors at an affordable price or incorporated into the general service to licensed sponsors. Meeting this considerable additional cost should not be the only means to gain information which is critical to ensuring that providers can improve their immigration compliance. As a new quality system for HE in England ensures that standards rise in line with compliance, services which disadvantage providers who recruit smaller numbers of students risk distorting the market.
- x. The government should explore the creation of a graduate work visa using the existing Tier 5 route. This visa would need to have its own marketable identity and to



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sit outside of the current Tier 5 cap in order to be effective. It would also need to be clearly branded as a short-term work visa for international graduates of UK further and higher education providers who are seeking international work experience to complement the international education they received in the UK.

- xi. The government should explore a multi-course, multi-sponsor visa similar to the one offered by New Zealand. There is a growing number of students looking to complete both school and higher education in the same country, and such a visa would encourage them to choose the UK, while also increasing awareness of and responsibility for visa compliance across a partnership of providers offering the visa.