

AASAP submission to APPG for International Students Inquiry

3 September 2018

To: APPG for International Students

From: Association of American Study Abroad Programmes in the United Kingdom (AASAP/UK)

Re: Our submission to APPG for International Students Inquiry

Who we are

The Association of American Study Abroad Programmes in the UK (AASAP/UK) is the representative body for UK-based US study abroad programmes, and speaks for our sector. It has 103 members, 90 of whom are universities, colleges and organisations providing study abroad in the United Kingdom to approximately 15,500 American students per annum. This figure is in addition to the many US students enrolled by UK HEIs directly, including at postgraduate level. AASAP/UK provides a forum for directors, faculty and administrative staff to discuss and respond to common issues in order to meet the needs of the present and anticipate the demands of the future. As a member-led professional body it hosts regular meetings, events and activities on best practice, legal issues, regulatory compliance and topics relevant to study abroad. It keeps members abreast of news and developments affecting the sector and facilitates links between institutions and stakeholders both within and outside the Association. Our website can be found at: www.aasapuk.org. See also Appendix for a full list of our members.

The USA study abroad sector, whose interests AASAP/UK represents, is significant in terms of its impact - both academic and cross-cultural - on the lives of these US students and is also a major contributor to the UK economy. Our recent survey of members programmes' expenditure (2016/17) puts the aggregate figure at over £158, 000 per annum. This figure does not include individual expenditure by students whilst they are in the UK, which our survey calculated to be on the order of £48 million annually.

American study abroad programmes have been in existence since the 1920s and are administered throughout the world. The number of US programmes based in the UK grew particularly in the 1960s and 1970s. Unique in many regards, US study abroad was established as courses of study managed by American institutions of higher education in order to promote global understanding and to fight against cultural isolation. Here in the United Kingdom, some study abroad students are full-time enrolees at UK universities; some are enrolled part-time at UK universities with additional instruction being offered by the UK office of an American college or university; and some are enrolled exclusively in modules administered and monitored by the UK office of a US institution ('island programmes'). The sector has students coming for as few as 3 weeks (short intensive modules) and as many as 10 months (academic year), but the majority are here for 4 months (one semester).

For many of these institutions it will also be fundamental to the design and ethos of their study abroad programmes that professors from the US campus participate in a teaching and/or programme-directing capacity in the UK. They strive thereby to integrate students' study in the UK within the curriculum of the home college or university; to support professional development by allowing their professors to teach courses that incorporate the rich 'on site' pedagogic

opportunities in the UK, thereby extending their knowledge and competencies; and to provide general mentoring and support for their students while they are abroad.

We as an association believe that US students (and accompanying instructors) can benefit deeply from a period spent studying in the United Kingdom, particularly at a time when the US seems bent in a more isolationist direction, under the banner of making America great again. But even predating the 2016 election, evidence shows that broad swathes of Americans still do not value contacts outside the borders of the US. For example, the British Council report (March 2013), 'Culture at Work' reported that, among countries included in the survey, US employers ranked lowest in the graph of 'percentage of employers who believe study abroad should be encouraged to improve intercultural skills', at a mere 8%. It was also lowest in the 'frequency of employee interaction with customers and partners or colleagues overseas'.

(<https://www.britishcouncil.org/sites/default/files/culture-at-work-report-v2.pdf>)

Yet, even as the forces of globalisation and strengthening, inward-focused nationalisms compete against one another, the need for internationally minded and internationally experienced US citizens remains paramount. Their numbers and influence will have a crucial impact not only within the US, but also on the rest of the world. As former US First Lady Michelle Obama's said in a speech at Stanford University's centre at Peking University (March, 2014): '[study abroad] will . . . make you more compassionate. We could always use more compassionate, young leaders out there in the world, people who are willing to step outside their comfort zones and be open to wiping away misconceptions'.

'Or, as the Chinese saying goes: "It is better to travel ten thousand miles than to read ten thousand books." But let's be clear, studying abroad is about so much more than improving your own future. It's also about shaping the future of your countries and of the world we all share. Because when it comes to the defining challenges of our time — whether it's climate change or economic opportunity or the spread of nuclear weapons -- these are shared challenges. And no one country can confront them alone'.

There have been numerous studies that attest to the impact of study abroad on US students' awareness of themselves as 'global citizens' and on the intercultural competencies they thereby gain. Here, for example, is an illustrative one: <https://files.eric.ed.gov/fulltext/EJ1062114.pdf>

The big picture of US students studying abroad

Current figures show that about 10% of US graduates have studied abroad.

(http://www.nafsa.org/Policy_and_Advocacy/Policy_Resources/Policy_Trends_and_Data/Trends_in_U_S_Study_Abroad/). The latest 'Open Doors' report (2017) shows the UK still to be the leading destination for US students studying abroad, followed by Italy and Spain:

<https://www.iie.org/Research-and-Insights/Open-Doors/Data/US-Study-Abroad/Destinations>.

NAFSA reports that 'An overwhelming majority of US study abroad takes place in Europe with 40 percent of students studying in just five countries, the United Kingdom, Italy, Spain, France, and Germany'.

However, it is notable that, according to Open Doors, the UK numbers are growing less strongly (2.5%) as against Italy and Spain (3.3% and 5.8% respectively). Moreover, recent numbers are very much more strongly up in these competitors: Germany, Ireland, Australia, Japan, South Africa, Mexico. There is also evidence of a small but steady trend downward of numbers studying in European countries, and a comparable small but steady trend upwards of those choosing to study

in Asian and Latin American countries: <https://www.iae.org/Research-and-Insights/Open-Doors/Data/US-Study-Abroad/Host-Region>.

It seems to us paramount that the UK do everything it can to project itself as a welcoming, affordable, and dynamic place in which to study and to gain ancillary work experience, if it is not to lose out against other nations and economies that do these things better.

Our evidence to the APPG inquiry's specific areas of focus

1. In the classroom.

- A) AASAP/UK members cite cogent and extensive evidence of the educational impact on US students who study in the UK, instancing numerous students who have been intellectually and imaginatively excited by the new learning opportunities afforded to them. We draw here merely on representative examples:
- This member's comment speaks for many: 'Many of my students coming to the UK are studying Politics, Economics, or International Affairs. They very much require the global perspective that UK universities (and media) can deliver, given the more globally focused nature of dialogue in this country. Particularly in the current era of political change, US students can derive valuable insights and experience from their immersion in such a global learning environment.'
 - Another member says: 'Students who come to study with us in London return to their home countries (for us, by and large their home country is the United States) and spread the message that travelling, living, and studying abroad are not only possible, but desirable. In this way they go on to become ambassadors for London, the UK, and Europe. They actively correct misconceptions and spread messages of global connection. Students who study in London gain a deeper understanding of the place which in turn they communicate more broadly to their home communities'.
 - Other members note examples of students who have either taken back to the US specific content ('Two students from the University of Pennsylvania attended Oxford Brookes for one semester in the Department of Nursing. On returning to Penn, they presented to their peers on the theme of nursing in the UK and the NHS'); or have chosen to spend longer in the UK because of intellectual enthusiasms ignited here ('A student from Brown University chose to extend her time studying in Edinburgh because she became fascinated by the influence of Viking culture/old Norse on Scottish cultural identity. This is a theme she hopes to explore in her postgraduate studies').
 - It is also noteworthy that the teaching of American students in Britain has stimulated the creation of many modules within the US study abroad community that focus specifically on British history and culture. In recognition, AASAP/UK recently sponsored a one-day symposium on 'teaching British studies'. A book has likewise recently been published specifically addressing this pedagogical ground: *Britain Explained* (Martin Upham, John Harper Publishing Ltd, 2017).
- B) AASAP/UK members also cite evidence of the positive impact of US students within the British university system:

- ‘Feedback from colleagues in universities that host our direct-enrolment students is that faculty appreciate having our students in their classes because our students are thoughtful, critical thinkers who raise good points for discussion. International students in general will bring a wider variety of perspectives to any classroom discussion, which can enrich the learning experience of all (including the faculty)’.
- One AASAP member notes that ‘International students make up the greater component of a number of modules run by British universities which would not otherwise attract sufficient numbers to run. Examples of modules which are recommended to study abroad students, who make up the majority of the class, include ‘Intercultural Awareness’ and ‘Museums of London’ at King’s College London; ‘History of Art in London’ and ‘History of Architecture in London’ at UCL; and ‘London and its Museums’ at Queen Mary University London.
- There are numerous examples of US students choosing to extend their studies at UK universities, citing newfound perspectives, or new clarity about the direction of their academic interests, in fields such as Politics, History, Psychology. One programme mentions two students who recently chose to extend their studies at King’s College London and Queen Mary University London, citing the inspiring lectures, in War Studies and in Business, respectively.
- Other examples given are of US students returning to the UK to do postgraduate studies, fortifying numbers taking postgraduate courses here. The numbers of students making this choice are significant and examples too numerous to list. Anecdotally, students have returned to undertake these courses within the last few years:
 - A Master’s degree in museum studies at UCL
 - A Master’s degree in Environment, Politics and Globalisation At King’s College London.
 - A Master’s degree in Economic History at Oxford University.
 - A Master’s degree in South Asian studies at SOAS.
 - A Master’s degree at the London School of Hygiene and Tropical Medicine.

2. In our communities.

AASAP members cite numerous examples of the impact of US students outside the classroom. US students in particular bring to the UK a fundamental ethos of volunteerism. Community service is a central part of many US teenagers’ lives, and they continue to pursue volunteer activities during university. Members cite other community impacts as well:

- ‘Based on feedback from students who wish to continue their “habit” of volunteering while in the UK, our programme has begun active outreach with charities to locate volunteer opportunities that can fit with a study abroad student’s varied schedule’.
- ‘Several of our students have volunteered in a homeless shelter, where guests find them to be friendly and interesting dinner companions. Having international students interested in them seems to offer a small, positive break from their difficult reality’.
- ‘Some US students become part of a religious community during their time in the UK. Some of these congregations are of a dwindling size or simply appreciate the addition of a new, young, and enthusiastic person’.

- 'Many students make friends and enter into relationships that give them lasting connections to the UK'.
- 'While they are in London, students on study abroad programmes explore and appreciate London and the UK. They inject money into the tourist economy as well as the local economy, as do their families who often come to visit them. They buy clothes, food, and other staples. When they return home, they often leave some of these behind, which we donate in turn'.
- One director of a US study abroad programme says: 'I personally book several thousand pounds worth of theatre tickets every semester to enable the teaching of a course on The London Stage'.
- Charley Harrison, Director, London Tailored Tours: 'US students make a significant impact to my small business, coming on cultural and educational tours throughout the year. I know their contributions to the economy in the tour industry to be great'.

3. For our regions and nations

A) We respond to the invitation to address the topic of the impact of the UK-wide approach to immigration.

- Many members cite the drag that is exercised on their programmes by the complex, and onerously expensive Tier 4 student visa system. Members have spent a disproportionate amount of time and resources in the last several years accommodating the frequent changes to Tier 4 guidance and regulations, having regularly to re-learn the regulations themselves and re-interpret them for their partner institutions and students. Even UKVI staff appear to have had difficulty keeping track of the constant changes, which has often resulted in erroneous advice being given to Tier 4 sponsors. One programme director recounts being advised by someone in the visa corrections unit that staff on the paid helpline 'often don't know the rules because they are agency staff, not Home Office staff'. On one occasion a Tier 4 sponsor was advised by someone on the helpline to ignore a rule change of sponsorship 'since nobody checks this anyway'.
- Members report that US students find the application system very complicated. An increasing number are opting to enter the UK on a short-term study visa in order to avoid the onerous process, thereby missing out on the opportunities a Tier 4 visa provides.
- The cumbersome, costly, and in some respects counter-intuitive application process has indisputably created a sense that the UK has become a less welcoming place for foreign students and some US institutions have acknowledged encouraging their students to seek other study abroad destinations just to avoid it. Once new links are established in other educational markets, students from these institutions are lost to the UK forever.
- The CAS allocation system can act as an impediment to programme growth and development and the penalties for inadvertent mistakes throughout the process can be disproportionate. Whilst we understand that the Home Office has had to root out the

charlatans and bogus educational providers and that UKVI must ensure ongoing compliance with its rules, the approach and language can seem excessively hostile for legitimate Tier 4 sponsors from a recognised low risk sector with exceptional compliance records.

- The immigration and compliance officer for one of our larger member programmes says: ‘As the two main immigration routes for students (Short-Term Study and Tier 4 General) were not designed with study abroad programmes in mind, we often face difficulty with the Home Office when it comes to their understanding of our programmes, and how the immigration rules apply to them. We have faced significant issues over the last few years with visa errors, both from the UKVI and the Border Force; we continually try to address this with those two branches of the Home Office and raise their awareness of how the rules pertain to study abroad. For example:
 - Over the last year, the UKVI have a 92% error rate when issuing Tier 4 visas for our students. These errors are predominantly related to work rights, but also frequently to the dates of validity. I believe this may be to do with the fact that the UKVI are no longer accustomed to issuing full-length visa vignettes since the advent of BRP collection; however, it still causes substantial disruption and cost to have errors amended.
 - The Border Force Officers often misinterpret the rules as they apply to study abroad in two ways:
 - Short-Term Study: They issue Standard Visitor entry stamps for students on short-term programmes, even though the students present letters confirming they intend to register on a study abroad programme and so are requesting Short-Term Student entry permission.
 - Tier 4 General: They often see the Tier 4 vignette in the student’s passport but decide not to validate it with an entry stamp, choosing instead to give the student a Short-Term Study entry stamp as their programme is less than six months. This is incorrect, as our Tier 4 students undertake assessed work placements, which is not permitted under the STSV route.
 - As the students are extremely low risk (and in the vast majority of cases not eligible to apply for leave to remain in the UK), it would be very beneficial for the Home Office to find a way of improving their experience of obtaining the correct permission to study and intern for short periods. I would suggest that this would involve not putting them through the same process as long-term students who obtain their qualifications in the UK, especially as this seems to create a significant number of errors for the Home Office to correct’.

B) We address the question of the UK-wide approach to education regulation as it impacts on our sector.

- The UK regulatory system for education providers also embroils some of our members in complex, time-consuming and expensive procedures of education oversight within the UK. Our ‘full’ members – those who operate stand-alone study abroad programmes in the UK that are in effect an overseas campus of the home institution – are permitted to adduce their accreditation by one of six NARIC-recognised US higher education accrediting agencies. However, our ‘associate’ members (or ‘Private Providers’ as listed on the Tier 4 Sponsor Register), who deliver academic programmes on behalf of multiple US HEIs, must

undergo yearly education oversight in the UK by QAA. At time of writing it is not clear whether some or all of our associate members may be compelled instead to come under the jurisdiction of the new Office for Students, which among other bureaucratic consequences will mean a significant increase in costs for those programmes. The OfS is in any case designed to oversee the quality of the student experience at three and four-year UK universities; its architects did not and could not have had in mind the study abroad experience of mostly one-semester US students.

- But whether QAA or OfS, we feel strongly that it is both illogical and unreasonable that third party providers are not granted the same educational oversight concession as our full members. By dint of the multiple institutions on whose behalf they deliver study abroad programmes in the UK, third party providers are in fact subject to more and in most cases *far* more education oversight and scrutiny than AASAP's full members. Crucially, each of the US universities and colleges on whose behalf they act are accredited by one of the same six NARIC-recognised agencies that accredit full members. The third party providers' course models in terms of structure, format, scheduling, content and assessment are identical to those provided by AASAP's full members.
- To a very great extent, therefore, education oversight in the UK not only duplicates these efforts but given the different benchmarks, rubrics and quality codes that are applied in each country, unnecessarily complicates it by adding a second and very often contradictory layer. A disproportionate amount of third party provider staff capacity and financial resource are directed at a UK oversight process that is out of sync with the fundamentals of its own academic provision.
- This burdensome and unnecessary layer of education oversight is an example of how the current UK regime impedes the rational and fruitful educational exchange that ought to be the case between two countries allegedly in a 'special relationship'.

C) We respond specifically to the invitation to address the topic of work experience and internships.

- Many of our members testify to the positive impact these opportunities have had on their US undergraduates. US students on study abroad programmes in possession of Tier 4 visas are able to undertake work experience that constitutes up to 50% of their study, so long as the work experience is an integral and assessed component of their overall course of studies here. Their placements have been in every sector of the working world, and in organisations ranging from large established companies to small start-ups, in areas including – but not limited to - business and finance, theatres and museums, politics and government, NGOs and charities, science and medicine, the IT sector, and the media. Were it to be made in any way more difficult for our students to undertake such work experience, it is a near certainty that our numbers coming to the UK would decline.
- As an example, the director of one study-abroad programme says: 'Our students have the option to participate in a part-time internship for academic credit in addition to their regular course work. This possibility serves to make the UK an appealing study abroad destination: students with international work experience on their resume stand out to future employers. According to the report *An Exploration of the Demand for Study Overseas from American Students and Employers* employers agree that candidates with an

international study experience are likely to possess cross-cultural communication skills, flexibility, autonomy, leadership skills, innovation, maturity, presentation skills, ambition, independence and cultural awareness’.

- Another says: ‘The students who come to study with our programme don’t just get to experience living and studying in the UK, they actively contribute to the economy through work placements (internships). Most of our placements last just 21 days (three days per week for seven weeks). Though it may seem short, we observe incredible student transformations during that time. Students report improvements in their confidence, independence, and adaptability. They are better able to negotiate difference and cope with intercultural nuance. When these students return home, they bring fond memories of their time in the UK and plans to return for future tourism or even graduate studies. They also carry home strong ties to their British friends and colleagues. We’ve seen former interns go on to be brand ambassadors in their home countries, introducing their former internship hosts to new markets and increasing brand awareness’.
- The above programme administrator goes on to add: ‘The companies, charities and other organisations where students are based during their internships also see enormous benefits. The students produce work product during their internship, but also bring new international insights and fresh enthusiasm. Because the placements are so short they do not displace local workers, but they do allow companies to experiment with new ideas, services and roles. We mostly partner with SMEs and start-ups, and have countless stories of successful internship placements leading to new product launches, entry into new markets, and increased hiring. Our students always return to their home country at the end of their programmes, but the benefits to the host placement are lasting’.

D) We respond specifically to the invitation to address the topic of the challenges and opportunities of achieving a greater balance of international students in regions across the UK.

- Whilst most of our members are based in London and the South East, we have several members in the regions that make a significant impact on their respective regions and communities. In addition to their tangible positive impact on the local economy and employment, our members also make a positive impact, albeit less tangible, on such things as community engagement and cultural exchange often in regions that are more rural and less diverse than London and the South East.

4. For research, trade and soft power

- We assert that the long-term impacts of the ties fostered through American students coming to study, and to do work experience, in the UK cannot be overestimated.
- This point is eloquently put by the director of one of our member programmes: ‘Less measurable than economic factors but no less crucial are the creative academic links, synergies in future research collaboration and soft power diplomacy that are fostered by the presence of US students in the UK. Hansard Society scholar alums mainly develop careers in politics and public service, academia, the law and Civil Society. Other AASAP member programmes tend to represent a much wider range of professional disciplines including but not limited to academia, the arts in all its many forms, business, commerce and trade, the law, medical research, science and technology. What almost all of these US alums have in common by virtue of their time spent studying and interning here are lasting British professional networks and a lifelong predilection to the UK, something that can only

position a post-Brexit UK economy more favourably in global markets in the uncertain years to come’.

- Another says: ‘Our students are often accompanied by a faculty member from the home institution. In addition to a small amount of teaching the faculty member will conduct academic research. In this respect study abroad programmes facilitate research in a wide variety of fields for publication in academic books and journals in the UK, Europe and the USA’.

APPENDIX

The following institutions are full members of AASAP/UK:

- Abilene Christian University
- Advanced Studies in England
- Arcadia University The College of Global Studies
- Boston College
- Boston University Study Abroad London
- Brigham Young University
- Bucknell University
- Carleton College
- Central University of Iowa
- Centre College-in-London
- Colgate University
- Cornell-Brown-Penn UK Centre
- Danenberg Oberlin-in-London Program
- Dartmouth College
- Dominican University London Programme
- Drew University London Semester
- Eckerd College
- Emory University
- Fashion Institute of Technology, State University of New York
- Florida State University International Programs Association (UK)
- Fordham University, London Centre
- Furman University
- Georgetown University
- Global Education Oregon in London
- Grinnell College
- Harding University
- Harlaxton College
- Harvard Summer School
- Hollins University (London Programme)
- Hult International Business School
- Illinois Wesleyan University
- Indiana University Global Gateway for Teachers
- Institute for Study Abroad
- Ithaca College
- James Madison University
- Lawrence University London Centre
- Lipscomb University
- NYU in London
- Pepperdine University
- Randolph College

- Richmond the American International University in London
- Rutgers University
- Samford University in London
- Santa Clara University School of Law
- Simpson College
- St. Cloud State University
- St. Lawrence University
- Stanford University Programme in Oxford
- Stetson College of Law
- Study in England Programme, University of Minnesota Duluth
- Susquehanna University
- Syracuse University London Program
- The College of William and Mary
- The George Washington University
- The University of South Carolina School of Law
- Tufts in London
- University of California Education Abroad Program London & Edinburgh Study Centres
- University of Chicago
- University of Chicago Booth School of Business
- University of Connecticut in London
- University of Illinois
- University of North Carolina, Chapel Hill in London
- University of Notre Dame (USA) in England
- University of Washington Department of English
- University of Wisconsin in Scotland
- University Studies Abroad Consortium
- Wake Forest University
- Washington University in St. Louis
- Williams College Oxford Programme
- Wroxton College of Fairleigh Dickinson University
- Yale in London

The following institutions are associate members of AASAP/UK :

- Academic Programs International (API)
- ACCENT International
- American Institute for Foreign Study
- Anglo Educational Services
- Associated Colleges of the Midwest
- CAPA The Global Education Network
- CEA STUDY ABROAD
- Council on International Educational Exchange (CIEE)
- Educational Programmes Abroad Ltd
- EducatorsAbroad Ltd.
- EUSA Academic Internship Experts
- Foundation for International Education

- Hansard Society
- IES Abroad London
- INSTEP-WFU
- International Studies Abroad (ISA) London
- St. Clare's, Oxford Liberal Arts Programme
- The British American Drama Academy
- Washington International Studies Council (WISC)

The following institutions are affiliate members of AASAP/UK :

- Across the Pond - Study in Britain Ltd
- Bader International Study Centre, Herstmonceux Castle, Queen's University
- Dewsign
- Goldsmiths, University of London
- International Students House
- Kingston University
- MUN UK Ltd (Memorial University of Newfoundland)
- Northumbria University
- Queen Mary University of London
- United Kingdom Council for International Student Affairs (UKCISA)
- University of East Anglia
- University of the Arts London
- University of Westminster
- US-UK Fulbright Commission