



## APPG for International Students

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#### Immigration White Paper – Views from international students and those who teach them.

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International Students Section, National Union of Students

International students in membership of the National Union of Students are most interested in the White Paper proposals on changes to post study work rights and changes for EEA students.

**Post Study Work Visa:** The White Paper proposes extensions to the amount of time international students at universities can remain in the UK after completing their studies. It proposes:

- Six months post study leave for masters students (as per the MAC recommendations)
- Six months post student leave for bachelors students (in addition to the MAC recommendations)
- One year's leave for those who complete a PhD.

The proposals will also allow for students studying at bachelor's level or above to be able to apply to switch into the skilled workers route up to three months before the end of their course in the UK, and from outside of the UK for two years after their graduation.

NUS would like to see this offer extended for further education students who often study technical courses which can be in demand in the UK. While we are pleased that there has been a movement on post-study work visas for undergraduate students, this white paper has not moved sufficiently to match the offers presented by global competitors such as Australia and the USA. NUS remain supportive of a clearly labelled post-study work visa of up to two years to ensure international students have the same ability to apply their learning in work experience in the same way as UK students.

**EEA Students:** The biggest change to the student immigration system could be for EEA students, who may have to adhere to the Tier Four rules currently endured by non-EEA students. As a result of the changes, EEA applicants could have to pay visa fees, provide a proof of funds, may not be able to study part-time at undergraduate level, may have to apply to sponsor dependents (only at PG level), and could be affected by work rules during study and limited post-study work opportunities.



This could deter many EEA students from applying to UK universities. It could also place a lot of pressure on places which sponsor students (such as the NHS, Schools, Universities etc) who have not previously had to consider sponsoring EU students. We are also concerned that international students will not continue to feel the effects of a hostile environment, but that EEA students will also begin to bear the brunt of this too.

NUS also believe the government should scrap the net-migration target as it is an unworkable and ill-informed approach to policy making.

#### UK Council for International Student Affairs (UKCISA)

Since 1968 the UK Council for International Student Affairs has worked to support international students and the institutions, students' unions and organisations who work closely with them. We have over 500 members including every university in the UK, many FE colleges, independent schools and students' unions. As well as giving advice direct to students, we support our members by providing training, up-to-date guidance about immigration rules and information about the wider student experience.

UKCISA has identified a number of areas the white paper proposals could impact students in a short briefing on [our website](#). In general, UKCISA remains concerned at the impact and consequence of requiring all EU/EEA students to be subject to the sort of visa and compliance controls in force for non-EU students which could well make the UK seem less attractive to them. However, we welcome the various proposals which could make it slightly easier for all qualified students with appropriate skills to gain post-study work in the UK. We also welcome the promise of an “extensive 12-month programme of engagement with sectors across the UK” which UKCISA will engage with. We will update this post as more information becomes available.

We have noted that the paper does not, of course, discuss entitlement to student finance ('Student Support') and 'home' fees status after the implementation period, as these issues are governed by separate arrangements outside the scope of the Bill – although they will, as expected, be of fundamental importance to students from the EU in the future and for many influence decisions they will take on whether or not to come to the UK in the future if the UK is no longer part of the EU.

#### Universities UK

In 2016-17, 442,375 international students made up 19% of all students registered at UK universities (6% from the EU and 13% from non-EU countries). We [welcome](#) the immigration white paper's recognition of the benefits that international graduates bring through the introduction of post-study work for a period of up to one year for PhD students and 6 months for others. However, unless we allow all graduates to stay and work for two years the UK will continue to lag behind our global competitors in our offer to international students. We are also concerned that these proposals will require EU students to obtain a study visa, placing an additional burden on students and universities.

Universities UK is calling on the government to introduce a [Global Graduate Talent visa](#) to allow international students to gain work experience in the UK for up to two years after graduation. Under this proposed visa, all higher education institutions registered as Tier 4 sponsors would be able to sponsor their graduates to search for and gain work experience in the UK for up to two years on a more flexible basis than currently permitted by the Tier 2 visa, without restrictions on job level or salary, and without an employer sponsorship requirement.



We are also calling on the government to introduce a number of other welcoming policies, such as removing students from the net migration target, minimising bureaucratic and financial barriers to student recruitment, launching a cross-departmental government strategy to drive up overseas student numbers and securing favourable mobility arrangements for UK and EU students in a future trade deal.

### Independent Higher Education

Independent HE is the UK membership organisation and national representative body for independent providers of higher education, professional training and pathways. [The Independent Higher Education Survey 2018](#) suggests that 14% of students in independent higher education providers are from the EU/EEA and 37% are from outside the EU/EEA. For some of our members, international students make up all or a very significant part of their student body, many of whom are EU students.

According to the Higher Education Statistics Agency, independent providers recruit more students from Italy than any other country. It is unsurprising then that student recruitment is the number one concern for independent providers of HE arising from the White Paper proposals. Requiring EU/EEA students to obtain a Tier 4 visa will place the UK at a recruitment disadvantage within Europe and will significantly increase the burden of recruiting EU/EEA students for UK higher education providers. Several independent HE providers do not yet have a Tier 4 licence as the system created is too complicated and costly for the number of students they recruit who would require a visa. This means to avoid removing all international students from their universities and colleges, they will need to spend significant resources to apply for a sponsor licence in a system ill-suited for their size and students.

Many independent higher education providers recruit EU nationals who also work within their industry or are active in their creative and performing arts. This not only brings industry-relevant teaching to students, but with the perspective of the many different cultures within the EEA. The White Paper proposals will make it impossible for a EEA-national to work both within industry or as an artist, and as a teacher/lecturer in a university or college, severing this industry and cultural link.

We call on the government to create an SME route for small and medium sized universities and colleges to support them to recruit international students. Like other SME approaches, this could both support their recruitment activity and ensure that regulations designed for larger universities and colleges were re-designed to make them less burdensome and more efficient for SMEs in education.

### Association of Colleges

The Association of Colleges (AoC) has written a [position paper on Brexit](#) which covers several areas related to the Immigration White Paper. We also keep our [Brexit webpage](#) updated accordingly.

For colleges, the main student-related issues are the ***future immigration procedures for EU students wishing to study in the UK*** (passports only; ETA and Tier 4) and ***the future tuition fee arrangements for EU students wishing to study in the UK***. AoC also has other queries in relation to the Tier 2 salary threshold and its incompatibility with college lecturer pay, which we outline in our paper *Brexit and Colleges*.



We welcome the opportunity to discuss the proposals as stated in the White Paper and that they would not be introduced straight away. The college sector will need decent lead-in time to plan for and to transition to a new system for EU students in particular. However, a no-deal Brexit scenario and therefore no transition period could pose a different set of challenges for EU students looking to come and study in the UK after 29th March.

### English UK

The key issues for the ELT sector are around the increased level of bureaucracy to be imposed on our EU learners. The introduction of an Electronic Travel Authorisation (ETA) for EU/EEA citizens, while it may be simple and inexpensive, is an additional step which is not demanded by our close competitors in Ireland or Malta. In addition, the planned phasing out of ID cards will come as a major shock to some of our EU source markets, such as Italy, who send groups of schoolchildren for a week or so only. 58% of our 500,000 students come from the EU and 53% of all our learners are under 18. The average length of stay is under 4 weeks.

However, we hope that the suggested expansion of the Youth Mobility Scheme will mitigate the loss of free movement that young European adults enjoy now and that they will continue to come to the UK to combine study with part time work as they seek to improve their English.

A final point is the part that the English Language Teaching sector plays in the wider international education context, specifically the pipeline to our HE sector, in which those who come here as teenagers for a language holiday, or as school-leavers to improve their English, dream about studying for their degree or post-graduate qualification at a UK university. When they enter the UK education system at a young-age they often form lifelong allegiances, so we would be wary of any changes that threaten that potential.

### Pathways to Higher Education

Pathway Providers play a critical role in helping Britain's universities recruit international students from around the world. We are valued partners of universities – who value the study skills we help international students develop to ensure they succeed when they begin their studies – and are viewed as “highly compliant” by UK Visas and Immigration (UKVI).

We are part of [Destination for Education](#), a coalition of education providers that wants to maintain the UK's position as one of the leading exporters of education.

The Home Office set out some commitments in the Immigration White Paper in December 2018, but the Bill contains few meaningful policy reforms. Destination for Education believes that the Immigration and Social Security Co-ordination Bill is a once-in-generation opportunity to create an immigration system for international students that helps Britain recover its status as the world's leading destination for students from around the world. [We are calling on members of parliament](#) in all parties to work together to reshape the Bill into powerful reforming legislation.

While the Immigration Bill is intended to be a framework, it is important that international student policy is not lost in post-Brexit debate. We believe that Britain's universities, and the local economies they serve, deserve the certainty of a Bill that sets out clearly the reforms necessary to recover Britain's lost ground in the battle to recruit the best students from around the world. The All-Party



Parliamentary Group for International Students set out its policy recommendations for international student policy, which we urge the government to adopt.

The UK needs to deliver a fair student visa regime to avoid losing out to its competitors, so that the economy can continue to benefit from international students.

#### Independent Schools Council

The Independent Schools Council (ISC) brings together seven associations of independent schools, their heads, bursars and governors. Through our member associations we represent over 1,200 independent schools in the UK and overseas. These schools are ranked among the best in the world and educate more than half a million children each year. According to our [2018 census](#), of the 529,000 pupils at ISC schools, 54,000 are non-British of which 29,000 have parents who live overseas. 16,000 pupils from EEA countries at ISC schools.

Independent Schools remain concerned about the ability of EU students and staff to travel between home and the UK after 29 March both in policy and practice. In the case of a no deal Brexit, Schools worry if EU students go home for Easter and come back without issues; if EU students are due to start school in September can they still come and take-up places? While the no deal paper on immigration suggests that in the event of no deal freedom of movement rules would essentially still apply in practice and EU students can come without a visa until a new immigration system in January 2021, this is not being clearly communicated and causing a lot of uncertainty.

Independent Schools are preparing for more administration for EU students who will have to get a visa post 2021. Over next few months ISC will work with our members to come up with a list of ideas on how the student visa system could be streamlined (as the White Paper invites). For those who employ EU staff, schools will have to fill roles through the Tier 2 work visa route that had previously been filled by EU staff exercising freedom of movement. This would include support (kitchen) staff and foreign language teachers in French/German etc who were previously EU migrants and whose salary may be below the £30,000 threshold under consultation.

#### British Association of Independent Schools with International Students (BAISIS)

At BAISIS we know that parents sending their child, at however young an age, to a UK boarding school have the long-term aim of their child entering into a university here. The attraction of entering a UK university in turn is heavily linked to post-study work opportunities in the UK. Therefore, BAISIS is concerned, as are all our colleagues in the international education sector, at changes to the visa system at any level. Any policy that makes the UK less attractive for international students considering HE here is likely to have an adverse knock-on impact on those considering enrolment into boarding schools.

#### Exporting Education UK

Education is one of the UK's most successful export sectors but its status as such is rarely recognised due to limited visibility in official economic statistics.

Exporting Education UK, the cross-sector group which supports the work of the APPG, has long called for the ONS to track education as a discrete export sector, and in doing so to develop a reliable data set with which to assess its economic impact and how this changes over time. Only that which is counted can be understood, and only that which is understood can be truly valued, so this move



would be an essential first step in properly taking education exports into account when designing and assessing the impact of government policy. This was also one of the key recommendations from the All-Party Parliamentary Group for International Students' inquiry report of November 2018 (A Sustainable Future for International Students in the UK). In common with the CBI, Exporting Education UK also calls for education exports to be included in the ONS's annual International Trade in Services (IT IS) survey.

International students in the UK today comprise the most economically significant component of education exports, and it is this group which is most directly impacted by the future immigration policy proposed in this White Paper. Data on international students which passes muster as official statistics only currently exists for students in publicly funded universities, and it is this data which therefore drives discussion of policy and impact. Other sub-sectors of education are less well served by accurate and accessible data, with the result that their economic contribution is often underestimated and not widely understood. This inconsistency will need to be addressed in order to form a complete picture of the impact of future immigration policy including the proposals in the White Paper.

The economic contribution of international students extends beyond the tuition fees they pay to our schools, colleges and universities, to encompass their accommodation and living costs, leisure and other retail expenditure, and the boost to travel and tourism represented by the family and friends who visit them in the UK during their time here. This wider contribution has not previously featured in official statistics, but recent attempts have been made to estimate its importance to regional economies in studies by Oxford Economics and London Economics.

The Department for Education made a first attempt at developing a more comprehensive picture of the sector data in its July 2017 report 'UK revenue from education related exports and transnational education activity 2010-2014'. The experimental nature of the statistics included in this report highlight the patchy data available in much of the sector and the difficulty of developing an accurate picture of the economic value of education exports more generally and international students in particular. The government should prioritise this work in the course of the further development and monitoring of its policy on international students in the UK's immigration system.