

From: Association of Heads of University Administration (AHUA) Executive

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## UKBA and the introduction of points based immigration for UK universities

The following comments are offered following recent consultation with AHUA members and are intended to complement the detailed concerns already provided by UUK, by UKCISA and by individual universities.

### Summary

The principal concern expressed forcefully by AHUA members is the long term reputational damage to the sector and to the UK economy that will ensue unless urgent rectification takes place of the widespread problems being experienced by UK universities following the introduction of points based immigration by UKBA. Members are also very worried about the short-term consequences for international student admissions in Autumn 2009 given that the difficulties experienced in the last few months will be compounded when the peak period for visa application takes place in the next two months.

#### 1 Value of the business

1.1 Around 240,000 international (non-EU) HE students contribute to the UK economically:

- Tuition fee income (£1.5 billion) and living costs contribute a total of £2.87 billion pa to the UK economy;
- Higher education outstrips the export value of other UK industries such as textiles, clothing, publishing and cultural and media;
- Additional fiscal benefit from students gaining employment in the UK after graduation;
- Four-fold growth in the injection into the UK economy since 1995;
- Net cash benefit of each FTE international student estimated to be £17,900.

1.2 A measure of excellence driving UK HE performance in international league tables (such as the Times Higher QS World University Rankings) is the proportion of international academic staff and students; the UK has 17 universities in the top 100. International mobility of the academic workforce is a key element underpinning international academic excellence.

1.3 Non-economic benefits:

- Goodwill from UK graduates returning to work in leadership positions overseas;
- UK nationals benefiting from an international HE learning experience.

*Data sources: HESA 2006/07; HEPI 'Economic costs and benefits of international students', July 2007*

## 2. State of the market

The market for international HE students is expected to continue to grow and for competition to be increasingly fierce. The UK is holding second position (11% of market share in 2004, but 16% in 1998) after the USA (20%). US institutions were severely affected by immigration restrictions introduced post 9/11 and are only now beginning to recover their position. Other EU countries are offering more degree programmes delivered in English to attract overseas students and benefit from government support in the form of state subsidy for international students via zero or very low tuition fees. The market is extremely sensitive to any actual or perceived disincentives to international student applicants – those who are academically and financially most mobile will have an increasing amount of choice in selecting the country and university for their studies. International HE is a large globalised business.

## 3. Key Concerns

- **Reputational damage.** Early evidence that applicants and agents handling applications are finding the UK less attractive than other countries because of the complexity and uncertainty of immigration process, delay, and additional cost. Students are losing trust and confidence in the institution of their choice and in the process. The longer term reputational damage to institutions, the sector and to the UK of being seen as unwelcome and incompetent is of the utmost concern.

*“[The University] is deeply concerned that the impact of some of the new arrangements for points based immigration will prove to be detrimental to students, academics, and far more worrying, that in the longer term, it will have the potential to damage the University and Higher Education in the UK as a whole... Recent curbs on immigration in the USA have seen a drop in academic mobility and it would be seriously damaging to the UK’s global competitiveness if this country witnessed a similar trend” University of Cambridge*

*“The risks are obvious and I’d give the US example of what happened when they changed their visa regime – an immediate downturn which hit some universities incredibly hard and it’s taken 5+ years to repair the damage. Our income from international tuition fees alone is worth c£60m per annum and with an intake of c3,000 we have at risk c£30m of new student income (over just their first year) – and that’s just tuition fees.” University of Nottingham*

*“Inconsistency of message, process and information from different branches of UKBA operations and in particular in different Entry Clearance operations means unpredictability and unnecessary delays in visa processing and unease and insecurity amongst agents. (Largely a reputational issue, but also immediate financial impact if students fail to receive visas in time for their programmes of study)... Negative impression the above engenders in students engaging for the first time with the UK visa regime. There is a tendency to conflate experiences so that UKBA delays, refusals or inconsistency reflect badly on agents and the University. University of Stirling*

- **Implementation failure.** Widespread concern in the sector that system failure in the introduction of PBS by the UKBA will detrimentally affect international student intakes for 2009/10 – one HEI reports an estimated 20% downturn in admission resulting from PBS (Tier 4). Examples of systems failure are numerous but can be categorised into changing and unclear information and poor communication by UKBA; inconsistent, sometimes pedantic, and incorrect interpretation by Entry Clearance Officers abroad of UKBA rules; average turnaround times for visa applications increasing significantly; absence of a central help line and contact point for HEIs.

*“One of the biggest problems for individual institutions and indeed for the UK as a whole, is the lack of consistent and accurate understanding and application of the Policy across the UK Border Agency itself. The sector has been expected to be able to fully understand and implement it, (and at relatively very short notice bearing in mind the scale of the work some of us have had to do to ensure this happened by the end of March), yet this work is not reflected across UKBA globally. The lack of a sufficiently rigorous communications plan within UKBA is one of the key problems we are experiencing. Different people are being given different messages, and indeed reasons for visa refusals, and the sector is continually having to go back to the UKBA here in the UK to check that the policy has not changed. This in itself causes unnecessary work, but more importantly, the ever-increasing lack of confidence is leading to an increased number of telephone calls and emails from overseas, because applicants are worried and confused.” University College London*

*“Rumour and speculation about what constitutes a ‘successful’ visa letter, manifest errors in interpretation and decision-making by ECOs and the publication of incorrect information have created substantial uncertainty, concern and additional work across the University’s admission community which has been exacerbated by the difficulty of getting quick and definitive action.” University of East Anglia*

*“Overall we feel there is a lack of communication from the UKBA and the absence of a central contact point... The default position of UKBA is also to refer enquirers to the website but there is no version control on the document displayed. Given that the situation is fluid, it is not clear whether you are looking at the most up-to-date advice and guidance. A central UKBA helpline for HEIs would be helpful and may ensure consistent messages are being communicated to the sector.” University of Durham*

*“Two weeks ago we were advised that students were being turned back from the Beijing visa office because our letters carried the wrong sponsorship number, despite that being the number which had been notified to us by UKBA.” University of Plymouth*

*“...In cases such as Thailand where there are 4 to 6 week delays, students are facing situations where they are not able to get their visas in time for the start of their pre-session courses. We have 10 students in this category.” University of Reading*

- **Training and resources.** Worry that embassies and offices are insufficiently resourced with properly trained personnel to handle the peak flow of visa requests in the period July-September; Universities have had to increase administration to implement changes to admission processes and resolve queries and will bear the costs of issuing Confirmation of Acceptance of Study (CASs).

*“We need guarantees that UKBA/FCO have put in place additional resources needed to deal with the increase in visa application volume over the shorter summer timeframe which will result from the introduction of PBS Tier 4. At the moment we are receiving reports from some parts of the world of 6-8 week turnaround times for issuing visas” London School of Economics*

*“I think the key message is to ensure that entry clearance processes and offices are fully staffed over the summer to ensure speedy processing” University of Nottingham*

*“Excessive staff resources spent on dealing with ever-shifting goalposts and inconsistent information - admissions and recruitment staff, advisers, administrators all devote an inordinate amount of time to resolving issues that arise through lack of clarity and consistency in the system as well as establishing systems to meet the requirements of our sponsor license.” University of Stirling*

- **IT.** The on-line Sponsor Management System is due for launch in the Autumn but full and final details of its operation are still awaited.

*“My concerns mainly relate to the information systems to support the new arrangements. We are in the process of implementing a new student record system and this has significantly affected the requirements of this project in terms of the functionality to support more robust attendance monitoring as well as all the general visa administration. We have been unable to get any helpful advice from the UKBA regarding the format that the visa license numbers will be in when we start getting them (for example, whether they will be sequential numbers which would allow for a level of automation or if we'll have to manually enter a visa license number for each relevant applicant).” BPP College of Professional Studies*

*“Another key area of concern is the IT framework for the SMS. We are going to use a new SITS module to interface with UKBA... but we understand that it will not be until September that anything is really ready for any degree of testing or familiarising. Again, this is significantly too late.” University of Bath*

*“Widespread unease about the workability of the yet-to-be-implemented computer-based system for issuing CAS and reporting students who fail to enrol or drop out. (There is a direct financial implication in costs of SITS modules and there may well be staff costs in adapting to the new system).” University of Stirling*

#### 4. Conclusion

The above summary and examples constitute a significant threat to UK universities at a time that the sector and UK economy can ill afford. Continuation of these problems will have immediate adverse consequences and long term damage on the UK's reputation for excellence. They require urgent action. AHUA, which represents the managers and administrative staff most closely involved in trying to successfully implement Points Based Immigration as it affects our institutions, would welcome speedy intervention from Government in addressing these concerns. AHUA stands ready to work with Government departments as appropriate to resolve these difficulties as swiftly as possible.

*Prepared on behalf of AHUA Executive by Dr Philip Harvey, Registrar & Secretary, University of Sussex*