

Crazy for you

What just happened, and where next,
for the UK's switchback policy
on international students?

Jonathan Thomas

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EXECUTIVE SUMMARY

The context of the UK's policies towards international students and the Migration Advisory Committee's recent review of the graduate visa route

This report sets out the competing priorities around the policies – which lie at the intersection of higher education, immigration, and trade – governing questions of the UK's offer to and admission of international students. Key points are:

- The UK's attractiveness to international students is the goose that lays the golden egg, bringing varied benefits to the UK, including significant economic benefit, although the exact quantum and impact of this is disputed.
- But attracting large numbers of international students requires acknowledging that this is not a simple win-win equation, and seeking to address potential trade-offs that this opportunity can give rise to. The UK is not alone in facing this, as developments this year in Canada and Australia – two of the UK's main competitors for international students – have confirmed.
- While the financial reliance of the UK higher education sector on international students cannot be ignored, neither can it simply provide a trump card in perpetuity, used to shut down any debate about the material considerations and consequences that can flow from the admission of large numbers of international students.
- The higher education sector's financial dependence on international students makes it more, not less, important to acknowledge and address – not dismiss and deride – any concerns over the admission of large numbers of international students, so as to not forfeit public consent to the UK's continued openness to international students. The increased debate in this area should therefore be viewed as an opportunity, not a threat.
- The UK's attractiveness to international students, and the numbers it receives, is determined not just by its policies governing admission of international students, but also the UK's broader immigration policies for work, and how these both compare with those of competitor countries, and also interact with the position and preferences of different countries' prospective students.
- The post-study (now renamed) graduate visa route is far from the only point of tension in this policy area, but sits at the core of the policy debate, inherently blurring the line between whether an international student is being sold, and whether they think they are buying, education or immigration, and because, in a globally competitive market, post-study work rights are important to prospective international students in choosing where to study.

The Migration Advisory Committee's (MAC) recommendation to maintain the graduate visa route looks inconsistent, but is in fact entirely explicable

- The MAC's recommendation to maintain the graduate visa route might seem inexplicable, given that the government had introduced the graduate route in effect against the advice of the MAC, and the MAC had argued on previous occasions against allowing the route.
- The MAC's rationale for its recommendation to maintain the graduate route though can best be understood through considering five different elements of the questions asked of the MAC in its review:
 1. The specific questions asked of the MAC, and their particular framing, in the Home Secretary's commissioning letter to the MAC, and how the MAC interpreted these.
 2. The evidence the MAC found in its review, both on the social care question specifically raised in the commissioning letter, but also more broadly as to the economic and fiscal contribution of those on the graduate route, and the sorts of jobs they were able to switch into at the end of the graduate visa period.
 3. Third, the importance of factoring in other recent important policy changes impacting this policy area – first, the large rise in the main minimum salary threshold for sponsoring overseas workers into jobs in the UK, and, second, the restrictions imposed on international postgraduate students bringing their dependants with them.
 4. A number of different aspects arising from the timing of the review: (a) the short time since those other important policy changes had been implemented; (b) the short time the graduate route itself had been re-opened; (c) the short time allowed by the government for the review, which meant that evidence was mainly taken from the higher education sector itself; and (d) the MAC's concerns about being pushed into making a rushed decision on an issue with considerable consequences reaching into different areas far beyond immigration policy.
 5. The MAC's broader discomfort at being asked to make a recommendation with consequences – for export strategy, for higher education financial sustainability, and for local economies – far beyond its specific immigration policy remit, and reluctance to provide cover for the important political decisions needed in these areas.

Six key takeaways

- Particularly in the light of the heated reaction on both sides of the debate which accompanied the publication of the MAC's review of the graduate route, it is important not to lose sight of important points arising not just from the review, but, also from the broader recent developments in the UK around admission of large numbers of international students, which are in danger of being overlooked, and key lessons of being ignored.

- The **six key takeaways** are:
 1. **The review of the graduate route was merited**, in the light of the number of concerns and questions raised around the route, not least by the MAC itself, the large numbers of students staying on through this route, and the changed behaviours of students which the data was showing. The review once again shows the worth of the MAC, which was able to generate and produce new evidence, new data, and new angles to address key misconceptions and misperceptions, to highlight areas for focus and for improvement, but also of good practice which might be potentially leveraged more broadly to address tensions within the system.
 2. **The higher education sector's strategy around international students is high reward, but high risk.** Its advocacy strategy, while formidable and impressive, risks appearing arrogant and remote, dismissive and misrepresenting of others' concerns, and therefore missing an opportunity to engage with, and allay, those concerns in a way that could bolster public support for the UK's approach to international students, and provide a better and more stable foundation for the policy that is agreed.
 3. **Public concerns around international students should not be ignored and can be addressed**, for, while it should not be overstated, polling confirms a worrying negative shift in how the British public are now regarding international students, and ignoring and wishing away these concerns risks missing a golden opportunity to address them.
 4. **A key challenge is around accommodation** in respect of admitting large numbers of international students, and, while the UK's position is not the same as Canada's and Australia's in this regard, there are clear indicators that the UK has been suffering some of the same pressures. But also that there are at least some positive examples of proactively addressing this challenge, as the MAC flagged in its review of the graduate route, in respect of the coordinated planning steps put in place in Sheffield.
 5. **Evidence-based policy making requires collection of evidence, which the Home Office must take more responsibility for.** Not only was there the data error in the commissioning letter to the MAC from the Home Office, but, while the graduate route had only recently been re-introduced, there was a lack of plans for the Home Office to collect data from, and about, it. The Home Office had posed difficult questions to the MAC about what the evidence showed, and what the outcomes were, without considering whether the Home Office would be able to provide the data to answer such questions. This undermined the ability for the MAC to carry out a thorough evidence-based evaluation.
 6. **The lack of data on what dependants do who accompany those coming to the UK**, including whether or where adult dependants work, means that, while they are counted for the purpose of the UK's immigration numbers, they not treated as making any economic or fiscal contribution in the UK. Their contribution can therefore conveniently be ignored – which would not be the case if as should be the case the evidence of it had been collected – and, on this un-evidenced basis, policies restricting dependants is then less controversial and becomes easier to justify.

CHAPTER ONE – A SCARY STORY

Last autumn we warned of the growing danger in the UK to the goose that lays the golden egg – international students.¹ Being the second most popular destination worldwide for international students not only builds the UK's soft power, but also earns the UK hard money, cross-subsidising study opportunities for domestic students and supporting not only UK higher education institutions but also local economies.

But the relative equanimity with which the British public has regarded international students has never been unconditional. As set out in the extremely extensive 2018 National Conversation on Immigration, which spanned the length and breadth of the country, the public:

*“largely had positive views about student migration, believing that it brought tangible economic and social benefits to universities and local communities... Yet support for student migration is not unconditional. In some places participants felt that international students were given priority over young people from local communities”.*²

A quid pro quo then for public acceptance of the high level of international students that UK higher education institutions take in is that there must be no suggestion that young people in Britain are adversely impacted in their own access to that education. The stock narrative had become that the higher fees that international students can be charged, and are willing to pay, actively benefit domestic students, allowing their fees to remain fixed at much lower levels, and for them to access a far greater variety of courses than would otherwise be the case.

Yet the goose has recently risked becoming a victim of its own success. The post-pandemic surge in numbers of international students – with an all-time high of 484,000 student visas issued in 2022 – initially raised concerns in respect of the sheer number of visas going to dependants accompanying international students. These made up one-quarter of all study-related visas issued by the UK in 2022, having risen eight times since 2019.³ The large increase was particularly focused on those coming for one year's postgraduate master's courses, with much greater numbers than previously coming in the over-25 age bracket, and with increasing numbers of accompanying dependants including significant numbers of children who themselves would consume education resources. Concerns around the impact of this were most visibly manifested around the availability of affordable accommodation in some university towns and cities, which appeared to be increasingly struggling to accommodate all their students and dependants.

This was the context for the government's adjustment to the rules – announced May 2023, to take effect from January 2024⁴ – restricting the right to bring dependants to only those students engaged in research,⁵ who amount to only around 5% of the UK's current international postgraduate student total.⁶

The government also moved to prevent those coming on a student visa from switching to a work visa *prior* to finishing their studies. Stories had emerged that some of those arriving on student visas were being encouraged into jobs immediately

on arrival in the UK, without even taking up their study place.⁷ Such a practice obviously does then look like a thinly veiled work immigration route rather than a genuine student immigration route.

In response to the high net migration figures announced in November 2023, the government then further announced that it would commission a review by the Migration Advisory Committee (MAC) of the graduate visa route. This visa specifically allows those students already in the UK on a student visa to stay on in the UK for a two-year period (three-year if a PhD student) after graduation during which period they are permitted to work in the UK without having to be sponsored into a skilled worker visa. The government said that it would “be asking the Migration Advisory Committee to review the Graduate route to prevent abuse, protect the integrity and quality of UK higher education and ensure it works in the best interest of the UK.”⁸

The start of 2024 only saw the debate over the international student sector in the public domain intensify further, with the ‘I got into uni, but couldn’t find anywhere to live’⁹ story for domestic students morphing into an even more dangerous narrative for the sector; the ‘I can’t get into uni any more at all’ story. As one sector commentator Jim Dickinson has put it, for many people:

“When their niece gets much better A Levels than they ever did but can’t get into the Russell Group university their school advised them to aim for, they’re angry. When they opt for a middle-ranking university in clearing but then can’t find accommodation in anything like a sensible price range, they’re angrier still.”¹⁰

The narrative framed in an exposé in *The Times* was that, intermediated by a web of profiteering agents, the UK’s top universities are allowing higher paying overseas students with relatively poor grades preferential access onto UK degree courses though foundation courses, while local students have to achieve much higher grades to gain access.¹¹ Far from being presented as positively complementary to the interests of domestic students, this narrative painted the burgeoning international student population in the UK as a threat to them.

CHAPTER TWO – RETHINKING INTERNATIONAL STUDENTS AROUND THE WORLD – EVEN IN AUSTRALIA AND CANADA

For those supportive of an open approach to international students, it is tempting to view these more challenging narratives around them as a misinformed storm in a teacup that will swiftly pass. But they have turned a technical policy area into a more visceral story capturing the public's interest; that some children in the UK – maybe your *own* child – may lose out on going to university because of high-paying but less able overseas students, unscrupulous agents, and profiteering universities.

In the debate about whether public concerns about immigration in the UK are primarily about numbers or control, we have argued that, even if controlled, large numbers do matter.¹² *The Times* story could not have been a better example. That story would not have been newsworthy at all had it not been for the large numbers of international students coming to the UK. And that story in turn then made international students even more newsworthy. A few weeks later the wholly unremarkable announcement of a slight uptick in the UCAS figures of international undergraduate student numbers in the UK became headline news,¹³ even though these figures showed little, other than to confirm that the large recent increases in international student numbers coming to the UK have largely not been at the undergraduate level.

Whether or not some aspects of *The Times* story may have been misrepresented, it resonated – since the pandemic, anecdotal stories abound of young people whose good grades did not secure them the university offers they were expecting – and it is hard to entirely ‘disprove’. And there are few things the public love more than an undercover story where agents portrayed as engaging in ‘grubby’ dealings are caught implicating themselves in front of hidden microphones and cameras.

While the notion that international students take places away from domestic students is not a new one, it had previously largely been confined to the level of technical debate amongst those immersed in the workings of the sector – the Department for Education, *The Financial Times* and *Wonkhe* – as to whether or not international students really can be viewed as an entirely “separate stream” with no adverse impact on the places available for domestic students.¹⁴ Now, *The Times* undercover story brought the issue to life and public attention in a whole new way.

While it is tempting to see the recent more restrictive shift in policy towards international students in the UK as nothing more than a symptom of the UK's particular parochial political paroxysms over immigration – part of a series of knee-jerk reactions from a failing and flailing government to desperately reduce immigration numbers – this would be a mistake.

What has been noticeably absent from the UK's current debate around international students is any acknowledgement that most of the UK's major competitors are themselves struggling and juggling to find the appropriate balance in this policy area, and that they are taking their own re-balancing actions to place more controls and/or restrictions on inflows. For the UK is by no means alone, nor even an outlier, in terms of a shift in the narrative around international students, and concerns over the levels

of international student admissions hitting the headlines, or in rethinking its approach in this policy area. Quite the opposite.

In the US, there has been a broader, ongoing controversy and disquiet around the potential unfairness of admissions processes to elite colleges and universities being seen to favour those who can pay the most, have the right connections and can play the system the best. This has now combined though with the international student angle into a story, told even by commentators who, more broadly, are very much *pro-immigration*, that poor local kids miss out while “rich kids and international students who pay full freight get preference”.¹⁵

The British Council has in fact singled out the US as, in relative terms, currently the most attractive market for international students, notwithstanding the acknowledged risk of a return of a more immigration restrictionist Trump presidency. This suggests something important about the policy turn that both Australia and Canada have recently taken in respect of international students.

In Australia, this recent description from Christopher Ziguras, the Director at the Centre for the Study of Higher Education at The University of Melbourne, explaining the context of the moves by the Australian government to place restrictions on the admission of international students, would not seem out of place in the UK.

*“At its heart, the government is trying to deal with multiple complex issues here. These include public perceptions about migration levels, a national housing crisis and universities’ reliance on international students to fund facilities and research.”*¹⁶

In Australia the government had sought to encourage higher education institutions to set up campuses abroad, and to offer more courses online in order to ease the pressures created by Australia receiving large numbers of international students.¹⁷ It has now though followed up with a more decisive and interventionist proposal: to impose quality requirements on higher education institutions wishing to take in international students – aimed at ‘ghost colleges’ and ‘dodgy operators’ – but also to cap international student places at each higher education institution which can only be exceeded if that institution can demonstrate that it has built sufficient new accommodation.¹⁸

In Canada, in recent times the most aggressively pro-immigration of countries, earlier this year the government announced a cap for the next two years on the number of foreign undergraduate students that Canada would allow in, in an effort to relieve substantial pressure on housing and healthcare services.¹⁹ The cap will operate at the provincial level, weighted by population. For 2024 “the Canadian Government have set a target of 235,600 approved study permits in 2024, a 42% reduction on 2023 levels”.²⁰

At the same time, Canada also announced an end to post-study work rights for students graduating from certain types of colleges, which the Canadian Housing Minister said he had “the sincerely held belief have come to exist just to exploit the program for the personal financial gains of the people behind some of these schools”.²¹

Another concern raised was that the student route into Canada was being used by many simply to access opportunities in the Canadian labour market without even bothering with the studying part first. Recent statistics showed that for nearly one in five foreign students in Canada there was no record at all of them having actually studied at the higher education institution they had been accepted into.²²

Canada may have gone further and faster than any other country in the past few years in dialling up its international student numbers, but now it has determinedly and very publicly slammed on the brakes and selected the reverse gear. Its pro-immigration Prime Minister could not have been clearer:

“international students have grown at a rate far beyond what Canada has been able to absorb ... [we want to] hold the line a little more on the temporary immigration that has caused so much pressure in our communities.”²³

Particularly striking is how closely the rhetoric and framing of the Canadian Immigration Minister’s announcement – presenting the government’s move to restrict international student numbers as to protect the ‘integrity’ of the system, and indeed protecting international students from being taken advantage of by high charging, poor quality courses delivered on under-resourced campuses²⁴ – echoed that of Theresa May’s 2011 announcement when these same concerns were first raised in the UK.²⁵

While the UK higher education sector has been airing its concerns that changes to the right to bring dependants and potentially also to the graduate visa risks damaging the UK’s international competitiveness, and that international students will choose to study somewhere else instead, the Australian and Canadian higher education sectors have been doing just the same in response to their governments’ announcements on capping numbers.²⁶

CHAPTER THREE – SELLING EDUCATION OR SELLING IMMIGRATION?

Over the last 15 years the UK's policy around admission of international students – most particularly the approach to their being allowed to bring dependants and to being granted post-study work rights – looks like the ultimate political football, or punchbag, swinging back and forth.

Under the same governing party, we have seen a real switchback ride:

- From 2012 Theresa May tightens the rules, including on the right to bring dependants and ending the post-study work visa for international students studying in the UK (save for a limited scheme for PhD students).²⁷
- Boris Johnson relaxes the rules, reintroducing the post-study work visa from 1 July 2021, rebranded as the graduate visa.²⁸
- Suella Braverman then re-tightens the rules around bringing dependants, announced in May 2023 for courses starting from the beginning of 2024.²⁹
- In December 2023 James Cleverly announces he will ask the advice of the MAC on potentially re-tightening the rules again in respect of the graduate visa.³⁰

Even by the standards of the seemingly ever-shifting perspectives on many different aspects of the UK's immigration rules, this degree of zigzagging and countermanding previous positions around the rules governing international students looks crazy. But, as the actions by Canada and Australia this year also demonstrate, while the ebb and flow of tightening/lightening international student rules may look like a crazy switchback ride, this is not necessarily a bug, but rather a feature of the leading international student regimes as they seek to balance priorities across different policy areas, factoring in evidence of the numbers and the impact of the international students they are attracting.

For there are competing imperatives and therefore a complex resulting tension to be balanced here. For the UK, its policy around international students lies at the crossroads of its education export strategy, higher education strategy, and immigration strategy. These are not naturally or necessarily going to align, so it requires political decision-making at the highest level to regularly review and balance competing interests.

The UK government's press release on this year's tightening of the right for international students to bring dependants stated:

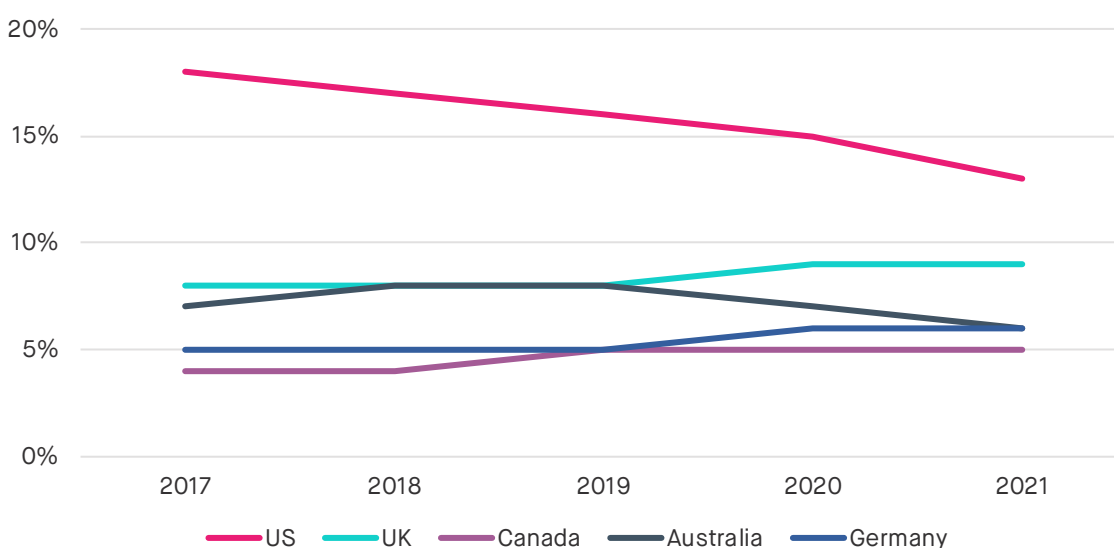
“The changes to student visas strike the right balance to continue to preserve the attractiveness of the UK's world-leading higher education sector, while removing the ability for institutions to undermine the UK's reputation by selling immigration not education.”³¹

But the debate then moved on to the graduate route – the right for an international student to stay on for a period in the UK post their studies including to work – which itself inherently blurs the line between whether someone is being sold education or immigration. It certainly blurs the line about what the international student might

think they are buying when they see the graduate route ‘add-on’ being dangled in front of them in the UK’s shop window, and when they are potentially comparing this against the other shop windows available to an international student.

The government’s International Education Strategy (IES) publicly targets, by 2030, annual ‘education exports’ of £35 billion and international student higher education numbers being hosted in the UK of 600,000.³² While these are absolute goals, the achievement of these targets is obviously linked to the UK’s relative success, or not, in the global competition for international students where the UK’s major competitors are primarily the US, Canada and Australia. Having briefly slipped behind Australia towards the tail-end of the last decade, the UK is now very much back in the number two spot worldwide as a destination for international students, behind the US.

Figure 1: International student market shares



Source: UNESCO, international inbound student flows. Note: US data is unavailable for 2019.

At the same time as having this outward facing agenda though, the export strategy also has another crucial function within the higher education sector. International student fees are not capped, so can compensate higher education institutions for the fact that fees for ‘home’ students have been capped at £9,000 from 2012 rising to just £9,250 from 2017, with their real value obviously eroded by inflation. These institutions have come to increasingly rely on international student fees as a core part of their funding to cover the shortfall on both domestic teaching and also on research funding.³³

“Universities make on average 31p for every pound spent on teaching international students, whilst domestic teaching makes an 8p loss for every pound spent”, the MAC reports.³⁴ Thus, the financial base of the sector is in effect exposed not only, directly, to the decisions and relative choices of those international students who may, or may not, choose to come to the UK, but also, indirectly, to the policy actions of those other countries competing for those students’ custom.

Between 2001/02 and 2021/22 the share of international students as a percentage of all students in UK higher education doubled, from 12% to 24%.³⁵ And in 2022 international students made up nearly 30% of first-year enrolments in tertiary education.³⁶ In 2021/22, fees from international students made up 45% of total fees across the higher education sector and 22% of total income.³⁷ As the Chief Executive of Universities UK puts it, “Instead of [income from international students] being the cherry on the cake, it is becoming the flour”.³⁸ Many consider the sector to be placing itself “in significant financial peril” should assumptions of the continued robustness of international student numbers to the UK prove too optimistic.³⁹

Moreover, this risk has arguably increased with the shift of international student numbers towards one year’s master’s programmes,⁴⁰ as the relative cost of attracting students onto these courses is higher relative to the income realised from them, and more rapid turnover makes this potentially a more volatile income base.⁴¹ In addition to which the UK higher education sector still has a concentration risk to a relatively small group of countries and, indeed, despite the relative slowdown in student numbers coming from China, still a reliance on Chinese students in high-tariff higher education institutions, particularly in STEM subject areas.⁴²

This dynamic can lead to a snowball effect. Those institutions increasingly reliant on income from international students lobby for the ruleset for their admission to be made as attractive to such students as possible, with as few restrictions, and as many rights, as possible. This provides the backdrop for international student numbers, and the income they generate, to rise further, which income then becomes even more important for those institutions, who then redouble their efforts to defend it.

In terms of progress towards the IES targets, the number of international students had already reached, indeed surpassed, its target in 2022.⁴³ And this at a time when, following Brexit, the level of full-time EU undergraduate students in the UK had fallen to a 30-year low.⁴⁴ The total value of the UK’s higher education exports is still some way shy of the target but on recent trends looks to be on track to achieve it by 2030.⁴⁵

Unlike the flood of criticism which greets any hint that any action taken by the UK government may adversely impact the competitive position of the UK’s higher education sector internationally, the opposite generally goes unmentioned. Yet the UK stole a march on its major competitors – particularly the US and Australia – during the COVID-19 pandemic, as it stayed more open for business and imposed fewer restrictions on international students than those competitor countries.⁴⁶ The result was that the “issuance of UK study visas returned to pre-pandemic levels by the third quarter of 2021, earlier than any other major host destination market”.⁴⁷ It is in effect this success which has sowed the seeds of the recent concerns over international student numbers and their impacts in the UK.

CHAPTER FOUR – THE RED HERRING OF THE DEBATE AROUND INTERNATIONAL STUDENTS AND THE IMMIGRATION STATISTICS

Some argue that policies around admission of international students are not rightfully part of immigration policy at all – indeed, that including international students' movements in official immigration statistics is not only misleading, but actively counterproductive to sensible policymaking. And as inflows of international students are one of the most directly and immediately controllable inflows, it is sorely tempting for any politician wishing to be seen to exert control over, or bring down, immigration numbers to reach for the lever marked 'restrictions on international students', which temptation only adds weight to the swinging policy pendulum we tend to see in this area.

When it comes to the argument that international students should not be included in the net migration figures at all, because it is wrong to categorise them as migrants⁴⁸ – even Enoch Powell apparently did not go that far⁴⁹ – there are though a number of arguments to the contrary.

International technical definition

While the UK statistical authorities are at liberty to decide to take a different approach, the immigration statistics compiled by the UK's Office for National Statistics choose to follow the widely accepted United Nations' definition of a long-term international migrant: someone who moves country for a period of 12 months or more. This definition is blind to the reason for that movement and to future intentions. Thus, international students meeting this definition are counted by both the UN, and therefore ONS as long-term international migrants.

Practical data collection

It is important that immigration statistics are as reliable as possible. Subject to the test of coming for at least 12 months, no other category of person is excluded from the immigration statistics on the basis that they may subsequently leave. This would add an extra element of complexity and potential error into the statistics, having to make sure that people who did not leave, but who stayed on under one of a variety of different available visa routes, were then subsequently captured, and included into the statistics at that later stage as having 'migrated' by staying on.

In 2018, when the MAC consulted on, and considered, the impact of international students, and the statistical debate around international students at that time mainly revolved not around their inclusion in the immigration statistics themselves but in the government's 'net migration target', the MAC said:

"Many of the responses to the call for evidence argued that students should be taken out of the government's net migration target. None suggested a practical way in which this might be done and we cannot see a reliable method."⁵⁰

What's the difference?

From the perspective of the immigration statistics, international students are counted as an inflow then they arrive, then an outflow when they leave. If they do not leave, and stay, they are counted as staying. While there are timing issues, the *net* result is therefore the same, whether or not students are included in the figures on arrival, or only once it is clear that they are staying longer.

Or, as the MAC puts it, even if an alternative reliable method for accounting for international students were found, “it would be unlikely to make much difference to the net migration statistics”.⁵¹ So why make the calculation of the immigration statistics more complex and uncertain for no real gain?

It's the impact while they are here that matters

In the words of the ONS:

“students contribute to population change and have an impact on housing and public services, regardless of whether they leave at the end of their studies.”⁵²

Or as a Jim Dickinson puts it:

“Even if every international student left after completing their degree and/or the graduate route, adding the best part of a million people to the UK's cities and university towns over three years requires both institutional and community infrastructure.”⁵³

Part of the purpose of tracking international migration is to seek to use that data to manage the pressure on local resources that it can cause if not properly accounted for and responded to. Regardless of how long international students might stay, while they, and any dependants, are in the UK, they need accommodation, and may use local health, transport and other services. If they bring children they will need to be provided with school places. To remove international students from the migration statistics could potentially compromise the quality of statistics used for the purpose of managing these impacts and requirements.⁵⁴

Classification irrelevant to public and policy concerns

How international students are classified has no bearing on concerns over the availability of sufficient student accommodation, or over the pressure on services, or over domestic students' own access to higher education places.

It is true that Australia and Canada classify international students separately from migrants, as temporary or non-permanent entrants.⁵⁵ But there is no evidence that that different technical classification has caused those two countries to manage their international student policy any differently, or had any bearing on how they have made their respective assessments of this policy area and decisions this year to cap their international student numbers because of the pressures they are causing. When, in the context of international students, the Canadian Prime Minister earlier this year referred to “hold[ing] the line a little more on the temporary immigration that

has caused so much pressure in our communities”⁵⁶ it was very clear that it was the pressure that was important, not the nature of the immigration.

The case weakens

Cross-cutting policy developments, interacting with the preferences of those international students coming to the UK, appear to have resulted in a greater number of them remaining here after their studies than was the case in previous periods. Even under the previous version of the post-study work visa, from 2008-2011, the large majority of international students left the UK within a few years, but this no longer seems to be the case, with the most recent cohorts of international students more likely to stay on by switching into work visas than in the past.⁵⁷ The latest ONS analysis confirms that there has been “an increase in the length of time students remain in the UK before emigrating”.⁵⁸

The case for not counting international students in the UK as migrants while they are here therefore seems the weakest it has ever been.

CHAPTER FIVE – PARSING INTERNATIONAL STUDENTS’ CONTRIBUTION TO THE UK

Contribution while a student

International students offer significant positive economic benefit to the UK. There has been a constant stream of figures seeking to quantify their overall economic contribution; not just the tuition fees that they pay, but also the money they spend while in the UK, on accommodation, subsistence and travel, and that is generated by people visiting them. The figures encapsulating all of this are large – the May 2023 estimate, sponsored by the higher education sector, came in at £37.4 billion for the total, with just one cohort of students in the highest grossing constituency, Glasgow Central, accounting for £292 million⁵⁹ – but, by their very nature must always be an estimate.

On one hand such numbers may in fact be an under-estimate of overall economic contribution in that they do not take account, for instance, of any taxes paid by international students and their dependants if they also work during their study period.⁶⁰ On the other hand, the fact that the calculation of these estimates tends to be sponsored by the higher education sector itself, as supporting evidence for its advocacy for an expansive approach to allowing in international students,⁶¹ means more independent commentators tend to view these numbers sceptically.⁶²

With that caveat, this analysis does though suggest that the net positive impact to the UK economy of international students coming to the UK is large, growing, and widespread across the UK.⁶³ Although even here some have queried whether, if so much of the positive impact is in fact represented by rent going into the pockets of landlords, is it necessary such a broad benefit as is characterised.⁶⁴

In terms of work done by international students *during* their studies, in theory, during term time at least, this is restricted to a maximum of twenty hours per week. While there is little evidence on how many students work while studying, and what they do, our *Whole of the Moon* report last year highlighted the fact that in sectors as diverse as hospitality, care and transport, some employers actively target international students, who in order to support their studies may be more willing to work flexibly and at more anti-social hours than other parts of the workforce.⁶⁵

Contribution post-study, as a worker

Here the story is much more complex, with different arguments being made from quite different perspectives, at least in terms of whether the bespoke post-study right to work – as currently offered by the UK’s graduate visa – makes a positive economic contribution to the UK.

From the perspective of the higher education sector, focused on the impact of not having the offer of this follow-on visa in the overall package offered to international students, the answer is quite clear. From this perspective:

- if selling education to international students adds to the UK economy, and

- the existence of a follow-on graduate visa increases the numbers of such students who might choose to come to the UK, and
- not having the graduate visa adversely impacts the global competitiveness of the UK's offering to international students and decreases the numbers of such students who might choose to come to the UK,

then the graduate visa is clearly economically a good thing.⁶⁶

An alternative perspective though considers what students remaining in the UK on a graduate visa actually do, and earn, and therefore how their net contribution to the UK appears from this perspective. The concern is that from this perspective, if many staying on through this route go into, and remain in, lower-skilled jobs and have a low level of earnings, they then become net recipients from, not net contributors to, the public purse.

This debate has become even more complex, as previously it could be assumed that those graduates subsequently transitioning into a skilled worker role under the UK's skilled worker visa route were demonstrably making an economic contribution at that required salary level. But since the inclusion of social care as a skilled worker route, at a far lower salary threshold than other skilled worker roles, even this is no longer self-evidently the case.

These different perspectives and debates have been at the heart of arguments over the pros, cons and future of the graduate visa. Before coming on to the detail of that though, it is important to recognise that framing international students' contribution to the UK, whether as students or workers, only through the lens of their economic contribution and net fiscal balance, may miss important aspects of their contribution.

Non-economic contributions and 'soft power'

If former students stay in the UK and work, they may not only directly contribute to the UK's economy, they may also help to unlock and grow commercial relations with their home country. This may also be the case even if they leave the UK, for important investment, business and trade links with the UK may be more likely to be formed by those who have studied here.

Indeed, an argument often heard in favour of maximising the numbers of international students to the UK is to buttress the UK's soft power more broadly. The idea is that those who have been educated in the UK will then feel some greater attachment and connection to the UK's interests and values, which will ultimately translate into a variety of preferential outcomes for the UK.⁶⁷ While some positives undoubtedly arise to the UK in this way, the evidence base for this is rather thin – the MAC has said that there is no meaningful way of measuring the impact of soft power⁶⁸ – and blunt.

An annually reported figure – showing the UK's absolute but also relative performance versus other countries – presented as a proxy for soft power is figures on how many world leaders have been educated, even in part, in the UK.⁶⁹ The UK ranks second on this metric globally, behind the US. But it might be questioned how much soft power benefit the UK has really accrued from, for instance, Viktor Orbán or Bashar al-Assad having studied in the UK's higher education system for a short while.

International students in the UK also bring increased diversity into the higher education student body, and “the evidence suggests that, on balance, domestic students have more positive than negative views of how international students affect their education”.⁷⁰

And for those who do stay on to work here, their economic contribution cannot be the sole metric. With large numbers of international students now staying on to work in the social care sector in the UK after their studies, the low wages in that sector may well mean that their strict economic contribution is low, yet they are clearly performing roles in an under-resourced sector which makes an important social contribution.

CHAPTER SIX – SOME IMPORTANT PERSPECTIVES ON INTERNATIONAL STUDENT POLICY IMPACT

Before focusing in on what just happened with the MAC’s review of the graduate visa route, it is important to set this in the broader context. The outcomes of international student policy are not all about ‘us’. The UK can set the conditions on which international students are accepted into the UK, but it cannot force them to come. Opening up, or liberalising, an immigration route may therefore lead to a flood or to a trickle, depending on the reaction to the route offered. And when routes are closed down, or restrictions are brought in, the reverse is also true – in some cases there may be a large and immediate impact, but in other cases less so.

While this is of course the case in many areas of immigration policy, this effect is heightened in the case of international students, as so many of them are making a direct choice between the major international centres of higher education. A recent online survey by the Home Office of over 2,000 student visa holders who had come to the UK found that half of them had also considered other countries – most commonly the USA and Canada – before applying to come to the UK.⁷¹ Student numbers coming to the UK will obviously therefore also be impacted by developments relating to international students in the main competitor countries and the different considerations between them.

But international students’ choices and decisions are also impacted not only by the UK’s offer on international students on both an absolute and a relative basis, but also potentially by other aspects of the UK’s broader immigration policy entirely including those not even directed at students at all, as we are seeing with the attractiveness of the UK’s social care visa to international students staying on in the UK to work after their course has ended.

At the same time, students’ choices and decisions are also impacted by changing conditions and shifting dynamics in their own countries and regions, which go far beyond the scope of what targeted UK policy can influence. This can also mean that different nationalities of students may react quite differently to each other, or be exposed to quite different impacts, with the result that these shifts can affect not just total numbers of international students coming to the UK, but also the proportionate breakdown of those numbers between different nationalities.

The shifting sands of the relative competition for international students

Regardless of any policy changes, the British Council sees the post-pandemic international student boom now plateauing across the world’s leading markets – US, UK, Australia, and Canada – as “the effects of the V-shaped recovery from the pandemic fade”. And because the UK had the shallowest dip in international student numbers during the pandemic, and emerged from it the swiftest, it is quite natural that it will top out the soonest.⁷²

In terms of the competitor markets, one of the developments which the British Council sees as potentially negatively impacting on the UK’s international student

numbers this year is “the re-emergence of the US education market” which, in its words:

“will likely increase its market share of international student enrolments in 2024 ... the US will present a more welcoming face to international students than the UK, Australia or Canada, where student migration flows will come under greater scrutiny from policymakers in 2024.”⁷³

Except it is also possible that, dependent on the outcome of the forthcoming US election, in 2025 this trend might go into reverse, and the US might switch from the most attractive to the least attractive of the major markets for new international students, as the British Council also points out:

“Issuance of US student visas became less permissive during former president Trump’s first term (2017-21), amid an overall decline in demand for US education. A similar outcome cannot be discounted after the next election”.⁷⁴

Except even then things might not pan out this way, given the recent suggestion that Trump might favour handing out green cards to graduating foreign students so they can stay in the US.

Such rapidly fluctuating developments are self-evidently outside the UK’s control but, separate to any adjustments the UK can make to its own approach to international students, may have a material impact on international student numbers coming to the UK. In terms of what a country can control in terms of its own policy – over student visas, rights and restrictions on dependants, and on post-study work – each competitor country must also be cognisant what the competitor countries are doing. But while each country should not ignore that, nor should it be led by that.

As Canada’s action this year demonstrated, while policy aimed at international students can never be wholly independent of what is happening in the other main competitor countries, equally each country may be at different parts of the tightening/lightening cycle at different times, and must address its own specific situation. Simply defaulting to the position of the currently most aggressive competitor in order to maintain competitive advantage at all costs is not a basis for sound policymaking, and risks escalating domestic tension.

Differential impact of UK student immigration policy by source country

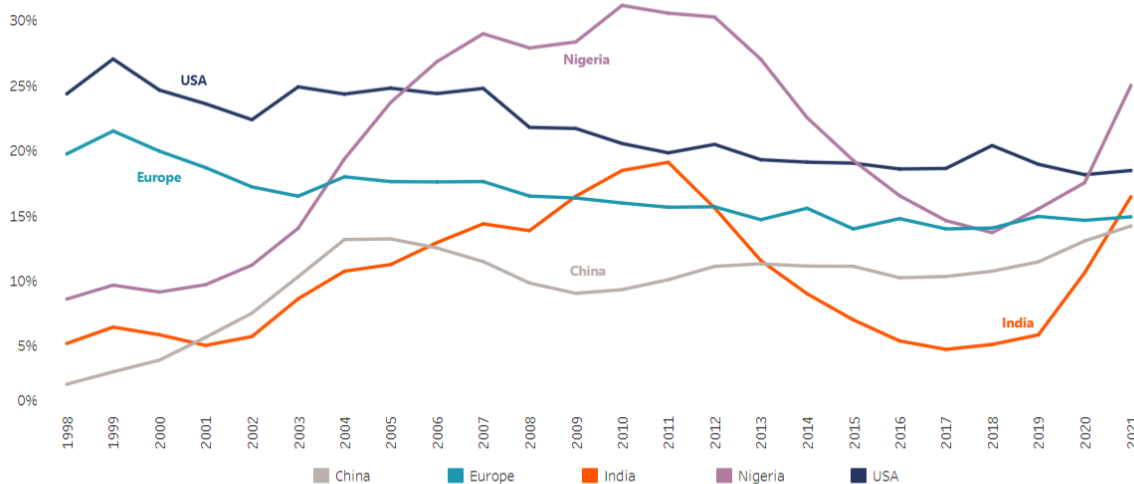
Employment prospects are important to many international students’ choice of destination. Many see explicit post-study work options as directly correlated with international student flows.⁷⁵ For those currently in the UK on the graduate route, a recent Home Office survey found:

“73% of those who were aware of the Graduate route when applying said it influenced their choice to come to the UK. Of these, just under half (46%) would still have chosen to come to the UK if the Graduate route was not available, whilst 34% said they would not have come and 20% were unsure.”⁷⁶

But employment prospects are broader than simply the availability of separate post-study work rights.⁷⁷ And the granting of both work and broader rights may play quite

differently with different types and nationalities of international students, who may therefore react quite differently to policy shifts in these areas.

Figure 2: ‘The UK’s share of selected countries’ outbound international students, 1998 – 2021



Source: Migration Observatory analysis of UNESCO Institute for Statistics data, Education, National monitoring, Number and rates of international mobile students (inbound and outbound).
 Notes: Includes students at ISCED (International Standard Classification of Education) levels 5 (short-cycle tertiary education), 6 (Bachelor's or equivalent level) and above.



Source: Migration Observatory, Student Migration to the UK, 2024

In choosing between different destinations of study, international surveys show prospective Nigerian students ascribing greater importance to how welcoming a country is and to graduate employment prospects. Whereas – consistent with the fact that Chinese students choose to study primarily in the highest ranked universities – Chinese students tend to be much more focused on the likely quality of teaching, the status of the higher education institution in terms of its formal ranking and overall reputation, all in the specific subject that they are planning to study.⁷⁸

In terms of the UK’s major student flows, Indian and Nigerian students have appeared more sensitive to policy variations in the opportunity to bring dependants and on post-study work rights, with Chinese and US students much less so. Nearly three-quarters of dependant study visas issued in 2022 went to Nigerian and Indian nationals. The average number of dependants brought then by each Nigerian student was 1.02. By contrast, American and Chinese students made much less use of the opportunity to bring dependants, bringing only 0.01 and 0.07 dependants per student respectively.⁷⁹

So, the UK may put an opportunity in front of international students which includes both an education opportunity and an immigration opportunity, but students from different countries may balance those two opportunities, and react to them, quite differently. Some countries’ students seemingly see themselves as much more investing purely in their education, while others seem to be drawn more to the broader package which also embeds an immigration opportunity and the to build a life in the UK.

With regard to Indian students specifically, for whom “the UK and the US have long been preferred destinations... the shorter duration of courses offered by the UK as compared to the US translates to lower overall costs. This, coupled with post-study work opportunities, has made the UK more financially attractive, especially to those who need to borrow to finance their studies”.⁸⁰ Translating this into actual outcomes, looking at the immigration status of international students five years after arriving in the UK on a study visa, as analysed by The Migration Observatory:

“Indian students are more than five times as likely as Chinese students to have moved onto a work visa, while Chinese students are almost twice as likely as Indian ones to still have a study visa.”⁸¹

Specifically regarding the take up of the graduate visa, while Indian (26%) and Chinese (25%) students make up roughly the same percentage of main student visas in the UK, Indians have accounted for 42% of main graduate visas in the UK since the route’s reintroduction, while Chinese have only accounted for 10%.

In this sense it is clear why higher education providers view the graduate route as helping them to diversify their international student base.⁸² In potentially impacting not only the overall numbers, but also the relative national mix, of the international students that choose to take up the UK’s higher education offer, policy shifts may therefore either work with, or against, efforts by higher education institutions to mitigate their potential over-reliance on, and therefore financial risk to, particular nationalities of international students, which is therefore not something that is entirely within the control of the institutions themselves.

But source countries students’ situations and preferences may also shift

National student preferences are not, though, set in stone. They are a consequence of the context and developments in their home country, which can shift. So, the recent history of the relative preferences of the major source countries of international students coming to the UK, while instructive, should not be regarded as static.

Less favourable economic prospects, and greater risk of unemployment, in a student’s home country, for instance, can make the right to stay on, and work, after studying overseas seem a more important and attractive right. That is why Nigerian students have in recent times tended to give much greater weight to that right in the UK than have Chinese or American students.

But circumstances and prospects can change. For the first time in some time the prospects for China’s economy are now looking less favourable, which seems to be leading to a particularly challenging situation for the prospects of graduates in the Chinese economy, with falling too demand meeting too much supply.⁸³ This may impact the pipeline of readily available jobs back home for Chinese students returning from studying abroad, and in turn make the opportunities provided by the UK’s graduate route look increasingly important and attractive to Chinese students.⁸⁴

Impact of student immigration policy versus broader immigration policy

A major factor behind the higher numbers of international students currently choosing to remain in the UK longer term has been the government's decision to make ordinary care workers eligible for the skilled worker visa route in early 2022. That immigration policy shift was not aimed at international students. But the take up of social care work by so many international students choosing to stay on in the UK – “more than half of all people who switched directly from study visas to skilled worker visas in the year ending June 2023 went into care work”⁸⁵ – highlights how flexible those wanting to build a life in the UK may be in terms of how they go about this, often defaulting to the quickest and easiest route to start off with, to get a foothold in the UK jobs market and on the path to a right to permanent residency.

And it highlights the potential broader impact on international students' choices and decisions of the UK's immigration policies beyond just those policies specifically targeted at international students. Indeed, it illustrates situations in which those choices and decisions might in practice respond more to the UK's immigration policies that are not specifically targeted at students than to those that are. As the Migration Observatory puts it, the recent data suggests that “in the long run, the care route may have more influence on how many international students remain in the UK than the Graduate Route”.⁸⁶

Indeed, until the loophole was closed by the government – by restricting international students from moving into a work visa until they had at least finished the course they had come to study – it seemed that the opportunities to go straight into care work in the UK were having an even more dramatic effect on the choices and decision-making of international students. It was reported that some international students who had come to the UK on a student visa were being tempted to switch into social care work immediately after arrival in the UK, even before starting their course, and not taking up their course place at all.⁸⁷ Surely there can be no better corroboration of the fact that, for some international students at least, the opportunity to live and work in the UK may be more enticing than the opportunity to study here.

Now that the rules around the care work visa are also changing though, to restrict the right to bring dependants on this route, this change – again although not aimed at students per se – may in turn potentially have a material impact on some students' decision whether or not to stay in the UK on this route longer term.

Policy versus other factors

“Tightening migration policy” is certainly one contributor to the British Council's prediction that inbound student mobility to the UK will decline from the post-pandemic boom. But it sees this in the context of “a natural correction that will put the UK back on its long-term pre-Covid growth trajectory” mainly resulting from a combination of “cyclical headwinds” for the UK sector which are not immigration policy related at all.

Key to these headwinds is the rising costs of higher education in the UK for international students, specifically for those from certain key countries – Nigerians

being the most impacted – due to the ongoing strength of the pound sterling exchange rate against their domestic currencies. In 2023, almost all of the UK's main source markets for students saw pound sterling appreciate against the local currency, but for Nigerian students this was the most significant, at 110%.⁸⁸

The British Council predicted that “prospective students and their parents [will in 2024] experience sticker shock when viewing UK fees denominated in their local currency”.⁸⁹ And the evidence is there for this already. At the undergraduate level – where the restriction on dependants is not relevant, so shifts in numbers here cannot be attributed to that change – applications from Nigeria are currently down by 46% compared to 2023, whereas from India there has been only a 4% reduction and from China a 3% rise.⁹⁰

And students already studying in the UK, and committed to their fees here, are also clearly being impacted, as seen with the recent story that Teesside University has defaulted some Nigerian students. They are having to leave the UK without having completed their course, because of their inability to keep up the fee payments due.⁹¹

And the impact of this may be compounded by the high visa fees and add on charges that the UK levies. Just focusing, for instance, on the graduate route option, the UK easily has the highest fees of all the major competitor countries.⁹² Which leads on to the question of what just happened with the government's commission to the MAC to review the graduate route, and the MAC's resulting recommendation.

CHAPTER SEVEN – THE MAC AND THE GRADUATE VISA ROUTE: THE ULTIMATE SWITCHBACK RIDE? OR RADICAL CONSISTENCY?

On the face of it, the outcome of the MAC's Rapid Review of the Graduate Route⁹³ seems inexplicable.

- A government that had itself introduced the graduate visa route
- in effect *against* the advice of the MAC,
- then subsequently asks the MAC to review how the route is working.
- The MAC carries out the review, and responds by saying that the route is working just fine and should be maintained.

What just happened? And why?

The context

The question is how policy can best be calibrated to appropriately balance the opportunity that is being given to international students to study in the UK with the opportunity to stay on and work here afterwards, in a way that ensures the most benefit to the UK.

If the UK did not offer the graduate visa at all, this would not mean that the UK is not open to, or even encouraging of, international students coming to the UK to study *and* to stay on in the UK to work. But what it would mean is that the UK would then only be encouraging those students to do so who can, at the end of their studies, command the minimum salary level – albeit set at a discounted rate for ‘new entrants’ into the labour market coming out of higher education – which has been set more generally across the UK's work immigration system. So, not having a graduate visa route would mean that international students would not then receive the dispensation – because they have studied in the UK – of a longer time period to work up to the salary threshold required by the UK skilled worker system.

A (recent) history lesson

It was this context that formed the basis of the MAC's argument in its 125-page 2018 report on international students – at a time when the graduate visa path was no longer being offered by the UK – that if the UK wanted international students to remain in the UK to work this did *not* require a separate graduate visa, but, rather, students should instead be given an appropriate period of time after the end of their studies to find a suitable sponsored skilled worker visa role at the discounted salary level required for new market entrants.⁹⁴

While the MAC's 2018 report was not solely dedicated to an analysis of the post-study work question, covering as it did the impact of international students in the UK as a whole, the report very much addressed the post-study visa question, concluding that offering international students a separate, standalone post-study route to remain and work in the UK risked selling immigration not education. As the MAC put it back then:

“demand for UK education should not be based on work rights. If students had unrestricted rights to work in the UK for two years after graduation there would potentially be demand for degrees (especially short Master’s degrees) based not just on the value of the qualification and the opportunity to obtain a graduate level job and settle in the UK, but for the temporary right to work in the UK that studying brings. A post-study work regime could become a pre-work study regime. It is important that demand for courses in the UK is built around the quality of the education offered and a reasonable opportunity to contribute to the UK as a skilled worker.”⁹⁵

The MAC’s concerns in this area focused on its finding that “the earnings of some graduates who remain in the UK seem surprisingly low and it is likely that those who would benefit from a longer period to find a graduate level job are not the most highly skilled”. In particular, it cited evidence which appeared to suggest that, rather than working in positions requiring graduate or master’s qualifications, a significant number of overseas master’s students staying on to work in the UK had taken jobs at or around the minimum wage, at a wage level where they would be net recipients from, rather than net contributors to, the state, and had subsequently experienced minimal wage progression.⁹⁶

The MAC saw the need for a balance here, between selling education and selling immigration to international students. But its argument was that the better approach was to allow international students reasonable time after their studies to find a skilled position in the UK, rather than to allow them an extended period to remain and work in the UK under a separate graduate visa for those who could not find a skilled position.⁹⁷

Notwithstanding this though, in 2021 the government pressed ahead with its commitment to reintroducing the graduate visa. The rationale was a defensive one: “to help universities weather the Brexit transition ... and smooth the impact of Brexit ...[with] universities facing large falls in EU student numbers”, but also a more aggressive one: to “make a reality of ‘Global Britain’”.⁹⁸

The reintroduction of the graduate route was backed by the government’s own impact assessment, which estimated a net positive contribution at the Exchequer level – £13.3 billion of additional tax revenue versus only £6.8 billion of extra fiscal costs for the decade ahead – from bringing back a separate post-study work right for international students at the end of their studies.⁹⁹

And, notwithstanding its own previous conclusions, the MAC had said that:

“We accept that the evidence for [our conclusion] is not as strong as it could be: one of our recommendations is that there is a proper evaluation, by us or others, of what students are doing in the post-study period and when they move onto other work permits. If, after that evaluation, a longer post-study work period seems warranted our advice could change.”¹⁰⁰

Certainly, by 2024, in terms of evidence the MAC now had much more to go on, and even more angles to consider. ONS research, issued in late 2023, suggested that significantly more international students were now staying on in the UK for longer than previous cohorts had done.¹⁰¹ And, specifically in terms of the graduate visa

itself, the evidence was that the take up was considerable. In 2023, nearly 115,000 international students extended their stay in the UK at the end of their studies in this way,¹⁰² nearly triple the level reached under the previous version of the scheme ended by Theresa May in 2012.¹⁰³

Indeed, even before the government commissioned the MAC's rapid review of the graduate visa, the MAC had itself decided to revisit the topic of international students in its 2023 Annual Report. Here the MAC pointed out that international student growth in the UK in the past five years had been overwhelmingly in one-year master's courses at less selective, non-Russell Group universities which charge the lowest fees, and that there could be a "concern that the graduate visa would incentivise demand for short master's degrees based on the temporary right to work in the UK, rather than primarily on the value of qualification".¹⁰⁴

The MAC also noted that the numbers staying through the graduate route had been compounded – and as a result significantly exceeding what had been anticipated – by the large increase in the numbers of dependants who had accompanied those students, and had then stayed on with them. This had stemmed from the relative shift in the countries that international students to the UK were coming from, as well as their propensity to bring dependants with them.

The MAC pointed out that "since both the applicant and an adult dependant can work both during the original study period (students can work up to 20 hours per week during term and full-time outside term), and for 2 years on the graduate visa, the cost-benefit of enrolling in a degree has changed substantially", and that this could therefore be an attractive option even for international students and their dependants staying on to work on to work at low wages.

The MAC did also point out though that, even if the graduate route was being used by students to stay on to work in low-wage roles, this might still "be considered beneficial given the tight labour market and large number of vacancies in low-wage roles currently in the UK". And also that, in not being tied to a specific employer, the graduate visa "may mitigate some of the risks of exploitation that have occurred in low-wage jobs where visa holders are sponsored by employers".¹⁰⁵

The MAC concluded that:

"the government needs to decide what the purpose of the graduate route is. If its primary objective is to enhance the offer to international students who choose to study in the UK and so increase the number of international students in higher education, then it appears to have been a resounding success. If the objective is to attract talented students who will subsequently work in high-skilled graduate jobs, then we are sceptical that it adds much to the Skilled Worker route which was already available to switch into after graduation, and we expect that at least a significant fraction of the graduate route will comprise low-wage workers".¹⁰⁶

Given the recent history of the MAC's analysis of, and pronouncements upon, the pros and cons of the post-study work route, combined with the large numbers now evidently staying on through that route since it had been re-introduced, it was not surprising that the government announced, on 4 December 2023, that it would

formally commission the MAC to review the graduate visa route. It was not though until 11 March 2024 though that the government issued the commission, giving the MAC only until 14 May 2024 to report back.

Five elements that explain the MAC's recommendation to maintain the graduate route

Why did the government commission the MAC to review the graduate visa route, when it had made the decision to restrict the right for international postgraduate students to bring dependants without even asking the MAC's advice? One reason may have been that the government took the view that the graduate route could not simply be shut down without sufficient cause and due process, because its introduction had been part of the government's own manifesto at the last election.¹⁰⁷

But also, of course, the government was well aware of what the MAC had previously written on the graduate route – the letter to the MAC commissioning the paid review cited both the MAC's 2018 and 2023 reports covering it.¹⁰⁸ And, on that basis the government may understandably have been relatively confident of which way the MAC would now come out on the questions now asked of it about the graduate route.

Given the MAC's previous pronouncements on many angles and aspects of the graduate route then, what explains the MAC's recommendation now, that the graduate route should be retained in its current form? The MAC's rationale for its recommendation can best be understood through considering five different, important elements of the questions asked.

1. The (framing of the) questions asked

The first element is the government's framing of the commission to the MAC, and the questions for the MAC to consider. The MAC's response to this framing was to be clear in how it was defining, as far as it could, what it had been asked to consider, and indeed the component parts of that. This included considering the definitions of what constitutes 'abuse' of the graduate route, and of how one might determine who are the 'brightest and best' students, because key to this framing, and how the MAC interpreted the framing, were the questions of has the offering of the graduate route to international students achieved its objectives, and is it being abused?¹⁰⁹

In terms of the question of achieving the route's objectives, the government's letter to the MAC commissioning the review accepted that the route supported the British higher education sector's earnings – and therefore important research and development and, of course, the teaching of domestic students – and the ambition and targets of the UK's International Education Strategy.¹¹⁰

And in response the MAC specifically noted – with a nod to its past position – that at the time of its 2018 review – in which the MAC recommended against a post-study work route – the International Education Strategy and its targets did not exist. And that now that they did it was inevitable that a tightening of post-study rules might imperil the achievement of those targets. The MAC also noted that the importance of international students for the finances of the higher education sector “has grown significantly since that [2018] report.”¹¹¹

The MAC took as its key frame for the objectives of the graduate route those set out by the Home Office itself when the route was reintroduced in 2021, being:

“to enhance the offer to international students ... to retain their talent upon graduation... ensure the UK remains internationally competitive, assist to achieve the Government’s ambition to increase the number of international students in higher education and increase the value of education exports.”¹¹²

And the MAC’s view was clear that, if this was the basis on which the assessment was to be made, then the graduate route had achieved, and was continuing to achieve, the objectives set for it.

This was not necessarily the same question that the MAC had been answering in its previous reports which had touched on the graduate route. And, indeed, it was subsequently made clear in this case that, if the question to the MAC had been framed differently, the answer may well then have been different, for the Chairman of the MAC subsequently commented in front of the Home Affairs Committee that:

“had we been asked the question by Government, ‘Do you think the graduate route is necessary, in addition to the skilled worker route, to bring skilled work into the UK?’, our answer would probably have been that the arguments are less compelling. That was not the question the Government asked us. The Government asked us, ‘Given the objectives we set for the graduate route, has it achieved those objectives?’ The answer to that is yes.”¹¹³

In terms of the question of whether the graduate route was the subject of “immigration abuse or visa exploitation”, the commissioning letter suggested that this should include consideration of whether “the demand for study visas [is] ... being driven more by a desire for immigration rather than education”? The letter also mentioned the government having “already taken significant action to reduce the potential for abuse of the student migration routes ... [by] restricting the ability of postgraduate taught master’s students to bring dependants”.¹¹⁴

The MAC’s approach though was to define the concept of ‘abuse’ narrowly, as “deliberate non-compliance with immigration rules”. In doing so the MAC stated that using the graduate route for purposes that did not necessarily “align with the government’s intended policy objectives” was not an abuse of the route, provided that those purposes were permitted.¹¹⁵

So, from this perspective, bringing dependants with you when you are allowed to bring dependants with you is not an abuse. Nor is transitioning through a graduate visa into care work under a skilled worker visa, just because you were hoping they would transition into STEM jobs. Even in respect of the increasing numbers of students applying for asylum once in the UK,¹¹⁶ for the MAC “coming to the UK legally on a work or study visa and proceeding to make a legitimate, admissible asylum application does not constitute abuse”.¹¹⁷

Another element of the framing of the government’s commission to the MAC was:

“understanding how the Graduate route is or is not effectively controlling for the quality of international students, such that it is genuinely supporting the UK to attract and retain the brightest and the best ...”¹¹⁸

Here the MAC said it was unclear how the government was defining, and how the MAC should define, ‘the brightest and the best’ students, so it “cannot comment on the performance of the route against this objective”. The MAC did say though that just because two-thirds of the main applicant graduate route visas so far have gone to those from non-Russell Group universities’ postgraduate courses, should not be taken to mean that the route is necessarily not attracting the brightest and best, as:

“the ranking of the university is an imperfect proxy for the quality of international students, whose choices will depend on many factors including their financial constraints ... [and] a student could be considered among the ‘brightest and best’ but cannot afford to pay the higher tuition fees associated with many higher-ranking universities.”¹¹⁹

David Willetts has also articulated the point though that even this might be too narrow a frame though which to consider this question:

“universities come in different shapes and sizes. A university can deliver world-class teaching or develop world-class links to business without doing world-class research. The University of Teesside focuses on auto-engineering for the nearby Nissan plant. Universities train our nurses and public health officers. Developing countries want to send some of their students to learn these skills.”¹²⁰

There was one final element of the framing of the commission though, which was to have a particularly significant impact on the MAC’s response. This was the commissioning letter’s assertion that:

“Initial data shows that the majority of international students switching from the Graduate route into the Skilled Worker route go into care work. This is clearly not what the Government intended in the 2019 Manifesto when it pledged to establish the Graduate route to attract the best and brightest students to study in the UK.”¹²¹

The MAC would of course have investigated this point anyway. But including this assertion as a frame for the review meant that it was a particular focus. And when the MAC probed this point, this assertion proved to be erroneous, resulting from an error in how the Home Office itself had recorded the data.

And, indeed, more broadly, when the MAC looked further into the evidence of what those on the graduate route were doing, the picture that emerged was brighter than the MAC may have been expecting.

2. The evidence found

The second element is therefore the evidence which came to light as part of the MAC’s review.

Taking the evidence around social care working first, the MAC found that many international students are indeed switching into social care roles in the UK. But most of that switching is happening directly from those switching from a student visa (49%), not those switching from a graduate visa (20%).¹²² While 20% is still a substantial proportion, it was a far lower figure than the over 50% claimed in the

commissioning letter for the review, and the MAC did not take too kindly to the incorrect steer it had been given by the Home Office itself.

The 20% figure is still over three times higher than the figure for domestic graduates going into social care, but this is hardly surprising. The configuration of the social care visa means that social care work now alone in effect provides the bottom rung of the ladder into the UK jobs market for those who cannot command the salary and skills level to access other skilled worker visa roles. Indeed, the importance of the lower minimum salary threshold of the social care route has only been further enhanced by the recent significant threshold increase across most other jobs under the government's recent changes to the UK immigration system.

A sizeable proportion of international students – directly from a student visa or transitioning through a graduate visa – into social care roles goes to the heart of the question of whether international students entering the UK jobs market might still be beneficial to the UK even if they are going into low-wage sectors, particularly where there are significant staff shortages in those sectors.

It also raises questions about the pros and cons of having – on paper at least – over-qualified workers fill roles in social care. On the one hand, this may provide a boost to the sector, and staff it with those less vulnerable to exploitation. On the other hand, it might suggest an even more transient workforce which may be even more keen to progress relatively swiftly to jobs away from the sector once able to do so.

These people could have applied directly for a social care work visa in the UK though. Is there any harm in allowing them to do so after voluntarily choosing, paying for and completing, a UK higher education qualification?¹²³ And for those who still choose to do take this route after having spent time in the graduate route, is there any harm in that?

Overall, the MAC review found that graduate visa outcomes by/at end of the graduate visa period were more economically and fiscally positive than had previously been credited with. Their fiscal contribution was small, but positive. Much of this was due to their low costs. The main fiscal cost associated with them was in terms of those bringing child dependants, but going forward the right to do so had of course now been restricted. And on the flipside they of course generated tax contributions, had low healthcare costs, were in any event required to pay the Immigration Health Surcharge, and had no recourse to public funds.

The evidence showed that graduate route switchers into work visas were going into more higher-skilled, and less lower-skilled, roles than direct student route switchers. So the graduate route does appear to be providing the opportunity for international students to gain a couple of years of skills and work experience which they can then capitalise on in their move into better positions in the UK jobs market. “Graduate route switchers are moving into graduate level jobs at the end of their visa in roughly the same proportions as we observe domestic graduates ... [and] the salary distribution for Graduate route switchers is very similar to domestic graduates.”¹²⁴

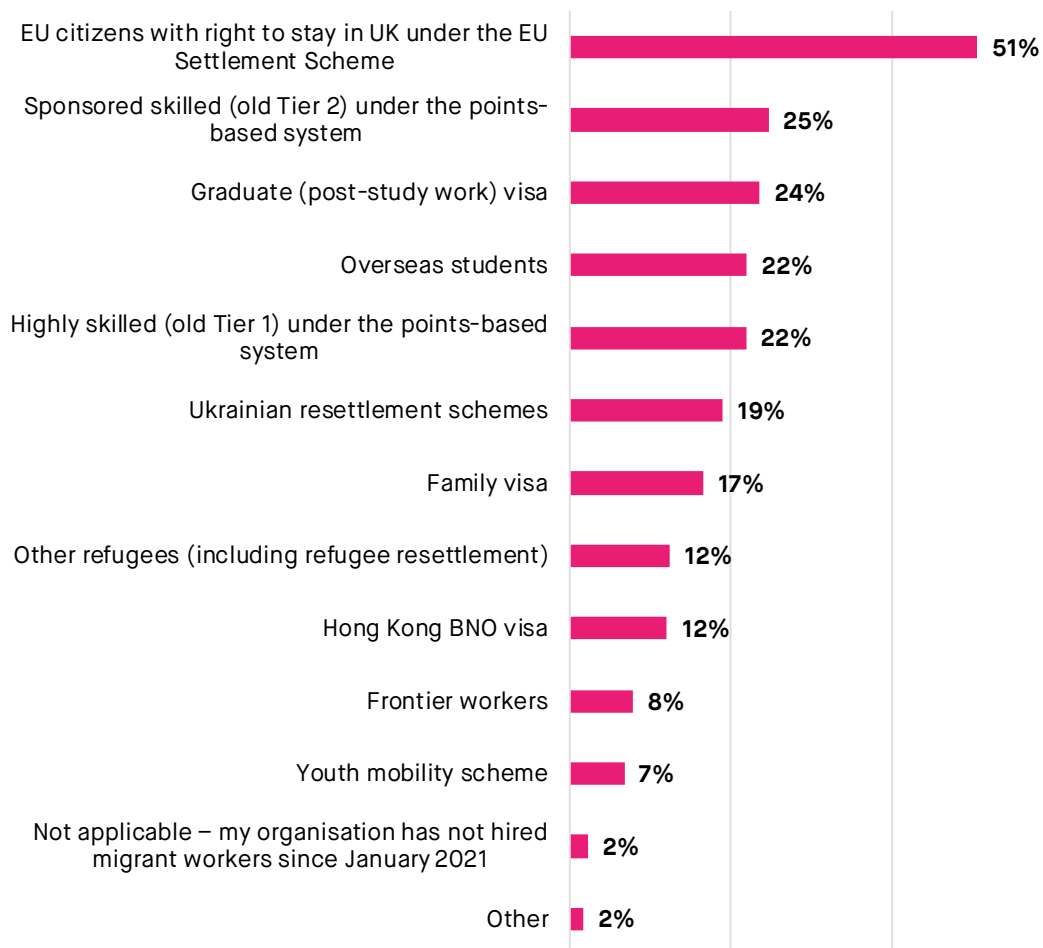
While the rapid nature of the review meant that the MAC was unable to properly engage with employers about their use of graduate route employees, the MAC did

cite concerns about lack of employer awareness of the route, and of its status in allowing working, which may make employers reluctant to hire individuals on the graduate route.

That may be true. But in a number of the sector conversations we carried out last year – in IT, health and care, and construction – for our *Whole of the Moon* report, the employers we spoke to were aware of the graduate route, that it could in effect be used to trial an employee without having to bear the full cost and administrative lift of having to sponsor them through the skilled worker visa, and that, if they subsequently switched them into that route, they were then exempted from the Immigration Skills Charge.¹²⁵

And when, as part of the CIPD Labour Market Outlook survey – distributed online by YouGov in January 2023, to over 2,000 senior HR professionals and decision-makers in the UK – we asked about employers’ use of the graduate route, this is what we found.

Figure 3: If you have employed migrants, which, if any, of the following categories has your organisation hired?



Source: LMO Winter 2023 Polling conducted by YouGov on behalf of CIPD

So there is evidence that the graduate route does provide important flexibility to businesses otherwise facing an upfront investment in an untested employee. And, at a time when the minimum salary threshold (even with new entrant discount) for a sponsored skilled worker visa has since been raised so significantly, this has now only potentially become even more important. This leads into the shifting policy context – the next important element in the MAC’s rationale for its recommendation around the graduate route.

3. The shifting policy context

The third important element is that the MAC’s review of the graduate visa had been commissioned at a time when other key policies potentially impacting the international student route, and the ability of students to access jobs in the UK after their studies, had themselves just changed.

Buried though it might have been towards the end of the MAC’s earlier rapid review of the Immigration Salary List, the MAC had already in effect given a clear warning to the government that where other policy changes intersect with, and potentially impact, a given policy, this might well change the MAC’s perspective on that policy. In the case of the Immigration Salary List rapid review, the MAC had for a long time been vocal in recommending ending the going rate discount for roles on the Shortage Occupation List (now Immigration Salary List). But the MAC’s rationale for that was that the going rate was set at the 25th percentile of salaries in an occupation. They were therefore concerned that a discount from that level would lead to a risk of material undercutting of the local workforce. But at the same time as the government announced that it was accepting the MAC’s recommendation to end the going rate discount, the government also announced that the going rate itself was to be raised to the 50th percentile. Rather than celebrate the fact that the government had accepted its recommendation, the MAC instead pointed out that the rationale behind its original recommendation in effect no longer applied, and therefore encouraged the government to think again about how these changes interacted.¹²⁶

In effect a similar dynamic now played out in the MAC’s rapid review of the graduate route. In this case, two significant policy changes just made by the government were considered by the MAC to be particularly relevant:

The minimum salary threshold

The first relevant significant policy change – taking effect from 4 April – was the large rise in the main minimum salary threshold for sponsoring overseas workers into jobs in the UK to the higher of £38,700 or the 50th percentile of the occupation going rate. While international students are eligible for the new entrant discount against this level when entering a sponsored role in the UK – which discount may now in effect become more valuable and attractive to employers¹²⁷ – this still represents an uplift from the previous minimum salary threshold level of £26,200 or the 25th percentile of the occupation going rate.

This obviously makes it much harder for international students to transition directly into sponsored jobs in the UK. There is therefore potentially a stronger case for international students to be allowed a transitional route – which the graduate route in

effect provides – which does not require them to be paid so much. And, from the employer perspective, now that the higher minimum salary threshold represents a greater commitment on their part, as we have said the graduate route may be even more attractive for them in allowing them to in effect employ overseas workers on a ‘try before they buy’ basis.

Even so, the significant minimum salary threshold increase required for a skilled worker visa will also mean that going forward fewer graduate visa holders are going to be able to make that transition at the end of their graduate visa term by commanding a high enough salary. Thus more graduate visa holders are now likely to leave the UK after the end of their graduate visa period. This is not necessarily a bad thing, for either the UK or the graduate. Both will have had the benefit of each other’s services, and for the students they will at least have had the opportunity to realise a financial benefit from their investment in their education.

The MAC review estimated that “of the Graduate visa holders who started the route between July 2021 to December 2021 and switched into the skilled worker route, approximately 40% would not have met the new salary thresholds”.¹²⁸ But it will take some time before it is clear how the minimum salary threshold increase is actually impacting this, and therefore what the impact on net migration is.

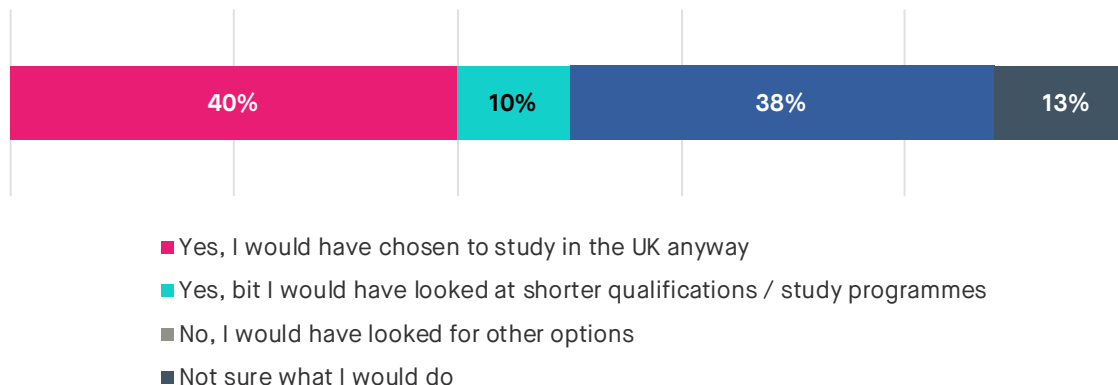
The restriction on bringing dependants

The second relevant significant policy change – taking effect from the start of 2024 – was the restriction on most postgraduate students bringing their dependants with them to the UK. As dependants accompanying postgraduate students are allowed to stay on with those students if those students choose to stay on under the graduate route – 30,000 dependants joined the graduate route in 2023 – as the MAC pointed out the restriction on bringing dependants was in effect itself a change of policy on the graduate route also.¹²⁹

And restricting the right for dependants to come in the first place would be expected not only to obviously have an impact on numbers of dependants coming to the UK, but also on the number of students coming to the UK, and on the number of students then choosing to stay on in the UK after their studies under the graduate visa. The question was how much of an impact?

One way of thinking about this is to ask international students here with their dependants what they would have done had they not been able to bring their dependants. This is what the Home Office has done, in a survey of 549 student visa holders in the UK already with their dependants which asked would they have still chosen to come to study in the UK if they could not have brought their dependants.

Figure 4: ‘Whether people would have still chosen to study in the UK if they could not bring dependants’



Source: UK Home Office, *Student visa: Views of students and higher education institutions, 2024*¹³⁰

Another way, of course, is to see what impact this change might already be appearing to have on the level of applications, although of course it is not always clear what can be attributed to any particular cause. The MAC report notes that, in the first quarter after the restriction came in, the Home Office figures show dependant applications down by 80%, and main applicant student visa applications down by 15%, versus the same period in 2023.

But the focal point of the academic year is obviously the September intake of new students. Here the MAC noted that indications to 6th May suggest a 63% drop in deposits paid for international postgraduate applicants this year in comparison with the same stage in 2023, whereas the drop for undergraduate courses has been 29%. So “while the number of international students coming to the UK is down across the board, it is having the biggest impact on courses affected by the change in dependant rules”.¹³¹ But of course the whole picture will not be visible until September, which leads on to the next important element animating the MAC’s recommendation – timing.

4. It’s all in the timing

The fourth important element – timing – was key in four different ways to the MAC’s decision to advise in favour of the graduate route being retained.

The time since other relevant policy changes had been implemented

As just reflected, the restriction on dependants will likely reduce both student numbers coming and then staying on to progress on to the graduate visa, and the increase to the minimum salary threshold evidence will likely reduce the numbers of those staying on under a graduate visa will then stay on further, transitioning into a skilled worker visa.

The MAC therefore felt that, given the yearly recruitment cycle, and the fact it is not yet clear what the full impact of this will be on those considering coming for the beginning of the next academic year starting this September, and the fact that the effect on those already here staying on in the UK will take time to become clearer,

that a further restrictive change at this time, to the graduate route itself, would be a precipitate action, and risk a policy overcorrection.¹³²

The time the graduate route had been re-open

The graduate route only (re)opened in July 2021 and therefore is still in its infancy in terms of the evidence of how it is working and the impact it is having.

In terms of one of the key questions posed – abuse of the graduate route – the MAC pointed out that there were not many ways to abuse the route, given the relatively few conditions attached to it. But, to the extent there are, the fact that the graduate route has been open such a short period of time inevitably means there is not much to see.

The time allowed for the collecting of evidence

If the government's short timeframe for requiring the MAC to complete the review was designed to improve the chances of the MAC recommending against retaining the graduate route in its current form, this backfired. For the consequence of the constricted timeframe, and the rapid nature of the review, was that there was insufficient time for a full call for evidence, and the MAC instead "focussed specifically on consulting with the HE sector".¹³³

The time allowed for a decision with such potentially broad consequences

The fourth important timing related aspect was that the MAC had concerns that it was being pushed to make a rushed decision on an issue with considerable diverse and outsized consequences going far beyond immigration policy – which was perhaps the MAC's major concern regarding the commission given to it to review the graduate route.

5. Such a consequential decision

The fifth important element is that the decision around the graduate route, while a seemingly discreet policy question, is in reality one that has so many different angles and potentially significant consequences for a number of different aspects of government policy. And intersects with important questions that go far beyond those just related to the immigration system. And the MAC felt particularly circumspect and uncomfortable recommending a policy change in these circumstances.

The MAC is used to being asked to advise on tough questions by the government. In our *Whole of the Moon* report, we highlighted one such example, with the seemingly impossible triangulation puzzle that was posed by the government to the MAC in the context of the development of the UK's post-Brexit immigration system, for the MAC to come up with a single salary threshold for the system that would:

*"help control migration, ensuring that it is reduced to sustainable levels, whilst ensuring we can attract the talented people we need for the UK to continue to prosper. Salary thresholds should also see skilled migrants continue to make a positive contribution to public finances."*¹³⁴

Notwithstanding the seeming impossibility of such a triangulation, the MAC rose to the challenge. It viewed the problem that was set as at least a legitimate question, rooted in the workings of the immigration system, so within the scope of the MAC's role in advising the UK government on issues relating to that system.

Where the MAC has increasingly begun to push back though is where it regards the government as asking for the MAC's advice either on what the MAC sees as political decisions and choices which are for the government, not the MAC, to make; or for the MAC's advice to in effect provide cover for the government's reluctance and refusal to make those important political decisions and choices, such as the use of immigration in the social care sector as a means of avoiding having to address key questions around the proper funding of that sector.¹³⁵

In respect of the graduate route review, the MAC identified that any restriction of the route would potentially have consequences not just for the government's International Education Strategy, but also for its levelling up agenda – both in terms of what international students contribute directly to local economies in spending, and in terms of those people employed to work in the higher education sector – and for the very survival of some higher education institutions. The MAC noted the risk of “job losses, course closures and a reduction in research, and in the extreme ... that some institutions would fail”.¹³⁶

To advise on a policy change that could potentially have such material wide-ranging consequences, without any indication that the government had “any plan in place to address [the sector's] structural under-funding”¹³⁷ clearly made the MAC very uncomfortable. And was fundamental to the MAC's recommendation to maintain the status quo.

CHAPTER EIGHT – SIX KEY TAKEAWAYS

This report has examined the competing priorities around the policy governing questions of the admission, and rights to stay, of international students in the UK. It has sought to highlight that:

- While the debate can become distracted by arguments around immigration policy, the presumption that attracting international students is a simple win-win equation, immune from any trade-offs or need for any meaningful debate, has been exposed globally. There are important tensions and concerns to be addressed in this area, as Canada and Australia are now doing.
- This shift in the debate is a good, not a bad, thing. The UK's attractiveness to international students is the goose that lays the golden egg, and protecting this through acknowledging and seeking to address potential trade-offs related to it is better than risking irreparable damage by pretending that these do not exist, and not doing so.
- While the financial reliance of the UK higher education sector on international students cannot be ignored, neither can it be the sensible policy outcome that this fact simply provides a trump card in perpetuity which is used to shut down any debate about the material considerations and consequences that can flow from the admission of international students.
- Indeed, the higher education sector's financial dependence on international students makes it more, not less, important to acknowledge and address any concerns over the international student route, not dismiss and deride them. And there is a real debate to be had about how the UK's approach to international students may best help to continue to support the UK's aims while not forfeiting the important and necessary public consent to the UK's continued openness to international students.

Particularly given that so much of the reaction on both sides of the debate which accompanied the publication of the MAC's rapid review of the graduate route was so heated, it is important not to lose sight of these points. Indeed, there is a danger that important points arising not just from the MAC's review, but, as importantly, from the broader recent developments in the UK around international students, will be completely overlooked, and key lessons ignored and left unlearned. Here are six key takeaways.

1. The review of the graduate route was merited, and once again shows the worth of the MAC

While one can of course criticise certain elements around the way that it was done, it was entirely reasonable, indeed advisable, for the MAC to be commissioned to review the graduate visa route, in the light of the number of concerns and questions raised around the route – not least by the MAC itself – the large numbers of students staying on through this route, and the changed behaviours of students which the data was showing. As the MAC's former chair had said, “there is a long-standing lack of research on this issue, which needs to be reversed to understand what's happening and to guide effective policy”.¹³⁸ Now we have a much better guide.

One can argue that the expedited review timeframe undermined the efficacy of the review. But the MAC at least had advance notice that the review was to be commissioned, and was still able to carry out an extremely thorough review, laying out all the key angles and aspects relevant to this policy area – both those that they had been specifically asked to consider, and some they had not.

Perhaps most importantly, in doing so the MAC's review was able to generate and produce new evidence, new data, and new angles. It was important not just what the MAC found, but how it found it. It was also able to evidentially address some key misconceptions and misperceptions, to highlight areas for focus and for improvement, but also of good practice which might be potentially leveraged more broadly to address tensions within the system.

2. The higher education sector's advocacy strategy around international students is high reward, but high risk

The MAC – a group of academics employed by the higher education sector; conflict of interest duly noted on page 11 of the MAC's report¹³⁹ – carried out its review of the graduate visa in circumstances where there was only time to take direct evidence from the higher education sector itself, which made a superb effort to present a coordinated and forceful case. It is hard to think of any other country where the higher education sector would have received such a fair and considered hearing as part of the policy process, and it took full advantage.

The APPG for International Students had itself proposed only last year that “the introduction of data and evidence strategy, not only to understand this Graduate visa, but to avoid the misguided policy intentions which resulted in the closure of the previous post-study work route in 2012.”¹⁴⁰ The MAC review in effect delivered that, materially boosting the case and evidence base for the graduate visa.

Notwithstanding all this though, and the fact that both the process and the outcome of the review were favourable to the higher education sector, the sector, though obviously relieved at the outcome, attacked the ‘toxic uncertainty’ inherent in the very act of the review having even been carried out.¹⁴¹ While of course one can criticise various aspects of the government's framing and timing of the review, one of the outcomes of the short timeframe given for the review was that it at least went some way to minimising the period of uncertainty.

And it is hard to know what possible way there would be to carry out such a review without there being some uncertainty around the outcome. Is the higher education sector really suggesting that there should only be an evidence-based review affecting the sector if it can be guaranteed that no policy change will result? The sector most commonly associated with selling evidence-based reasoning as its core product seems to regard as a hostile affront any evidence-based assessment of any policy that it benefits from, even if it turns out that it is only the sector itself that is providing the evidence.

While the higher education sector's approach to marshalling its forces and sponsoring its own research and polling has been extremely formidable and impressive, it seems uninterested in engaging with any evidence that it has not itself

generated. And the sector has sought to represent any move by the government to even review the question of the numbers of international students as damaging, hostile and toxic.¹⁴² This is a perfectly legitimate advocacy tactic. But it risks significantly misrepresenting the context of the concerns and tensions in this policy area, of which both sides of the debate have been guilty.

Aided and abetted by the government's own rhetoric and framing, representatives of the higher education sector have relentlessly treated questions around international students as being solely an issue of them being incorrectly and inadvertently swept up in the immigration numbers debate, negatively comparing the UK's approach with that of its main competitors for international students. There is never any acknowledgement in the sector's advocacy that key competitor countries ever themselves – as they have done this year – reconsider and introduce restrictions in their own policies towards international students, in response to concerns that have arisen from the results of their own higher education sectors being given a free hand to recruit without limit.

On the contrary, even in the midst of the emergence of these restrictive developments in competitors' systems, voices supporting the sector continue to cite as evidence modelling that assumes as a given that competitors never make any restrictions themselves. A letter sent to the Home Secretary as part of the graduate route review argued that modelling shows that the UK restricting the graduate route would lead to “a 12% average increase in international students for the US, Australia and Canada”.¹⁴³

But, if countries such as Canada and Australia can have a debate around where the right balance lies in their approach to international students, there is no reason why the UK should not do likewise. And while, with the maintenance of the graduate route, the advocacy approach of the higher education sector has achieved its aims for now, its approach is not without risk. If the sector's response comes to be viewed – in the words of one sector commentator – as too rooted in a “mixture of naivety and performative bafflement” at why there should be any question of restriction, and too “knee-jerk resisting any and every attempt at regulation”,¹⁴⁴ too dismissive and misrepresenting of others' concerns simply as “playing on xenophobia”,¹⁴⁵ the sector may come across as arrogant and out of touch with the real concerns being raised. We have seen, in other areas of immigration policy, that although this approach may work for a time, ultimately it may not end well.

Refusing to acknowledge concerns may also lead to a missed opportunity to engage with them, and allay them before they get too dangerous, in a way that could bolster public support for the UK's approach to international students, and provide a better and more stable foundation for the policy that is agreed.

A more hopeful sign is that the sector has at least acknowledged that “concerns that some people have raised about whether pressure on university finances can encourage bad practice, particularly around the use of agents” might be legitimate, even if not widespread.¹⁴⁶ And that Universities UK – while critiquing The Times' article exposé as ill-informed and misleading, and seeking to correct the record on admissions and foundation courses – did acknowledge the need for review of the use

of agents, because “we recognise the concern this has caused for students, their parents, and the public and it is vital that they all, along with government, have confidence that the system is fair, transparent, and robust”.¹⁴⁷

In this regard the sector should embrace the MAC’s key recommendation from the rapid review of the graduate route:

“that the government establishes a mandatory registration system for international recruitment agents and sub-agents, which encompasses the quality controls in the voluntary Agent Quality Framework ... and that universities should be required to publish data on their spend on recruitment agents and the number of international students recruited through such means annually as a starting point to improving disclosure.”¹⁴⁸

3. Public concerns around international students should not be ignored and can be addressed

It may well be that, faced with the cyclical headwinds plus the impact of the restrictions on the right to bring dependants, the number of international student arrivals in the UK will fall back to levels where public concern recedes. But that is still no excuse for the current level of complacency and denial about the dangerous way the wind has begun to blow. The issue of public consent to this area of policy is now very much a live one, and is likely to remain so; the genie cannot be put back in the bottle.

The sector may take comfort from the fact that the same sources claiming that international students are in effect being preferred to domestic ones are also running headlines bemoaning the fact that universities are being forced to cut staff and courses as international student numbers drop.¹⁴⁹ But, this is not necessarily as contradictory as it may seem. As one sector commentator puts it:

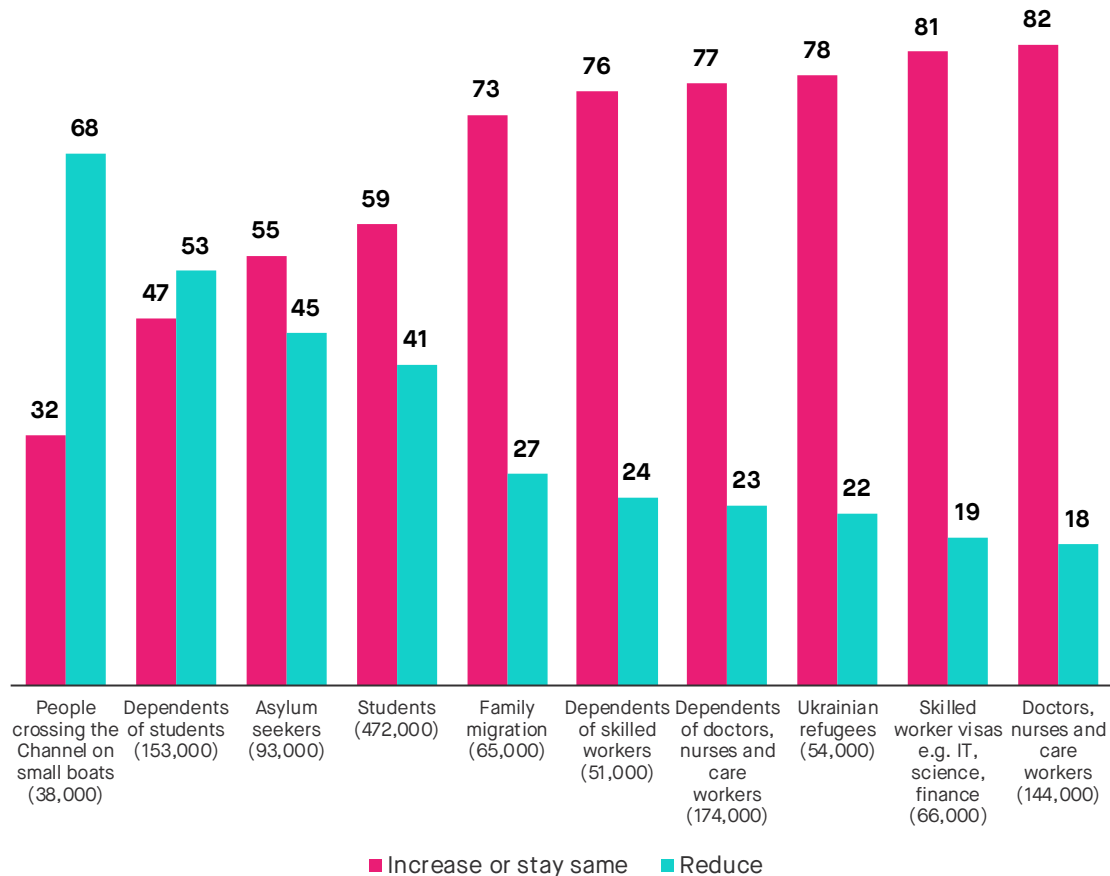
“if you have a course that can take 300 students this year, even if the internationals have allowed to you to invest in staff and capital to get it up from 250, if 100 of those places are going to international students that’s 100 that could be going to home students if the funding was better.”¹⁵⁰

It is understandable that with the recent focus on the graduate visa route, the higher education sector has sought to prove how popular that particular route is with the public.¹⁵¹ And the post-study work right is indeed viewed relatively positively by the British public.¹⁵² But in terms of the British public the graduate route is a red herring. What matters is how they are feeling more generally about international student numbers and impact. And that does not look so good.

While polling carried out for the Russell Group to assist the sector’s advocacy effort over the graduate visa route shows that international students remain popular with the public,¹⁵³ there is a clear risk of complacency evident from statements from those in the sector such as the British public “understand that [international students] are not taking the places of their own sons and daughters”.¹⁵⁴ It is far from clear that the public do understand this. In fact, a raft of other recent polling gives significant pause for thought in terms of how the British public are now thinking about international students.

When the public are polled on their views towards different migration flows, accompanied by the data showing the size of those flows for each category of incomer to the UK – including separately for international students and their dependants – international students and their dependants are now among the least popular groups of incomers to the UK, with asylum seekers sandwiched in between them.¹⁵⁵

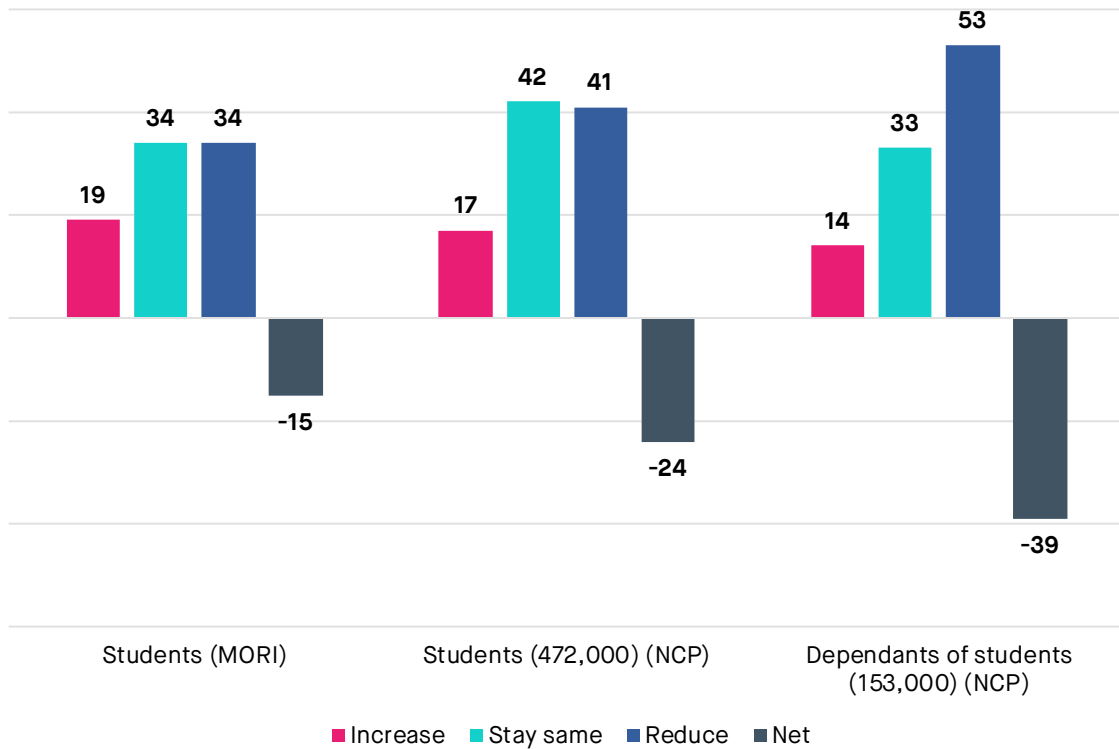
Figure 5: Balance of opinion on migration levels for ten different groups when presented with official statistics



Source: *UK in a Changing Europe, Immigration: where would voters cut?, 2024*

And when one looks at recent polling across different, reputable, sources that have not been sponsored by the sector to do the polling, the takeaway is that size of recent inflows of international students to the UK have begun to raise concerns among the British public.

Figure 6: Recent polling suggests growing public concern about the scale of student migration



Source: UK in a Changing Europe, using NatCen panel (Jan 2024); IPSOS-MORI Immigration Tracker (Feb 2024)

The latest NatCen Panel from January 2024 also shows the public not in favour of the general principle of allowing universities the freedom to recruit students from abroad.¹⁵⁶ And the February 2024 release of the Ipsos/British Future ‘Attitudes towards immigration tracker’ – capturing longitudinal shifts, i.e. the direction of travel, in public attitudes – shows “increasing support for reducing the proportion of migrants who are bankers or students (39% and 35% respectively) since July 2022”.¹⁵⁷

A sector which responds to a raft of more concerning independent polling by simply sponsoring its own polling, hoping to find reasons to believe a less concerning picture, may be thought to be a sector that is overly dismissive of, and has little interest in acknowledging, let alone facing up to and engaging with, potential concerns. One higher education sector commentator has framed the sector’s approach as a “mixture of naivety and performative bafflement”.¹⁵⁸ The warning signs are there.

On the other hand though, the extent of public concerns over international students should of course should not be exaggerated. And it is likely that even some of those with these concerns would also have concerns with the consequences of cuts to international student numbers: “tax rises, fee increases or cuts to domestic student places”.¹⁵⁹ But that is what makes it all the more important to engage with the public concerns that do exist over international students.

And, if the froth is indeed now coming off international student numbers in the UK, this does not mean there is no longer a need to engage with these concerns, but, instead, that there may now be a breathing space and better conditions in which to do so, in hopefully a less fraught environment. Ignoring and wishing away those concerns instead may risk missing a golden opportunity to be able to work to address them. Such as over accommodation.

4. The challenge of accommodation

Canada's and Australia's action this year to cap their international student numbers have both put concerns around a squeeze on accommodation front and centre of their rationale. Indeed, in Australia the government's proposal is that, in order to be exempted from the cap, higher education providers would have to demonstrate the building of new accommodation for their students.¹⁶⁰

The UK is of course different in a number of important respects from Canada and Australia in terms of its greater ability and flexibility to manage accommodation pressures from international students. Nevertheless, it might be thought surprising that, with all the focus on accommodation pressures in those countries' policy debates, and indeed with the headlines in the UK that have been written around these, the higher education sector in the UK itself scarcely ever even mentions accommodation as a relevant issue in the debate at all.

In theory there are some checks and balances in the UK system. Universities cannot apply for an increase of more than 50% of their previous year's international student visa allocation. And, for any requested increase, UK Visas and Immigration (UKVI) "will look at numerous factors including the total student capacity of the premises and the institution's explanation of their expansion plans and how they will mitigate potential impacts from increased student numbers"¹⁶¹.

And, of course, accommodation pressures may be exacerbated further where students are accompanied by greater numbers of dependants than might have been anticipated, and/or stay on in the UK under a graduate visa with those dependants in greater numbers than had been anticipated. And, as the MAC has pointed out, while UKVI will question universities on the justification for any increase in their number of international students, in practice it has no way to "independently verify the institution's plans regarding infrastructure, for example to confirm whether students can access affordable accommodation a reasonable distance from campus."¹⁶²

Even if UKVI did have the expertise required to do this though, it is unclear how this would realistically be possible. Higher education institutions do not themselves provide all of the required accommodation, but rely on the private sector to also do so. The strategy for accommodating the expansion of student numbers has been referred to as little more than trusting that "the invisible hand of the market will take care of that"¹⁶³ but that inviting in such a large number of international students is "like staging Eurovision in a city with no hotels ... Waiting for the market to respond with capacity is too slow – and basically immoral."¹⁶⁴ The invisible hand of the market may also decide that it would be more profitable to convert its property into an Airbnb rental, instead or withdraw the property from the rental market altogether.

This means that how the supply/demand dynamics will impact the availability, and cost, of accommodation for students is inevitably hard to predict with any certainty. And while tuition fees are frozen, rent is not.¹⁶⁵ If prices get squeezed this may lead to further supply coming on to the market. But if it does not, and prices remain elevated, then while accommodation may in theory be available, in practice many students may then be priced out of accessing it, and left disgruntled, living at home or in another, more distant, town instead.

In its 2023 annual report, the MAC highlighted “the risk of accommodation pressures arising from significant increases in the student population in a local area over a short period of time”, which can “be exacerbated if there was insufficient discussion between universities and local planning authorities regarding the expected increase in student numbers.”¹⁶⁶ In its rapid review of the graduate route, the MAC were hampered by the time constraints from looking into this further. There are therefore only two paragraphs in the review on ‘Housing and public service impacts’.

But there is still an important takeaway set out there, which is in danger of being missed. The MAC noted that an expansionary strategy towards international student numbers had been pursued without any “coordination or consideration across government of the implications of increasing student numbers for public services and housing at a local level ... with the clear implications for ... housing at a local level ... not mentioned within the International Education Strategy.” But there was also a bright spot noted by the MAC:

“We have encountered instances of good practice between universities and local authorities across the UK in conducting integrated planning exercises to estimate the impact of cohorts of international students upon local housing stock and public services over the short, medium, and long term. For instance, Sheffield Hallam University and the University of Sheffield have worked with Sheffield City Council to shape housing development in the city to 2039, accounting for the likely impacts of both domestic and international students. The universities, along with their respective student unions, collaborate with the council on a housing standards and landlords accreditation program to help students navigate the housing market.”¹⁶⁷

Here is a key takeaway from the MAC report in terms of what to focus on going forward. For building greater public confidence in the UK’s competition for international students to come here, greater regulation of the use of agents by higher education institutions is of course important. But seeking to ensure that the numbers of international students who do choose the UK are planned for appropriately and can be accommodated without adversely impacting and distorting local housing markets is arguably as, if not more, important.

So, if Sheffield is indeed a best practice example, what are the details of what it is doing and how can these be shared? And are there other, similar examples of this also? This would appear to be an important area where devolved action at the local area level is key to finding the right balance between economic growth and the housing and infrastructure needed to support it.

5. Data defects

We have previously written in defence of the Home Office in the context of data. The fact that each quarter it publicly releases large amounts of immigration data, “regardless of whether that shows the Home Office in the best light or not ... indeed, it often provides key ammunition for those who wish to criticise and hold the Home Office to account.”¹⁶⁸

But the MAC rapid review exposed a much less favourable perspective on the Home Office’s data performance. First, the good news. The MAC thanked the Home Office for the “significant progress... made on the matching of visa data to HMRC data to enable us to answer critical questions on earnings of migrants”. That is where the good news mainly ends.

First of course there was the data error – around the numbers of those transitioning from the graduate route into social care work – which found its way into the commissioning letter as a key part of the framing of the review. This arose from what the MAC characterised as “significant issues on the misunderstanding or mislabelling of Home Office data”. The MAC also commented that this was not the first time that it had faced such an issue with Home Office data. And therefore suggested the Home Office carry out a thorough data variable review across the main visa routes.¹⁶⁹

Second was the fact that as the graduate route had only recently been re-introduced, this had therefore presented the perfect opportunity to make sure that the appropriate data was being collected in respect of it. Instead, the MAC found:

“it extraordinary that the government appeared to have very limited plans for data collection, monitoring and evaluation when the route was launched ... In future, we recommend that the government should only open new migration routes or make significant policy changes when it has a clear plan for how it will collect and monitor data to assess the effectiveness of the route against its objectives and understand wider impacts. This includes prioritising more regular use of matched datasets which can capture a fuller picture of impacts and trends, supplemented by surveys to understand motivations and information not already captured in administrative data.”¹⁷⁰

Third was the fact that the data which was lacking was that which was needed to answer the questions that the Home Office itself has asked as part of the commission to the MAC. It is one thing not to collect data. Quite another for the Home Office to not collect data on questions that the Home Office itself thinks are important.

The commission had specifically asked the MAC whether the route was “supporting the UK to attract and retain the brightest and the best”. Yet the MAC pointed out that, “until this review, there was no data readily available looking at what universities those on the Graduate route had attended.” Even more fundamentally:

“It is not possible to provide analysis on the academic achievements of those who go onto the Graduate route as the Home Office do not collect data on this. The Home Office only have data on whether a student has successfully completed their course, as that is a requirement for the Graduate visa. Access to data on academic achievement would provide more insight into what the

government considers ‘brightest and best’ and whether they are going onto the Graduate route.”¹⁷¹

Fourth was that in order to answer the key questions in immigration policy requires sequential data – to illuminate the path of a migrant in the UK over time, as they transition between different visas and statuses – and linked data – so that one can see someone’s immigration journey and status (from Home Office data) alongside their earnings path (from HMRC data). This is important “for analysing long term migrant progression and impact over time”, particularly when answering questions about a route like the graduate route. While progress had been made on this, the MAC made it clear there is more to be done.

In this sense the main takeaway for the Home Office from the rapid review of the graduate visa is not that the Home Office was wrong to commission it – so much useful data and insight has been revealed by it doing so – but that, before commissioning reviews which ask difficult questions about outcomes of its policies, the Home Office should ask itself the difficult question of whether only it will have the data to answer such difficult questions and, if so, can it source and provide access to that data?

6. A final word. On dependants.

A data omission of broader import arises in respect of the question of dependants. Dependants accompanying those coming to the UK have been very much in the spotlight in the last year: first, in terms of the numbers of them coming, reflected in the UK’s immigration statistics; second, in respect of the restrictions that were then placed on them coming to the UK – if accompanying a social care worker or a postgraduate student – by changes to the UK’s immigration system.

There is always a trade-off in restricting an immigration route. But in the case of dependants we cannot see it. This is because while dependants separately appear in the immigration statistics, they do not separately appear in the economic and fiscal statistics.

In terms of student dependants, although considered as part of the student visa population they have a quite different cost/benefit profile for the UK than the students they are accompanying.¹⁷² On the one hand they do not contribute to university finances. On the other hand, they generally have unrestricted rights to work which, as we focused on in our *Whole of the Moon* report last year, means that they have significant potential to rapidly and flexibly fill labour force gaps in the UK.¹⁷³

Others have pointed out that, with no recourse to public funds, dependants have every incentive to work, and have “likely formed a large part of the boost to labour supply from migration over the last few years, especially in sectors like hospitality, so there may well be impacts in these sectors”¹⁷⁴ if they are restricted. Indeed, on the same day as the MAC’s review of the graduate route, the Home Office published its own online survey research which showed that, from a sample of 516 international students in the UK with dependant partners, 61% of those dependant partners were in full time work, and a further 10% in part-time work.¹⁷⁵

But an ad hoc sample survey is not the same as data, and data is not available on whether or where adult dependants work. Which also means that, unlike those on the graduate route, it is therefore not possible to look at what are the outcomes and progression of dependants in work. What is not measured does not get counted, or, rather, is only counted for one metric – for the calculation of the UK's immigration numbers – not for the purpose of calculating dependants' economic or fiscal contribution in the UK. So we know there is a trade-off from restricting dependants, but as the full cost of cutting dependants is invisible, it can be conveniently ignored, is therefore less controversial, meaning that cutting their ability to come to the UK is easier to justify.

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