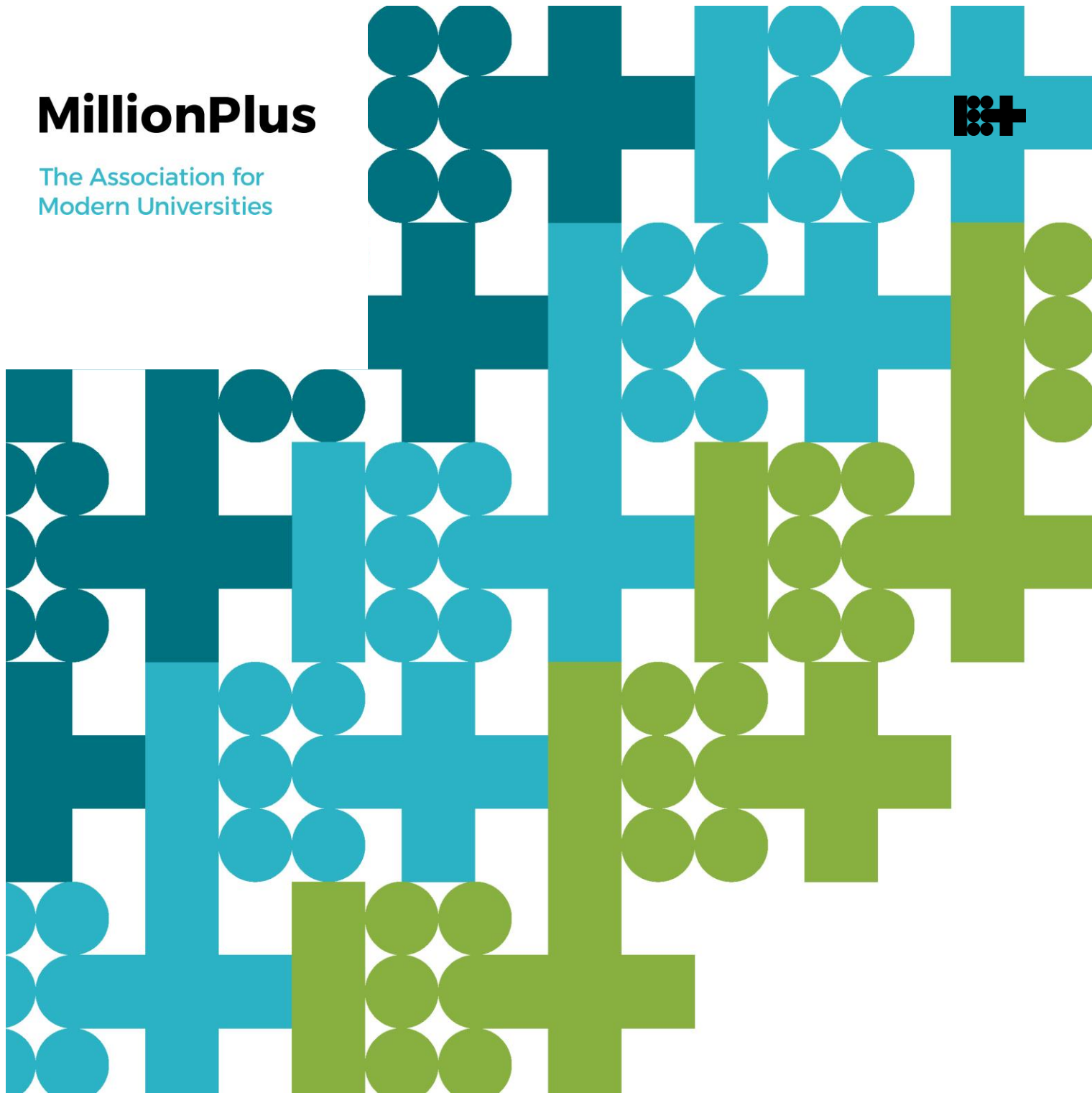# MillionPlus

The Association for
Modern Universities

POLICY BRIEFING

A new system for student visas

March 2019

Executive Summary

- The current student visa system (Tier 4) does not deliver for the UK: it is unduly subjective, inequitable, and can act as a non-tariff barrier to trade in educational exports.

- Boosting educational exports, and dealing with immigration in a post-Brexit world, will require reforms to the way student visas are issued and/or processed. Tier 4 policy should be rebooted to increase fairness and enhance the UK's competitiveness to deliver genuine growth.

- The government's target of achieving £30bn in education exports by 2020, can only be achieved through a sector-wide strategy for growth, with a range of reforms to international student recruitment.

- MillionPlus believes that reducing bureaucracy, eliminating unnecessary subjectivity, and building a stronger partnership between the Home Office and the university sector would help the UK to achieve meaningful growth in education exports.

- MillionPlus has proposed two ways of reforming the system to meet the objectives of the government and the universities in the years ahead.

Introduction

1. Overseas students are hugely beneficial to the UK. They add greatly to the academic and cultural vibrancy at universities, they support tens of thousands of jobs across the country, while adding £26bn to the overall size of the UK economy.[1] The Migration Advisory Committee (MAC) report into international students was clear that the UK benefits economically from these students and recommended growing the numbers coming to the UK. There are no mainstream politicians who advocate for anything other than expansion in this area.[2]

2. It is curious, therefore, that a perception remains entrenched around international student migration to the UK of hostility and barriers. It is similarly puzzling why the UK should lose market share in a sector in which it is so respected worldwide for its quality. For some commentators, the issue comes down to international students being included within the migration target. For others, it is the lack of a competitive post-study work visa that holds the UK back. Both are valid reasons, and no doubt play a part, however, to focus on these individual reasons is to miss a deeper and more fundamental issue within the system.

3. MillionPlus believes that the current Tier 4 visa application system for international students is overly complex, bureaucratic, and too often arbitrary and subjective in its outcome. The current system does not work in the interests of universities and students or meet the Home Office's (stated) aims.

4. In short, all concerned would gain positively from the wholesale reform of how the Tier 4 visa application process operates and it would especially benefit one of the UK's most successful export industries at a time when enhancing our exports around the globe has never been as important or urgent. Now is the time to rethink the system and push for change that could see sustainable growth.

5. In this paper we address the problems inherent within the current system and suggest alternative approaches that would serve to mitigate them, freeing up the university sector whilst not dismantling compliance procedures.

6. In a democratic society Home Office Ministers have every right to set the rules by which visas are granted, however, ensuring these rules are fair and applied appropriately and transparently would lead to greater co-operation between institutions and government. A joined up and successful international student strategy would be the result, and a highly desirable one at that.

The Current System – How did we get here?

7. The Tier 4 system exists in a changing policy environment and a changing sector but has failed to catch up with developments in either. The climate that led us to this point was one of wariness between government and providers, and one borne out of a desire to clamp down hard on those apparently abusing the system – the so-called 'bogus college' agenda. The policy environment from around 2012 therefore became more aggressive, and tougher scrutiny was enforced across the board. Whilst this may have had some impact on those abusing the system it also increased the non-tariff barriers and the bureaucracy for the vast majority who were using the system fairly.

8. The UK Government is open about the effect of the policies they enacted with regard to those abusing the system. There is also an awareness of the negative consequences this has had on institutions who are highly trusted and have done nothing wrong – yet have still had to invest huge resources of time and money into new and complex compliance regimes. Following this, recent Immigration Ministers have recognised the efforts universities have made, today seeing universities as highly trusted and compliant,

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[1] See: https://www.universitiesuk.ac.uk/policy-and-analysis/reports/Documents/2017/briefing-economic-impact-international-students.pdf

[2] See: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/739089/Impact_intl_students_report_published_v1.1.pdf

appreciating the efforts made to increase international students coming to UK universities and recognising this as a good thing.[3] As mentioned above, however, whilst the rhetoric has moved on substantially the policies and practices of the Home Office and UKVI lag behind.

If we look at the current student journey through the system, we can see several issues to be addressed immediately. The first of which is on duplication, and subsequent confusion:

    i.   A prospective international student applies to a UK university and is judged by that institution against the academic standards and financial requirements required to undertake a given course.

    ii.   If these standards are met, the applicant is issued with a Confirmation of Acceptance of Study (CAS) by the university.

    iii.   From that point they can apply for a Tier 4 student visa from the Home Office, via UK Visas and Immigration (UKVI).

    iv.   UKVI then also obtains another, similar, sets of data to see if they meet the visa requirements.

    v.   Upon completion of these checks many applicants are also asked to be interviewed by an Entry Clearance Officer (ECO) to assess their credibility, at UKVI's discretion.

9. This process can be long-winded for the applicant, as well as highly resource intensive for universities and UKVI – absurdly so in many cases where much of the data being collected is essentially the same. This duplicated approach can then be compounded when administrative errors occur within the system, such as records not matching to the letter, which can flag up the application as a refusal pending a review, which means yet more time and resource being dedicated to rectifying the sometimes-trivial problems the system throws up.

10. This alone is confusing and frustrating for the applicant, but once they get beyond this, and into the credibility interview process, it gets no less difficult, with processes that are by no means uniform in their approach and which can vary wildly in content and judgement. Interviewees can be assessed on criteria that bear little relation to the visa requirements, by officers who may have no means to adequately ascertain academic credibility, in a system that is open to subjectivity and with very little transparency.

11. A 2013 report by the UK Council for International Student Affairs (UKCISA) highlighted instances of judgments being made by ECOs well beyond the stated terms of 'credibility', going beyond any reasonable assessment of how or why a student may wish to take a course.[4] For instance, applicants can be asked arbitrary, subjective and deeply personal questions about their family background. These include citing parental occupations to doubt credibility, or questions such as the numbers of buses that run through the city they hope to study in, why they did not choose another 'more prestigious' university, the name of local landmarks, or the names of the individual modules they may study on the course. Failure to answer these adequately can result in an application coming under doubt or simply refused.

12. The lack of a uniform approach, due to the individual nature of the process and its proclivity for subjective decision making, means that universities and applicants do not have any indication of the sort of questions that can reasonably be asked, making advice or guidance for the international applicant difficult. If an applicant speaks off the cuff about their dream job and that does not relate directly to their course of study, that can be seen as suspicious. If an applicant says what they think the ECO wants to hear and has done all the research a university might suggest, they could look coached and forced which might be treated as equally suspicious. Similarly, if the applicant mentions that post-study work in the UK

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[3] https://www.conservativehome.com/platform/2017/11/brandon-lewis-our-immigration-policy-taking-back-control-with-compassion.html

[4] https://www.ukcisa.org.uk/Research--Policy/Resource-bank/resources/2/Tier-4-Credibility-Interviews-UKCISA-survey-report

might be attractive to them, which is a thoroughly legitimate offer for a university to make or an applicant to take advantage of, that can be treated as suspect.

13. By themselves these examples would be confusing, but it is also important to remember that some applicants will come from countries where individuals have very different relationships with government officials. Considering such cultural sensitivities cannot be reasonably expected in every instance but issues such as this - in a system set up in this manner - still has an impact on the result through an individual's assessment at interview.

14. The fact that there is such a high potential for subjectivity built in to the system and a lack of coherent or uniform decision making can lead people to query the basis on which officers ask certain questions or make judgements, with the consequences that can spring from that. It is important to note that it should not be the ECOs themselves who are necessarily at fault. The system itself has to inherently process too much information in a circuitous and unduly subjective manner, leading to outcomes that lack objectivity and transparency.

15. A number of factors will necessarily influence an ECO during a credibility interview. One of which may well be the country from which an applicant is applying (and a perceived level of risk attached to it), while another may be the institution to which the applicant is applying. Taking the country of origin to begin with, the level at which the Home Office may wish to classify a country on a risk register is a matter for the Home Office. However, the lack of transparency and of any official guidance means that universities are having to work on the basis of rumour or innuendo in place of objective facts or official analysis. A university may have very good reason to want to go into a certain country, but currently there are no avenues by which they can adequately and officially communicate this with UKVI, the consequence being that decisions in this regard are being made in the dark.

16. There is a similar problem at the institutional level. It is unreasonable, if not impossible, to expect all ECOs to appreciate the varied nature of the current higher education sector, or to understand a given individual's attraction to certain modes of study, locations, or offers from a particular institution. It would equally be unlikely, and unfair, to assume that all ECOs would know which universities are world-class in certain fields, or of all the facilities and services they have to offer that could attract an applicant. When asking questions in interviews to ascertain credibility it is therefore not unreasonable to assume that shorthand measures may be employed. These could include an individual ECO's knowledge of a given university, or the institutions ranking in a league table, and we have heard many instances of this being the case. Clearly, within the Tier 4 rules, all licenced providers should be treated equally, and these factors should have no bearing whatsoever on a given student's credibility. The fact that the interview process takes place in the way that it does, however, injects the very real and documented potential for high levels of subjectivity such as this to unfairly influence decision making.

17. Of course, not all credibility interviews are problematic, but therein lies part of the problem. Either there is a degree of randomness within the system throwing up poor decision making (albeit a randomness that seemingly impacts some more than others) or there is some level of bias embedded within the decision-making process. Neither of these options are a good advert for this system, but the latter is particularly harmful to the UK, as it holds back institutions that should be growing and expanding in a globally competitive marketplace. Whilst all the above can be distressing for individual applicants and reflects poorly on the UK more generally, the bigger issue for growth is that universities are judged as to how compliant they are based on the rate of individual refusals they receive as decided by UKVI.

18. The current maximum rate of refusal is 10% of all CASs issued and exceeding it can lead to a licence to recruit internationally being revoked. This can also have an impact on the institution's Tier 2 license (for staff recruitment). As a result, we have a system in which applicants who have been accepted by a university onto a course then go through the demonstrably inconsistent Tier 4 application process administered by UKVI. The university has no part in, nor influence on, this aspect of the process but decisions taken can lead to major consequences for the university should applicants be refused. This risks a university's global reputation and their financial stability.

19. This system means that universities can have a major source of investment stopped owing to decisions made largely outside of their control, which severely limits institutional willingness to expand provision into potential growth markets. The logical extension of this is that universities act with enormous caution in many parts of the world, or even scale back from overseas operations in those places. Why would a university risk investing in an area if, through a process outside of their control, a number of refusals could have such devastating consequences? This is not only contrary to what the MAC report states would be best for the UK economy, it also gives up any resources the university may have put into that region over time and enables the UK's global competitors to take advantage. Through having a system that mixes such a loose and subjective process with one of set targets and refusal rates you end up with confusion and a lack of context that runs counter to long-term planning and puts a limit on reasonable ambitions for growth.

20. Furthermore, and with some degree of irony, the way this system operates can work against ensuring the high standard of compliance the Home Office has worked so hard to achieve. The UKVI rules on compliance set out three core requirements: i) the refusal rate, ii) enrolment, and; iii) course completion. Currently the emphasis sits squarely on refusal rate (as was clearly evidenced when the government's Tier 4 pilot named the most compliant institutions as those with the lowest refusal rates). However, it is on enrolment and course completion that a university can actually be said to have real influence and responsibilities for during an international student's time studying in the UK. The answer is not to leave things the way they are but then put greater emphasis on measures to ramp up scrutiny on enrolment and completion. Indeed, it would be deeply unhelpful if too much emphasis was placed on tracking students and making them feel as though they are being watched. Instead, we need to change the dynamic that has led to this situation or look in the round at what each provider is doing, and at the various ways they are ensuring good compliance. The system should not be based simply on what is the easiest to measure.

21. The current system, therefore, is letting too many prospective international students down, and for too many universities it can bring unpredictability and limit their ability to grow in many parts of the world. If the whole UK higher education sector is to continue to be successful in the years ahead and grow international student numbers in line with shared goals it cannot continue with a system operating in this way. The additional resources that will most likely be required to deal with EU students as International Students after Brexit will exacerbate this issue, making the case for reform even more urgent. An unfair and unequal system is bad for students, bad for universities and is bad for the UK economy: bold thinking and innovative solutions are required.

Our proposals for reform

22. Clearly, any system that would work in the interests of potential applicants, the university sector, and the Home Office, would need to meet a set of criteria:

- remove as much unnecessary subjectivity from the system as possible, so that all applicants (and universities) are treated fairly;

- work to encourage genuine growth in line with government objectives by looking at decisions within context without unnecessary fear or favour;

- reclaim lost reputational ground in countries around the world; and,

- reduce unnecessary bureaucracy, especially as a successful regime would see application numbers rise, coupled with the probable inclusion of EEA students post-Brexit.

23. These are not unambitious asks for the new system, but they are not unachievable either. Below we set out two possible solutions. The first is a substantial departure from the current system but is built on the logical consequences of dealing with the problems outlined above. The second is an attempt to use the architecture of the current system while making adjustments that would have an immediate beneficial

impact. Both are based on the premise of ensuring sustainable growth, no reduction in compliance and working constructively with the government to increase international student numbers.

PROPOSAL 1: PROVISIONAL VISAS

24. To reduce undue risk to universities, whilst maintaining high compliance levels, the relationship between student, university and UKVI could be realigned. Currently, the student applies to the university, is assessed by them, issued with a CAS and is then assessed by UKVI using similar metrics and, in most cases, an interview process. A pass or fail judgment is then made by UKVI.

25. Instead, as we outline below, a potential student could apply first to UKVI, not the university. UKVI would assess their visa eligibility, based on publicly available assessment criteria as decided by the Home Office. If they are then judged to be a genuine applicant, with the means to undertake a course, they would be issued with a **provisional visa** (out-of-country). The applicant could then formally apply to a university of their choice. Once the university has confirmed acceptance, the applicant would have their visa fully ratified by UKVI as Tier 4 and then could enter the UK (see Figure 1). It would be sensible to put a fee on the initial application to UKVI to ensure only those who have a serious interest in studying would apply. We propose this fee remains in line with the current cost of a Tier 4 visa.

Figure 1: Proposed application process in outline
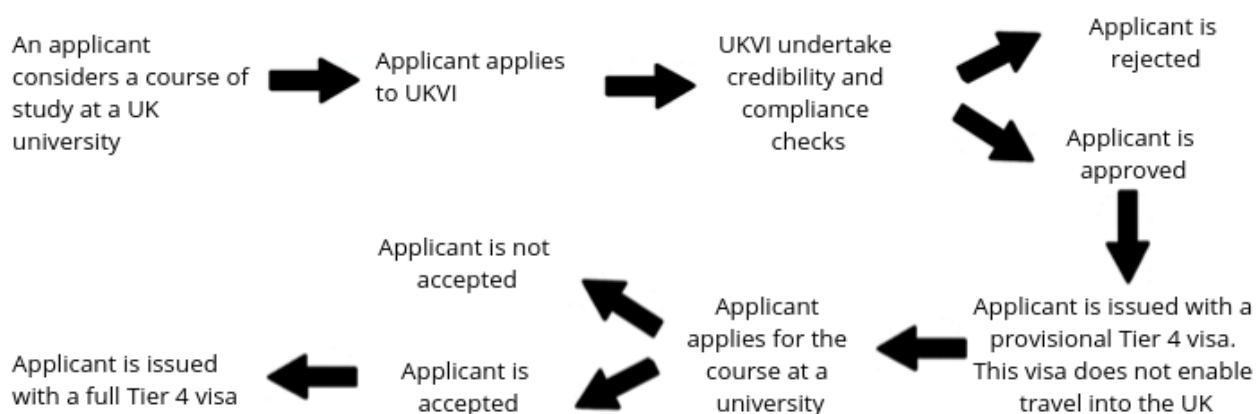
26. Under such a system UKVI would have freedom to impose greater scrutiny based on published Home Office guidance on a country's risk assessment. UKVI currently has two general classifications: those countries that fall under Appendix H of the rules (which are more light touch) and those that do not. In practice it is widely accepted that certain countries are scrutinised far more heavily than others. As a result, universities that may wish to accept students from those countries, no matter how qualified or talented, run serious risks if UKVI feel they need to do extra checks, or ask more irregular questions due to a lack of trust (as highlighted above).

27. Making UKVI the first point of entry would remove these non-tariff recruitment barriers from universities, and would enable the government to be open, honest and transparent about how it assesses a country's risk and the criteria of acceptance to be met by an applicant. This system would enable a university and the government to be frank and open, and work on the basis of developing growth and expanding provision in as risk-free a way as possible.

28. This system would be simpler and reduce bureaucracy as it would enable UKVI to assess visa eligibility and a university to assess educational ability, that is, enabling each to be judged by the right people.

29. The new system would also ensure that applicants are on a more equal footing when they are assessed, and UKVI can base its decisions on transparent published criteria, resulting in less dramatic consequences for institutions, or potential damage to the reputation of the UK HE sector.

30. Naturally, any perceived transfer of greater power to UKVI might be alarming to some, while there may be legitimate questions over whether the government could effectively manage immigration through this new system, clamping down on students from certain parts of the world at the provisional visa stage. In reality, however, the government and UKVI already have this power (which is why there is such a great debate around students in the net migration figures or target). This power can be used by government 'behind the scenes', in a way that is already impacting upon many providers. Under this new system if the government used any such levers, it would be transparent and would not jeopardise a university's ability to recruit or explore new markets (as a refusal of an applicant would not trigger such difficulty for a university).

31. Formalising a tool that the government already fundamentally has at its disposal would have the benefit of making it a far more transparent and accountable process. High risk countries and acceptance criteria for a Tier 4 visa would have to be published so if the government suddenly clamped down on student numbers and set a refusal rate target for UKVI, this would be highly visible as provisional refusal rates would be published and broken down by country. An increased refusal rate would therefore be seen by providers but also parliamentarians. This would enable scrutiny of the practices that caused such an increase, putting the government to the test if a policy on a particular nation was being put in place. The current system enables the Home Office/UKVI *de facto* control on acceptances/refusals already, should they wish to use it, and can be deployed in a way that would be hard to detect or contextualise. This new system would bring all of this into the open and would be blind to factors outside of those directly related to visa eligibility.

32. In conclusion, the benefits of this proposal would mean the removal of the threat of licence revocation for providers, enable growth to continue in line with government ambitions, whilst maintaining compliance standards. It would require a shift in how the system works at a fundamental level and there would still be much to ascertain around the initial metrics that could be used to determine who would merit a provisional visa. However, at a basic level it would inject greater stability and transparency into the process and remove many of the issues dogging the current system that hold too many UK universities back and damage the image of UK higher education around the world.

PROPOSAL 2: STREAMLINE AND CONTEXTUASLISE THE COMPLIANCE REGIME

33. Taking the current architecture of the Tier 4 system and making less dramatic, but still highly significant, changes could also be hugely beneficial to the UK. One way to speed up processes and to modernise the way the system operates, while fostering a sense of partnership and trust between university and government, would be to remove the elements of the system that are overly problematic and draconian, and introduce context into Tier 4 compliance. To do this we need to appreciate what elements are holding the system back (i.e. subjectivity and bureaucracy) and find solutions that work for the sector and the government.

34. As has been established, the credibility interview is the main element of the current process that is most open to subjectivity, and which has seen the most arbitrary and egregious decisions. Potential students can be asked irrelevant questions and there is very little recourse as to the decisions made or the reasons given. Almost every university will have many examples of inexplicable instances in these interviews, with many feeling that the questions asked go far beyond what is appropriate.

35. Alongside the major issues with subjectivity, the interviews are a hugely resource-intensive operation, which puts excess strain onto the system. This will only worsen if EU students are brought into Tier 4 or if numbers grow in the way we all hope. These interviews are problematic and are also, in most cases, utterly unnecessary, particularly at a time when compliance regimes at universities have never been better. They also take up time and effort on the part of applicants and streamlining the process would be hugely beneficial to all concerned.

36. Given the strong evidence of long-standing compliance with visa rules from the university sector, it would be reasonable and proportionate for the Home Office to streamline processes and make the visa

application process less alienating. To do so the Home Office should firstly look to **phase out the Tier 4 credibility interview process**.

37. Removing the credibility interview would remove a layer of unnecessary bureaucracy and subjectivity. However, this does not address the question of how to maintain effective compliance to ensure that these institutions remain highly compliant, particularly in a system which is being set up with growth in mind. To achieve this the government would need to have a more fundamental re-evaluation of the way it understands and measures compliance and remove some of the arbitrary and counter-productive parts of the current framework.

38. The current system is based on a compliance measure that understands a compliant institution as one that has fewer than 10% of its CASs refused. This is both highly illogical and deeply problematic. A 10% refusal rate is an arbitrary target, designed as a lever for control. It does not flow from the requirements of a good compliance regime. The 10% rate was dropped from 20% in 2014 as part of a wider political strategy to 'clamp down' on immigration, and on the issue of "bogus private colleges".[5] Moving forward, we need to recognise that any arbitrary target leads to a series of unintended consequences that are unfair and potentially damaging.

39. The threat of losing a Tier 4 licence for an institution is a grave one. Besides the clear reputational damage, it also has enormous financial implications and an impact on other immigration licences they might hold, such as for Tier 2. It is therefore a clear priority for universities to remain as far below the threshold as possible, wherever it is set, no matter what compliance processes they are already running. This is once again a perverse consequence of an over-reliance on refusal rate as a measure of compliance.

40. This situation has an impact on university decision making in a way that goes against the stated aims of government policy, as instead of simply keeping an eye on a university's compliance regime it can actively deter institutions from competing with national or international competitors in a global marketplace. For example, a move into a new territory, or even a change in government policy towards a region in which a provider is already established, runs the risk of a university being hit with refusals that could push them towards the 10% threshold. This may mean that a university scales back from recruiting in a certain area, which means lost revenue, decreased investment in the local region and a potential boost for competitors (at home or abroad).

41. With a target set to boost educational exports by billions of pounds, coupled with a need to increase global trade post-Brexit, it is a significant problem to force a highly successful export industry to make decisions that will harm its own revenue streams and boost competitor nations, all as a result of arbitrary targets and subjective decisions. This is before one even explores the other positives associated with broadening the reach of UK higher education and the cultural, academic and societal benefits that come with it.

42. A further problem identified as a consequence of a target is the propensity of UKVI, and the government more generally, to understand the sector in terms of degrees of compliance. In the current Tier 4 rules it states that the core requirements are that a sponsor must have "*a visa refusal rate of less than 10 per cent; an enrolment rate of at least 90 per cent; and a course completion rate of at least 85 per cent*"[6]. Nowhere in the rules is any allusion made to 'more compliant' and 'less compliant institutions', or any ranking system. As such, it can be stated that any university that meets the criteria as set out by the Home Office and is then awarded a Tier 4 licence is a fully compliant institution with all necessary and relevant privileges and responsibilities that go with that. However, despite all UK universities demonstrating compliance, it is commonly understood that an unofficial league table of compliant

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[5] See: https://www.telegraph.co.uk/news/uknews/immigration/10995875/David-Cameron-Were-building-an-immigration-system-that-puts-Britain-first.html
[6]See:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/725667/Tier_4_Sponsor_Guidance_-_Doc_3_-_Compliance_2018-07-16_FINAL.pdf

providers is applied in practice. For example, the government published the following rationale at the launch of the larger Tier 4 streamlining pilot in 2017: "*universities were selected* [for the pilot] *as their visa refusal rates are consistently the lowest in their area or region*."[7] Such a rationale implies that universities should be working to 0% and graded on their distance away from this accordingly.

43. The use of such hierarchies within the ranks of trusted providers creates a negative feedback loop: if a provider finds itself with a higher refusal rate at a given time (though still below 10%) this can suggest a knee-jerk response for greater scrutiny of them in general which in turn causes an increase in subjective and inappropriate questioning of applicants for that institution, which can lead to more refusals, and so the pattern continues. The continued establishment of such a process acts as an in-built barrier to export growth and the perverse consequences of this have led to a differentiated, unequal and distinctly unfair compliance process for many universities, hindering competition from within the sector and with international competitors. In a forward-looking system that phases out the credibility interview process the **10% maximum refusal rate should also be removed, focusing instead on reasonable and proportionate enforcement designed to combat any real abuse of the system**. This will have no material effect on compliance, but it will enable greater freedom for providers.

44. With the removal of the artificial target and of interviews, compliance would begin to move away from purely assessing refusal rates, and look more equally at refusal, enrolment and completion, as the formal rules state. This rebalancing could be accompanied with a change in how universities are assessed. Context is the element most strikingly lacking from how the current system operates. With the removal of interviews and the 10% threshold, therefore, we are proposing that a context-based approach, involving greater dialogue between all parties concerned, would serve as a far better measure of compliance than a 10% threshold.

45. Under such a system a university would meet at pre-set intervals with UKVI to provide information on compliance and would be assessed on all necessary measures (be they refusal rate, enrolment rate, completion rates etc.) in a more holistic and rounded way, **which would put context and planning at the heart of the system**.

46. The benefit of such an approach would be that, instead of constant scrutiny of each individual applicant, which duplicates work and creates a potentially alienating environment, a university would manage their compliance regime as they do currently. This would be ratified annually by UKVI to ensure providers are maintaining the high standards that they are currently operating at. This would save huge resource on the UKVI side also, as they can focus their attention on ensuring genuine long-term compliance and not waste time checking and double-checking the vast majority of applicants and students who are abiding by the rules.

47. A more light-touch and context-based system is also the right vehicle for genuine growth in international student numbers. As we have seen, providers are often worried currently about expanding into some new markets, for logical reasons. However, under this system a provider could say to UKVI ahead of time that they are looking to target a particular country and share with them all the steps they will be taking to ensure compliance is being upheld. If this country had a higher propensity for refusals then this could be noted, and if a university saw a spike in refusals (based on whichever metrics UKVI applied) it would not result in them pulling out abruptly due to fear, instead it would have been taken into account by UKVI ahead of time. Rather than each refusal on a student by student basis ramping up pressure, universities could plan for the longer-term safe in the knowledge that they won't have their licence revoked, whilst UKVI can be satisfied that, despite any spikes in refusals, compliance is being fully maintained at all stages of the applicant/student journey. This approach, with the sector and government working in genuine partnership with a common goal, would make it that much easier to invest in and grow overseas student numbers coming to the UK.

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[7] See: https://www.gov.uk/government/news/twenty-three-universities-join-student-visa-pilot

48. The benefits of this fresh, contextual approach to Tier 4 are clear: a streamlined and less complex system, an end to subjective and resource-consuming interviews, a smoother applicant journey and growth in international student numbers.

Conclusions and Recommendations

49. Reforming Tier 4 in a substantial enough way to address the current issues and enable the sustainable growth across the sector will not be easy and will take time, but the benefits of doing so would be enormous. Even if that was not the case, the peculiarities and fundamental flaws of the current system are reason enough to act. Continuing with a system that disregards strategy, planning and intent does the sector, and the UK, a disservice, and it cannot be expected to grow in the way we hope without addressing that fundamental issue. We have sought to highlight the many reasons why change needs to happen and have suggested possible alternatives. These are not exhaustive, but we hope to begin a wider conversation with the sector and government on this new approach.

50. In either of our suggested scenarios we advocate a whole sector strategy as the best way forward to reap the greatest benefits. This approach is based on the understanding that, initially, it would apply to all those with university title, as they have strong track records of continued compliance. Government should work fundamentally from that basis, only treating providers differently when there is clear evidence of significant non-compliance in the round.

51. To make the most of a post-Brexit world the UK's Tier 4 visa application process needs to change at this point more than ever. If we can take up the challenges the UK faces and grasp the opportunities for expanding international education, we can achieve our shared aspirations to boost this critical export sector.

52. Universities across the UK, and modern universities in particular, are perfectly placed to expand into new markets, unlock fresh potential and improve the student experience. With real reform, their potential can be better realised, delivering an outcome that will strengthen our economy while presenting a positive image of the UK to the rest of the world.