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## 1. Introduction

The UK Council for International Student Affairs (UKCISA) is the UK's national advisory body supporting international students and those who work with them.

Since its foundation in 1968, UKCISA has established its reputation as the essential membership body for organisations working with international students in UK higher education (HE), and a consistent and trusted source of information for international students.

Our vision is that every international student who comes to the UK has a positive experience and is able to tell friends and families that the UK is a welcoming place to study and live. Our mission is to inform, advise and support international students and the institutions, students' unions and organisations who work with them.

UKCISA plays an essential role in providing independent advice, guidance and information for current and prospective international students and their families, and for sector practitioners supporting international students. Our comprehensive guidance covers the international student experience throughout the whole student lifecycle, from preparation and arrival (including guidance on immigration, student finance and tuition fee status), to employment post-graduation - as well as living and studying in the UK. This gives us a unique perspective on the immigration system and its interrelationship with UK higher education.

UKCISA's members include all UK public universities as well as private HE providers, Students' Unions, internationally active Further Education (FE) colleges and independent schools that provide a route to UK HE. Its membership also comprises corporate organisations that support HE recruitment - such as immigration law firms, pathway providers and education agents - and sector organisations including the Association of Commonwealth Universities (which administers UK government scholarships for international students), British Council, English UK, GuildHE, Independent HE, National Union of Students (NUS), Universities UK (UUK) and UCAS.

Our expert staff have extensive knowledge of policy and legislation related to international students, with decades of experience in sector bodies, education providers, immigration law and the charity sector. They monitor and analyse legislation and regulations and ensure our highly trusted advice and guidance for students and education providers is up to date.

UKCISA is regulated by the Office of the Immigration Services Commissioner (OISC) for the provision of immigration advice to International Students, ensuring high-quality advice, guidance, and information direct to current and prospective international students.

Our highly respected training programme empowers higher education staff to advise and support international students in their own institution by enhancing their knowledge of all aspects of the international student experience, but with a strong focus on immigration.

Our extensive member network gives us access to expert practitioners across UK higher education, as well as specialist advisers experienced in delivering advice to students and training to education organisations, enabling us to share good practice to maintain the highest standards of international student support in UK education, and provide intelligence on issues facing international students.

We are a trusted government stakeholder, funded by the Department for Education and the Scottish Government to support the higher education sector and its students in England and Scotland.

We are a member of the Home Office's Education Advisory Group (EAG) and UKVI Education Stakeholders Group. We are also represented on the Home Office's Simplification of the Immigration Rules Committee (SORT). These forums enable us to maintain a close dialogue with governments and members across the UK to bring together diverse perspectives to advise on policy and legislation.

UKCISA is actively involved in supporting the delivery of the International Education Strategy (IES), specifically in support of its ambitions to enhance the international student experience – in line with our organisation's vision. UKCISA is explicitly referenced in Actions 5 and 6 of the IES, working with the Office for Students to understand what works in terms of the international student experience, and – through our International Student Employability Group (ISEG) – enhancing the sector's understanding and evidence base on international graduate outcomes.

UKCISA welcomes the decision by the Independent Chief Inspector of Borders and Immigration to conduct an inspection of the relationship between the immigration system and the higher education sector. The following paper outlines relevant intelligence from UKCISA's work to support its higher education members to inform ICIBI in this inspection, and contribute to the wider evidence to inform policy at government and institutional level. It also reemphasizes relevant recommendations from UKCISA's July 2020 [position paper](#) – which called for government to ensure the new immigration system delivers an improved 'customer journey' for international students.

It provides feedback under the following themes:

- a. Dialogue between government and the higher education sector
- b. Visa sponsorship and compliance requirements
- c. Availability and usefulness to the higher education sector of guidance for study and work applications
- d. Service provision by the Home Office's Premium Customer Service schemes
- e. Competitiveness and accessibility of the UK's immigration "offer" to international students and staff, and the systems that underpin it.

## 2. Dialogue between government and the higher education sector

### 2.1 Engagement with the sector

The Home Office has put in place structures for regular engagement with higher education stakeholders on matters related to the immigration of students and staff. This engagement is principally with the relevant Home Office policy teams but communication mechanisms have also been established with the operational teams across UK Visas and Immigration (UKVI). Additional engagement points are created in response to the external context, for example:

- the Home Office introducing a range of concessions and flexibilities in the visa and immigration system to minimise the impact of Covid-19 on continuing and prospective students, and on the higher education sector in general.
- UKVI instigating weekly meetings during the peak periods of student immigration.
- most recently, in response to the emerging crisis in Afghanistan to identify flexibilities for those applying for visas in exceptional circumstances.

These structures broadly work well, and our members benefit from the regular dialogue UKCISA maintains with officials. The current level of engagement is higher than we have sometimes experienced in the past, and this is welcome and should be maintained to the benefit of the higher education sector.

However, it is important to ensure that this engagement is reciprocal. The Home Office should ensure that all meetings and forums provide an opportunity for the sector to raise its queries and concerns, and to understand how these are acted upon.

The following examples describe what works well in terms of engagement, and what could be improved further.

#### *Example 1 - Education Advisory Group*

*The Home Office Education Advisory Group (EAG) meets monthly to present updates on policy related to the education sector.*

*This group provided a forum for The Home Office and UKVI colleagues to engage actively with the sector as the Coronavirus pandemic evolved, and for the sector to highlight the emerging challenges and considerations.*

*In summer 2021, it sought feedback from members on how these meetings might be improved, and UKCISA submitted the following recommendations to enhance engagement with the EAG members:*

- *Sector organisations should be invited to suggest agenda items in advance of each meeting, to ensure that the agenda includes items that government want to engage on, as well as emerging issues that are of relevance to EAG members.*
- *The Secretariat should circulate items that require feedback from EAG members **at least 2 weeks in advance** of the meeting, to enable sector organisations to gather intelligence from their constituencies as required.*
- *Each meeting of the EAG should include representatives from relevant policy teams across the Home Office and UKVI, to reduce the number of queries that need to be referred to policy teams who are not in attendance.*
- *That queries raised in the meetings that require further consideration or referral to another policy or operational team a) are followed up promptly, and b) that responses are circulated by email to the whole EAG after the meeting, as well as the member organisation that raised the query.*

*Example 2 – Engaging with the sector to shape the Graduate Immigration Route*

*UKCISA convened sector round tables on the technical development of the Graduate Immigration Route, which were widely attended by colleagues from the Home Office and UKVI, to inform development of the application system. Sector feedback in this forum quickly identified that there was insufficient lead-in time for institutions to implement the system requirements to enable effective integration and automation of reporting between institutions' and the visa application systems. The forums highlighted the need for essential, temporary, workarounds that did not create undue burden on institutions to be put in place for the launch of the Route while providers undertook the necessary system work.*

*UKCISA also had regular dialogue with Home Office colleagues around the Graduate Route rules and guidance, providing direct feedback via the SORT committee, and in meetings with colleagues from the Student Migration Policy team. Home Office responded to this engagement with changes to the Graduate Route guidance, improving its clarity for sponsors. It engaged with UKCISA and its ISEG as we advocated for the inclusion of self-employment in the Graduate Route, and as a consequence, the ability to work on a self-employed basis was included in the Route as it launched.*

### 3. Visa sponsorship and compliance requirements

#### 3.1 Burden of compliance

There is a conflict between the responsibility placed on providers by government to implement immigration policy, and the trust placed in providers to do this.

Student engagement and attendance monitoring requirements should place the requisite trust in sponsors, to allow for diversity across courses, levels of study and individual circumstances.

UKCISA calls for the compliance burden on providers to be reduced, to better reflect the extensive knowledge and experience in immigration compliance that the sector has developed, and to maximise participation in international recruitment. This has become increasingly important since the International Education Strategy has set ambitious recruitment targets for the UK.

The Home Office must continue to invest in technology to improve the Sponsor Management System, in consultation with sponsors, to ease the administrative burden of compliance on all institutions and utilise new methods of recording and navigating data, particularly in light of the new immigration routes that have been introduced.

#### 3.2 Disparity of the burden across different types of provider

The new points-based system was introduced with the intention to make sponsor reporting requirements more proportionate and transparent, but a significant burden remains for sponsors, particularly smaller higher education providers. Providers with small numbers of international students are vulnerable to the 10% cap on visa refusals, as this can mean that a relatively small number of refusals could trigger penalties, impacting on their international recruitment.

Furthermore, the system for annual CAS allocations should be reviewed to allow institutions to fully implement their recruitment strategies and achieve their targets.

Institutions face another significant challenge in implementing policy where immigration policies discriminate eg on the grounds of nationality, sponsor type, type and level of course. Sponsors whose students face greater barriers on the grounds of nationality - eg increased likelihood of undergoing credibility interviews and receiving refusals on subjective grounds - are less likely to continue recruiting from the countries or regions concerned, regardless of the academic ability of individual students.

Students with a partner and/or children are restricted largely to studying postgraduate courses sponsored by a Higher Education Provider with a Track Record or must be separated from their family while studying.

UKCISA continues to call for government to remove credibility interviews, apart from in clearly defined exceptional circumstances, and issue guidance to increase transparency and accountability in the decision-making process in such circumstances.

### **3.3 Inflexibility of In-country applications and Academic progression**

To ensure the most competitive offer, **in-country applications** should be made possible for all course changes and transition to work or further study, regardless of level of education.

Despite the many flexibilities introduced during the pandemic, it remains that most students who have not finished their current course are unable to change course without leaving the UK to apply for new permission. Furthermore, students sponsored by a Higher Education Provider without a Track Record of compliance and students on courses below degree level sponsored by a Higher Education Provider with a Track Record (HEP+TR) cannot change course in the UK.

Undergraduates sponsored by a HEP+TR must be able to complete the new course within their current permission.

Postgraduates sponsored by an HEP+TR can change course but usually have to leave the UK because of **academic progress requirements** if they need to apply for extra permission. Academic progress can prevent in-country applications for those who have passed their current course.

Work routes seem more accessible, though government should enable Students to switch in the UK into Temporary Work routes including Creative Worker and Charity Worker. Switching into a Government Authorised Exchange visa (GAE) is open only to those sponsored by an HEP+TR or an overseas HEI who have a degree.

Academic progression requirements in general should be removed, recognising that they do not adequately account for diverse individual circumstances. Sponsors are best placed to know if students are on a genuine (if not always linear) academic journey and should not be constrained by inflexible rules on academic progression.

Academic progression requirements are also not supportive of students who need extra time to complete their studies, eg disabled students.

A recent Free Movement [article](#) by Nichola Carter provides an excellent illustration of the burden of compliance that our members experience.

#### 4. Availability and usefulness to the higher education sector of guidance for study and work applications

It is essential that government takes steps to ensure that any guidance is published before new Rules come into force to give sponsors time to prepare and fully understand any implementation requirements. We urge government to **facilitate SORT's implementation of the Law Commission's recommendations** in this regard.

Government needs to also take great care to ensure that guidance in different locations is not contradictory, and that any updates required are implemented promptly and across all locations.

##### *Example 3 – incorrect and inconsistent information on Short-term students*

*The short-term student route was replaced on 1 December 2020 with the short-term student (English language) route, introducing a right to an administrative review (for refused applications under this new route). This was made clear in Appendix Short-term student (the Rules on short-term students) and Appendix AR (the Rules on administrative review). However, as the caseworker guidance on Administrative Review hadn't been updated and the caseworker guidance on short-term students didn't mention the right to an administrative review, it was not clear that students could rely on this. More concerning was the fact that the gov.uk webpages on Administrative Review expressly stated that students who were refused permission under the short-term student could not apply for an administrative review. UKCISA asked that this be rectified, and received no response.*

*A Statement of Changes in April 2021 removed the right to an Administrative Review from the Short-term student Rules. The Explanatory Memorandum which accompanied this Statement said that its inclusion in the route in December 2020 had been an error. However, no corresponding changes were made to the Administrative Review Rules.*

*In October 2021 the Statement of Changes re-introduced the right to an Administrative Review to Appendix Short-term student. There was no explanation, but the Rules are now aligned and it is clear in the Rules that short-term student refusals include the right to an Administrative Review. However, this is not yet reflected in any of the guidance documents (although the Home Office Student Migration Policy team have agreed to include it in the next update of the short-term student guidance). Even more concerning is that the public facing [gov.uk](#) webpages continue to state that refusals of short-term student permissions do not attract the right to an administrative review:*

*The impact of this unclear legal and policy position, exacerbated by the lack of guidance and the fact that different policy teams have ownership of different aspects of the policy on this, has meant that those who have had a route to challenge a refusal of short-term student permission have likely not known of this for nearly a year.*

#### 5. Service provision by the Home Office's Premium Customer Service schemes

##### 5.1 Issues with the Premium Customer Service Team (PCST)

UKCISA and our members have noted numerous issues related to the Home Office's Premium Customer Service.

Firstly, there is the inappropriate use of the service as a means of communicating amendments to sponsor guidance. While this service is used by many higher education sponsors, there are also many

who do not subscribe to the service. This creates a **two-tier system, and consequently some important challenges for the higher education sector and international students.**

During 2021, essential updates to guidance were issued to advisors on the PCST but not replicated in the guidance to all sponsors. This created a disparity in terms of knowledge and understanding which discriminates students and sponsors in institutions who do not subscribe to this service.

The Home Office must **communicate policy clearly and quickly via publicly available formats (for example, caseworker guidance or on gov.uk), to enable all sponsors to access information on amendments contemporaneously.** Using PCST as a guidance service presents significant risks, and disadvantages many key stakeholders - including applicants/students themselves – who do not have access to information issued in this way.

There are significant **issues with the quality of service provided to subscribers.** The service has been priced consistently since July 2013, despite the likely rise in delivery costs during this time period. There is no available information on how Home Office quality assures the advice provided, and a lack of clarity across UKCISA's membership about the level of service they should expect.

The role of the Premium Account Manager (PAM) is poorly defined, which at best leads to confusion over which areas they should be advising on, and at worst delivers inconsistent and contradictory advice from different Premium Customer Service advisers.

UKCISA receives several calls each month to its members' advice line, and monitors several discussions on its members forum, about inconsistent advice provided or about advice provided that is not verifiable in published guidance. This presents a significant risk to the trust that applicants place in the system, and those who advise them.

#### *Example 4 – inconsistent advice on late EUSS applicants from PCST*

*The [ministerial statement](#) of 6 August 2021 confirmed the status (in line with the [Withdrawal Agreement between the UK and the EU](#)) of those who make late applications under the EU Settlement Scheme. As there was no UK legislation or further guidance to support this, students who were seeking entry from this time (for the start of their studies) were asking their institutions about: (a) entry to the UK and (b) the right to study.*

*A lack of published policy/law or insufficient clarity on policy led Student sponsors to turn to the PCST for guidance. This resulted in inconsistent, conflicting and often incorrect interpretations on policy points or incorrect advice. It was reported to UKCISA that the PCST offered varying responses to these questions, for example, that students who entered while they had pending late applications during this time would be entering as visitors, or they were not allowed to study.*

*The Home Office Student Migration Policy team produced a welcome update to the sponsor guidance and a letter which outlined the rights of entry for those with pending applications in early October.*

## **5.2 User feedback on the Premium Customer Service offer**

UKCISA's Immigration Compliance Network has worked with the Academic Registrars Council to seek feedback from member institutions about their experience with the Home Office's Premium Customer Service schemes. The most common priority expressed by respondents was for prompt

and clear responses regarding policy interpretation. This was highlighted as the most common priority for improvement. In addition, this reports

- 63% of respondents believe that the service does *not* represent good value for money
- 21% were clear about the range of services that they are being asked to pay for, with 70% being only somewhat clear
- 100% of respondents believe that the service should include checking and interpreting policy, but only 4% were confident that they received robust and clear responses to questions about policy. Most (65%) felt that they only sometimes received clear responses to policy questions.
- 65% fed back they were not satisfied with the methods in place to contact their Account Manager. (Staff contact via an Account Management Portal. It is difficult to reach PCST by phone and most staff would value account managers being more accessible.)
- 62% said they always or usually receive a response to enquiries within the 5 day service standard

## 6. Competitiveness and accessibility of the UK's immigration "offer" to international students and staff, and the systems that underpin it

### 6.1 The user experience of the UK's digital immigration system

The Student Immigration Route is intended to provide a more transparent and streamlined route for students to study in the UK. However, there is much that still needs to be done to **minimise the differential treatment of international students** in higher education.

Much of the current UK 'competitive offer' to international students and sponsors is reliant on technological advances and efficiencies to deliver a streamlined system, easy for all users to navigate. The Home Office has also moved to digital-only status for applicants, the success of which depends on the system functioning without issues.

There are several critical areas where the systems do not support this streamlined, accessible, customer journey.

UKCISA members and their students consistently report **significant issues with technology** related to the immigration process, including:

- BRPs issued with errors that are not the fault of the applicant.
- Issues and delays with BRP production, causing stress and anxiety for applicants
- Errors in digital status
- Delays to information updates in the system, which makes it unclear to an employer or student sponsor whether the applicant has permission.

These issues are compounded by the requirement to pay for an Administrative Review (AR) or access a premium telephone line to correct any errors, including those that are the fault of the system not the applicant. This leads to a **very poor customer experience, and undermines the UK offer to international students and their sponsors.**

It is essential that the **Home Office ensures that the systems it deploys to deliver the immigration system for users (customers) are invested in and improved** to ensure that the system is easy to navigate. As yet, the commitment to a more streamlined and easy-to-use system is hampered by the technology that underpins it.

## 6.2 Police registration

The outdated **requirement for students to register with the police is not fit for purpose**. For many years now, appointments have been insufficient in large population centres, and students have been unable to meet the requirement. This requires elaborate, time-consuming and costly workarounds that are stressful for students. It does not reflect the extensive compliance processes that institutions conduct for international students, and the list of nationals who require registration has not been updated for many years. The process significantly undermines students' perceptions of the UK as a welcoming destination.

The aforementioned backlog of appointments in major centres has now reached an unprecedented peak. At the time of submission, the next available appointments in London are in late 2022 – by which point many of the students waiting for the appointment will have completed their course. In the meantime, the sponsoring institution and UKVI holds up-to-date information for visa compliance purposes.

Government and its agencies have made significant advances in technology since the introduction of police registration. The Department for Work and Pensions (DWP) and the National Health Service, for example, now have automatic access to data related to changes of name and address. All other information gathered by police registration is also collected by UKVI. Police registration is therefore an unwieldy and unnecessary duplication, which is costly to the authorities and sponsors.

As a process, police registration was suspended during the pandemic restrictions with no impact on compliance. The Home Office should **urgently review the police registration policy with a view to rendering it obsolete and instead enabling the law enforcement authorities to access relevant data from other systems.**

### *Example 5: Issues with the production and distribution of Biometric Residence Permits (BRPs)*

*BRPs are issued to international students and staff (customers) in UK higher education, and required as evidence to open bank accounts, rent accommodation and other processes where proof of immigration status is required.*

*During the peak enrolment period for the 2021/22 academic year, the IT system that produces BRPs experienced a series of outages and technical issues, which led to extensive delays in producing and distributing BRPs and high levels of stress for applicants. Many BRPs were issued with errors including the wrong start or finish date, requiring the customer to apply for a replacement. As well incurring additional cost, these replacement BRPs were then also held up by the same delays to the system and the delivery network.*

### 6.3 Academic Technology Approval Scheme (ATAS)

The ATAS process is now under more demand than ever before, as the number of applications increase due to the expanded requirements of the Scheme, and as EU nationals now fall under the immigration rules and therefore the ATAS requirements.

ATAS has experienced significant delays to processing times over 2021, as the programme is extended and more staff and students are subject to review. In addition, the numbers increased as applicants who had deferred their studies due to the pandemic applied to study in 2021.

**Government must invest additional resource in the Academic Technology Approval Scheme (ATAS) process across the relevant Departments**, to maximise efficiency as the pressure on the scheme increases.

Government must also **provide clear communications to higher education institutions around the Academic Technology Approval Scheme (ATAS) process** to enable institutions to manage expectations around applications and minimise refusals and resulting reputational damage to the higher education sector.

*Example 6 A Case Study: Experience of ATAS at Imperial College London*

#### **ATAS Delays**

As a result of delays, in early September and one month prior to the start of the academic year, Imperial still had over 500 unresolved ATAS applications. This is 500 applicants who were unable to convert their offers of admission in time to enable them to apply for visas to commence their course of study. This resulted in significant distress for applicants, as well as problems for the institution which has quotas to meet in order for programmes to be viable. Many did manage to submit their application and join their courses but this was far from the welcome Imperial wishes to give to our new students.

Significant resource was dedicated to chasing applications with the ATAS processing team, and similarly the ATAS processing team were inundated with both applicants and institutions chasing late decisions. This also meant that other things, such as updating passport numbers in certificates were not being processed or were taking weeks, subsequently delaying the applicants ability to make a timely visa application to start their course. In the absence of any response or decision from ATAS this also led to applicants making multiple applications further adding the large numbers of applications.

#### **ATAS Refusals**

Given the expansion of the scheme and the scrutiny of particular nationalities, there was always likely to be an increase in refusal decisions. Given that ATAS applications used to require an HEI unique identifier (student ID number) and that an ATAS application is needed for each institution/course, it is likely that the FCDO / MOD removing this for student applications has negatively impacted their processing. ATAS refusals have repeatedly been issued with only a name, not even a DOB or unique identifier and we have to follow up with FCDO for further details to match the record – a totally unnecessary burden on them and us. Citing GDPR as a reason for not providing any further information beyond a name for an ATAS refusal when they provide all details concerned where they approve the application seems bizarre.

### Possible solutions

- a. Better collaborative working practices with stakeholders could result in a more streamlined application process for applicants. The HE sector has a wealth of experience in working with international students / staff and assisting with ATAS applications. We see the same issues being raised time and time again – for example with academic referees, tracking, change of details etc. We can work together to negate the impact of some of these issues by amending the application form, providing better applicant information and guidance etc.
- b. More applicant data to be provided when the institution is sent information about a refusal – a name alone is simply not useful and results in more information being sought from the ATAS processing team – diverting them from other tasks.
- c. A more trackable application system for applicants with built in reassurance that their submission is under consideration.
- d. Better communication with sector /institutional representatives. Institutions need to know if things are going wrong in a timely manner so that they can pass the information on to applicants / students. There is an appreciation that the ATAS scheme is a national security initiative (so there is some information we simply cannot be party to) and the sector fully supports the work of the FCDO / MOD in this area and it would be helpful to have better lines of communication with government to help institutions to support the scheme more effectively.
- e. Better communication with Home Office colleagues. The ATAS Scheme is directly linked to an applicant's ability to apply for a visa. The additional numbers in the surge this year had been anticipated by UKVI – this should have also been noted to colleagues in FCDO / MOD.

### 6.4 Post-study work routes

The Graduate Immigration Route has been widely welcomed by the higher education sector as a return to a competitive post-study work offer for the UK. It is a key part of the UK's offer to international students, to help it achieve the ambitions of the International Education Strategy. It offers a flexible, unsponsored route to employment after completion of study for those on degree-level courses – complementing the sponsored Skilled Worker route – with no minimum salary threshold and the flexibility to work on a self-employed basis. Graduates who have completed an eligible course at degree level are able to apply for the visa without a job offer.

As it is a new route, **more work needs to be done to raise awareness of the Route** and reduce barriers to take-up, ensuring the success of the Graduate Route for applicants and UK Government. Higher education stakeholders have developed a range of materials and offered advice and training on the new route, but UKCISA members report that there is still confusion among employers about the benefits of the Route, and how it situates with the Skilled Worker and other post-study routes.

Government should therefore **develop guidance for employers on recruiting graduates via the Graduate Route**, to enhance understanding. This should be a simple, short, reference guide that higher education institutions can share with employer networks through their careers departments, that sector organisations can refer to in communications and that graduates could signpost to employers as they apply for roles. Government-branded guidance provides much needed assurances for employers and applicants and can be widely disseminated by the higher education sector.

Most importantly, it is essential for the Home Office to **evaluate the cost implications of the Graduate Immigration Route for employers and applicants**. As well as ensuring that the pricing for the Graduate Immigration Route is competitive for graduates who have not yet secured a job role,

the Home Office should ensure that the Route does not incur additional, unexpected, charges for employers. If a student moves from the student route into skilled worker route, the employer does not incur the immigration skills charge, but they do incur this charge if an individual moves from the Graduate route into the sponsored route. While the Graduate Route is not intended as a route to the Skilled Worker route, this disparity is reportedly leading to some reticence among employers in recruiting via the new route. The Home Office should make clear its policy intention here with employers and the higher education sector.