



**SECURING
OUR BORDER
CONTROLLING
MIGRATION**

THE STUDENT IMMIGRATION SYSTEM A CONSULTATION

December 2010



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MINISTERIAL FOREWORD



1.1 The Government believes that immigration has enriched our culture and strengthened our economy. However, in recent years, the system as a whole has been allowed to operate in a manner which is not sustainable. Unchecked migration can place significant pressure on our public services and can damage community cohesion if not properly managed. Now is the time to improve the public's confidence in our immigration system with the introduction of better controls, that sensibly limit the number of migrants coming to the UK while ensuring that the brightest and the best can come to the UK to live, work and study.

1.2 Up until now, we have concentrated on reforming the economic routes to the UK. However, it is clear that the Government's aim to reduce net migration will not be achieved without careful consideration and action on the non-economic routes including students.

1.3 We have a long and proud tradition of excellence when it comes to education in this country, and a great many of our top educational institutions have been established for centuries. The UK's education system is world-renowned, and we remain the global destination of choice for the many thousands of higher education students who choose

to study abroad each year – second only to the United States¹. The contribution international students make – not only to the economy with the fees they pay and their wider spending, but also on a personal level in establishing and maintaining relationships with those they meet whilst in the UK – is not to be underestimated. In higher education alone international students contributed some £2.2 billion in 2008/09 to their institutions in tuition fees, and if personal off-campus expenditure is included we estimate the figure approaches £5 billion². We must continue to ensure that UK continues to attract the brightest and best students to our educational institutions.

1.4 Many international students come here to attend our universities, further education colleges and independent schools and we must continue to encourage these students to do so. There is though a far more varied picture of international access to the UK's education system. As well as universities, the sector includes the publicly-funded further education sector, private institutions of further and higher education, language schools, independent schools and many partnerships between both publicly funded and private higher and further educational institutions. Two in five international students coming to the UK in the first year of the operation of Tier 4 came to study courses below degree level at both our publicly and privately funded institutions.

1.5 In principle, such diversity is welcome. But it also raises questions about consistency of the quality of international students and the courses they follow. I am concerned that the UK is attracting students who aren't always the brightest and best. The Government wants to ensure that those who enter on a student visa genuinely come here to study, not to work or with a view to settling here. Too many students, in particular those

1 OECD: Education at a glance 2010 – OECD Indicators. This refers to 2008 data.

2 Drawn from the Universities UK report "The impact of universities on the UK economy".

studying at private colleges at below degree level, are not in compliance with the terms of their visa. We must take action now to weed out abuse of the student system.

1.6 We want a student visa system which encourages the entry of genuine students coming to study legitimate courses – that means students who are equipped to study the courses to which they have subscribed and who fulfil their academic obligations.

1.7 For these students and their education providers, we are looking at ways of reducing the complexity of Tier 4, bearing in mind the need to make sure that we are able to continue to compete in the global market for the best international students, especially with respect to higher education. We do not want genuine, high quality students to be deterred by visa procedures.

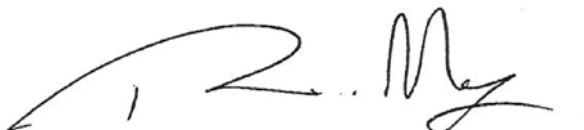
1.8 We also want to make clear that the student route is a temporary one, and on completion of their studies, students will be expected to return to their countries of origin.

1.9 We intend to build on recent changes to the points-based system, which we believe offers a transparent and flexible framework but which needs further strengthening. Our proposals and consultation questions are grouped under the following broad aims we expect our reforms to achieve:

- Raising the level of courses students can study. Only Highly Trusted Sponsors will be able to offer courses to adult students at National Qualification Levels 3, 4 and 5 (Scottish Credit and Qualifications Framework Levels 6, 7 and 8).
- Introducing tougher entry criteria for students other than child students
- Ensuring students return overseas after their course
- Limiting the entitlements to work and sponsor dependants
- Simpler procedures for checking low-risk applications
- Stricter accreditation procedures for education providers in the private sector

1.10 This consultation sets out the ways in which we believe the new system for international students should operate in future. These changes seek to ensure that our high-quality institutions remain able to attract genuine students from overseas, while bearing down on abuse.

1.11 We look forward to working with the education sector to ensure we deliver changes to this system which are in the best interests of the UK.



Theresa May
Home Secretary and Minister for Women and Equalities

2. CONTEXT

2.1 Over the last 10 years, the number of people from outside the EEA and Switzerland given entry to the UK as students has increased by over 70%, from approximately 272,000 in 1999, to 468,000 in 2009³. This is despite a reduction by half, of the number of institutions able to bring students from outside the EU to the UK when Tier 4 – the student tier – of the points-based system was introduced on 31 March 2009.

2.2 The introduction of the Tier 4 sponsor register meant that only those education providers that had passed an assessment of the quality of their education provision as well as an inspection undertaken by the UK Border Agency to assess likelihood of compliance with the immigration requirements of sponsors, could obtain a sponsor licence to bring students to the UK from outside the EU.

2.3 Educational institutions that obtain a sponsor licence have signed up to a number of duties, including the monitoring and reporting of any of their sponsored students who fail to enrol or continue their studies. In return for these additional responsibilities, sponsors are given greater say over who they wish to bring to the UK, and students' applications are assessed against clear, transparent points criteria on the basis of an offer of a place on a course they wish to follow, and having sufficient funds available to cover course fees and living costs. This removes subjective decision-making that was part of the previous system and criticised by the education sector.

2.4 However, over the course of the summer of 2009, it became clear that the new system was not working as had been intended. Following surges in application levels, particularly by those applying

to study English language and some lower-level courses, operational suspensions were put in place in South China, North India, Nepal and Bangladesh, preventing certain student applications from being lodged. These suspensions allowed the UK Border Agency to undertake investigations to ensure that all overseas Tier 4 applicants were meeting the required standards. In the UK, we have revoked the licence of 56 sponsors who were found not to be complying with their sponsor duties since Tier 4 was introduced.

2.5 The concerns over abuse of the system prompted the last Government's review of Tier 4, and led to the introduction of a number of changes earlier this year, including restricting the work rights of students on courses below degree level, raising the minimum level of English language study permitted under Tier 4, restricting the ability of students to bring dependants with them to the UK, and of those dependants to work.

2.6 The new Highly Trusted Sponsor (HTS) licence was introduced in April 2010. Only education providers with a proven track record of student retention and compliance can qualify for a HTS licence – to date less than a third of licensed and active Tier 4 sponsors have met the stringent criteria. Since the introduction of this new category, only HTS institutions are able to offer (i) courses of study at National Qualifications Framework (NQF) level 3 / Scottish Credit and Qualifications Framework (SCQF) level 6; and (ii) courses at NQF levels 4 and 5 (SCQF levels 7 and 8) that contain work placements. Non-HTS sponsors cannot recruit international students on to courses at NQF 3 (SCQF level 6) or which are below degree level and involve a work placement. We believe that while progress has been made in securing the student

3 Control of Immigration Statistics 2003 & 2009 (the figure for 2009 includes those given entry as a student visitor, a category that was introduced in September 2007). Please note that this is based on landing card data, and so multiple visits by the same student are counted. Numbers will therefore be higher than the total number of individuals coming to study in the UK.

route through the last Review, there is still more to be done to minimise abuse.

2.7 The aim of minimising abuse also coincides with the Government's intention to reduce annual net migration to the UK to sustainable levels, in the tens of thousands a year. The Government has started its reduction programme through a limit on the number of non-EU economic migrants admitted to the UK to work. The Government has made clear that it will also expect the student route to make its contribution towards reducing net migration to the UK. Students count as migrants, according to the internationally agreed definition, when they stay in the UK for more than 12 months.

2.8 In 2009, approximately 273,000 visas were issued to students to come and study in this country (excluding student visitors) and approximately 30,000 dependant visas were issued⁴. Students now represent the largest proportion of non-EU net migration. In 2009, the student route (including dependants) accounted for approximately 139,000 out of the total net migration figure of 184,000, which is 76% of total net migration⁵.

2.9 We need to ensure that the number of international students coming to the UK is broadly in balance with the number leaving. Home Office analysis published in September 2010⁶ looked at those students who came to the UK in 2004 and found that more than 20% who were granted visas in 2004 were still here in 2009. The same report showed that in 2009, settlement was granted to more than 23,000 people who initially came to the UK in a study route – this figure represents more than 13% of all those who were granted settlement that year.

2.10 So the Government's policy aim is to ensure that only genuine students who are committed to their academic study come to the UK, with a presumption that upon completion, they will leave promptly. This consultation sets out our proposals for achieving these aims.

2.11 This consultation will run until 31 January 2011. We intend to announce our response and final decisions as soon as possible thereafter.

HOW TO RESPOND TO THE CONSULTATION

The consultation document is available on the UK Border Agency website and responses may be returned by completing the online survey, which can be accessed via the UK Border Agency website, at: www.ukba.homeoffice.gov.uk/student-consult-online

Responses can also be posted, using the template available on the UK Border Agency website to:

Student Consultation
1st Floor, Green Park House
29 Wellesley Road
Croydon
CR0 2AJ

In addition, responses can be emailed to: studentconsultation@homeoffice.gsi.gov.uk

The closing date for responses is 31 January 2011.

4 Control of Immigration Statistics 2009, available at: <http://rdshomeoffice.gov.uk/rds/immigration-asylum-stats.html>

5 UK Border Agency modelling of visa data for migrants intending to stay for more than 12 months

6 The Migrant Journey Analysis, available at: rds.homeoffice.gov.uk/rds/pdfs10/horr43c.pdf

3. SUMMARY OF PROPOSALS

3.1 Our proposals, on which we now invite views, are as follows:

Raising the level of courses students can study

- Restrict Tier 4 largely to degree-level courses and child students. Only Highly Trusted Sponsors will be permitted to offer courses below degree level to adults (i.e. NQF 3, 4 and 5 / SCQF 6, 7 and 8). We invite views on the phasing of such an approach. Lower level courses of under six months' duration will continue to be offered outside the PBS, through the student visitor route.
- We propose no tightening of the Tier 4 (Child) route; this is a relatively small part of the Tier 4 composition and one which poses us least risk.

Introducing tougher entry criteria for students

- Raise the Tier 4 language bar as a key indicator of fitness to complete a higher level course. All Tier 4 (General) applicants including degree level and English language students will be subject to a secure English language test showing competence at level B2.

Ensuring students return overseas after their course

- Students wanting to remain in the UK after their initial course to extend their studies will have to show clear evidence of academic progression to a higher level. We are also considering whether such students should be required to leave the UK and re-apply from overseas.
- Close the Tier 1 Post Study Work route.

Limiting the entitlements of students to work and sponsor dependants

- Students should only be allowed to work on campus during the week and for any external employer at weekends and during vacation periods.
- Where a course includes a work placement, raise the minimum ratio of study to work placement from 50:50 to 66:33 so that these types of courses become less attractive to people using them as a way to gain access to the UK employment market.
- Remove permission to work for all dependants of Tier 4 students, except where they qualify in their own right under Tier 1 or Tier 2 of the PBS.
- Only those Tier 4 students studying for more than 12 months to be allowed to bring their dependants to the UK.

Simpler procedures for checking low-risk applications

- Impose different requirements as regards evidence of maintenance and previous qualifications in order to lighten the burden on lower risk students.

Stricter accreditation procedures for education providers in the private sector

- Tighten the accreditation regime, working with departments responsible for education across the UK to ensure the quality of education provision within private institutions of further and higher education for Tier 4 purposes.

3.2 It is important to bear in mind that unlike competitor countries, the UK will retain its student visitor route which will continue to provide a route of entry for those wishing to study short courses under six months' duration, which may be below the minimum academic level permitted under Tier 4.

3.3 In implementing our proposals we will continue to monitor how our system of student migration compares with key competitor countries to ensure we continue to be attractive to the genuine international students from across the world. The next section takes each proposal in turn, providing more detail on each and seeks your views on each proposal.

3.4 Appendix 1 summarises the current policy on the student routes, and the reforms we are proposing to make.

4. RAISING THE LEVEL OF COURSES STUDENTS CAN STUDY

Tier 4 (General)

4.1 At present, under the Tier 4 (General) route, students aged 16 and over must be undertaking a course of study that leads to an approved qualification at a minimum of NQF level 3 or SCQF level 6. Permission to stay in the UK is granted for the full duration of the course.

4.2 We estimate that between the launch of Tier 4 at the end of March 2009 and March 2010, almost two-fifths of adult students coming to the UK were studying courses below degree level (excluding those studying at independent schools)⁷.

4.3 In gathering evidence to identify areas which may pose the greatest risk of abuse to our immigration control, we undertook some analysis of the levels of compliance of students by sponsoring institution type⁸. Broken down by sector, our evidence shows that:

- 8% of Tier 4 students at publicly funded institutions of further and higher education were estimated to be non-compliant;
- 14% of Tier 4 language school students were estimated to be non-compliant; and
- 26% of Tier 4 students in private institutions were estimated to be non-compliant.

A separate analysis of 12,656 Tier 4 university students was also undertaken. This showed that 84% were enrolled on a course and continuing to study, and just 2% were estimated to be non-compliant.

4.4 Of the adults using the Tier 4 (General) category for study below degree level, more than half were studying at private institutions of further and higher education⁹ – the group of institutions we estimate to have the least compliant students. We also have some concerns about the motivation of some international students who choose to invest large amounts of money to obtain qualifications at NQF levels 3, 4 and 5 (SCQF levels 6, 7 and 8), compared with their cost. We believe that some students choosing these courses are using them as a pretext to enter the UK with a view to living and working here, rather than to gain a qualification which will improve their career prospects on their return home. Our caseworkers have encountered many students who are unaware of the nature of the course they are proposing to study (such as hospitality students believing they will qualify as doctors), its location and requirements, nor what benefit it will be to them.

4.5 The thrust of our policy is to tighten up on the requirements for courses below degree level where there is evidence of lower levels of compliance with visa requirements. However, we recognise that some courses below degree-level merit inclusion within Tier 4 and therefore propose to build on the approach started earlier this year when NQF level 3 (SCQF level 6) courses were restricted to Highly Trusted Sponsors (HTS). We are proposing that only HTS institutions should be able to offer courses of study below degree level (i.e. NQF levels 3, 4 and 5, SCQF levels 6, 7 and 8). There is also an argument for removing courses at NQF level 3 (SCQF level 6) entirely from Tier 4. The very low

⁷ These estimates are based on analysis a representative sample of 17,034 Confirmation of Acceptance of Studies by the UK Border Agency.

⁸ The attendance behaviour of 5,648 non-university students, as reported by their institutions, was analysed by UKBA. In addition a sample of 12,656 university students was also analysed. Since the sample was not fully representative of the Tier 4 student population or sponsor population, the findings should be taken as indicative only. For further information please see the UKBA research report "Overseas students in the immigration system: types of institution and level of study" <http://www.ukba.homeoffice.gov.uk/sitecontent/documents/aboutus/reports/pbs-tier-4/>

⁹ See footnote 7 for source.

entry requirements needed for many courses at this level are insufficient as a guarantor of the quality of students.

4.6 We also invite views on any transitional measures such as phasing needed to allow the education sector to adjust to this approach.

We therefore propose raising the minimum level of study standard sponsors¹⁰ are permitted to offer under Tier 4 (General) to degree-level study (NQF level 6 / SCQF level 9), with Highly Trusted Sponsors only being able to offer courses at NQF levels 3, 4 and 5 or SCQF levels 6, 7 and 8. Students wishing to study courses below this level in the UK for up to six months would continue to be permitted to use the student visitor route.

QUESTION 1

Do you think that raising the minimum level of study sponsors with a standard sponsor licence can offer under Tier 4 (General) to degree-level and above is an effective way of reducing abuse of Tier 4 (General) route, increasing selectivity and simplifying the current rules?

- a) Yes
- b) No
- c) Don't know

If you answered yes or no to the previous question, please give your reason(s).

QUESTION 2

Do you think that only Highly Trusted Sponsors should be permitted to offer study below degree level at NQF levels 3, 4 and 5 / SCQF levels 6, 7 and 8 in the Tier 4 (General) category?

- a) Yes – only HTS should be able to offer these sub-degree level courses
- b) No – all sub-degree level study should be prohibited under Tier 4 (General)
- c) No – study at NQF level 3 (SCQF level 6) should be prohibited, even where the sponsor is HTS
- d) Don't know

If you answered yes or no to the previous question, please give your reason(s).

QUESTION 3

Do you think that the changes discussed in this section should be phased in?

- a) Yes
- b) No
- c) Don't know

If you answered yes to the previous question, what time period do you think is appropriate for phasing in these new measures?

- a) 0-11 months
- b) 12 – 24 months
- c) 25 – 36 months
- d) 37 months plus
- e) Don't know

¹⁰ "Standard sponsor licence" means those who are rated A – Trusted, or B – Sponsor.

Tier 4 (Child)

4.7 The Tier 4 (Child) category allows children aged between 4 and 15 to study at our independent schools, and those aged 16 or over to study at any licensed sponsor institution. There is no minimum level of study permitted under this category, although all sponsors must meet stringent minimum standards in order to be allowed to educate minors.

4.8 Our experience is that sponsors of child students have generally been responsible and there is good compliance on this route. *Therefore we are not proposing to tighten this route further.*

QUESTION 4

Do you think that, in the light of the low risk of abuse amongst users of the Tier 4 (Child) route, there should be no changes to the route?

- a) Yes
- b) No
- c) Don't know

5. INTRODUCING TOUGHTER ENTRY CRITERIA FOR STUDENTS

5.1 We believe that all students wishing to study in the UK should be able to demonstrate a proven track record of general educational achievement relevant to the course they are coming to study, but also proficiency in English language.

5.2 Since August 2010, all Tier 4 (General) students wishing to undertake a course of study below degree level (excluding English language students) have had to pass a secure English language test to demonstrate proficiency at level B1 on the Common European Framework of Reference for languages (CEFR), an intermediate level of language competency. They have to demonstrate competence at B1 level in reading, writing, speaking and listening.

5.3 Those studying at degree-level or above already have their language proficiency tested as part of the institutions' entry requirements onto the course. However, Border Force Officers continue to encounter Tier 4 (General) students whose language proficiency is considered to be poor and who appear not to have had their language skills independently tested.

5.4 We believe that competence in English language is a key indicator of a student's ability and motivation to follow a course of study and that independent verification of this ability is essential. We believe that all students using the Tier 4 (General) route should have a good standard of English, not merely an intermediate one. Therefore we propose to require that all Tier 4 (General) students should be competent at B2 standard of the CEFR, an upper-intermediate level of competency, and that this should be evidenced through an independent test. English language students using Tier 4 will also have to demonstrate competency at this level to study a course at a minimum of C1 level. Those who are not proficient at level B2 will be able to use the student visitor route.

5.5 This is broadly in line with the levels other countries such as the USA and Australia require of the academic institutions bringing international students to those countries. In the USA, individual institutions specify their own language entry requirements, but typically universities will require international students to have passed one of a small number of independent language tests showing competence ranging from B2 to C1 level. Proficiency in English is a requirement for receiving an Australian student visa, and the International English Language Testing System (IELTS) is the only test accepted by the Australian Department of Immigration and Citizenship. While education providers specify their own minimum language requirements for nationalities deemed to be lower risk, many universities require language proficiency at IELTS 6.5, which is approximately equivalent to C1 level. For higher risk nationalities, a minimum score of IELTS 5.0-6.0 is required (ranging from B1 and B2 proficiency levels) to study any kind of course.

5.6 Raising the language bar will act as evidence of a student's fitness to complete the course in English, as well as assisting with their integration with other students and wider society on arrival in the UK. Secure language testing will ensure that the person applying for entry to the UK is the person who sat and passed the language test. It will remain the responsibility of the student's Tier 4 sponsor to ensure the sponsor's academic entry requirements onto their chosen course are met.

5.7 At present, those from majority English-speaking countries, and those who have recently studied in the UK as children are exempt from the secure English language test requirement. They would continue to be exempt from the language testing requirement, along with those who had been awarded a qualification equivalent to UK degree-level or above, that had been taught in English in a majority English-speaking country.

5.8 We will also ensure that those who need to undertake a short (up to three month) preparatory or pre-sessional course before embarking on their main course of study at degree level or above are able to do so immediately before their main course of study.

We therefore propose that all students using the Tier 4 (General) must be able to demonstrate that they have passed a secure English language test showing proficiency at level B2 across all four components of language testing.

QUESTION 5

Do you think that all students using Tier 4 (General) category should have passed a secure English language test to demonstrate proficiency in English language to level B2 of the CEFR, in order to improve selectivity and to simplify the current system?

- a) Yes
- b) No
- c) Don't know

QUESTION 6

Do you think that students from majority English-speaking countries, those who have been awarded a qualification equivalent to UK degree-level or above that was taught in English in a majority English-speaking country, and those who have recently studied in the UK as children should be exempt from any new language testing requirement?

- a) Yes
- b) No
- c) Don't know

6. ENSURING STUDENTS RETURN OVERSEAS AFTER THEIR COURSE

6.1 In order to achieve the objective of reducing net migration over the course of this Parliament, we need to couple any steps we take on limiting the number of students coming to the UK, with action to ensure that students leave the UK on completion of their course of study. Summer 2010 saw an intensified period of nationwide enforcement action by the UK Border Agency working with the Serious Organised Crime Agency and police forces across the country to crack down a range of immigration offences including illegal working, sham marriages, bogus colleges and organised crime. We are determined to build on this and the UK Border Agency is continuing to use information gathered from the co-ordinated summer activity to provide

fresh impetus and focus on targeting the organisers, perpetrators and beneficiaries of immigration crime, clamping down on bogus colleges and removing from the UK those who have overstayed or abused their student visas. However, this is not just a question of enforcement action against those who overstay after their visas have expired. It is about restricting the ability of students to prolong their studies as a vehicle for achieving protracted stays in the UK. As the Home Office's recent research report "The Migrant Journey"¹¹ showed, whilst almost 80% of those granted student visas in 2004 had left the country five years later, more than one-fifth of students who were granted visas in 2004 were still here in 2009, including just 6% who were

Table 1: Percentages of students in the 2004 cohort remaining in 2009, by selected nationality¹²

Nationality	Total no. Of students in 2004 cohort	Initial leave of less than 12 mths		Initial leave of less than 12 mths or more	
		Total no. in 2004 cohort	Percentage remaining in UK in 2009	Total no. in 2004 cohort	Percentage remaining in UK in 2009
China	20,346	4,577	18%	15,769	24%
India	18,598	4,040	43%	14,558	44%
Pakistan	13,658	1,968	36%	11,690	48%
Russia	9,936	8,528	3%	1,408	15%
USA	9,023	1,344	5%	7,679	12%
Taiwan	8,589	5,643	2%	2,946	6%
Nigeria	6,922	846	35%	6,076	51%
Japan	8,226	3,329	7%	4,897	10%
South Korea	6,740	3,840	7%	2,900	15%
Malaysia	5,148	181	14%	4,967	19%
Thailand	4,744	2,630	8%	2,114	10%
Turkey	4,124	3,237	6%	887	12%

¹¹ Home Office Research Development & Statistics Research Report 43 – The Migrant Journey, by Achato, Eaton and Jones.

¹² UK Border Agency unpublished research, supporting Migrant Journey Analysis.

continuing their studies. This analysis also indicated that certain nationalities were more likely to stay in the UK for longer periods than others.

6.2 Since the introduction of Tier 4, there has been a requirement that prevents students on courses below degree level from being able to stay in the UK for longer than three years. There is presently nothing to prevent those studying at or above degree level from extending their stay indefinitely. We need to ensure that all students understand that Tier 4 is a temporary route, with the expectation that students should return home on completion of their course.

6.3 As part of our research into the student route, analysis of a small sample of case files was undertaken, looking in particular at those students who had repeatedly extended their stay in the UK¹³. Around one-fifth of case files sampled showed evidence of non-progression, with applicants seeking leave to repeat modules or take further courses at the same academic level.

6.4 One accountancy course, for example, allows up to 10 years for its students to complete all the necessary components. Further, our case file analysis showed that all but one of the cases of non-progression identified that the students concerned had spent the majority of their time in the UK undertaking courses at private institutions of further and higher education.

6.5 In order to prevent students from staying in the UK indefinitely without making academic progress, we propose that if a student wishes to continue to pursue further study in the UK, their sponsor will need to provide written confirmation that the new course is at a higher level than the one they've just completed.

6.6 We have considered whether, as an alternative, we should extend to degree level courses the rule which prevents sub-degree level students from staying for more than three years. The difficulty with this however is that some degree courses are of a longer duration and there will be legitimate reasons for extended study.

We therefore propose that those students who wish to extend their stay in order to study a new course will have to provide confirmation from their sponsor that the new course represents progression to a higher level course, so that we can be satisfied that study is the real reason for a longer stay in the UK.

We also wish to consider whether students wishing to extend their studies should be required to return home to apply overseas for a new visa, in order to mark the fact that their initial stay has expired and that they leave the UK in line with their original intention, prior to a new permission to enter. In general we wish to challenge the perception that once a student visa has been obtained, an extended stay in the UK will be permitted.

QUESTION 7

Do you think that students wishing to study a new course of study should be required to show evidence of progression to study at a higher level?

- a) Yes
- b) No
- c) Don't know

If you answered yes, what is the best way to demonstrate progression?

QUESTION 8

Do you think that students wanting to study a new course should return home to apply from overseas?

- a) Yes
- b) No
- c) Don't know

If you answered no, do you have any alternative proposals?

¹³ The findings from the case file analysis should be treated as indicative only as they are based on a sample of (120 cases which represent just one per cent of students with three or more extensions) and are heavily reliant on the information available on case files from caseworkers.

Tier 1 Post-Study Work

6.7 The student route is a temporary migration route, with students expected to leave on completion of their studies. We are concerned that the Post Study Work route confuses this concept. This route enables international graduate students to move from study to work in the UK. All students who have studied in the UK and have been awarded a UK recognised bachelor's or postgraduate degree, a UK Post Graduate Certificate in Education (PGCE) or Professional Graduate Diploma of Education (PGDE) or a Higher National Diploma from a Scottish institution, are eligible to switch into the Tier 1 Post Study Work route. This then allows the former student to stay in the UK for up to two years to look for skilled work, and then switch into one of the main work routes (Tier 1 or Tier 2) as soon as they are able to do so. In 2009, over 38,000 Tier 1 Post Study Work applications were granted, along with almost 8,000 of their dependants.

6.8 The survey of points-based system users asked respondents about their current employment status. Of those in the Tier 1 Post Study Work category who answered this question, almost one-fifth were unemployed, and only around half of those who were employed were in a skilled or highly skilled occupation, which is disappointing for a graduates-only route. The Higher Education Careers Services Unit published their annual report in November 2010 which showed that graduate unemployment has risen to its highest level for 17 years. There is a risk that the Post Study Work route is adding to this problem.

6.9 In any case, international graduates who wish to enter the UK labour market are able to do so by being sponsored as a Tier 2 migrant. Their student visa is valid for four months after completion of their studies if the course was longer than 12 months in duration, enabling them to secure sponsorship from a UK employer. We have recently facilitated this process by allowing employers to not carry out the Tier 2 Resident Labour Market Test in respect of foreign graduates recruited in the UK through the milkround. This will continue.

We therefore propose to close the Tier 1 Post Study Work route. We also invite views on any necessary transitional arrangements.

We recognise there are other options short of closing the route entirely. These could include, for example, restricting it to those with a higher degree such as a PhD. However any option short of closure must ensure that access is tightly restricted to the very brightest and best. We believe that a student's primary motivation for coming to the UK should be the prospect of obtaining a world class education here, not of being able to work afterwards; especially when entry to work is in any case possible through direct entry to Tier 2, which in turn ensures that the student finds a skilled job rather than potentially filling unskilled jobs for up to two years.

QUESTION 9

What changes do you think we should make to the Tier 1 Post Study Work route?

- a) Close the route entirely
- b) Restrict it significantly
- c) Other

If you chose option b) or c) please provide additional comments and suggestions, including on the timing of any changes and any transitional arrangements you feel would be necessary.

7. LIMITING THE ENTITLEMENTS OF STUDENTS TO WORK AND TO SPONSOR DEPENDANTS

Students' ability to work

7.1 At present, all Tier 4 (General) students are able to work full-time during their vacations, and part-time during term time. The number of hours' work permitted during term-time depends on the level of the course the student is following; those on foundation degree courses, Scottish Qualifications Authority (SQA) Higher National Diploma courses, and courses at degree level and above are permitted to work up to 20 hours per week during term-time. Those on courses of study below degree level (except those mentioned previously) may only work up to 10 hours per week during term-time.

7.2 The complexity of the current system makes it difficult for employers to comply with these restrictions, and for UK Border Agency staff to enforce them effectively. But student working in breach is an identified area of abuse; the 2009 Labour Force Survey suggests that amongst non-EEA students, there is significant working in breach by those following courses at degree level and above, as well as by those studying below degree level. For those studying full-time at degree level and above, 30% reported working more than 21 hours per week, and for those studying below degree level, 53% reported working more than 21 hours per week. We are aware however that some education providers offer jobs on campus and do not wish to restrict this.

We propose allowing students to work only on-campus¹⁵ during the week, and as many hours as they wish off campus at weekends and during vacation periods. We will be seeking assurance via our educational inspection and accreditation bodies that term lengths are reasonable in line with the courses of study on offer, and not simply constructed to allow students to work full-time during excessively lengthy vacation periods.

QUESTION 10

Do you think that we should restrict further the amount of work students should be allowed to undertake while studying?

- a) Yes
- b) No
- c) Don't know

QUESTION 11

Do you think we should make it simpler for employers to understand the rules around student work, by limiting it to set times, except where they are working on campus?

- a) Yes
- b) No
- c) Don't know

Courses containing work placements

7.3 We believe that we need to do more to emphasise that the primary purpose of the student route is that it is one for study, rather than work. In recent years, a wide variety of vocational courses and qualifications have developed with the domestic workforce in mind. Many of these courses aimed to allow workers to demonstrate to their current and prospective employers that they have the skills and experience to do a specific job, without having to leave work in order to study full-time for a qualification. As such, they often do not have to be completed in a specified amount of time, have no age limits, and no pre-entry requirements.

7.4 Under the current arrangements students are required to spend no more than 50% of their course length undertaking a work placement, and

¹⁵ On-campus includes work on the any of the institution's premises

at least 50% of their time undertaking classroom-based study. This time on work placement is in addition to the part-time working hours permitted during term-time, and full-time during vacations. We fully recognise the value of obtaining hands-on, practical experience, however we believe that the current policy around work placements veers too far towards allowing students to spend more time working than in the classroom and therefore is particularly attractive to migrants whose main driver is economic rather than genuine study. Only HTS can offer such courses below degree level.

We propose raising the minimum ratio of study to work from 50:50 to 66:33, except where there is a UK statutory requirement that the placement should exceed one-third of the total length of the course¹⁶.

QUESTION 12

Do you think that the minimum ratio of study to work placement permitted should be increased from the current 50:50 to 66:33, except where there is a statutory requirement that the placement should exceed one-third of the total course length?

- a) Yes
- b) No
- c) Don't know

Family members

7.5 The ability for the family members¹⁷ of students to come to the UK and work have grown up in a piecemeal manner over time, from a longstanding restriction carried forward from the previous student route, to more recent changes that were introduced in March this year. Under the current Immigration Rules:

- if the student is granted leave for less than 12 months, regardless of the level of course, their dependants are not able to work;
- if the student is following a course of study that is below degree level (except for those following foundation degrees and equivalents), their dependants are not permitted to work (although they are permitted to switch into Tier 1 or Tier 2 in the UK if they qualify in their own right);

- if the student's course of study is six months or less, regardless of the level of course, dependants are not permitted to join them.

7.6 Approximately 30,000 visas were issued to dependants of Tier 4 students in 2009, so the number of family members seeking to accompany students is significant. Those coming to the UK for longer than six months become eligible for access to certain public services, such as NHS treatment, and children of compulsory school age can be admitted into the state education system. We believe that in some cases the primary motivation for a migrant to obtain a student visa is for reasons other than to study, principally to work.

To help ensure that short courses do not bring a disproportionate entitlement to sponsor dependants, we are proposing only allowing Tier 4 students studying for more than 12 months to bring their family members to the UK.

We are also concerned that the prospect that family members can have free access to the UK labour market is distorting the intentions of prospective student migrants. We propose that family members will not be able to take employment, except where they qualify as Tier 1 or Tier 2 migrants in their own right. We believe that prohibiting family members from working in the UK will act as a deterrent for those who are primarily economic migrants from attempting to use the student route to come to the UK.

QUESTION 13

Do you think that only those studying for longer than 12 months should be permitted to bring their family members with them to the UK?

- a) Yes
- b) No
- c) Don't know

¹⁶ For example, the Post Graduate Certificate in Education (PGCE) course.

¹⁷ Family members include the spouses, civil partners, unmarried or same-sex partners, and dependent children aged under 18.

QUESTION 14

Do you think that family members permitted to accompany the student should be prohibited from working?

- a) Yes
- b) No
- c) Don't know

8. SIMPLER PROCEDURES FOR CHECKING LOW-RISK APPLICATIONS

8.1 Tier 4 requires all visa applicants to provide the same documents and evidence in order to demonstrate they meet the specified requirements, for example as regards maintenance and qualifications. This has helped bring about objective and transparent decision-making. However our experience is that in some cases the evidentiary requirements are unnecessary and burdensome, where low risk students are concerned. We want to move to a system that will allow lower risk students to “self-declare” that they have the required level of funds available to them to meet the maintenance requirement, and that they have been awarded educational qualifications on which the offer of a place on a course has been made. The UK Border Agency will reserve the right to verify any declaration that is made by seeking documentary evidence. At the same time, higher risk students will be required to supply original documents, as now, and staff will verify that the evidence of funds they have presented are genuinely available to the student.

8.2 We believe the steps we propose earlier in this document will go some way toward addressing the abuse we have observed, as well as reducing the number of students coming to the UK in support of the aim to reduce net migration. Alongside these aims, we are keen to simplify the student route where possible, and we believe one of the ways in which we can do this is by adopting a differential approach, subjecting an appropriate level of scrutiny to every application dependant on the level of risk posed.

8.3 Under Tier 4, applicants earn points for having a valid Confirmation of Acceptance for Studies that has been assigned by a licensed sponsor (which acts as the offer of a place on a course for immigration purposes). Applicants are also required to earn points by demonstrating that they have sufficient funds available to them to cover course

fees and living costs, and that they have held these funds in a regulated account for at least 28 days. In considering Tier 4 applications, UK Border Agency staff in the UK and overseas undertake verification checks to ensure that any documents presented as evidence of funds, as well as evidence of previous qualifications used to obtain an offer from an education provider, are genuine.

8.4 We are developing a body of evidence that provides information on the number of Tier 4 applications we have refused on the basis of the use of forged documents, by nationality. The use of forged or counterfeit financial documents is of particular concern, as it is vitally important that all Tier 4 students genuinely have the funds available to pay their course fees and to maintain and accommodate themselves in the UK. Alongside differentiating between lower and high risk nationals, we will also take steps to ensure that any evidence provided shows that funds are genuinely available to the applicant. We have been made aware that funds presented by applicants in some parts of the world are being provided by agents and passed from applicant to applicant for the purpose of meeting the Tier 4 funds requirement – we are determined to clamp down on this kind of activity and are considering methods which in the longer term will tackle this specific type of abuse, e.g. the use of escrow accounts such that students would be required to deposit funds into an account which they can only access in a phased manner once they had enrolled on the course in the UK.

8.5 The use of forged and counterfeit documents is just one indicator we are considering in developing a differential approach. In order to establish risks posed by different kinds of students, we will also consider rates of non-compliance in the UK (e.g. non-enrolment, non-attendance and working in breach) and attendance levels.

8.6 The UK Border Agency's International Group Management Information on the number of applications refused, by visa post and category of application gives an indication of the prevalence of forged documents used in Tier 4 applications made throughout the world. We are undertaking further work to compile a list of refused applications on the basis of the use of forged documents, by nationality (rather than post). Table 2, below, shows the top 10 posts at which Tier 4 applications were refused on the basis of the use of forged documents between January and end October 2010.

Table 2: Top 10 posts at which Tier 4 applications were refused on the basis of the use of forged documents between January and end October 2010¹⁸

Visa Post
1. New Delhi
2. Islamabad
3. Dhaka
4. Mumbai
5. Abu Dhabi
6. Chennai
7. Abuja
8. Colombo
9. Beijing
10. Guangzhou

8.7 This information is indicative only, as it lists refusals made on the basis of forged documents of all types, not just financial documentation used to earn points for maintenance. That said, more than half of all forged or fraudulently obtained documents detected and reported by overseas posts are forged or counterfeit bank documents. The visa post is estimated to be in the country of the applicant's nationality in at least 90% of cases, however, a small percentage of these applicants will be nationals of countries other than the one they applied in. Abu Dhabi is an exception to this rule as in 2010 (up to September), 78% of all Tier 4 applications at that post were made by Pakistani nationals, followed by Iranian nationals.

We therefore propose adopting differential requirements for high and low risk students under the Tier 4 (General) and Tier 4 (Child) routes, for provision of documentary evidence of maintenance and/or qualifications. High and low risk will either be defined according to nationality, based on an assessment of the evidence (such an approach is likely to require an exemption from the Race Relations Act), or according to whether the sponsor is Highly Trusted or not.

QUESTION 15

Do you agree that differential requirements for high and low risk students should be adopted?

- a) Yes
- b) No
- c) Don't know

QUESTION 16

Do you believe that we should focus on the abuse of documentary evidence for maintenance and/or qualifications as the basis of differential treatment?

- a) Yes
- b) No
- c) Don't know

QUESTION 17

Do you believe that we should also, or alternatively look at the sponsor's rating as a basis for differential treatment?

- a) Yes
- b) No
- c) Don't know

¹⁸ Source: UKBA International Group provisional management information which may be subject to change

9. STRICTER ACCREDITATION PROCEDURES FOR EDUCATION PROVIDERS IN THE PRIVATE SECTOR

9.1 As has been outlined previously in this document, students who entered the UK under Tier 4 to study at private institutions of further and higher education have been found to be the least compliant within the education sector. Alongside other measures on which we are consulting, we believe that more should be done to ensure that only those genuine institutions offering genuine, worthwhile qualifications to international students should be able to use Tier 4.

9.2 At present, private institutions of further and higher education are subject to accreditation by one of five UK Border Agency-approved accreditation bodies. Up until July 2010, 56 Tier 4 sponsor licences have been revoked since the introduction of the tier, almost three-quarters of which were private institutions of further and higher education¹⁹. Our analysis of a sample of 5,648 Tier 4 students showed low levels of attendance levels at these institutions, with only 39% of students at private institutions of further and higher education enrolled and continuing to study. In the separate analysis of 12,656 university students, 84% were enrolled and continuing to study²⁰.

9.3 Tier 4 of the PBS has given education providers much greater certainty, compared with the previous student visa regime, that once they offer a place to a student, a visa will be granted. In return the UK Border Agency expects the education providers to operate to high standards. We believe that the current system of accreditation and inspection of private sector education providers (other than independent schools) could be strengthened, to ensure it is consistently rigorous. This is particularly important given the general

absence of regulation of private sector education providers, other than independent schools, in the UK for domestic purposes.

9.4 We will work closely with the departments responsible for education across the UK to review the work of the currently approved accreditation bodies in relation to private further and higher educational establishments, and to establish what more can be done on an institutional level to ensure the quality of education provision, and how this links up with meeting sponsor duties in relation to sponsored international students. From April 2011, as the accreditation of individual education providers within the private further and higher education sectors start to expire, the UK Border Agency will want to ensure the current system of accreditation of these providers is replaced by a system which generates greater confidence in the register of sponsors.

9.5 We are keen to consider other ways in which we can raise the quality of the education provision of international students, and will work with other Government departments and executive agencies such as the Office of Qualifications and Examinations Regulation (Ofqual) and the Scottish Qualifications Authority (SQA) to ensure that education providers bringing international students to the UK are delivering on their agreement to only offer courses that meet the definition of an approved qualification for Tier 4 purposes. We also want to ensure that sponsors are operating in a manner that is fully compliant with the UK Border Agency's requirements, rather than operating just within the boundaries of what is permitted.

¹⁹ These figures are based on management information which is not fully quality assured, so should be taken as indicative only.

²⁰ Please note that the sample of university students was different from the sample of non-university students. Please see university students. Please see the UKBA research report "Overseas students in the immigration system: types of institution and level of study" www.ukba.homeoffice.gov.uk/sitecontent/documents/aboutus/reports/pbs-tier-4/ for further details.

We therefore propose raising the quality of accredited education providers, by working with departments responsible for education across the UK to ensure the quality of education provision within private institutions of further and higher education.

QUESTION 18

Do you think that more should be done to raise accreditation and inspection standards to ensure the quality of education provision within private institutions of further and higher education for Tier 4 purposes?

- a) Yes
- b) No
- c) Don't know

QUESTION 19

In the light of the proposals described in this document, what do you think will be the main advantages / disadvantages, including any financial impacts, to you, your business or your sector?

BACKGROUND CONSULTATION QUESTIONS

Are you responding to this consultation as:

- a) An individual
- b) On behalf of an organisation/institution etc

Please indicate whether you are:

- a) A student
- b) An academic
- c) Other

Please select your organisation/institution type:

- a) University
- b) Publicly funded FE College or institute of further/higher education
- c) Private FE College or institute of further/higher education
- d) Independent School
- e) English Language School
- f) Local Authority or other public sector
- g) An institution or business not directly involved in providing education

If you are responding on behalf of an organisation/institution involved in providing education:

Please state the name of your organisation/institution:

How many students (approximately) started new courses at your institution in the 2009/2010 academic year?

- a) Less than 500
- b) Between 500 and 999
- c) Between 1,000 and 4,999
- d) Between 5,000 and 14,999
- e) Between 15,000 and 25,000
- f) Over 25,000

What is your estimate of overseas students (non-EEA) as a proportion of your total student population?

- a) less than 5%
- b) 5% up to 10%
- c) 10% up to 15%
- d) 15% up to 20%
- e) 20% up to 50%
- f) More than 50%

APPENDIX 1

COMPARISON OF CURRENT TIER 4 REQUIREMENTS WITH PROPOSED REFORMS

	CURRENT REQUIREMENTS	PROPOSED REQUIREMENTS
Tier 4 (General) Minimum level of course & sponsor type	<ul style="list-style-type: none"> • NQF level 321 – HTS only • NQF 4 & 5 including work placement (excluding foundation degrees) – HTS only • NQF 4 & 5 no work placement – any sponsor • Foundation degree & NQF 6+ – any sponsor 	<ul style="list-style-type: none"> • NQF 3, 4 & 5 – HTS only • NQF 6+ – any sponsor
Tier 4 (General) English language requirement (for non-English language courses)	<ul style="list-style-type: none"> • NQF 3, 4 & 5 (excluding foundation degrees) – SELT²² required, minimum B1 level. • Foundation degree & NQF 6+ – no SELT required 	<p>All courses levels:</p> <ul style="list-style-type: none"> • SELT required, minimum B2 level
Tier 4 (General) English language courses	<ul style="list-style-type: none"> • Minimum level of course B2 – no SELT required 	<ul style="list-style-type: none"> • Minimum level of course C1 – SELT required, minimum B2 level
Tier 4 (General) Progression	<ul style="list-style-type: none"> • Students can apply for extension after extension in the UK • Maximum three years study permitted below degree level 	<ul style="list-style-type: none"> • Students must return home and apply for entry overseas • Students must demonstrate intention to study at a higher level on return
Tier 4 (General) Staying in UK	<ul style="list-style-type: none"> • Graduates of specified courses – up to two years' free access to labour market – Tier 1 Post Study Work 	<ul style="list-style-type: none"> • Tier 1 Post Study Work closed • Graduates with a job offer can apply under Tier 2

21 NQF 3 = SCQF 6, NQF 4 = SCQF 7, NQF 5 = SCQF 8, NQF 6+ = SCQF 9+

22 SELT = Secure English Language Test

	CURRENT REQUIREMENTS	PROPOSED REQUIREMENTS
Tier 4 (General) Permission to work & work placements	<ul style="list-style-type: none"> • NQF 3, 4 & 5 (excluding foundation degrees) – 10 hours per week term-time, full time during vacations • Foundation degree & NQF 6+ – 20 hours per week term-time, full time during vacations • Study to work placement ratio – 50:50 	<p>All course levels:</p> <ul style="list-style-type: none"> • On-campus working only during the week • Any employment at weekends and during vacation • Study to work placement ratio - 66:33
Tier 4 (General) Dependants	<ul style="list-style-type: none"> • Student studying courses six months or less – no dependants allowed • Student granted less than 12 months leave – dependants allowed but no permission to work • Student studying at NQF 3, 4 & 5 (except for those on foundation degree) for more than 12 months – no permission to work unless qualify under Tier 1 or Tier 2 • Students studying foundation degrees & NQF 6+ for more than 12 months – almost unrestricted permission to work 	<p>All course levels:</p> <ul style="list-style-type: none"> • Course less than 12 months long – no dependants • Course longer than 12 months – dependants allowed but no permission to work (unless qualify under Tier 1 or Tier 2)
Tier 4 (General) & Tier 4 (Child) Provision of documentary evidence	<p>All students must provide original documents showing:</p> <ul style="list-style-type: none"> • Evidence of maintenance funds • Evidence of previous qualifications 	<ul style="list-style-type: none"> • Lower risk students can self-declare that they can meet the maintenance requirement & hold specified qualifications • Higher risk students must provide original documents as now to demonstrate maintenance & previous qualifications • Proposal to differentiate according to sponsor rating
Tier 4 (General) Accreditation within the private sector	<ul style="list-style-type: none"> • Private institutions of further and higher education of varying quality, subject to accreditation by one of five approved bodies 	<ul style="list-style-type: none"> • UK Border Agency and UK education departments to ensure quality of education provision within private institutions of further and higher education

	CURRENT REQUIREMENTS	PROPOSED REQUIREMENTS
Tier 4 (Child)	<ul style="list-style-type: none">• No minimum level of study• Children aged 4-15 able to study at independent schools only• Those aged 16 or 17 able to study at any licensed institution	<ul style="list-style-type: none">• No minimum level of study• Children aged 4-15 able to study at independent schools only• Those aged 16 or 17 able to study at any licensed institution

APPENDIX 2

LIST OF CONSULTATION QUESTIONS

QUESTION 1

Do you think that raising the minimum level of study sponsors with a standard sponsor licence can offer under Tier 4 (General) to degree-level and above is an effective way of reducing abuse of Tier 4 (General) route, increasing selectivity and simplifying the current rules?

- a) Yes
- b) No
- c) Don't know

If you answered yes or no to the previous question, please give your reason(s).

QUESTION 2

Do you think that only Highly Trusted Sponsors should be permitted to offer study below degree level at NQF levels 3, 4 and 5 / SCQF levels 6, 7 and 8 in the Tier 4 (General) category?

- a) Yes – only HTS should be able to offer these sub-degree level courses
- b) No – all sub-degree level study should be prohibited under Tier 4 (General)
- c) No – study at NQF level 3 should be prohibited, even where the sponsor is HTS
- d) Don't know

If you answered yes or no to the previous question, please give your reason(s).

QUESTION 3

Do you think that the changes discussed in this section should be phased in?

- a) Yes
- b) No
- c) Don't know

If you answered yes to the previous question, what time period do you think is appropriate for phasing in these new measures?

- a) 0–11 months
- b) 12–24 months
- c) 25–36 months
- d) 37 months plus
- e) Don't know

QUESTION 4

Do you think that, in the light of the low risk of abuse amongst users of the Tier 4 (Child) route, there should be no changes to the route?

- a) Yes
- b) No
- c) Don't know

QUESTION 5

Do you think that all students using Tier 4 (General) category should have passed a secure English language test to demonstrate proficiency in English language to level B2 of the CEFR, in order to improve selectivity and to simplify the current system?

- a) Yes
- b) No
- c) Don't know

QUESTION 6

Do you think that students from majority English-speaking countries, those who have been awarded a qualification equivalent to UK degree-level or above that was taught in English in a majority English-speaking country, and those who have recently studied in the UK as children should be exempt from any new language testing requirement?

- a) Yes
- b) No
- c) Don't know

QUESTION 7

Do you think that students wishing to study a new course of study should be required to show evidence of progression to study at a higher level?

- a) Yes
- b) No
- c) Don't know

If you answered yes, what is the best way to demonstrate progression?

QUESTION 8

Do you think that students wanting to study a new course should return home to apply from overseas?

- a) Yes
- b) No
- c) Don't know

If you answered no do you have any alternative proposals.

QUESTION 9

What changes do you think we should make to the Tier 1 Post Study Work route?

- a) Close the route entirely
- b) Restrict it significantly
- c) Other

If you chose option b) or c) please provide additional comments and suggestions, including on the timing of any changes and any transitional arrangements you feel would be necessary.

QUESTION 10

Do you think that we should restrict further the amount of work students should be allowed to undertake while studying?

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QUESTION 14

Do you think that family members permitted to accompany the student should be prohibited from working?

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QUESTION 15

Do you agree that differential requirements for high and low risk students should be adopted?

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QUESTION 17

Do you believe that we should also, or alternatively look at the sponsor's rating as a basis for differential treatment?

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Do you think that more should be done to raise accreditation and inspection standards to ensure the quality of education provision within private institutions of further and higher education for Tier 4 purposes?

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- c) Don't know

QUESTION 19

In the light of the proposals described in this document, what do you think will be the main advantages / disadvantages, including any financial impacts, to you, your business or your sector?

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Please indicate whether you are:

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- b) An academic
- c) Other

Please select your organisation/institution type:

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- a) less than 5%
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- c) 10% up to 15%
- d) 15% up to 20%
- e) 20% up to 50%
- f) More than 50%