Earned Settlement consultation – UCEA's response

This is the response from the Universities and Colleges Employers Association (UCEA) to the Government consultation on **A Fairer Pathway to Settlement: consultation on earned settlement.**

UCEA represents the views of higher education institutions (HEIs) across the UK in their capacity as employers.[1] UCEA is a membership body funded by subscriptions from 169 HEIs in the UK. Our purpose is to support our member Higher Education (HE) employers in delivering excellent and world-leading higher education and research by representing their interests as employers and facilitating their work in delivering effective employment and workforce strategies.

HEIs are independent employers and determine their own employment policies, usually in consultation with recognised trade unions; therefore, there are a variety of HR practices in place in the sector.

Our response is based on views provided by our member HE employers to the questions below in the consultation questionnaire. UCEA did not survey members on all the consultation questions however the numbers of the questions below correspond to the numbers of the relevant questions in the various sections of the consultation questionnaire.

Earned Settlement Framework

1. Overall, how clear do you find the proposed changes to the settlement framework?
The 44 respondents to this question said:

Very clear – **3**
Somewhat clear - **21**
neither clear nor unclear – **4**
Somewhat unclear - **14**
Very unclear – **2**
Don't know - **0**

2. [If unclear] Which aspects of the proposed changes to settlement are not clear?

The concept of earned settlement - **0**
The overall purpose - **1**
Which groups may be eligible for exemptions from the 10-year qualifying period - **3**
How reductions to the qualifying period will be applied - **5**
How extensions to the qualifying period will be applied - **0**
How reductions and/or extensions will be applied if applicants meet multiple criteria - **13**
How the proposed changes will apply to dependants and children - **6**
Other – **8** – **see comments below**:

- How changes will impact people already in the UK and their families.
- How voluntary work would be measured and assessed under the 'contribution' requirement.
- How this will affect people currently on the path to settlement

[1] The terms "HEI(s)" (Higher Education Institution(s)) and "university/universities" are used interchangeably throughout to describe UCEA's membership which consists of Higher Education providers which are active in teaching, research and scholarship including universities, colleges, and conservatoires, and associated organisations.

- How reductions/extensions to qualifying period will be applied, how will migrants provide evidence, i.e. volunteering
- The overall purpose, the groups eligible for exemptions, the eligibility criteria for the qualifying period.

3. Overall, to what extent do you agree or disagree with the proposed changes to the settlement framework?
The 44 respondents to this question said:

Strongly agree - **1**
Agree - **5**
Neither agree nor disagree - **6**
Disagree - **19**
Strongly disagree - **12**
Don't know/prefer not to say- **1**

Integration

1. What do you think about a 1-year reduction for applications who can demonstrate advanced English language ability (at C1 standard)?
The 44 respondents to this question said:

- The reduction doesn't go far enough (it should be longer than 1 year) - **23**
- The reduction is about right - **15**
- The reduction goes too far (it should be shorter than 1 year) - **0**
- There should be no reduction for these applicants - **4**
- Don't know / prefer not to say – **2**

2. How do you think integration should be assessed? (please select all that apply)

- Through a formal test (such a revised Life in the UK Test) - **20**
- Through gathered ongoing evidence (such as participation in certified English- Language education or employment/volunteering evidence) - **28**
- Through completing a cultural orientation course once arrived in the UK - **8**
- Through character references from public services professional and British Nationals - **9**
- Through evidence of learning and participation within the wider community (including testimonies from relevant organisations/groups) - **8**
-In another way (please specify) – **4** (see further comments below)
- Don't know / prefer not to say – **6**

Further comments from responding HEIs:

- If English language has already been assessed for a previous visa application and meets the CEFR level specified for ILR, the applicant should be able to provide the previous evidence, whether current or expired, e.g. SELT/ECCTIS statement to demonstrate that they meet this requirement, without any further requirement to evidence English language proficiency.
- Assessing lawful continuous residence, paying taxes where applicable, compliance with immigration conditions.

- Memberships to UK organisations e.g. social societies, professional memberships (such as membership to Chartered organisations), academies.
- The life in UK test needs to be more relevant. Currently it is pass or fail but it is not clear what it is actually achieving in the testing or if it remains relevant.
- We do not agree that integration should be measured "Through evidence of learning and participation within the wider community (including testimonies from relevant organisations/groups)" as this is subjective. It also places a strain on certain groups who cannot participate in the wider community e.g. carers, those with a disability, or those who work long hours. We do not apply these criteria to British citizens so we should not apply this to migrants.

3. Do you have any further comments on how 'Integration' should be considered in relation to settlement?

Summary of comments from responding HEIs:

Across responding HEIs, there is strong agreement that long-term employment in roles that demonstrably benefit the UK—particularly in research, teaching, healthcare and other public-value fields—already provides compelling evidence of integration. Several HEIs highlight that significant numbers of their research workforce are made up of non-UK nationals whose contributions drive innovation, economic growth and cultural enrichment. For these individuals, ongoing lawful residence, stable employment and sustained contribution to UK society should be considered sufficient indicators of integration without the need for additional, burdensome evidential requirements. Many responding HEIs argued that a decade-long qualifying period risks undermining workforce stability and discouraging global talent, and that HE employment should automatically satisfy advanced English requirements and be recognised as a form of community contribution.

There is broad recognition that any integration assessment must be clear, objective and consistently applied. While the Life in the UK Test is currently the most established mechanism, HEIs question its relevance, noting that its content often fails to reflect real-life integration and is not well understood even by UK nationals. A revised, meaningful version of the test could play a role, but subjective measures—such as community testimonies, cultural courses or ongoing evidence-gathering—are widely seen as impractical, open to inconsistency and likely to place undue pressure on charities and community groups. If the government introduces additional integration pathways, HEIs stress the need for transparent criteria, clear definitions of acceptable evidence and guidance that avoids discretionary judgement. Transitional arrangements for English language requirements are also considered essential for individuals already progressing toward settlement.

Finally, responding HEIs emphasised that integration is multifaceted and cannot be reduced to a single test or activity. Length of residence, employment history, voluntary engagement, family life and professional contribution all shape how individuals become part of UK society. Some HEIs argue for a tiered approach that recognises different forms of contribution—including world-leading research—while others caution against creating hierarchies that could lead to unequal treatment. What unites the HE sector is the call for a fair, workable and accessible system that values the genuine, long-term contributions migrants make to UK higher education and the wider economy. Integration, they argue, should be encouraged through stability and opportunity rather than through onerous or subjective evidential demands.

Contribution

1. Do you think the following groups should be exempt from the requirement to have earned above £12,750 for at least 3 to 5 years?

The 44 respondents to the questions below said:

Those on maternity leave or long-term illness/disability
- Yes – **35**
- No – **3**
- Don't know/prefer not to say – **6**

Those in certain occupations with different pay arrangements (e.g. Ministers of Religion)
- Yes - **15**
- No - **7**
- Don't know/ prefer not to say – **22**

2. Are there any other groups that you think should be exempt from the requirement to have earned above £12,750 for at least 3 to 5 years?

Summary of suggestions from responding HEIs:

- Individuals who have taken unpaid leave under permitted exemption categories, including long-term family leave (parental, shared parental, adoption, neonatal) – essentially all forms of long-term family leave resulting in reduced or nil pay should qualify for exemption.
- Children, dependants and stay-at-home parents or carers, particularly those caring for young children or disabled/long-term ill relatives, should not be required to meet independent earnings thresholds.
- Dependants whose visa status relies on the main applicant should not face separate financial assessments for indefinite leave to remain (ILR) as this risks splitting family timelines and creating unfair burdens.
- Part-time workers, including those on reduced hours due to caring responsibilities, should not be penalised for lower earnings.
- Full-time students, including those on student visas restricted to 20 hours of work per week, should be exempt from earnings-based requirements.
- Individuals who have volunteered overseas, including in humanitarian roles, should have this recognised.
- Domestic abuse victims, and those in lower-income but essential roles (e.g., social care, early years education) should be protected from disadvantage.
- Postgraduate researchers and fellowship holders on tax-free stipends should have their stipends treated as equivalent to earnings to avoid undermining UK research and innovation.
- Self-employed workers who may not have made profit but have contributed to the economy in other ways such as employing others.

3. To what extent do you agree or disagree that migrants who have worked in an occupation below RQF level 6 should have their standard qualifying period for settlement

set at 15 years?
The 44 respondents to this question said:

- Strongly agree - **0**
- Agree - **2**
- Neither agree nor disagree - **3**
- Disagree - **19**
- Strongly disagree - **20**
- Don't know/prefer not to say - **0**

4. To what extent do you agree or disagree that applicants who earn a taxable income above £50,270 should be eligible for a reduction in their time to settlement?
The 44 respondents to this question said:

- Strongly agree - **8**
- Agree - **18**
- Neither agree nor disagree - **9**
- Disagree - **5**
- Strongly disagree - **3**
- Don't know/prefer not to say - **1**

5. What do you think about the proposed reductions for applicants based on their annual taxable income?
The 44 respondents to the two questions below said:

7-year reduction for applicants who earn a taxable income above £125,140
- The reduction doesn't go far enough (it should be longer) - **1**
- The reduction is about right – **27**
- The reduction goes too far (it should be shorter) – **4**
- There should be no reduction for these applicants – **9**
- Don't know / prefer not to say - **3**

5-year reduction for applicants who earn a taxable income above £50,270
- The reduction doesn't go far enough (it should be longer) – **7**
- The reduction is about right – **24**
- The reduction goes too far (it should be shorter) – **3**
- There should be no reduction for these applicants – **6**
- Don't know / prefer not to say - **4**

6. Do you think those employed in a public service occupation (i.e. health and education occupations where going rates are based on national pay scales) should be eligible for a reduction in their qualifying period to settlement?
The 44 respondents to this question said:

- Yes - **34**
- No – **9**
- Don't know/prefer not to say - **1**

13. Do you have any further comments on how 'Contributions' should be considered in relation to settlement, including any potential benefits or challenges of recognising giving back to the community as a contribution towards settlement?

Summary of comments from responding HEIs:
Responding HEIs broadly opposed linking settlement eligibility primarily to salary thresholds arguing that income is a poor proxy for contribution, particularly in HE where many lecturers, researchers, technicians, and professional staff make significant social, scientific, and economic contributions while earning below proposed thresholds. The proposed £50,270 taxable income threshold was seen as unrealistic, misaligned with HEI pay structures, regionally unfair (especially in Scotland due to higher tax bands), and discriminatory against women, carers, and those with interrupted careers. There was strong support for recognising PhD-level roles, shortage occupations, and medium-skilled staff, with calls for lecturers and researchers to benefit from shorter settlement routes.

Responding HEIs had strong concern that high-earner routes would disproportionately benefit private sector roles over core academic and research positions. Early-career academics, research fellows and specialist technicians - central to the UK's research and innovation system - would be excluded from accelerated settlement despite their strategic importance. Several responding HEIs suggested that salary thresholds should be lower, regionalised or aligned with median or sector-relevant salaries, rather than tax bands.

Responding HEIs commented that HE sector staff contribute significantly to the UK through teaching, research, clinical trials, public engagement, student support, knowledge exchange, and pandemic-era scientific work. These contributions are not reflected in pay or tax status alone and suggested that contribution should be based on occupational criteria rather than earnings as for other public sector roles. Responding HEIs highlighted that staff such as laboratory technicians, project managers, and clinical research workers deliver critical national benefits but would be disadvantaged under the proposed income-based or narrow occupational criteria. Many responding HEIs supported a standard five-year route to settlement for lecturers, researchers, and related professionals similar to other public service roles, based on occupational criteria rather than earnings.

The proposal to recognise 'community contribution' and volunteering was viewed as potentially positive in principle but highly problematic in practice. Responding HEIs noted that contribution to the community is not objectively measurable or fair and had widespread concerns about subjectivity, evidential burdens, administrative pressure on charities, and the risk of 'box-ticking' or coerced volunteering. HEIs stressed that volunteering should remain genuinely voluntary and linking it to immigration outcomes risks undermining its spirit and creating inequalities. Clear, consistent, and measurable criteria were seen as essential, yet responding HEIs doubted such a system could be designed without creating inequity, inconsistency, or opportunities for abuse.

The impact on equality and diversity was a major concern to responding HEIs. Women, carers, part-time workers, early-career staff and those who have taken maternity or care leave would be disadvantaged under income-based measures. Responding HEIs argued that the proposed system risks reinforcing gender, age, and regional inequalities rather than promoting inclusion.

Responding HEIs expressed particular concern about the impact of the proposals on medium-skilled roles at RQF levels 3–5 such as technicians and those working in hospitality. Many HEIs already face shortages in technical and specialist roles, and prolonged settlement timelines would make the UK less competitive internationally. Extending the settlement routes to 10–15 years for these workers who came into the UK on a skilled worker visa will be harmful to recruitment, retention, and institutional stability. Responding

HEIs commented that allowing skilled worker visas for shortage medium-skilled roles and subsequently penalising them in settlement policy was also contradictory and fundamentally unfair.

Responding HEIs also expressed serious concern about the lack of clarity on transitional arrangements, noting that many existing visa holders have made long-term personal and professional decisions based on the current five-year route. The lack of clarity about whether new rules will apply retrospectively undermines confidence in the UK immigration system and risks destabilising the existing HE workforce.

Overall, responding HEIs agreed there needs to be a fair, transparent, and proportionate settlement system that recognises both economic and social value without relying primarily on high earnings. HEIs supported a common baseline qualifying period, recognition of occupational and societal value, avoidance of rigid income or volunteering benchmarks, lower and more flexible income thresholds, protection for carers and early-career staff, and clear transitional safeguards. Contribution should be understood holistically - encompassing research, teaching, innovation, care, and everyday civic participation - rather than reduced to narrow financial or prescriptive measures.

Without these changes, the proposals as currently drafted risk undermining equality, weakening the HE workforce, and reducing the UK's attractiveness as a destination for international academic and research talent.

Residence

2. Do you have any further comments on how 'Residence' should be considered in relation to settlement?

Summary of comments from responding HEIs:

The majority of responding HEIs expressed significant concerns about the proposed shift to a 10-year qualifying baseline period for settlement in terms of fairness, workforce stability and the practical realities of academic employment. Applying this change retrospectively to those already on skilled worker visas or Dependants visas, many of whom entered the UK on the clear understanding of a 5-year route to ILR, was considered particularly unjust. Responding HEIs agreed that at minimum there should be transitional agreements for this cohort, and any new baseline applied to new arrivals from a set-point of time in the future if this is the Government's intention. HEIs emphasised that transitional arrangements are essential; without them, institutions face immediate operational pressures, increased administrative and financial burdens, and heightened risks to staff retention at a time when global competition for talent is already intense.

Responding HEIs argued that residence should be assessed on more than the length of time someone has lived in the UK. Many international staff contribute deeply to their communities, maintain lawful status, and work in essential fields such as education, research, and care. A rigid time-based model fails to recognise these contributions and risks penalising individuals for reasonable absences linked to family, fieldwork, or international collaboration, activities that are integral to academic roles. Clearer guidance is needed on how absences, visa transitions, and breaks in employment will be treated, particularly given the mobility and international engagement that characterise HE careers.

Responding HEIs questioned the rationale for applying the 10-year baseline uniformly across all work routes. If the policy is driven primarily by rising settlement numbers in specific

categories such as the Health and Care visa it is unclear why routes with different risk profiles and public policy objectives, including those central to research and innovation, should be subject to the same restrictions. Tailored approaches already exist for categories like Global Talent, and several HEIs argued that similar proportionality should be applied elsewhere, especially given the essential contributions made by health and care workers and the UK's reliance on international labour in these areas to maintain the functioning of the health and social care system.

Responding HEIs were strongly of the view that extending the qualifying period for settlement will undermine integration rather than support it. Prolonging precarity and uncertainty makes it harder for individuals to build stable lives, invest in housing, plan families, or fully participate in their communities. This instability disproportionately affects lower-paid workers, carers, and those with health conditions, and risks weakening social cohesion. For HE specifically, the inability to count overseas research, fieldwork, or partnership-building activities toward residence would place academics at a structural disadvantage and hinder the UK's international research competitiveness. The fact that researchers, academics and other international professionals need to spend time outside the UK should be incorporated into the proposals so that employees in these kinds of roles are not at a disadvantage.

Overall, responding HEIs did not support the retrospective application of the proposals, viewing them as a significant breach of trust that will deter global talent and damage the UK's reputation as a predictable and attractive destination for academic careers. HEIs called for transitional protections, a more flexible and holistic definition of residence, and settlement rules that reflect the realities of academic and research work and the broader societal contributions made by international academic and professional services staff.

Eligibility and Equalities

1. Where the standard qualifying period is proposed to increase from 5 to 10 years, which option for you think should apply to each of the following visa holder groups?

	Reduction (of 5 or 7 years from the standard qualifying period of 10 years)	**Apply full change (standard qualifying period of 10 years)**	**Don't know / prefer not to say**
Applicants who currently require 3 years continuous residence under the Global Talent route	**40**	**3**	**1**
Applicants who currently require 5 continuous years residence under the Global Talent route	**40**	**3**	**1**
Applicants who currently require 3 continuous years residence under the	**28**	**3**	**12**

Innovator Founder route			
Applicants on humanitarian visa routes (e.g. Syrian, Afghan)	**23**	**7**	**14**

2. To what extent do you agree or disagree that dependants of migrants who hold Global Talent or Innovator Founder visa status should retain their current 5-year path to settlement?
The 44 respondents to this question said:

- Strongly agree - **20**
- Agree - **14**
- Neither agree nor disagree – **3**
- Disagree - **4**
- Strongly disagree - **0**
- Don't know / prefer not to say – **3**

3. To what extent do you agree or disagree that there should <u>not</u> be transitional arrangements for those already on a pathway to settlement?
The 44 respondents to this question said:

- Strongly agree - **6**
- Agree - **3**
- Neither agree nor disagree - **0**
- Disagree - **5**
- Strongly disagree – **30**
- Don't know / prefer not to say s - **0**

4. Do you think the following vulnerable groups should retain their current arrangements and be exempt from the proposed settlement changes?

The 44 respondents to the four questions below said:

Victims of domestic violence and abuse
- Yes **- 36**
- No **- 3**
Don't know/ prefer not to say **- 5**
Bereaved partners
- Yes **- 34**
- No **- 4**
Don't know/ prefer not to say **- 6**
Children and young adults who grew up in the UK without immigration status
- Yes **- 35**
- No **- 4**
- Don't know/ prefer not to say **- 5**
Adults with long-term care needs
- Yes **- 33**
- No - **3**
- Don't know/ prefer not to say **- 8**

5. Are there any other vulnerable groups that you think should be considered as part of this consultation?

Responding HEIs suggested the following groups:

- Refugees and humanitarian visa holders who may face trauma or language barriers.

- Carers and people with disabilities.

- Academics at Risk (e.g. through the Council for At-Risk Academics (CARA) – these are academics who are deemed at imminent risk of danger or loss of life and their expert field is aligned to an academic or unit within a university) who enter on temporary work visas rather than protection routes. These individuals are effectively displaced but, under these proposals, would face a 10-year wait despite being unable to return home.

- Children of skilled workers - extending the baseline to 10 years creates a new vulnerable cohort of children of skilled workers who turn 18 before settlement. Under the current 5-year route, a child arriving at age 13 settles with their parents. Under the proposed 10- year route, children who turn 18 during their parents' qualifying period would potentially lose their status and access to Uk education as a home student. This creates a cliff-edge that needlessly splits families and disrupts the education of young people integrated into the UK system.

7. To what extent do you agree or disagree that dependant partners of migrants should earn settlement in their own right?
The 44 respondents to the question said:

- Strongly agree - **2**
- Agree - **11**
- Neither agree nor disagree – **5**
- Disagree - **14**
- Strongly disagree - **10**
- Don't know / prefer not to say – **2**

8. To what extent do you agree or disagree that <u>dependant</u> children of migrants should earn settlement in their own right? (with employment-related requirements waived if they were admitted as a dependant under 18)
The 44 respondents to the question said:

- Strongly agree - **1**
- Agree - **10**
- Neither agree nor disagree – **2**
- Disagree - **18**
- Strongly disagree – **13**
- Don't know / prefer not to say – **0**

9. To what extent do you agree or disagree that resettled refugees should have a 10-year route to settlement?
The 44 respondents to the question said:

- Strongly agree - **0**
- Agree - **12**
- Neither agree nor disagree – **8**
- Disagree - **7**

- Strongly disagree - **6**
- Don't know / prefer not to say – **11**

10. [If organisation providing immigration advice or support services] As an organisation which provides immigration advice or support services, are there any migrant groups in particular that you think will face barriers in demonstrating their eligibility or meeting new requirements for settlement?

Responding HEIs identified the migrant groups below and commented as follows:

1. Council for At Risk Academics (CARA)

Some HEIs support hosting individuals who are awarded a fellowship under the Council for At Risk Academics (CARA). These are academics who are deemed at imminent risk of danger or loss of life and their expert field is aligned to an academic or unit within the University. Whilst most Fellows move to other UK Visa routes following their Fellowship (i.e. Global Talent), responding HEIs had concerns whether their dependants would be able to satisfy the new requirements for settlement, for example, Dependant partners and children with a weaker grasp of English.

2. Medium Skilled Worker visa holders at RQF level 3- 5

Responding HEIs reported that Medium Skilled Worker visa holders at RQF level 3- 5 in care, hospitality and other essential service roles in the higher education sector are likely to face significant challenges under new settlement requirements. These roles are critical to not only the education sector but also the UK's economy and wellbeing, yet they are often undervalued in terms of pay and perceived skill level, making it harder for individuals to meet income thresholds or other criteria. It is important to recognise the difficulties employers have experienced in recruiting UK residents to take on these roles. Migrants in these positions are filling gaps that are essential to society, and restricting their settlement pathways could worsen labour shortages and undermine essential services.

11. [If organisation providing immigration advice or support services] What are the main barriers that you think this group / these groups will face? (please select all that apply)
Responding HEIs said:

Lack of documentation - **7**
Complexity of requirements - **27**
Language barriers - **17**
Financial barriers - **32**
Health-related barriers - **8**
Limited access to advice/support - **16**
Other (please specify) - **0**

12. Do you have any further comments on how specific should be considered in relation to settlement? We particularly welcome views on how the proposed changes could affect children in the UK.

Summary of comments from responding HEIs

One of the greatest concerns of responding HEIs was that the new requirements will lead to family separation, particularly for children who may be forced to live apart from a parent if only one adult qualifies to remain in the UK. Such outcomes could have profound emotional and developmental consequences for children who view the UK as their home. HEIs argued

that immigration policy should prioritise family unity, protect children from the effects of decisions beyond their control, and include safeguards that prevent families from being split.

Several responding HEIs commented that extending or complicating the settlement pathway for dependants of Global Talent Visa holders would make the route less attractive. If partners and children are required to qualify for settlement independently, families may be unable to settle together, undermining the UK's ability to recruit and retain top international researchers and specialists and weakening the competitiveness of HEIs, research institutes, and innovative industries.

Additionally, responding HEIs agreed that children should have settlement rights aligned with their parents and that uncertainty about a child's long-term status will discourage skilled individuals from committing to the UK. Those already in the UK on existing visas should receive transitional protections, since many have paid for visa durations designed to meet current settlement timelines. Changing the rules now would impose unexpected financial and personal burdens as well as disrupting family life if dependants are unable to settle at the same time.

Impact on organisations

1. To what extent, if at all, do you think the proposed reforms will impact your organisation in the following ways?

	Very positive impact	**Somewhat positive impact**	**No impact**	**Somewhat negative impact**	**Very negative impact**	**N/A**	**Prefer not to say**
Ability to attract suitable candidates	**0**	**0**	**1**	**17**	**26**	**0**	**0**
Ability to retain existing migrant workers	**0**	**0**	**0**	**22**	**22**	**0**	**0**
Workforce planning	**0**	**0**	**2**	**14**	**27**	**0**	**1**
Administrative burden	**0**	**0**	**2**	**8**	**33**	**0**	**1**

2. [If organisation with intention to sponsor in future] To what extent, if at all, do you think the proposed reforms will affect your organisation's plans to sponsor employees to work in the UK on a visa in the future?
The 44 respondents to the question said:

- Much more likely to sponsor - **1**
- Slightly more likely to sponsor - **1**
- No change - **23**
- Slightly less likely to sponsor - **12**
- Much less likely to sponsor - **5**
- Don't know / prefer not to say - **2**

3. To what extent, if at all, do you think the proposed reforms will affect your organisation's plans to sponsor students to study in the UK on a visa in the future?
The 44 respondents to the question said:

-Much more likely to sponsor - **0**
-Slightly more likely to sponsor - **0**
-No change - **24**
-Slightly less likely to sponsor - **3**
-Much less likely to sponsor - **8**
-Don't know / prefer not to say - **9**

4. To what extent, if at all, do you think the proposed reforms will affect your organisation's plans to sponsor refugees and displaced people to work in the UK on a visa in the future? (e.g. such as visa a community sponsorship scheme)
The 44 respondents to the question said:

- Much more likely to sponsor - **0**
- Slightly more likely to sponsor - **0**
- No change - **21**
- Slightly less likely to sponsor - **0**
- Much less likely to sponsor - **3**
- Not applicable - **15**
- Don't know / prefer not to say - **5**

5.Please provide any evidence you may have on whether the proposed changes might influence visa applicants' or visa holders' decisions to come to or remain in the UK.

Summary of evidence from responding HEIs

Responding HEIs highlighted that the rising cost of the UK immigration system, particularly visa fees and the Immigration Health Surcharge (IHS) has already led to a decline in international applications and international candidates withdrawing after accepting offers. HEIs reported that interest from European Union (EU)/European Economic Area (EEA) researchers has dropped significantly and is expected to fall further if the proposed reforms to earned settlement are implemented. HEIs agreed that the reforms will lead to increased costs, for example, upfront IHS costs will double with longer routes to settlement (an increase in the settlement period from 5 years to 10 years). Many HEIs reported difficulty recruiting in highly technical fields such as engineering and science, with costs and complexity acting as major deterrents. Responding HEIs emphasised that compared with other countries, the UK is increasingly perceived negatively with a lengthy and expensive route to settlement.

A major factor in attracting global talent is the opportunity to settle permanently and eventually naturalise as a British citizen. Responding HEIs commented that for many applicants, especially from regions where citizenship is difficult to obtain, this pathway is central to relocation decisions. The UK has historically benefited from welcoming skilled migrants into a multicultural society, strengthening the economy and research base. However, HEIs stated that uncertainty over settlement routes now threatens the UK's reputation and weakens the country's competitive position.

There was broad consensus from responding HEIs that delinking of dependants from primary earners under the proposed new rules should not be done, for example, that in future

a spouse of a migrant worker must independently earn settlement. Another concern was the extended baseline from five years to up to 10 years for most people before they qualify; early career academic pay, for example, does not meet the proposed higher earnings thresholds. Responding HEIs reported that both existing staff and applicants were expressing growing anxiety about the proposed changes, particularly the extension of the baseline settlement period to 10 years. Many existing staff are worried about their long-term security, housing decisions, and family stability. HEIs reported that some of their migrant staff were already seeking alternative employment, either overseas or within the UK, to increase their earning potential. Others feel unable to plan their futures, leading to emotional strain and declining morale.

The proposal to apply these rules retrospectively was an issue of great concern to responding HEIs. Families that have relocated to take up positions in the UK in good faith under one set of rules, which covered settlement of dependants, will have to operate under a completely new set of rules that do not cover dependants. Responding HEIs reported that existing staff have stated that they would have considered their options differently before relocating to the UK if the proposed changes were in place at the time.

Personal testimonies from migrant workers themselves highlight the profound personal and professional impact of this uncertainty. One researcher described the financial, emotional, and cultural sacrifices made in relocating, only to face renewed insecurity when settlement timelines changed. Despite strong academic contributions, such individuals feel undervalued and unsupported. This lack of a clear and reliable pathway discourages long-term commitment and risks losing highly productive researchers to more stable immigration systems abroad.

Responding HEIs reiterated that high upfront and ongoing costs, especially for families, were a consistent concern. Visa fees, repeated extensions, and paying the IHS over a potential ten-year period place heavy financial pressure on migrants. These burdens are compounded for those with dependants, making the UK less attractive than countries with shorter and cheaper routes. Rising costs are already influencing decisions to decline offers or leave existing posts.

Responding HEIs reported increasing recruitment and retention problems linked to the earned settlement proposals. Skilled Worker and Global Talent visa holders frequently seek clarification from HEIs about settlement rules, dependants, and income thresholds. Some staff have already resigned and relocated to countries with more favourable systems, increasing recruitment and training costs for institutions. HEIs also reported that other existing staff are expediting rushing to apply for settlement before changes take effect, reflecting widespread insecurity.

The proposed reforms are criticised by responding HEIs for their complexity, lack of clear transitional arrangements, lack of transparency and potential unfairness. A two-tier or fragmented system risks disadvantaging workers who planned their lives around the existing five-year route. Salary thresholds and definitions of qualifying income may penalise those using childcare or pension schemes and restrict their choices for their family. HR teams supporting global mobility face growing administrative burdens in navigating unclear and shifting rules.

Overall, responding HEIs believed the proposed changes to the baseline settlement periods will narrow the talent pool and will render the UK uncompetitive for global academic and research talent. Compared with countries such as Canada and Australia, which offer settlement in three to five years, the UK risks losing its appeal. Retrospectively applied and/or poorly targeted reforms undermine trust and disproportionately affect sectors such as higher education. To remain attractive, the UK needs a fair, predictable, and proportionate

settlement system aligned with international standards and supportive of long-term workforce stability.

6.. Do you have any further comments on the potential impacts on your organisation in relation to the proposed changes to settlement?

Summary of comments highlighting the potential impacts on HEIs in relation to the proposed changes to settlement:

1. Reduced international attractiveness

Responding HEIs agreed that extending the settlement route to 10 years will make the UK significantly less attractive to global talent. Compared with competitor countries such as Canada, Australia, and New Zealand, the UK is seen as offering a more restrictive, costly, and unwelcoming immigration environment. HEIs considered that the proposed changes risk discouraging highly skilled individuals from relocating to the UK and prompts existing international staff to seek opportunities elsewhere.

2. Damage to recruitment and retention

Responding HEIs reported that the proposals will undermine their ability to recruit and retain skilled staff. HEIs reiterated that many academic, research and technical roles are already difficult to fill domestically. Restricting settlement pathways and increasing uncertainty will shrink the talent pool, weaken recruitment pipelines, and intensify competition for staff, with no quick way to replace lost expertise. This will be compounded if dependants also need to earn settlement in the UK.

3. Financial burden on employers and individuals

There were significant concerns that extending sponsorship requirements will substantially increase costs for both HEIs and employees. The many HE employers that reimburse immigration costs face higher expenses from repeated visa applications, IHS charges and Immigration Skills Charges resulting in sharply increased recruitment and retention costs. Individuals and their families must pay more in visa fees and IHS payments, often over many years, creating significant financial strain and hardship. Many employees will struggle to afford extended visa routes, especially those with dependants.

4. Administrative and operational pressures

Responding HEIs agreed that longer and more complex immigration routes will increase the administrative workload for HR and compliance teams. HEIs were concerned about an increase in close monitoring to ensure they fulfil their sponsorship duties as well as supporting international staff and applicants, particularly if dependants have to earn settlement in the UK. This will include managing increased numbers of visa extensions, sponsorship reporting duties, monitoring loan schemes, obtaining legal advice and signposting immigration advice. Administratively, the reforms will increase complexity and workload for HR and compliance teams. HEIs will need to consider expanding their financial support, legal guidance and wellbeing services, placing further strain on limited resources. This added bureaucracy diverts resources from core educational and research activities and increases operational risks. There were also concerns about discrimination claims if HEIs decided not to sponsor roles due to increased costs.

5. Unfairness of retrospective application

A major concern for responding HEIs is the proposal to retrospectively apply the new rules to individuals already in the UK on five-year pathways. The majority of HEIs described this as unfair and destabilising highlighting that many existing staff made long-term personal and

professional decisions based on existing rules i.e. they moved to the UK based on clear expectations of settlement under existing rules. Changing requirements mid-route undermines trust in the immigration system and creates distress and uncertainty and a sense of betrayal among affected individuals and their families.

6. Impact on HE and research excellence

Responding HEIs view the proposals as a strategic threat to the UK's HE and research sectors. Reduced attractiveness to international academics and researchers could weaken research output, innovation capacity, and grant income. This would damage the UK's global reputation and reduce the sector generally and individual HEIs' ability to contribute to economic growth and critical national priorities. The proposals also threaten the financial stability and global reputation of UK universities. International staff and students contribute significantly to research income, innovation, and local economies. Reduced attractiveness could lead to falling student numbers, loss of research funding, redundancies, and weaker international competitiveness, particularly in regional and 'Levelling Up' regions.

7. Regional and equity concerns

Several responding HEIs were critical of the proposal to use flat national thresholds for contribution and fast-track settlement. These thresholds disadvantage staff in lower-wage or 'levelling up' regions, encouraging migration to London and creating regional talent drain. Responding HEIs considered that this undermines regional campuses and contradicts broader economic development goals.

8. Wellbeing, morale and social integration of migrant staff

Responding HEIs agreed that extended periods on temporary visas are associated with anxiety, insecurity and reduced wellbeing. Prolonged uncertainty affects morale, productivity, family stability, and mental health. HEIs stated that longer routes to settlement will weaken social cohesion, leaving individuals feeling excluded and unable to fully integrate or plan for the future.

9. Need for transitional arrangements

There was strong support by responding HEIs for transitional protections for existing visa holders, particularly for academic and PhD-level staff. Responding HEIs called for fairer income measures, regionalised thresholds, and shorter routes for key contributors. They also stressed the need for clearer guidance, financial support, mental health provision and stable long-term immigration policy to protect the UK's competitiveness and workforce sustainability.

10. Effects on students and graduate pathways

Responding HEIs highlighted the negative implications of the proposals for international students and graduates. A more complex and extended route to settlement weakens the 'study-to-work' pathway, making UK education less appealing. This may reduce international student recruitment and limit HEIs' ability to retain talented graduates and early-career researchers.

Overall, responding HEIs agreed that the proposals pose a strategic risk to the UK's HE and research sectors. There is a need for fair transitional arrangements, targeted reforms, regionally sensitive thresholds and more humane pathways to settlement. Without these changes, the UK risks losing skilled workers, weakening its knowledge economy, and damaging its long-term social and economic interests.

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