

Russell Group response to the Home Office consultation on tackling illegal immigration in privately rented accommodation

1. Introduction

- 1.1 The purpose of The Russell Group is to provide strategic direction, policy development and communications for 24 major research-intensive universities in the UK; we aim to ensure that policy development in a wide range of issues relating to higher education is underpinned by a robust evidence base and a commitment to civic responsibility, improving life chances, raising aspirations and contributing to economic prosperity and innovation.
- 1.2 We welcome the opportunity to comment on the Home Office consultation on tackling illegal immigration in privately rented accommodation. We are also responding to the Home Office consultation on regulating migrant access to health services in the UK and would encourage these responses to be read in tandem.

2. The impact of tackling illegal immigration in privately rented accommodation on international students and staff at UK universities

- 2.1 Higher education is one of this country's most successful export industries and is estimated to contribute more than £11 billion a year in overseas earnings¹ – roughly on a par with earnings from all UK exports of goods to China or exports of aircraft from the UK to all countries in 2012².
- 2.2 If we are to maintain our place as a global leader in higher education then the UK must continue to attract the very best talent from around the world and show that its doors are open to genuine international students and staff who contribute so much to our economy and our global standing in higher education.
- 2.3 Changes to immigration regulation can significantly affect the UK's higher education institutions and in particular our world-leading research-intensive universities as they rely on recruiting the best international staff and students from overseas. The Government must make sure that the immigration rules deter the fraudsters but still welcome the brightest and the best.
- 2.4 We are pleased that the consultation proposes to exempt university and college halls of residence from checks on the immigration status of tenants as this would be wholly unnecessary.

¹Data for 2011/12 from BIS calculation:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/227033/BIS-13-1081-International_Education-Global_Growth_and_Prosperty-Accessible_2.pdf

²http://www.ons.gov.uk/ons/dcp171778_318161.pdf

- 2.5 In addition, **we recommend that the exemption for university-owned properties should be extended to properties rented out via the university's accommodation service** as international students and staff will already have been subject to a rigorous immigration process in order to obtain a visa and will have undergone visa checks by their universities as part of the enrolment process.
- 2.6 However, the proposed checks will still apply to students and staff attempting to rent private accommodation, which is a concern. As well as impacting on international students and staff, the proposals would also affect UK citizens. Given the age profile of students at university, the Government must not assume that all will have passports that they can use to demonstrate their citizenship status to private landlords, so alternative options will also have to be available.
- 2.7 Before implementing this policy, the Home Office should consider the repercussions of asking untrained private landlords to check a multiplicity of different visa types. Uncertainty on the part of the landlord could mean that renting a property to an international student or staff member could be perceived as too high a risk. Private landlords typically already insist on guarantors and/or 6 month's rent (or more) upfront before letting to international students and the proposals contained in this consultation are unlikely to improve the situation. This would have consequences for the international reputation of the UK higher education sector and would go against moves elsewhere in Government to ensure the UK provides a warm welcome for international students³.
- 2.8 Should this policy be introduced, it is imperative that the procedure for making checks on a prospective tenants' immigration status is as simple and efficient as possible in order to minimise the burden of proof and possibility of delays. Extensive guidance and a rapid response advice service must be provided for private landlords who are unsure whether they can legally rent to a prospective tenant. This will require significant additional resource to be allocated within the Home Office in order to provide a sufficient level of support for private landlords. It will be important for the Home Office to monitor the application of the new procedures to ensure that the process is not overly burdensome and that the unintended consequences described above do not occur.

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³ As set out in the Government's new International Education strategy, BIS, July 2013