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**CONSULTATION ON  
EMPLOYMENT-RELATED  
SETTLEMENT, TIER 5 AND  
OVERSEAS DOMESTIC  
WORKERS: (9 JUNE –  
9 SEPTEMBER 2011)**



Home Office

SUMMARY OF THE FINDINGS  
FROM THE CONSULTATION

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## Introduction

On the 9th June 2011 the Government published the consultation document “Employment-Related Settlement, Tier 5 and Overseas Domestic Workers”. The consultation closed on the 9th September 2011 having run for just over 13 weeks.

The consultation paper represented the next phase in the Government’s review of the immigration system. It contained proposals to reform how those who come to the United Kingdom to work in Tiers 1 and 2 of the Points Based System may be granted indefinite leave to remain. It also contained a review of Tier 5 and both overseas domestic worker routes. A summary of the proposals can be found at Annex A, together with a copy of the questions asked (Annex B).

In addition to the 12,499 responses, a large number of additional or supplementary comments were received from businesses, charities and the educational sector as well as from UK and foreign governments and members of the public.

The Government is grateful to all those who responded to the consultation.

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## Profile of respondents

In total 12,499 responses were received. The vast majority were received through the online survey (11,493), the remainder by email or post (1,006).

A number of responses were received by email and post which did not specifically answer the consultation questions, but which nonetheless provided valuable contributions. A selection of comments from these written responses have been included in this report to give a flavour of the main points made. A proportion of the respondents to the on-line survey provided comments to the open questions (questions 8, 12 and 22). These on-line responses have been analysed thematically with findings presented at appropriate points in this report.

Most of the respondents were responding as a member of the public (89%). Over half of these respondents were non-British (55%) and, of these, over two-thirds (69%) had a time limit on their stay. Forty-five percent were British citizens. Please note that those responding to consultations are self selecting and are not necessarily representative of the UK population.

A large proportion of responses received by post or email (42%) were sent by two organisations. Owing to their particular interest in domestic workers, these respondents have exerted greatest influence on the responses relating to the questions on Overseas Domestic Workers.

Eleven percent of all responders were responding in an official capacity. Almost two-thirds of these (64%) represented a private sector body and almost a half represented large companies (46%). The largest proportion (41%) were a UK wide company, 29% were based in London. Ninety-one percent of the organisations employed workers from outside the UK.

A list of those organisations who submitted email or postal responses or comments to the consultation is available at Annex C. The details of respondents who completed the online survey were not collected.

## Findings

Throughout this report, comparisons have been made between those who said they were responding in an official capacity and those who said they were responding as a member of the public. A large proportion (over one-quarter) did not tell us which group they fell into. There is the possibility that someone responding on behalf of an organisation may in practice have been responding in an individual capacity and vice versa. A further breakdown of the 'member of the public' group has been presented comparing responses from non-British respondents with responses from the British respondents. Differences by these four respondent groups have only been presented if they are statistically significant (at the 5% level).

Respondents did not answer every question and so the overall numbers responding varies by question. Please see the accompanying excel data tables for a breakdown of the responses by question (consultation findings – data tables).

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# Clearly defining temporary and permanent migration routes

The consultation proposed that all visas should be categorised as either 'temporary' or 'permanent'. Permanent visas would allow migrants to apply to settle in the UK at a later date subject to meeting any criteria in place at the time.

Sixty-five percent of all respondents agreed with the proposal that creating clear categories of temporary and permanent visas would help migrants and the public better understand the immigration system. Members of the public were more inclined to support this view (66%) compared with those responding in an official capacity (58%). Of the members of the public, the non-British respondents were more supportive of the view (72%) than were the British respondents (62%).

## Written responses

It was noted that comments which were supportive of this proposal recognised the clarity that this change could deliver i.e. that it could help migrants to understand their options better, and allow businesses to plan ahead with greater certainty.

Other comments highlighted that the information provided about the entitlements attached to visas should be clear and unambiguous. For example:

We support the principle of clarifying the rules with regard to employment related settlement and on the clarification of visas. If implemented effectively, this could help workforce planning.

### **Quote from a private sector organisation**

It is essential that the information available to migrants is open and transparent so that they are able to make educated and informed decisions when considering a move to the UK.

### **Quote from a health sector organisation**

Other comments questioned the use of the words 'temporary' and 'permanent'. For example:

...'permanent' visas are likely to be understood as affording permanent residence. In fact, the proposal is for 'permanent visas' to be those which allow the possibility of an application for permanent residence. Temporary visas will not allow for such a possibility. However, some temporary visas can be used to switch into a permanent migration category. ..at a practical level this new system may only add to confusion.

### **Quote from an organisation engaged in the provision of voluntary, community or charitable services**

# Allowing only the brightest and the best workers to stay permanently

The consultation proposed various changes to the Tier 1 and Tier 2 categories of the Points Based System which are set out in detail below. Overall, the key themes which were identified from the responses to these proposals were the need for any system to provide certainty for migrants and employers, some degree of flexibility and to be simple to understand and operate.

## TIER 1 - SETTLEMENT

The consultation asked whether Tier 1 exceptional talent migrants should be able to apply to settle in the UK and also whether temporary leave in this category should be capped at five years.

Seventy-six percent of all respondents agreed with the proposal that exceptional talent migrants should have a route to settlement after five years. Those respondents who said they were members of the public were more supportive of the proposal (77%) than those responding in an official capacity (69%). The non-British respondents were more likely to support the proposal (83%) compared with the British respondents (74%).

### Written responses

It was noted that comments in support of allowing Tier 1 exceptional talent migrants to retain a right to apply for settlement, tended to highlight the skills levels and talent of those who would enter under this route and the potential benefits they could bring to the UK. For example:

We believe that if the Tier 1 exceptional talent route is an automatic route to settlement it will be more attractive thereby bringing more exceptionally talented migrants to the UK, which would be consistent with the purpose of the route. Further, given that the Government wants such people to come here, it would be illogical not to try to retain them and therefore to encourage them to establish a permanent life in the UK. This should

be reflected in the route being an automatic route to settlement.

### Quote from an organisation in the arts and entertainment sector

Almost half (47%) of all respondents felt that temporary leave for Tier 1 migrants should not be capped at a maximum of five years. British respondents were slightly more likely to disagree with the proposals (52%) compared with the non-British respondents (49%).

### Written responses

Comments received in relation to the proposal to cap leave under the Tier 1 exceptional talent route tended to highlight the potential reduction of the attractiveness of the route as whole. For example:

Capping temporary leave at a maximum of 5 years and making those who wish to stay longer apply for settlement removes the flexibility and attractiveness of Tier 1 and makes the UK less competitive with other destinations of choice for highly valued migrants worldwide.

### Quote from an organisation engaged in the provision of legal services

## TIER 2 - CAPPING TEMPORARY LEAVE

The consultation asked whether temporary leave under the Tier 2 category should be capped at five years.

Almost two-thirds (64%) of all respondents disagreed with the proposal to cap temporary leave for Tier 2 migrants at five years. In particular respondents who were responding in an official capacity were more likely to respond negatively towards the proposal (71%) compared with the members of the public (66%). Furthermore, the non-British respondents were more inclined to disagree with the proposals compared with the British respondents (70% and 65% respectively).

Twenty-eight percent of all respondents thought that temporary leave should be capped at five years for Tier 2 migrants, of these: two-thirds felt they should be permitted to reapply for another Tier 2 visa after they have left the UK (non-British respondents were much more supportive (74%) than were the British respondents (57%)); and 50% felt there should be a grace period before they could reapply.

### Written responses

It was noted that the comments in favour of the proposal to cap temporary leave under Tier 2 came from members of the public rather than organisations. For example:

When people living in this country do not have jobs why should migrants be allowed to come to work here. And if it is very necessary to have to bring migrant workers, they should leave in 12 months. Further visa extensions should not be granted.

#### Quote from a member of the public

It was noted that comments from those responding in an official capacity tended to disagree with the proposal, and there were particular concerns raised by certain sectors as to the potentially adverse impacts of the proposal itself.

... any proposals that would limit the stay of leading academics and researchers to five years would be counterproductive. If, after any period of time, an international academic is still best placed to continue work that is of benefit to the UK's economy and society, then the immigration system should allow them to do so.

#### Quote from an education sector organisation

The NHS invests heavily in training and supporting ... doctors and to restrict the length of time a visa can be issued for to 5 years will not only lose the return on investment already provided but leave

gaps in duty rotas that will be difficult to fill but will likely turn the NHS into an unattractive destination for training, damaging its international reputation.

#### Quote from a health sector organisation

## TIER 2 - SETTLEMENT

The consultation asked whether the Tier 2 route should become wholly temporary in nature with no option of applying for settlement. It also asked whether, if this change were to be made, there were some routes which should nevertheless retain a right to settlement. The consultation asked what criteria Government might use to select those who should be allowed to go on to apply for settlement and when that decision should be taken.

A clear majority of all respondents (73%) disagreed with the proposal that Tier 2 General become a wholly temporary route with no avenue to settlement. In particular those responding in an official capacity were more likely to disagree with the proposal (78%) compared with the 'members of the public' group (74%). In terms of the members of the public, the non-British respondents were more inclined to disagree with the proposal (79%) compared with the British respondents (73%).

### Written responses

It was noted that the written comments were similarly negative towards this proposal. Those responding in an official capacity highlighted that removing the option of settlement might act as a disincentive to skilled migrants to come to the UK in the first place, thus damaging the attractiveness and competitiveness of the UK as a whole. For example:

Tiers 1 & 2 are advantageous to the UK, therefore settlement control should protect these routes – retaining a route to settlement is vital.  
... members are not opposed to the introduction



of a new mechanism to test settlement applications, but believe removing the right to settlement completely would have a strongly negative effect on the attractiveness of the UK to key foreign staff.

... it is notable that the UK would be isolated internationally if rights to settlement were removed.

**Quote from a membership organisation**

Concern was also expressed that the proposal would inhibit migrants from integrating whilst here. For example:

The 'guest worker' system has not worked satisfactorily in other countries, for example Germany. Without the option of settlement, migrants may be discouraged from integrating into mainstream society, with the risk of segregated communities developing.

**Quote from a membership organisation**

Only 20% of all respondents thought that the Tier 2 General route should become a wholly temporary route. Of these respondents the majority disagreed that Sportspeople or Ministers of Religion should continue to have a route to settlement (60% and 71% respectively). Just over half (52%) of all respondents agreed that those earning over £150,000 should continue to have a route to settlement, but 42% disagreed.

**Written responses**

It was noted that some comments were in support of making Tier 2 wholly temporary. However, these supportive comments were in the minority compared with the number of comments received overall reflecting the high level of disagreement with this proposal.

This is a vital part of the policies to reduce net migration and prevent our population rising dramatically. As employers are able to recruit from

the UK and from the whole of the EU without restriction we believe that all work migration from outside the EU should, in principle, be of a temporary nature. If, however, the government decides to allow a route for some temporary workers to switch into a settlement category, this should be only for a select few who meet the highest criteria.

**Quote from a membership organisation**

Comments which did not support capping leave under Tier 2 at 5 years focussed on the need to allow for extensions of further temporary leave. For example:

We do not want firms to be in the position where a skilled migrant has worked for them for five years, is denied settlement and is required to leave the UK whilst they are still in employment.

We cannot risk such business being moved abroad, possibly following the key individual denied settlement and then removed from the UK.

We believe there should be an exemption in the law which states that if an individual is denied settlement but still works for their sponsor that they should be given leave to remain whilst this is the case.

**Quote from a membership organisation**

It was noted that there were both positive and negative comments received in response to the proposal to exempt some of the groups highlighted in the consultation. For example:

We do not agree that only migrants earning over £150,000 should be exempt. This means that many industry sectors, which do not typically pay high salaries, will be disadvantaged and in our view there is no justification for certain highly paid sectors to be treated in preference to others.

**Quote from an organisation engaged in the provision of legal services**

Although we do support those earning over £150,000 continuing to have a direct route to settlement, that does not suggest that we do not support those earning less from having the same option. Indeed many indispensable employees are paid less than £150,000 and some businesses, organisations and occupational fields rarely, if ever, pay annual salaries at that level. Therefore, salary alone is simply not a reliable measure of skills.

#### **Quote from an organisation engaged in the provision of legal services**

An academic or a researcher can contribute significantly over a long period of time, up to and beyond the outgoing default retirement age; sportspeople have a significantly shorter active life. It is also unfortunate that the skills of sportspeople are prioritised over scientists and researchers in previous iterations of the PBS [Points Based System].

#### **Quote from an education sector organisation**

The UKBA has recognised that MOR [Ministers of Religion] are no threat to the labour market. The Church relies on international migration to accomplish its mission and an automatic right to settlement is beneficial not only to the church but to the wider society.

#### **Quote from a faith community organisation**

Eighteen percent of the online respondents thought there was another group who should continue to have a right to apply for settlement. 324 suggestions were made, with some respondents making more than one suggestion. Nearly half of these suggestions (146, 45%) identified the groups which had been proposed in the consultation. Other comments received did not directly address the question posed and have not been recorded separately here. Of the remaining 178 suggestions, the following groups, which respondents felt should be exempt from any changes, were identified.

- Migrants whose income fell within the following income brackets: between £40,000-75,000 (six

responses); £75,000-100,000 (four responses) or over £100,000 (one response). Two respondents referred to 'income' without specifying any level.

- Migrants who work as medical practitioners (27 responses).
- Migrants who work in the scientific field or in research (24 responses).
- Migrants who make an economic or social contribution including creating jobs (13 responses).
- Migrants who work in education (ten responses).
- Migrants who work in academic research (nine responses).
- Migrants who work in the IT sector (six responses).
- Migrants who work in engineering (four responses).
- Migrants who do not claim benefits (two responses).
- Migrants of exceptional talent (one response).
- Forty-four respondents (25%) referred to 'occupations and skills' without being more specific.
- Fourteen respondents (8%) suggested that all Tier 2 migrants should be exempt. However a similar number said no-one should be exempt (11 respondents).

#### **Written responses**

Additional comments were received. The following give a flavour of the types of migrants who, respondents felt, should have an automatic route to settlement.

Researchers, scientists and higher education professionals should have a direct route to settlement considering the considerable importance they have for the UK science base, innovation, the

economy, and the UK academic climate. The UK needs to be able to recruit from a global talent-pool and this is especially important in shortage disciplines.

**Quote from an education sector organisation**

... migrants undertaking PhD level jobs should also retain an automatic route to settlement.

**Quote from an education sector organisation**

Overseas doctors who apply to the training grades should have a visa connected to the length of the training programme but not necessarily have a direct route to settlement unless there is a workforce need. Where evidence shows that there are shortages in that particular specialty at a higher level after completion of training then settlement should be considered.

**Quote from a health sector organisation**

Exceptionally talented students  
Doctors, nurses, teachers

**Quote from an anonymous response to the on-line survey**

Almost two-thirds (65%) of all respondents disagreed with the proposal that there should be an annual limit on the number of Tier 2 migrants progressing to settlement. In particular those responding in an official capacity were more inclined to disagree with the proposal (72%) compared with those responding as a member of the public (66%). The non-British respondents were slightly more likely to disagree with the proposals (69%) compared with the British respondents (65%).

Just over a quarter of all respondents (27%) agreed that there should be an annual limit on the number of Tier 2 migrants progressing to settlement. Of these, 62% thought 40% or below should be allowed to progress to settlement (including 37% who felt that this proportion should be only 10%). The British respondents were more likely than the non-British

respondents to suggest a smaller proportion (under 40%) of Tier 2 migrants should be allowed to progress to settlement (71% and 54% respectively). Forty-nine percent of the British respondents thought only ten percent of Tier 2 migrants should be allowed to progress to settlement.

**Written responses**

It was noted that comments on the proposal to introduce a limit, tended to view this as an arbitrary mechanism for selecting migrants who should be able to apply for settlement. For example:

A cap imposes an arbitrary limit. A cap at the settlement stage would mean that whether a person can settle depends on how many other persons happen to be settling during the same period, regardless of the individual merits of the application, the importance of the person to the organisation within which they work, or of other factors that make their long-term stay in the UK desirable.

**Quote from an organisation engaged in the provision of legal services**

The risk of imposing an arbitrary limit is that talented people who are making a significant contribution to the UK might be turned away in order to meet this limit without due consideration of the benefits that the UK will miss out on in the process.

**Quote from an organisation engaged in research and development**

However, it was noted that there was recognition that a cap or limit could be operated. For example:

Members are not opposed to limiting the total number of migrant workers that can progress to settlement as long as an avenue remains for skilled workers to extend their leave and fulfil their permanent employment contract. In determining a

'limit' the UKBA should take into consideration the actual length of stay in the UK of those obtaining settlement and also emigration statistics from companies and industry sectors.

#### **Quote from a membership organisation**

Nearly all respondents (94%) felt that setting objective criteria should be used to determine which migrants can apply for settlement. When asked what criteria should be used, the majority of all responders thought academic qualifications to be the most important (73%), followed by professional/vocational qualifications (63%), salary, or a combination of salary and age (59%) and shortage occupation (41%). All the subgroups were in agreement on the order of importance of the criteria.

Respondents could provide additional suggestions as to what objective criteria should be used. 1,288 suggestions were made, with some respondents making more than one suggestion. Nearly half of these suggestions (632, 49%) identified the criteria proposed in the consultation. Other comments did not directly answer the question posed and are not therefore recorded separately here. Of the remaining 656 suggestions, the following themes were identified.

- Having spent a continuous period of time in the UK (196 responses, 30%).
- Migrants demonstrating that s/he had made some kind of social contribution and/or had integrated (183 responses, 28%).
- Being free of criminal convictions and or having good conduct and character (123 responses, 19%).
- English language ability (74 responses, 11%).
- Being solvent or having not claimed public funds (48 responses, 7%).
- Having family ties in the UK (32 responses, 5%).

It should be noted that many of these requirements are already tested at the settlement stage.

#### **Written responses**

It was noted that there was similarly clear support expressed amongst the written responses for adopting a system which used objective criteria to select those who should be allowed to go on to apply for settlement; it was felt this would be both fairer to migrants and provide more certainty for employers. For example:

A random allocation process would create unnecessary uncertainty and anxiety for migrants, and would offer no guarantee that the individuals most likely to contribute to the UK's economic interests would be prioritised.

#### **Quote from an organisation engaged in research and development**

A number of comments were provided on the consultation suggestions as to what any objective criteria might include:

Age is also not necessarily an appropriate indicator. Whilst it may be appropriate to assume that younger applicants at the beginning of their working lives may have more years to contribute to the UK economy, the intended benefits of removing the default retirement age in the UK indicates the view that age should not dictate usefulness to industry. Therefore individuals in their 30's, 40's and beyond are still able to contribute significantly to the UK.

#### **Quote from an education sector organisation**

... the earning capacity criterion cited elsewhere, which benefits individuals earning over £150,000, already disproportionately favours certain sectors and industries with highly paid workforce; penalizes economically active, enterprising and law-abiding migrants even if their earnings are only a little

below the threshold; and completely disregards their other contributions to the British economy and social life, which cannot always be expressed in monetary terms.

**Quote from an organisation engaged in the provision of voluntary, community or charitable services**

Criteria set by competent professional bodies. This is appropriate for Tier 1 'exceptional talent' migrants, and in principal is also suitable for Tier 2 migrants. However, in practice this might be extremely difficult and should take into consideration the administrative burden on professional bodies should a system similar to Tier 1 be planned.

**Quote from an education sector organisation**

The criteria as it remains now. If the criteria is set unrealistically high then it is absolutely pointless.

**Quote from an anonymous response to the on-line survey**

Over half of all respondents (54%) felt that a decision on who is eligible for settlement should be made after Tier 2 migrants have been in the UK for three years (option 1). Thirty-two percent thought the decision should be made on entry in selected cases, but after three years in the UK for the majority (option 2).

## **TIER 2 – A STRONGER ROLE FOR EMPLOYERS**

The consultation asked whether employers should continue to sponsor a Tier 2 migrant seeking to stay in the UK permanently, when this sponsorship should occur and whether the employer should contribute towards the costs of the settlement application fee. It also asked if migrants should continue to be able to switch employers.

Approximately half of all respondents (51%) disagreed with the proposal that employers should be required to sponsor a Tier 2 General migrant seeking to stay in the UK permanently. The views between those responding in an official capacity and the members of the public

were polarised, with the former more supportive of the proposal (50%) compared with the members of the public (39%). Non-British respondents were more likely to disagree with the proposal (56%) compared with the British respondents (52%).

### **Written responses**

It was noted that comments reflecting the feelings of disagreement with the proposal, highlighted the fact that it would heighten the employer's control over the migrant and may place some migrant workers at risk of exploitation. For example:

Such a shift in control is likely to have implications for the ability of migrant workers to claim and enforce their legal/labour rights against their employers with a view to lifting themselves out of situations of exploitation.

**Quote from an organisation engaged in the provision of voluntary, community or charitable services**

It was also noted that other comments focussed on the existing responsibilities for employers in this regard, and that these were already sufficient and/or considered to be demanding. For example:

We do not want to see a position where:

- further administrative, financial and regulatory burdens are placed on employers over and above that with which they already have to contend under the PBS system.

**Quote from an organisation engaged in the provision of legal services**

Of the 41% of all respondents who agreed that employers should be required to sponsor a Tier 2 General migrant, 42% thought sponsorship should be required at the three year point. Those responding in an official capacity were more likely to say the sponsorship should be required at the three year point (47%) compared with the 'members of the public' group (41%).



## Written responses

It was noted that comments in favour of this proposal suggested that an employer should be willing to sponsor their worker for settlement. For example:

Members that supported this were of the viewpoint that if a company would like an individual to remain in the UK and in its employment, it follows that there should be a level of sponsorship and a financial commitment to ensure that outcome.

### Quote from a membership organisation

Approximately half of all respondents (51%) disagreed with the proposal that the employer should be expected to pay to sponsor their Tier 2 General employee's transfer to a permanent visa. This view was consistent across the sub groups. A clear majority (81%) agreed that Tier 2 migrants should be able to switch employer. The 'members of the public' group were particularly supportive of this proposal (82%) compared with the 'official capacity' group (75%). The non-British respondents were more supportive (88%) than the British respondents (79%).

## Written responses

It was noted that those who were less supportive of the proposal that employers should pay or contribute towards their migrant worker's settlement application, mainly focussed on the fact that the migrant worker may choose not to remain with that employer once he had acquired settlement, therefore the benefits for the employer would be lost. For example:

Employers would, however, be unwilling to pay for their employees to transfer to permanent visas where there will be significant risks to employers that employees could then leave their employment to join another company.

### Quote from an organisation engaged in the provision of legal services

However, it was noted that comments which supported this proposal identified a role for the employer in the settlement application process. For example:

Yes, employers should be required to pay to sponsor their Tier 2 (General) employee's transfer to a permanent visa. An employer should be required to express their commitment to the employee through payment for a permanent visa.

### Quote from a private sector organisation

## TIER 2 - ENGLISH LANGUAGE REQUIREMENTS

The consultation proposed the introduction of a language test for the dependants of migrants who switch from a temporary route to a permanent route which can lead to settlement.

Just over half of all respondents (56%) felt that adult dependants of Tier 2 migrants, who switch from a temporary to a permanent route, should be subjected to an English language test. The British respondents were more inclined to support the proposals (60%) compared with the non-British respondents (57%). Of those who supported the proposal, an intermediate level of English language requirement was considered the most appropriate by 61%. The non-British respondents were more likely to suggest a basic level was more appropriate compared with the British respondents (40% and 35% respectively), although the majority of both sub-groups supported an intermediate level. The respondents felt the most important skill to test was speaking in English (96%), followed by listening (87%), reading (77%) and writing (64%).

## Written responses

It was noted that those comments which were in support of this proposal tended to highlight the integration benefits that this could bring; but that the requirements of any such test should be made clear from the point of entry. For example:

... it would not be unreasonable, for someone wishing to remain in the UK indefinitely, to have sufficient knowledge of the English language. It would ensure that they can engage in UK society generally, allow for greater integration and provide greater employment prospects.

**Quote from an organisation engaged in the provision of legal services**

Providing the route requirements are clear from the outset, we can see no issue with dependants who have been in the UK for at least 3 years from undertaking an English Language test.

**Quote from an organisation engaged in the provision of legal services**

In contrast, it was noted that comments which were not supportive of this proposal suggested it was unfair to link the success of the main worker's application for settlement to the success of his or her dependant passing a language test. A small number of comments focussed on the lack of available language courses.

In principle, members, support dependants of Tier 2 migrants who are seeking to settle in the UK, being subject to some form of English language assessment. However, the language competence of dependants should not be used as the basis for rejecting a migrant's application to switch into a permanent route.

**Quote from an education sector organisation**

Increasing the English language skills of dependants of Tier 2 migrants would encourage integration in local communities. However, it is generally accepted that the availability of ESOL classes does not meet demand.

**Quote from a membership organisation**

# A review of Tier 5 of the Points Based System

The consultation proposed various reforms to the Tier 5 route including: whether the period of leave under the route should be limited to a maximum of 12 months; limiting the ability of dependants to join or accompany their Tier 5 migrant, or continuing to allow dependants to enter the UK but not to work once here. It was also proposed that the skill level in the Tier 5 Government Authorised Exchange route should be increased to N/SVQ level 4 or above.

## TIER 5 TEMPORARY WORKERS - PERIOD OF LEAVE

Just under half of all respondents (49%) agreed with the proposal that those who enter on the temporary worker route be restricted to a maximum of 12 months leave. Whilst over half (52%) of those responding in an official capacity were supportive of the proposal, over a third (35%) responded more negatively compared with the 'member of the public' respondents (28%). The British respondents were more likely to support the proposals (55%) than were the non-British respondents (47%).

Twenty-nine percent of all respondents disagreed with the proposal to limit leave under this category to 12 months. 1,818 comments were received in relation to this proposal, with some migrants making multiple comments. 254 comments (14%) did not answer the question posed and these comments are not therefore recorded separately here. Of the remaining 1,564 suggestions, the following themes were identified as to why respondents disagreed with the proposal.

- It was unfair to those migrants who may have an expectation that they could remain longer (164 responses, 10%).
- There was little benefit from making this change (136 responses, 9%).
- It could have a negative impact in cultural terms for the UK (14 responses, 1%).
- Migrants who enter under this route are self-sufficient and/or have not accessed benefits so they do not represent a burden to the public purse (14 responses, 1%).
- It may result in the exploitation of workers by some employers (13 responses, 1%).

### Written responses

Comments received in relation to this proposal highlighted the divergence between the various sub-categories and their value to the UK. For example:

A uniform restriction of 12 months does not reflect the diversity of migrant working experiences covered by this tier.

#### **Quote from an anonymous response to the on-line survey**

Tier 5 is of huge economic benefit to the UK as GATs, and equivalent agreements, are vital to the UK's trade ambitions globally. ... As the positions are intended for knowledge sharing and to strengthen the links between the UK and the foreign partner involved these migrants are not denying opportunities to the resident workforce, in fact they provide access to markets which would otherwise be out of the reach of UK businesses.

#### **Quote from a membership organisation**

It was noted that other additional comments submitted on this proposal highlighted the impact it could have on specific schemes within Tier 5. For example:



The Newton Fellowships is a government funded programme which ... aims to establish links between the best early career researchers and the UK research base to ensure that the UK maintains strong collaborative links with the international scientific community....The Newton Fellows currently enter the UK through Tier 5 under the government authorised exchange scheme... If the UKBA reduce the term of the Tier 5 visa to 12 months it will effectively finish this BIS funded initiative.

**Quote from an organisation in the arts and entertainment sector**

... limiting the duration of stay for immigrants under a tier 5 visa will have a detrimental affect on the Medical Training Initiative and our ability to promote and develop global health.

Limiting Tier 5 visas will handicap our ability to facilitate a two way flow of doctors. We would then be at risk of appearing to withdraw from previous commitments set out by the UK for Global Health and meeting the Millennium Development goals.

**Quote from a health sector organisation**

## TIER 5 - DEPENDANTS

Sixty percent of all respondents disagreed with the proposal to remove the ability for Tier 5 Temporary Workers to bring in dependants. Those responding in an official capacity were more inclined to respond negatively to the proposal (64%) compared with those responding as a member of the public (60%). Similarly the non-British respondents were more negative towards the proposal (63%) compared with the British respondents (59%).

If Tier 5 Temporary Workers were allowed to continue to bring in their dependants, over half of all respondents (57%) felt the dependants should still have a right to work. 'Members of the public' respondents felt more strongly than those responding in an official capacity that dependants' right to work should not be removed (58% and 51% respectively). Non-British respondents were also more inclined to

disagree with the proposal (62%) compared with the British respondents (56%).

### Written responses

It was noted that additional comments received in relation to these proposals also reflected the overall negative response to the consultation questions. For example:

We see no reason to prevent the dependants of temporary workers from travelling to the UK. Nor do we see a case for preventing those dependants working. Temporary workers will often be on relatively low salaries and may struggle to provide for their entire family during their stay. Dependants should be allowed to work and help to support their family.

**Quote from a private sector organisation**

We believe that it is a fundamental human right to live with one's dependants (wife and children) and therefore it should be guaranteed.

**Quote from an overseas government department or organisation**

## TIER 5 GOVERNMENT AUTHORISED EXCHANGE (GAE) CATEGORY - SKILL LEVELS

Just over half (52%) of all respondents agreed with the proposal to raise the minimum skill level in the GAE category to graduate level. In particular those responding in an official capacity were more supportive of this proposal compared with the member of the public respondents (57% and 51% respectively). The British respondents were also more supportive compared with the non-British respondents (57% and 50% respectively).

### Written responses

It was noted that comments received which agreed with raising the skills level under the GAE route, pointed out that this would reinforce the temporary nature of this category.

Other comments showed disagreement. For example:

This proposed change would severely and adversely affect our scheme. Participants are either currently university degree level students or apply within 12 months of graduation. This means that they are already educated to N/SVQ Level 3 and are currently studying towards Level 4 equivalent qualification.

**Quote from an education sector organisation**

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# A review of the Overseas Domestic Worker routes

The consultation proposed the closure of the Overseas Domestic Workers (ODW) in private households route, or, if it were to be retained, asked whether leave should be capped at a maximum of six or 12 months. It also proposed removing the unrestricted right of ODWs in private households to change employers. With regard to the ODW route in diplomatic households, the consultation asked whether leave should be capped at 12 months. And, for both routes the consultation asked whether settlement rights should be removed.

## OVERSEAS DOMESTIC WORKERS IN PRIVATE HOUSEHOLDS

Over half (55%) of all respondents disagreed with the proposal to close the route for ODWs to work in private households. Members of the public were more likely to disagree with the proposals compared with those responding in an official capacity (57% and 43% respectively). Whilst over half of British and non-British respondents disagreed with the proposal, over a third (37%) of the British respondents compared with over a quarter (26%) of non-British respondents supported the proposal.

### Written responses

It was noted that the majority of comments received reflected the views of only those who did not support the consultation proposals. A variety of concerns were noted, for example:

The closure of the route for domestic workers in private households will increase the exploitation and abuse of migrant domestic workers by:

- Removing a system that works well to protect domestic workers
- Removing a system that has been hailed as best practice in preventing trafficking

- Increasing trafficking and preventing migrant domestic workers enforcing their rights.

**Quote from an organisation engaged in the provision of voluntary, community or charitable services**

One comment received, however, did support the proposal to close the route.

The right of foreign nationals, diplomatic or otherwise, to bring domestic servants should be removed. The incidence of abuse is too high and there are sufficient UK nationals with the skills needed to take up the jobs required. The crossover with trafficking is a serious concern and, in of itself, means this route should be closed down.

**Quote from an organisation engaged in the provision of voluntary, community or charitable services**

Forty-three percent of all respondents thought leave for ODWs should not be capped, whilst 40% thought it should. Those responding in an official capacity were more supportive of the proposals compared with the 'members of the public' respondents (45% and 40% respectively). Almost half (48%) of British respondents favoured the proposal compared with 38% of the non-British respondents.

### Written responses

It was noted that even though the response rates were fairly well matched for and against the proposal, the only comments received were submitted by those respondents who did not support the proposal. For example:

A visa cap would play into the hands of unscrupulous employers who would not want to replace their nanny or carer after six or 12 months. Instead they would encourage workers to overstay with the associated vulnerabilities of undocumented working. It is vital that migrant

domestic workers have the right to change employer, without it unscrupulous employers can use the UK immigration authorities as an additional threat to coerce and control a worker.

**Quote from a membership organisation**

Forty-three percent of all respondents disagreed with the proposal that given the existence of the National Referral Mechanism, the unrestricted right of ODWs in private households to change employer be removed. Once again respondents in an official capacity were more supportive of the proposal (43%) compared with the members of the public responders (35%). British respondents were more supportive of the proposal (41%) than were the non-British respondents (34%).

**Written responses**

Once again, it was noted that the only comments received in relation to this proposal were from those respondents who did not support it. For example:

We do not believe that the National Referral Mechanism provides adequate protection for domestic workers in private households, and that the protection that is offered is in no way comparable to that offered by the right to change employer.

**Quote from an organisation engaged in the provision of voluntary, community or charitable services**

Where ... a domestic worker has to pursue legal remedies against her employer, the ability to change employer is vital as bringing an employment tribunal claim would be impossible for a domestic worker who remained in the household of the respondent.

**Quote from an organisation engaged in the provision of voluntary, community or charitable services**

The ability to withdraw their labour is the only bargaining power migrant domestic workers have

in relation to their employers and as such is an important protection against abuse and exploitation in an otherwise unequal relationship.

**Quote from an organisation engaged in the provision of voluntary, community or charitable services**

**PRIVATE SERVANTS IN DIPLOMATIC HOUSEHOLDS**

Views were fairly even between those who agreed with the proposal to cap leave for private servants in diplomatic households and those who did not. Forty-one percent of all respondents were in agreement, whilst 40% disagreed with the proposal. The 'members of the public' respondents were more inclined to disagree with the proposals compared with those responding in an official capacity (41% and 32% respectively). Almost half (49%) of the British respondents supported the proposal compared with 38% of the non-British respondents.

**Written responses**

It was noted that the proposal to limit diplomatic households ODWs' leave to 12 months solicited two comments, both of which focussed on the possibility of linking the ODW's length of leave to that of the diplomat:

Diplomatic postings normally last 2 to 3 years and in some cases longer, and we would expect private servants to be employed for the duration of the posting. Therefore we do not believe it would be appropriate to cap leave at 12 months...

**Quote from an overseas government department or organisation**

... a 12-month cap would be costly, impractical and inefficient. Few diplomats in the UK and around the world have tours-of-duty which are completed in 12 months; most diplomatic tours would be from two to six years, with many senior diplomats serving well beyond that period at post.

**Quote from an overseas government department or organisation**

## OVERSEAS DOMESTIC WORKERS AND SETTLEMENT

Forty-three percent of all respondents disagreed that ODWs should no longer be able to apply for settlement from both ODW routes. However, 39% agreed with the proposal. The responses from those in an official capacity were once again more supportive of the proposal (45%) compared with the responses from the members of the public (38%). There was a significant distinction between the views of the British respondents and the non-British respondents. The former was more supportive (47%) compared with the latter (35% were in agreement).

### Written responses

The only comments received were from those respondents who did not support the proposals. For example:

ODWs have separated from their own families to devote themselves to support families in the UK. It is only right that after a period this sacrifice should be recognised by the right to be joined and to settlement.

**Quote from an organisation engaged in the provision of voluntary, community or charitable services**

The right to settlement ends the dependence of domestic workers on their employers and will further limit the levels of exploitation and abuse of workers.

**Quote from an organisation engaged in the provision of voluntary, community or charitable services**

## OVERSEAS DOMESTIC WORKERS AND THEIR DEPENDANTS

Over a half of all respondents (57%) disagreed with the proposal to remove the right for ODWs to bring

in their dependants. Both those responding in an official capacity and members of the public were of a similar opinion, although the members of the public were more inclined to disagree (58%) compared to 53% for the 'official capacity' group. Whilst the same proportions of both British respondents and non-British respondents disagreed with the proposal, just over a third of the British respondents compared with just over a quarter of the non-British respondents supported the proposal (34% and 25% respectively). Just over a half of all respondents (53%) felt that the ODW dependants' right to work should not be removed. In particular the members of the public respondents were more inclined to disagree with this proposal (55%) compared with 42% of the 'official capacity' group. As seen above, similar proportions of both British respondents and non-British respondents disagreed with the proposal, whilst over a third (36%) of the British respondents compared with over a quarter (27%) of the non-British respondents supported the proposal.

### Written responses

It was noted that where comments were received these did not support the proposal to remove the ODWs' right to work. For example:

Allowing the dependants of migrant domestic workers to work should be continued as the measure of economic independence it provides offers an additional safeguard against abuse, allows the family unity of migrant domestic worker to be maintained and contributes to the UK economy. The fact that the family member of a domestic worker has an additional source of income reduces the economic dependency of that worker on their employer and increases the likelihood that the domestic worker would be able to access advice and support if abuse does occur.

**Quote from an organisation engaged in the provision of voluntary, community or charitable services**

# ANNEX A - Summary of consultation proposals

## CLEARLY DEFINE TEMPORARY AND PERMANENT MIGRATION ROUTES

- Categorise all visas as either 'temporary' or 'permanent'. Permanent visas will be those which allow migrants to apply for settlement (indefinite leave to remain) in the UK.

## ALLOWING ONLY THE BRIGHTEST AND BEST WORKERS TO STAY PERMANENTLY

- Consider capping the maximum period of Tier 1 temporary leave at five years and restricting the number of exceptional talent migrants granted settlement.
- Define Tier 2 as temporary and thereby end the assumption that settlement will be available for those who enter on this route.
- Consider whether certain categories of Tier 2 migrant (for example ministers of religion, elite sportspeople, those earning over £150,000) should retain an automatic route to settlement.
- Create a new category into which, after three years in the UK, the most exceptional Tier 2 migrants can switch and go on to apply for settlement.
- Apply robust selection criteria to those Tier 2 migrants who wish to switch and possibly a limit on the total number of migrants allowed to switch.
- Allow those Tier 2 migrants who do not switch into a settlement route to stay for a maximum of five years with the expectation that they and any dependants will leave at the end of their leave.
- Apply these changes to those entering the PBS from April 2011.
- A stronger role for employers.

## ENGLISH LANGUAGE REQUIREMENT FOR DEPENDANTS OF TIER 2 MIGRANTS APPLYING FOR A ROUTE TO SETTLEMENT

- Introduce an English language requirement for adult dependants of Tier 2 migrants applying to switch into a route to settlement.

## TIER 5 TEMPORARY WORKERS

- Consider restricting the maximum period of leave in Tier 5 (Temporary workers) to 12 months.
- Consider removing the ability of Tier 5 (Temporary workers) to sponsor dependants and/or remove the right of their dependants to work.
- Raise the minimum skill level in the Government Authorised Exchange sub-category to graduate level.



## OVERSEAS DOMESTIC WORKERS

- Abolish the route for overseas domestic workers in private households or consider restricting leave to a 6 month period as a visitor only, or 12 months where accompanying a Tier 1 or Tier 2 migrant, with no possibility of extension, no right to change employer, no ability to sponsor dependants or alternatively no right for dependants to work in the UK, and no right to settlement. If the route remains: strengthen the pre-entry requirements to minimise the possibility of abusive or exploitative employer/employee relationships being imported into the UK; and continue to provide access to assessed forms of protection for genuine victims of trafficking.
- Stop granting settlement to domestic workers in diplomatic households, restrict temporary leave to 12 months and remove their ability to sponsor dependants, or alternatively remove the right for dependants to work in the UK.

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# ANNEX B – List of questions asked in the consultation

**Question 1:**

Would creating clear categories of temporary and permanent visas help migrants and the public better understand the immigration system?

**Question 2:**

Should exceptional talent migrants have an automatic route to settlement after 5 years?

**Question 3:**

Should temporary leave for Tier 1 migrants be capped at a maximum of 5 years (those who wish to stay longer will be obliged to apply for settlement)?

**Question 4:**

Should temporary leave for Tier 2 migrants be capped at a maximum of 5 years?

**Question 5:**

If you answered 'yes' to question 4, should a Tier 2 migrant who has completed 5 years in a temporary capacity be permitted to re-apply for a Tier 2 visa after they have left the UK?

**Question 6:**

If you answered 'yes' to question 5, should there be a grace period (say 12 months) before resubmitting a further application for a Tier 2 visa?

**Question 7:**

Should Tier 2 (General) become a wholly temporary route with no avenue to settlement?

**Question 8:**

If you answered 'yes' to question 7, should the following migrants be exempt from the policy and continue to have a direct route to settlement?

- Those earning over £150,000?
- Sportspeople?
- Ministers of religion?
- Other? Please specify

**Question 9:**

Should there be an annual limit on the number of Tier 2 migrants progressing to settlement?



**Question 10:**

If you answered 'yes' to question 9, what proportion of Tier 2 migrants should be allowed to progress towards settlement? Please select 1 answer only:

- 10%;
- 25%;
- 40%;
- 50%;
- 75%;
- 100%.

**Question 11:**

How should we determine which migrants can apply for settlement? By setting objective criteria or by random allocation? Please select 1 answer only:

- By setting objective criteria
- By setting random criteria

**Question 12:**

If you answered 'by setting objective criteria' to question 11, what criteria should we use to identify settlement candidates? Please select all that apply:

- Salary, or a combination of salary and age
- Academic qualifications
- Professional/vocational qualifications
- Pre-determined sectoral or occupational groups
- Working in a recognised shortage occupation at the time of the settlement decision
- Those set by competent professional bodies
- Other – please specify
- No opinion

**Question 13:**

If some Tier 2 migrants are permitted to enter a route that leads to settlement, when should the decision be taken? Please select one answer only:

- After 3 years in the UK for all cases (this is option 1)
- One entry in selected cases, but after 3 years in the UK for the majority (this is option 2)
- No opinion

**Question 14:**

Should employers be required to sponsor a Tier 2 (General) migrant seeking to switch to stay in the UK permanently?

**Question 15:**

If you answered 'yes' to question 14, should sponsorship be required at the 3 year or 5 year point, or both?  
Please select 1 answer only:

- The 3 year point
- The 5 year point
- Both

**Question 16:**

Should the employer be expected to pay to sponsor their Tier 2 (General) employee's transfer to a permanent visa?

**Question 17:**

Should Tier 2 migrants be able to switch employers as they can now?

**Question 18:**

Should adult dependants of Tier 2 migrants, who switch from a temporary to a permanent route, be subject to an English language test?

**Question 19:**

If you answered 'yes' to question 18, what level of language requirement would be appropriate? Please select 1 answer only:

- Basic
- Intermediate
- No opinion

**Question 20:**

If you answered 'yes' to question 18, which of the following should we test?  
Please tick all that apply:

- Speaking
- Listening
- Reading
- Writing
- No opinion

**Question 21:**

Should those who enter on the temporary worker route be restricted to a maximum of 12 months leave to reinforce the temporary nature of the route?

**Question 22:**

If you answered 'no' to question 21 please explain why.

**Question 23:**

Should the ability to bring dependants in the Tier 5 (Temporary worker) category be removed?

**Question 24:**

If we were to continue to allow Tier 5 (Temporary workers) to bring their dependants, should those dependants' right to work be removed?

**Question 25:**

Should the minimum skill level in the government authorised exchange sub-category be raised to graduate level (N/SVQ level 4 or above)?

**Question 26:**

Should the route for domestic workers in private households be closed?

**Question 27:**

If we were to continue to allow domestic workers in private households to enter the UK, should their leave be capped (at a maximum of 6 months, or 12 months if accompanying a skilled worker)?

**Question 28:**

Given the existence of the National Referral Mechanism for identifying victims of trafficking, should the unrestricted right of overseas domestic workers in private households to change employer be removed?

**Question 29:**

Should leave for private servants in diplomatic households be capped at 12 months?

**Question 30:**

Should an avenue to settlement be removed from overseas domestic workers (private servants in diplomatic households and domestic workers in private households)?

**Question 31:**

Should the right for overseas domestic workers (private servants in diplomatic households and domestic workers in private households) to bring their dependants (spouses and children) to the UK be removed?

**Question 32:**

If we were to continue to allow overseas domestic workers to bring their dependants, should those dependants' right to work be removed?

# ANNEX C - List of organisations who responded by email or post to the consultation

1994 Group  
Academy of Medical Royal Colleges (AoMRC)  
Amnesty International UK  
Anti-Trafficking Legal Project (ATLeP)  
Archbishops' Council of the Church of England  
Association of Circus Proprietors of Great Britain  
Association of Commonwealth Universities  
Association of Foreign Banks and the British Banking Association  
Association of Surgeons of Great Britain and Northern Ireland  
Banff and Buchan College  
The Bar Council of England and Wales  
Bates Wells & Braithwaite Solicitors  
Berkeley Law Ltd  
Blackpool and the Fylde College  
The Board of Deputies of British Jews  
British Academy  
British American Business and the British American Business Council  
British Chambers of Commerce  
British Council  
British Hospitality Association  
British Medical Association  
BUNAC (British Universities North America Club)  
Campaign for Science and Engineering (CaSE)  
Cancer Research UK  
Cardiff University  
Catholic Association for Racial Justice  
Catholic Bishops' Conference of England and Wales  
Confederation of British Industry (CBI)  
Centre for Research on Migration, Refugees and Belonging  
The Chartered Financial Analyst Society of the United Kingdom (FCA UK)  
Children and Families Across Borders (CFAB)  
Citizens Advice  
The Childcare Recruitment Company Ltd  
Chinese Embassy in London  
Church Communities UK  
Clyde & Co LLP  
College of Emergency Medicine  
Convention of Scottish Local Authorities (COSLA)  
COPMeD (Conference of Postgraduate Medical Deans of the UK)  
Cross Party Group on Balanced Migration  
CSA Global  
Dance UK\*  
Daughters of the Cross of Liege

Dearson Winyard International  
Deloitte LLP  
Derby Japanese School  
Department for Business Innovation and Skills  
Department of Health  
Deutsche Bank  
Discrimination Law Association  
Laura Devine Solicitors and Laura Devine Attorneys  
Douglass Simon Solicitors  
Early Years – the organisation for young children  
Eaves  
EEF – the Manufacturers Association  
EDF Energy  
Ellel Ministries International  
Embassy of Guatemala  
Embassy of Japan  
Embassy of the Kingdom of Belgium  
Embassy of Mexico  
Embassy of Peru  
Embassy of the Republic of Korea  
Embassy of the Republic of Turkey  
Employment Lawyers Association  
England and Wales Cricket Board  
Engineering Construction Industry Training Board  
English Pen  
The European Entertainment Corporation  
Fragomen LLP  
Freshfields Bruckhaus Deringer  
Fullbright Commission  
The Gambia High Commission  
German Embassy  
Google  
Greater London Authority  
Greater Manchester Children, Young People and Families Network  
GTI Recruiting Solutions  
Guild HE  
Guru Teg Bahadur Gurdwara  
Hammersmith Medicines Research  
Heriot-Watt University  
Heystones Consulting  
Hogan Lovells International LLP  
HSBC  
International Financial Reporting Standards Foundation (IFRSF)

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Immigration Law Practitioners' Association (ILPA)  
The Independent Theatre Council\*  
The Japanese School Ltd  
Japan External Trade Organisation (JETRO)  
The Japan Foundation, London  
Japan International Cooperation Agency (JICA)  
Japan Local Government Centre  
Japan National Tourism Organization  
Japan Oil, Gas and Metals National Corporation (JOGMEC)  
Japan Society for the Promotion of Science (JSPS)  
Jewish Agency for Israel\*\*  
Joint Council for the Welfare of Immigrants (JCWI)  
Joseph Rowntree Foundation  
Justice 4 Domestic Workers  
Kalayaan  
KANLUNGAN  
Keele University  
Kiwi Expat Association (KEA)  
Kingsley Napley LLP  
KPMG LLP  
Law Centre NI  
The Law Society  
London Chamber of Commerce and Industry  
London Deanery  
London First  
London School of Economics  
Magrath Solicitors  
Microsoft  
Migrant Help  
Migrant Rights Centre Bristol  
Migrants' Rights Network  
Migrants' Rights Scotland  
Migration Watch UK  
Migration Yorkshire  
Millennium Circus Productions Ltd  
Mishcon de Reya \*\*  
Morgan Stanley  
National Association of Software and Services Companies (NASSCOM)  
National Board of Catholic Women of England and Wales  
The National Campaign for the Arts\*  
National Grid  
Newcastle University  
Newport City Council

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NHS Employers  
NHS Pharmacy Education and Development Committee  
North East Strategic Migration Partnership  
Northern Ireland Human Rights Commission  
North Kensington Law Centre  
North West Regional Strategic Migration Partnership  
Overseas Nurses and Care Workers Network  
Oxfam UK  
The Producers Alliance for Cinema and Television (PACT)  
Penningtons Solicitors LLP  
Petroleum Geo-Services  
Philippine Embassy  
Population Matters  
Praxis  
PricewaterhouseCoopers Legal LLP  
Queens University  
Recruitment and Employment Confederation (REC)  
Research Councils UK  
Rights' of Women  
Rio Tinto London Ltd  
RLG International Ltd  
ROKPA Trust  
Rolls-Royce plc  
Royal Bank of Scotland  
Royal College of Anaesthetists  
Royal College of General Practitioners  
Royal College of Obstetricians and Gynaecologists  
Royal College of Nursing  
Royal College of Ophthalmologists  
Royal College of Physicians  
Royal College of Physicians of Edinburgh  
Royal College of Physicians and Surgeons of Glasgow  
Royal College of Radiologists  
The Royal Society  
Russell Group of Universities  
The Sainsbury Laboratory  
Scottish Council of Independent Schools  
The Scottish Government  
A. Seelhoff Solicitors  
D. E. Shaw & Co (UK)  
Siemens  
Sikh Council UK  
Sisters Faithful Companions of Jesus

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Society of London Theatre and Theatrical Management Association\*  
Soroptimist International  
Southall Black Sisters  
South Tyrone Empowerment Programme (STEP)  
Speechly Bircham Solicitors  
Sport and Recreation Alliance  
St George's, University of London  
The Theatrical Management Association \*  
Trust for London  
Maurice Turnor Gardner LLP  
Trades Union Congress (TUC)  
United Jewish Israel Appeal\*\*  
UNITE the union  
Universities Scotland  
Universities UK  
University College London  
University of Abertay, Dundee  
University of Exeter  
University of Glasgow  
University of Lincoln  
University of Oxford  
University of Sussex (Joint response submitted by The Institute of Developmental Studies and The International Institute for Environment and Development)  
University of Warwick  
Vira International  
VSO UK  
Watson Farley and Williams LLP  
Wellcome Trust  
Welsh Government  
Yokowo Europe Ltd  
Young Legal Aid Lawyers  
Zionist Youth Group\*\*  
Zippos Circus

\* The Society of London Theatre's response included those of Dance UK, The Independent Theatre Council, The National Campaign for the Arts and The Theatrical Management Association

\*\* Mishcon de Reya's submission included those of their client Jewish Agency for Israel along with letters of support from United Jewish Israel Agency and Zionist Youth Group





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