

**CONSULTATION BY THE MIGRATION
ADVISORY COMMITTEE ON THE LEVEL OF
AN ANNUAL LIMIT ON ECONOMIC
MIGRATION TO THE UK**



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1. Introduction

1.1 The Coalition for Government paper, published on 20 May 2010, commits the Government to introducing an annual limit on the number of non-EU economic migrants admitted into the UK to live and work. The paper states *“We will introduce an annual limit on the number of non-EU economic migrants admitted into the UK to live and work. We will consider jointly the mechanism for implementing the limit”*.

1.2 On 28 June 2010 the Government published *“Limits on non-EU economic migration: a consultation”*. In this paper it announced that it will consult on how an annual limit for Tiers 1 and 2 of the Points Based System (PBS) for migration from outside the European Economic Area (EEA) will work in practice, and the mechanism through which it should be achieved. At the same time, the Government commissioned the Migration Advisory Committee (MAC) to consult and provide advice on the level at which the first annual limit on migration should be set.

1.3 The Government asked the MAC to take into account the overall policy objective of reducing net migration to the tens of thousands over the lifetime of this Parliament. The MAC was asked to take into account the balance between the economic, social and public service impacts of migration.

1.4 The Government has requested the MAC to report on its recommended limit by the end of September 2010. This paper sets out the issues that the MAC plans to consult on and how we plan to do it. **Sections 4 and 5 contain our consultation questions and details of how written evidence may be submitted. Written consultation responses are required by 7 September 2010.**

1.5 Only Tiers 1 and 2 of the PBS are in scope for this work. Our recommended limit for Tier 1 will apply to the current Tier 1 general route only, including dependants. It will apply to inflows into and from within Tier 1 from both within and outside the UK. It will therefore include in-country migrants switching into, and extending under, Tier 1. The Post-Study Work Route (PSWR) is outside the scope of our recommended limit: the Home Secretary has said that the Government will be reviewing other immigration routes and bringing forward further proposals in due course. The investor and entrepreneur routes under Tier 1 are also excluded.

1.6 Our recommended limit for Tier 2 will cover the current Resident Labour Market Test and Shortage Occupation routes. The Government is consulting on whether these routes should be merged. We are also working on the basis that our limit should cover the intra-company transfer route, although we note that the Government is consulting on whether this route should be included in the limit. Dependants of main migrants through these routes will be covered. As with Tier 1, both out-of-country migrants and in-country switchers and extenders are in-scope. Our recommended limit will not apply to the sportspeople and ministers of religion routes.

2. Policy and Data Context

2.1 Limits on migration

2.1 The Government's paper "*Limits on non-EU economic migration: a consultation*" stated that "*it is the Government's aim to reduce levels of net migration back to the levels of the 1990s – tens of thousands, not hundreds of thousands – over the lifetime of this Parliament... We recognise the importance to the UK economy of attracting the brightest and the best from around the world who can make a real difference to the country's economic growth. But we should not be bringing in migrants we do not need, and we should be taking action across government and with the Devolved Administrations to upskill British workers and get them into jobs and sectors which have been too reliant on migrant labour.*" Alongside the publication of the paper it was announced that interim limits would be put in place for Tiers 1 and 2.

2.2 In deciding how the limit should operate, there are a number of factors which the Government will consider, as follows:

- Fairness: The annual limit should operate in a way that is, and is seen to be, fair and rational.
- Predictability: The annual limit should operate in a way that is transparent and allows, as far as possible, migrants and their sponsors to submit applications with a reasonable expectation as to the likely outcome.
- Selectivity: Where the aim of policy is to ensure that the migration system admits those who will bring the most economic benefits but the operation of the annual limit means that the number of those to be admitted is constrained, it may be desirable to design the system to deliver a further degree of selectivity.
- Operability: The means of delivering the implementation of an annual limit must be practical, both for those administering migration controls and for the customers who use the system.

2.2 The Points Based System

2.3 The Points Based System (PBS) for migration to the UK from outside the European Economic Area (EEA) was introduced by the previous Government in 2008. It consists of five tiers:

- Tier 1: highly skilled individuals to contribute to growth and productivity.
- Tier 2: skilled workers with a job offer to fill gaps in the UK labour force.

- Tier 3: limited numbers of low-skilled workers needed to fill specific temporary labour shortages.
- Tier 4: students.
- Tier 5: youth mobility and temporary workers.

2.4 Tiers 1, 2, 4 and 5 are all in operation. Tier 3 is suspended. To qualify to work in the UK under each tier, individuals must earn a given number of points in relation to the requirements for that tier.

2.5 Further information on Tiers 1 and 2 is provided below. The policy is described as it operates at present, or will operate shortly in the future. The Government is currently consulting on aspects of this policy.

Tier 1

2.6 Tiers 1 and 2 of the PBS allow for skilled persons to come to the UK to take up employment. Persons coming under Tier 1 do not require an offer of employment before they come to the UK, whereas those coming under Tier 2 do, and must work for that employer.

2.7 Tier 1 currently has four routes. The general route is for persons who wish to obtain highly skilled employment in the UK. Unlike sponsored skilled workers (who are covered by Tier 2 of the PBS), applicants do not need a job offer to apply under the Tier 1 General route. Applicants are awarded points based on qualifications, previous earnings, UK experience, age, English language skills and available maintenance funds. Our recommended annual limit for Tier 1 will apply to main migrants through the general route only and their dependants.

2.8 There are three other Tier 1 routes, which will not be covered by our recommended limit. The Post-Study Work Route (PSWR) is for non-EEA international graduates who have studied in the UK. The entrepreneur route is for those wishing to invest in the UK by setting up or taking over, and being actively involved in the running of, a business. The investor route is for high net worth individuals making a substantial financial investment in the UK.

2.9 Applicants under Tier 1 need to demonstrate enough points to qualify to enter, or remain in, the UK. Points are earned against three sets of criteria:

- criteria specific to each route (the pass mark was raised from 75 to 80 alongside the introduction of interim limits for Tiers 1 and 2 on 28 June);
- competence in English language (pass mark 10); and
- maintenance (pass mark 10).

2.10 If an applicant does not score the pass mark for each of these three criteria then the application will fail (except under the investor route, where exceptions prevail).

2.11 Even if applicants gain sufficient points, the application may still be refused for other reasons, such as previous migration abuses.

2.12 There are three ways to apply for Tier 1:

- out-of-country in order to come to the UK under one of the Tier 1 routes;
- in-country in order to extend a stay in the UK under one of the Tier 1 routes; and
- in-country in order to switch into or out of one of the Tier 1 routes.

2.13 Under Tier 1 general, the initial leave to remain entitlement is two years, followed by a three year extension subject to evidence that the individual is in highly skilled employment.

Tier 2

2.14 Tier 2 is for skilled migrants only. A successful applicant must be coming to fill a job at National Qualification Framework level 3 (or equivalent) or above and be paid at least the 'appropriate rate' that would be paid to a skilled resident worker doing similar work. They must also meet specified requirements under Tier 2. Points are awarded for different requirements and the overall pass mark is currently set at 70.

2.15 Tier 2 has five routes. Two of these, for sportspeople and ministers of religion, will not be covered by our recommended limit. The other three routes are:

- Shortage occupation: for people coming to the UK to work in a skilled occupation that is deemed to be in shortage and where it is sensible to fill that shortage via migration from outside the EEA. Successful applicants entering by the shortage occupation route gain 50 points which, along with the 20 points from the mandatory requirements, allow applicants to obtain the pass mark of 70 points.
- Resident Labour Market Test (RLMT): the employer (sponsor) needs to show that there is no suitably qualified worker from the UK or EEA available to fill the specific vacancy. Employers are required to advertise the relevant vacancy through Jobcentre Plus and as agreed in a sector code of practice (for example in a trade magazine) for at least four weeks, at a level of earnings deemed reasonable by the UKBA for that job. Thirty points are obtained for applying via this route, with the other 20 points needing to be

obtained through a combination of prospective earnings in the job and qualifications.

- Intra-company transfer: for employees of multinational companies with at least twelve months' company experience being transferred to a skilled job in a UK-based branch of the organisation. Twenty five points are obtained for applying via this route, which need to be supplemented by points for earnings and qualifications.

2.16 Tier 2 also includes switching from the PSWR category of Tier 1. Applicants need to have a sponsoring employer and, if they satisfy certain requirements, can score 30 points for sponsorship based on previous experience with that company, without the requirement for that company to carry out the RLMT.

2.17 The leave entitlement awarded to successful Tier 2 PBS migrants is initially three years followed by a two-year extension if the migrant still meets the requirements.

Other information

2.18 PBS migrants are not generally immediately entitled to access to public funds such as income-related benefits, including income-based Jobseeker's Allowance, housing benefit and council tax benefit. Where migrants have paid National Insurance contributions they will qualify for contributory benefits, including contribution-based Jobseeker's Allowance and Incapacity Benefit (now replaced by contributory Employment Support Allowance). Contributory benefits are not classed as public funds.

2.19 PBS migrants are entitled to bring dependants (specifically children, spouses, civil partners, same-sex partners and unmarried partners) into the UK, providing they can support their dependant(s) without claiming benefits.

2.20 Tiers 1 and 2 are routes to permanent residency and citizenship, with the exception of the PSWR under Tier 1 and the intra-company transfer route within Tier 2 which are for temporary migration only. Once a migrant has lived in the UK continuously for five years, he or she is eligible to apply for permanent residency, recognised through a grant of indefinite leave to remain, which secures the right to stay in the UK without being subject to migration controls. The same entitlements to apply for leave and then residency are available to the dependants of PBS migrants.

2.3 Migration data

2.21 We consider four different types of migration data, first looking at official estimates of Long-Term International Migration (LTIM), then information on reasons for travel to the UK from the International Passenger Survey (IPS), the Labour Force Survey (LFS) and, finally, Home Office administrative data for Tiers 1 and 2 of the PBS.

2.22 Net LTIM to the UK was 163,000 in 2008, the latest full-year finalised data that are available. This consists of an inflow of 590,000 people entering the UK who intend to stay for one year or more, minus the outflow of 427,000 people leaving the UK for one year or more. This may be split by country of citizenship, as shown in Table 1.

Table 1: Long-Term International Migration (LTIM) to and from the UK by country of citizenship, 2008

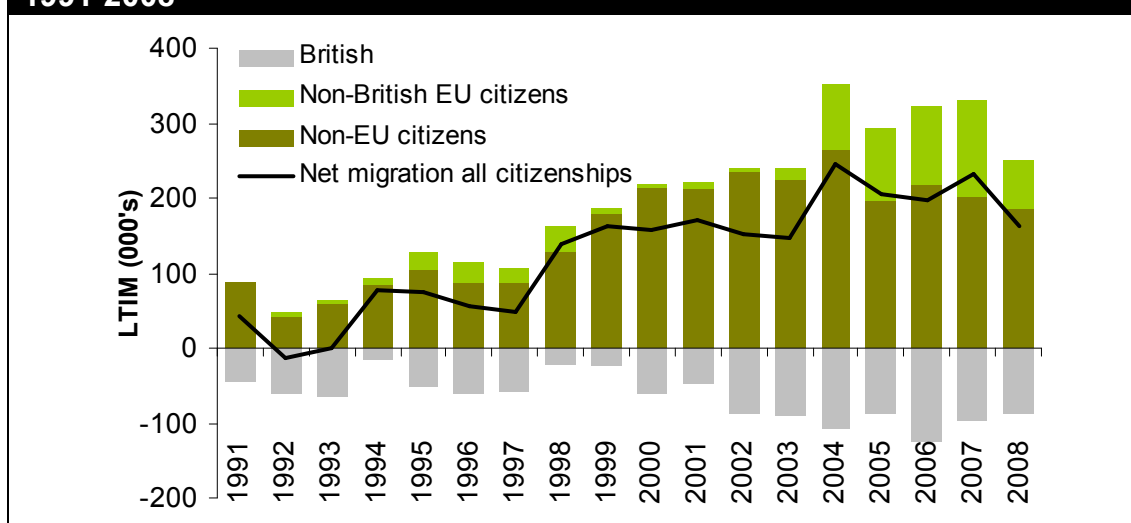
	Flows by country of citizenship (thousands)			
	British	EU	Non-EU	Total
Inflow	85	198	307	590
Outflow	173	134	121	427
Net migration	-87 (net outflow)	63 (net inflow)	187 (net inflow)	163 (net inflow)

Notes: Long-term migrants are defined as those intending to change their place of residence for one year or more. Estimates derive from the International Passenger Survey plus adjustments for migrants and visitors that change their intentions, migration within the Common Travel Area, and asylum.

Source: Estimates of Long-term International Migration.¹

2.23 The net migration figure therefore consists of a net outflow of British citizens, and net inflows of EU and non-EU citizens. Figure 1, shows how these net migration flows have developed over time.

Figure 1: Net Long-Term International Migration (LTIM) by citizenship, 1991-2008



Notes: Long-term migrants are defined as those intending to change their place of residence for one year or more. Estimates derive from the International Passenger Survey plus adjustments for migrants and visitors that change their intentions, migration within the Common Travel Area, and Asylum.

Source: Estimates of Long-term International Migration.²

2.24 According to the LFS, the foreign born working-age population in the UK remained constant between the first quarters of 2009 and 2010 (not

¹ Office for National Statistics (2009a). *Long-Term International Migration (LTIM) tables: 1991 – latest: table 2.01a*. Accessed at: www.statistics.gov.uk/statbase/Product.asp?vlnk=15053

² as above

shown). The apparent lack of growth in the migrant stock over this period may reflect the consequences of the economic recession. The LFS data are not directly comparable with LTIM or IPS data. Migration of British citizens is not reflected in these figures.

2.25 Table 2 provides data on inflows (i.e. not net migration), split by reason for migration. These data are from the International Passenger Survey (IPS) only, and do not include the adjustments that are included in the official LTIM figures. The IPS data suggest that only about a quarter of non-EU inflows in 2008 was for work reasons. A little under a half was for study purposes. Because of the way questions are asked in the survey, it is not possible to split outflows according to the reason why migrants originally came to the UK.

Table 2: Inflows recorded in the International Passenger Survey (IPS) by citizenship and reason for migration, 2008

Reason for migration	IPS inflows by citizenship (thousands)			
	British	EU	Non-EU	Total
Work	41	99	67	207
Study	6	40	126	172
Other reasons	34	40	86	160
Total	82	178	278	538

Notes: Long-term migrants are defined as those intending to change their place of residence for one year or more. 'Other reasons' includes those coming to accompany or join relatives and those giving another or no reason for migration. Figures derive from the International Passenger Survey only and do not include the other components and adjustments used to produce official estimates of Long-term International Migration such as asylum.
Source: International Passenger Survey.³

2.26 Table 3 provides administrative data collected by the Home Office on the number of entry clearance visas issued for employment-related categories and in-country grants of extension to leave to remain and settlement. These relate to non-EEA citizens who require a visa and include temporary migrants (coming for less than 1 year). It is important to note that the administrative data are not directly comparable with the LTIM and IPS data presented above. Notable trends include a fall in the number of out-of-country Tier 2 main applicants in 2009 compared to the previous year, and a rise in the number of dependants over the same period.

³ Office for National Statistics (2009b). *Long-term international migration from International Passenger Survey (IPS) tables: 1991-latest: table 3.08*. Accessed at: www.statistics.gov.uk/statbase/Product.asp?vlnk=15054

Table 3: Entry clearance visas issued and grants of extension to leave to remain to non-European Economic Area (EEA) citizens in employment-related categories, 2007 – 2009

	2007	2008	2009
Out-of-country: Entry clearance visas issued			
Main applicants	78,410	74,630	55,275
...of which Tier 1 and Highly Skilled Migrant Programme	10,055	15,515	18,785
...of which Tier 2, work permits and other employment leading to settlement	68,355	59,115	36,490
Dependants	36,440	30,260	42,005
In-country: Grants of extension to leave to remain			
Employment-related extensions*	91,850	117,965	104,370
Notes: Figures describe only employment-related categories leading to settlement; temporary employment categories are omitted. Figures are rounded to the nearest five. *Dependants are not included in data for in-country extensions. Source: Control of Immigration statistics. ⁴			

2.27 We interpret the Government's aim of bringing net migration down to the tens of thousands over the lifetime of the Parliament to relate to the LTIM data presented in Table 1 and Figure 1. Our recommended limits for Tiers 1 and 2 will relate to the number of visas issued.

⁴ Home Office (2010). *Control of Immigration: Quarterly Statistical Summary, United Kingdom: January – March 2010*. London, Home Office

3. The MAC's approach

3.1 Three themes provide the framework for our consultation questions, and are briefly discussed below. We then outline some of the other potential sources of information available to us to inform our work. Finally, we set out some key issues and limitations that we and our corporate partners will need to take account of as this consultation progresses.

3.1 Framework

3.2 In answering the question the Government has posed, we will need to consider:

- what **criteria** should be taken into account when recommending a limit for Tiers 1 and 2, and how should those criteria be balanced?
- what precise **objective** for net migration, and Points Based System (PBS) migration, would be consistent with the Government's aim to reduce net migration to the tens of thousands over the lifetime of the Parliament?
- what **trajectory**, for Tier 1 and Tier 2 migration over time, is most desirable in order to achieve the objective?

3.3 In terms of **criteria**, the Government has asked that we take into account social and public service impacts as well as economic impacts in making our recommendations. We will, therefore, need: to decide what impacts may sensibly fall under those three broad headings; consider how to measure or estimate them; and consider what economic framework we can use to combine an assessment of these impacts. In practice it can be difficult to distinguish between economic, public service and social impacts. Nonetheless:

- economic impacts include those on GDP per head, productivity growth, accumulation of human capital and inflation. These effects will manifest themselves, in part, through the labour market, so employment, unemployment and earnings are all relevant;
- public service impacts will be on both the supply of public services (through the part that migrants play in the provision of these services and the role their taxes play in funding them) and the demand for them (through migrant use of such services); and
- social impacts include diverse factors such as congestion, crime, the housing market and social cohesion.

3.4 The time, cost and policy implications of accelerating any required up-skilling of UK workers to replace migrants that are no longer permitted to enter the UK is a critical consideration when considering criteria. Also relevant is the feasibility of other alternatives to migrant labour, including potentially paying

higher wages to some workers, and increased mechanisation and use of new technology.

3.5 Regarding the **objective** for overall net migration, we will need to consider what contribution reduced flows through Tiers 1 and 2 of the Points Based System (PBS) can and should make towards attaining it. We need to account for the fact that demand for migrant labour will adjust with the economic cycle. It may be less necessary to recalibrate points under Tiers 1 and 2 in 2011/12, alongside placing limits on those tiers, than in future years.

3.6 A limit on Tiers 1 and 2 can only reduce overall net migration in 2011/12 up to a point, especially if some routes are ruled out from consideration in the first instance. Therefore, we will also need to consider how to achieve net migration in the tens of thousands. We will need to take into account the uncertainty and volatility around factors such as UK and EU migration.

3.7 The **trajectory** for net migration, and for migration through Tiers 1 and 2, may involve smaller reductions to begin with followed by larger reductions later on, or larger falls followed by smaller ones, or reductions of approximately equal magnitude in successive years.

3.2 Data and evidence

3.8 Evidence and data on migration required to support our work will span three broad areas:

- flows;
- characteristics; and
- economic, social and public service impacts.

3.9 Some of these data are readily available and have been used in our previous analyses. Nonetheless, in considering public service and social impacts in particular, we will also need to utilise sources that the MAC has not previously used in its work.

3.10 To understand the impact of potential policy options on migration flows, a number of data sources are available, including:

- the International Passenger Survey (IPS) and official estimates of Long-Term International Migration (LTIM), which provide estimates of inflows and outflows, and are used to calculate net migration;
- Control of Immigration statistics on the number of visas issued and in-country applications granted;
- UKBA management information from the Points Based System, which provides more granular information on the use of different routes within the PBS; and

- the Annual Population Survey, which is a measure of the stock of migrants, and may assist in corroborating any assumptions.

3.11 Information on the characteristics of migrants will help us to assess their economic, public service and social impacts. Sources of such information are large-scale national surveys and administrative data, including:

- the Labour Force Survey;
- the Census;
- UKBA management information, which includes information such as age, dependants, the occupation and salary of Tier 2 migrants; and
- other ad-hoc surveys and research.

3.12 More direct information on economic, public service and social impacts of migration spans a number of academic fields and areas of government. We will draw on existing evidence from the academic and other literature, and supplement this with our own analysis. Data sources that may be of use include, but are not limited to National Insurance Number records, the Citizenship Survey, and other ad-hoc surveys and research. We will also explore, with Government departments and other relevant bodies, how migrants, for example, use public services such as healthcare and education, and how they may impact on the transport network and housing market.

3.3 Issues and limitations

3.13 The task the MAC has been set is achievable, but nonetheless challenging in terms of the scope of the work required within a short space of time and the complexity of the issues that need to be addressed. Some particular issues and limitations are summarised in broad terms below.

3.14 The Government's consultation on the mechanism by which a limit on economic migration will be delivered is running in parallel with ours on the level of the limit. The optimal limit for 2011/12 may be affected by the precise outcome of the Government's consultation. We will consider how best to provide our advice in the context of the simultaneous Government consultation as our work progresses.

3.15 Additionally, if the Government wishes to be able to report that the official measure of net migration is within the "tens of thousands" range by the end of the Parliament, that will need to be demonstrated by reference to figures available at that point. Under current reporting schedules, LTIM data available at the end of the current Parliament in May 2015 will refer to the calendar year 2013. This may have consequences for our consideration of the objectives and trajectories for net migration and annual flows through the PBS.

3.16 The absence of an agreed, established and all-encompassing economic framework for analysing limits on work migration presents a further challenge. There is, for instance, no off-the-shelf method for combining the economic, social and public service impacts of migration into a single framework.

3.17 Lack of data is another issue. For example, we do not know how many migrants leave the UK each year having previously entered via Tiers 1 or 2 of the PBS. This means that estimating the impact of policies on net migration is not straightforward. Data on the impact of migration is partial, particularly in relation to the non-economic impacts in areas such as housing, healthcare and congestion. Our analysis will need to make some strong assumptions in order to overcome some of the data limitations. We will present these assumptions, and discuss their implications, in a clear and transparent manner.

3.4 Consultation process

3.18 Information from corporate partners will also be invaluable in terms of helping us to overcome gaps in the data and evidence. The specific questions which we wish to consult partners on are based around the framework discussed above, and are set out in the following section.

3.19 Copies of this consultation document will be sent directly to our main corporate partners, identified by their previous responses to our consultations and calls for evidence. It is also available on our website, as detailed in section 5. We will contact a wide range of individual and representative organisations from across a wide spectrum including, but not restricted to:

- the UK Commission for Employment and Skills and Sector Skills Councils;
- Government departments;
- Devolved Administrations;
- regional bodies;
- Local Authorities;
- employers and employer bodies;
- trade unions and professional bodies;
- universities, academics and think tanks;
- charities; and
- education, healthcare, housing, law enforcement, social services and transport bodies.

3.20 We are looking into attending events that will enable us to take the views of corporate partners in person. If you or the organisation you represent are running any suitable events during the consultation period at which you would value MAC participation, please contact us at the address in section 5.

4. Consultation questions

4.1 This section outlines our consultation questions. The questions are organised around the analytical framework set out above. Section 5 details how to provide evidence. Respondents are not required to answer all of the questions.

4.2 Please note that we may quote evidence received, attributed to the individual or organisation that supplied it, in our published report unless we are explicitly asked not to do so.

4.1 Criteria

4.3 The Government has asked the MAC to balance the economic, public service and social impacts of migration in recommending suitable limits for Tiers 1 and 2 of the Points Based System (PBS).

Question 1: What factors should the MAC take into account, in order to inform its recommendations for Tiers 1 and 2 in 2011/12, when assessing the impacts of migration on:

- the economy;
- provision and use of public services; and
- wider society.

Question 2: How should the MAC measure or assess these impacts?

Question 3: How should the MAC trade off, prioritise, and balance the economic, public service and social impacts of migration?

Question 4: To what extent and how quickly can alternatives to employing Tier 1 and Tier 2 migrants, including training and up-skilling of UK resident workers, reduce reliance on such migration? What can Government and other bodies do to facilitate this?

4.2 Objective for net migration

4.4 The limits in 2011/12 on Tiers 1 and 2 need to be in accordance with that broad objective of reducing net migration to the tens of thousands over the lifetime of the Parliament. The level of net migration is dependent not only on flows from outside the European Economic Area (EEA) but also flows from within the EEA and the movement of British citizens.

Question 5: What trends do you expect to see over the lifetime of the Parliament in non-PBS migration, including of British and European Economic Area (EEA) citizens? Will limits on non-EEA migration affect this? Please provide reasons.

4.5 The optimal precise objective will also depend on the future design and purpose of Tiers 1 and 2 of the PBS, including treatment of switchers, extenders and dependants.

Question 6: The stock of main (non-dependant) migrant workers under Tiers 1 and 2 is determined by (i) new migration from outside the UK and (ii) extensions and switching between routes by migrants within the UK. If migration is to be reduced, do you most favour achieving this via cuts in (i) or (ii)?

Question 7: To what extent should reductions in flows through Tiers 1 and 2 be met through reduced migration of dependants? Should dependant numbers be reduced by proportionately more than those of main migrants?

4.3 Trajectory

4.6 The limits on Tiers 1 and 2 in 2011/12 will be a staging post in the movement towards net migration in the tens of thousands. The optimal speed of travel towards that objective has direct implications for the right level of the limits in 2011/12. It can be achieved, in part, through reductions in flows through Tiers 1 and 2, or routes within those tiers.

Question 8: What would be the likely impact on your organisation, sector or local area of reducing (from 2010) the number of main migrants through the Tier 1 general route in 2011/12?

Question 9: What would be the impact on your organisation, sector or local area of reducing the number of main migrants through the Tier 2 shortage, Resident Labour Market Test, and intra-company transfer routes?

Question 10: The Government's objective is to lower net migration overall. If you are proposing small or zero reductions in migration through a particular tier or route, through which Tier 1 and 2 routes do you think migration should be reduced instead?

5. How to respond to this consultation

5.1 Responses to this consultation can be sent direct to the MAC at either:

mac@homeoffice.gsi.gov.uk

or

Migration Advisory Committee
1st Floor
Green Park House,
29 Wellesley Road, Croydon
CR0 2AJ

5.2 Respondents are not required to answer all consultation questions. However, all responses should explicitly state which questions are being addressed.

5.3 The closing date for this consultation is 7 September 2010. Please note that, in order to allow us to carefully consider the evidence received, this deadline is 10 days prior to the end of the parallel Government consultation.

5.4 The responses we receive will be drawn upon in our consideration of the level of the limits for Tiers 1 and 2. We will report on this consultation as part of our overall report to the Government in autumn 2010.

5.5 This consultation document can be downloaded from our website at www.ukba.homeoffice.gov.uk/mac.