

This Explanatory Memorandum replaces the previous version, laid before Parliament on 14 October 2025 and withdrawn on 10 November 2025 (Session 2025-26). Copies will be provided free of charge to all known recipients of the previous version.

EXPLANATORY MEMORANDUM TO
THE STATEMENT OF CHANGES IN IMMIGRATION RULES
PRESENTED TO PARLIAMENT ON 14 OCTOBER 2025 (HC 1333)

1. Introduction

- 1.1 This Explanatory Memorandum has been prepared by the Home Office and is laid before Parliament by Command of His Majesty.
- 1.2 This Explanatory Memorandum contains information for the Joint Committee on Statutory Instruments and the Secondary Legislation Scrutiny Committee.

2. Declaration

- 2.1 Mike Tapp MP, Minister for Migration and Citizenship at the Home Office, confirms that this Explanatory Memorandum meets the required standard.
- 2.2 Dr Sam Worby, Head of Simplification and Systems Unit at the Home Office, confirms that this Explanatory Memorandum meets the required standard.

3. Contact

- 3.1. Specific written queries relating to this Statement of Changes should be directed to Robert Hayes-Walters at StateofChanges@homeoffice.gov.uk. Please note that this mailbox is only for parliamentary use in relation to specific technical queries regarding the drafting of this Statement of Changes. It is not a contact point for general enquiries. Queries to this e-mail address from outside Parliament about other immigration issues, including how these changes affect applications, will not receive a response.
- 3.2. More general queries should be directed to the Home Office as per the ‘Contact UKVI’ section on the visas and immigration pages of GOV.UK website.¹
- 3.3. A copy of this Statement of Changes can be found on the visa and immigration pages of the GOV.UK website.²

Part One: Explanation, and context, of the Instrument

4. Overview of the Instrument

What does the legislation do?

¹ Available at <https://www.gov.uk/government/organisations/uk-visas-and-immigration>

² Available at <https://www.gov.uk/government/collections/immigration-rules-statement-of-changes>

4.1 This instrument amends the Immigration Rules, made under the provisions of section 1(4) and section 3(2) of the Immigration Act 1971, that are used to regulate people's entry to, and stay in, the United Kingdom.

4.2 The changes being made relate to:

- Introduction of a visit visa requirement for nationals of Botswana
- Recognition of Palestine: changes to the visa national list
- German school groups travel: easing travel requirements for German school groups visiting the UK
- Change to the validity requirements in Appendix Temporary Permission to Stay for Victims of Human Trafficking or Slavery
- Introduction of dependants for Stateless people (amendments to Appendix Statelessness)
- Changes to English language requirements for economic migration routes
- High Potential Individual - targeted and capped expansion of eligibility
- Change to reduce the duration of stay under the Graduate route to 18 months
- Change to allow students to transition to the Innovator Founder route
- Change to replace Part 9: Grounds for Refusal, with Part Suitability
- Change to align Family and Private Life rules with the common suitability rules for refusal (amendments to Appendix FM, Appendix Private Life, Appendix Adult Dependant Relative and Appendix Settlement Family Life)
- Changes to Appendix Temporary Work – Seasonal Worker concerning the number of months a seasonal worker must be outside the UK before being permitted to apply for a new seasonal work visa
- Changes to the Ukraine Permission Extension Scheme to maintain safeguarding measures.

4.3 This instrument also makes minor changes to other policy areas, detailed in paragraphs 5.41 and 5.61 of section 5 of this Explanatory Memorandum.

Where does the legislation extend to, and apply?

4.4 The extent of this Statement of Changes in Immigration Rules (that is, the jurisdiction(s) which the statement forms part of the law of) is all of the United Kingdom.

4.5 The territorial application of this Statement of Changes in Immigration Rules (that is, where the statement produces a practical effect) is all of the United Kingdom.

5. Policy Context

What is being done and why?

Introduction of a visit visa requirement for nationals of Botswana

- 5.1 The changes will introduce a visit visa requirement for nationals of Botswana, which means that these nationals will need to apply for and obtain a visa prior to visiting the UK.
- 5.2 Linked to this Botswana will be removed from the list of countries whose nationals are eligible to apply for an Electronic Travel Authorisation (ETA).
- 5.3 By applying a visit visa requirement and removing eligibility to enter the UK with an ETA, those travelling to visit the UK can be assessed against the requirements of the Immigration Rules in advance of arrival in the UK. This means that their visit visa application will be refused where it is assessed that they do not meet those requirements or issued where it is concluded that they do.
- 5.4 UK visa requirements are kept under review. There are high numbers of nationals of Botswana who travel to the UK for purposes that are not permitted under the Immigration Rules for visitors. In particular, since 2022 there has been a persistently high number of nationals of Botswana who claim asylum. Between January 2022 and June 2025, 1,332 nationals of Botswana claimed asylum with 642 of these claims made at port. So far in 2025 (January to June), 147 nationals of Botswana have claimed asylum. While the number of people claiming asylum has fluctuated, numbers have remained high throughout this period and all asylum claims place additional resource pressure on the borders and migration system.
- 5.5 In 2023, 62% of asylum claims were made at the UK border. In 2024, 21% of asylum claims were made at port. All asylum claims made at port add significantly to operational pressure at the border, diverting staff from other priorities.
- 5.6 The visa national status of Botswana will be kept under review; particularly with regards to whether the visa introduction affects the number of individuals claiming asylum from within the UK.
- 5.7 The introduction of the visa requirement will include a transition period for nationals of Botswana to travel to the UK without a visa where they hold a confirmed travel booking made prior to the introduction. This period will commence at the same time as the visa requirement is introduced and run until six weeks after the introduction date: 15:00 GMT on 25 November 2025. During this period, nationals of Botswana who hold a confirmed travel booking at the time of the introduction and an ETA, for travel to the UK within the six-week transition period, will not be required to obtain a visit visa before travel. Applications for an ETA for nationals of Botswana will close at 15:00 BST on 14 October 2025. Nationals who hold confirmed bookings for travel to the UK on a date after the transition period ends will need to obtain a visa in advance of travel. Amending the date of travel on a confirmed booking to an earlier date that falls within the transition period would still require the person to have a visa.
- 5.8 This transition period is designed to prevent operational difficulties, general unfairness, and ensure that people who arranged travel before this announcement do

not lose money. The length of the period (six weeks) has been chosen to give those affected enough time to apply for and receive a visa. The current customer service standard processing time for applicants to receive a decision and, if issued, a visitor visa, is three weeks. Further information can be found at <https://www.gov.uk/guidance/visa-processing-times-applications-outside-the-uk>.

- 5.9 The introduction of a visa requirement will be accompanied by amendments to the Immigration (Passenger Transit Visa) Order 2014, to ensure that nationals of Botswana will require a direct airside transit visa (DATV) when conducting airside transit travel (unless they fall within one of the exceptions set out in Article 4 of the Order). Airside transit passengers are those who do not need to change airports and do not need to pass through the UK border when changing to a connecting flight. If these amendments are not made, nationals of Botswana will be able to travel to the UK purporting to have booked onward travel and instead claim asylum, circumventing the visa requirement. It would also continue to enable nationals to transit through the UK with the intention of travelling to another country to claim asylum.

Recognition of Palestine: changes to the visa national list

- 5.10 In September 2025, the UK announced formal recognition of the state of Palestine. To deliver this commitment and ensure that the UK maintains the requirement for these nationals to obtain a visa to visit the UK, Palestine is being added to the Immigration Rules Appendix Visitor: Visa National List.
- 5.11 This change will introduce a visit visa requirement on nationals of Palestine, which means that these nationals will need to apply for and obtain a visa prior to visiting the UK. Whilst the Occupied Palestinian Territory (as formerly known) was not previously included on the Visa National List, its citizens were already subject to a requirement to obtain a visa to visit the UK, either as citizens of the Occupied Palestinian Territory or as stateless individuals in certain cases under existing operational guidance. In respect of the Immigration Rules Appendix Visitor: Visa national list, Palestinian nationals could also previously be considered under section VN 1.1(b) (stateless persons) or VN 1.1(C) (persons travelling on any document other than a national passport).
- 5.12 By amending legislation to include the newly recognised state of Palestine, those travelling to visit the UK can continue be assessed against the requirements of the Immigration Rules in advance of arrival.
- 5.13 This is a necessary change to protect the UK's border and national security and to deliver on the Government's decision to recognise the state of Palestine.
- 5.14 The addition of Palestine to the Immigration Rules Appendix visitor: Visa national list will be accompanied by amendments to the Immigration (Passenger Transit Visa) Order 2014, to ensure that Palestinian nationals continue to require a direct airside transit visa (DATV) when conducting airside transit travel (unless they fall within one of the exceptions set out in Article 4 of the Order). Again, this is not a new requirement but ensures continuity and consistency with changes to the Appendix Visitor: Visa national list. Airside transit passengers are those who do not need to change airports and do not need to pass through the UK border when changing to a connecting flight.

German school groups travel: easing travel requirements for German school groups visiting the UK

- 5.15 Following EU Exit (effective from 1 October 2021), the UK required passports from EU, EEA, and Swiss nationals, as is the case with nationals from the rest of the world. On the same date, the UK ended its acceptance of the List of Travellers scheme, which allowed people studying in an EU Member State to travel within the EU on an organised educational visit without a passport or visa. The requirement to travel on a passport and hold a visa (if a visa national) was viewed by Germany as a significant barrier to German school groups visiting the UK. The changes address this concern.
- 5.16 This change will allow people aged 19 years and under who are studying at a German school or educational institution, the existence of which is confirmed by the relevant German municipal or competent authority, to come to the UK without an advance permission (an ETA or visa) when they are travelling as part of a school party of five or more. It also allows EU, EEA, and Swiss nationals aged 19 and under who are studying at the school to travel on a national identity card rather than passport. This change mirrors the similar arrangement the UK already has with France and was agreed in the context of the UK-Germany Treaty.³

Change to the validity requirements in Appendix Temporary Permission to Stay for Victims of Human Trafficking or Slavery

- 5.17 The change will correct an inconsistency between the validity criteria of Immigration Rules Appendix Temporary Permission to Stay for Victims of Human Trafficking or Slavery and the caseworker guidance, to accurately reflect that there are two types of application under the route; one via application form FLR (HRO), and one made directly to a relevant competent authority.

Introduction of dependants to Appendix Statelessness

- 5.18 These changes are informed by the case of **Asylum Aid v SSHD [2025] EWHC 316 (Admin)**, in which the High Court quashed the Immigration Rules in relation to its application to dependants of stateless persons. Appendix Statelessness was introduced in January 2024 to simplify and replace the previous Part 14: Stateless Persons Immigration Rules, which permitted partners and children of stateless people to apply as a dependant on their sponsor's application. Appendix Statelessness introduced the requirement for all dependants who were not themselves stateless or were overseas to apply to come to or stay in the UK under the family route set out in Appendix FM. In February 2025, the High Court quashed these changes. Since then, any dependant applications have been considered under the previous Part 14: Stateless Persons family member rules. These Autumn changes simplify the rest of Part 14: Stateless Persons.
- 5.19 Changes are being introduced which affect partners and children of a Stateless Person. The changes include:
- A partner or child of a stateless person may apply for entry clearance or permission to stay under Appendix Statelessness from 11 November 2025

³ Available at <https://www.gov.uk/government/news/friendship-and-bilateral-cooperation-treaty-the-17-projects-the-uk-and-germany-will-deliver-together>

where they formed part of the family unit before a stateless person was granted permission to stay. Those applying as a dependant on this route will need to meet the relevant partner or child requirements.

- Where a partner or child of a Stateless Person are not themselves stateless and formed part of the family unit after a stateless person was granted permission, they may apply to come to or stay in the UK under the family provisions in Appendix FM. The existing provision in Appendix FM has been amended to reflect this change. Those applying under Appendix FM will need to pay the application fee, or be granted a fee waiver, as well as meet the relevant partner or child requirements.

5.20 As a result of these changes, a minor consequential change has been made to Appendix FM, Appendix Children and Appendix Relationship with Partner.

Changes to English language requirements for economic migration routes

5.21 As set out in the Immigration White Paper (Restoring Control over the Immigration System), we are introducing new requirements for English language in relation to economic migration routes.

5.22 The English language requirement for the Skilled Worker, High Potential Individual and Scale-up routes is increased from B1 Level to B2 Level (as defined under the Common European Framework for Reference for Languages (CEFR)).

5.23 The new requirements will apply to those seeking an initial grant of leave in a relevant route following the implementation of these provisions on 8 January 2026. Those who have already obtained a permission where they were required to show a B1 level, will continue to be subject to a B1 level requirement where they are seeking an extension on the same route.

High Potential Individual - targeted and capped expansion

5.24 Expansion of the High Potential Individual route, doubling the list of eligible institutions (subject to any exclusions the Secretary of State considers appropriate). This may be, for example, where inclusion of an institution would undermine UK national security or foreign policy. There will also be a cap placed on the route of 8,000 applications per year. This follows a commitment made in the Immigration White Paper, published in May 2025.

Change to reduce the duration of stay under the Graduate route to 18 months

5.25 The Immigration White Paper published on 12 May announced the Government's intention to reduce the duration of stay under the Graduate route to 18 months. The Graduate route currently allows eligible graduates who have successfully completed a UK bachelor's degree, master's degree, or other relevant qualification to remain in the UK for two years, and PhD graduates for three years.

5.26 The change to 18 months will apply to applications submitted on or after 1 January 2027, with PhD graduates continuing to receive three years of leave. The data shows that too many graduates allowed to stay in the UK following the successful completion of their studies are not moving into the graduate level roles which the

Graduate route was created to facilitate access to. It is important that those who stay transition into graduate-level jobs and are properly contributing to the economy.

Students transitioning to the Innovator Founder route

- 5.27 This is a specific change to Student work conditions that will allow Student visa holders to establish a business, where they have completed their course and are switching to the Innovator Founder route. It replaces a similar provision that previously applied to those switching into the Start-up route, which is now closed to new applications.

Change to replace Part 9: Grounds for Refusal, with Part Suitability

- 5.28 Part 9 has been replaced by a new section called Part Suitability, which serves as the central reference point for all suitability-related refusal and cancellation grounds. This change aligns with the terminology already used in simplified immigration routes, where applicants are assessed against “suitability requirements” rather than “grounds for refusal”.
- 5.29 Paragraph 39E, which sets out exceptions for individuals who have overstayed their visa or permission, has been moved into Part Suitability under a dedicated section titled “Exceptions for overstayers”. This ensures that overstaying exceptions are considered within the broader suitability framework and improves consistency across routes.
- 5.30 A number of consequential changes have been made to other parts of the Immigration Rules to reflect the new structure. These include updates to paragraph references, removal of outdated terminology, and alignment of drafting with simplification principles. For example, references to “Part 9” have been replaced with “Part Suitability” in various sections, and the treatment of overstaying has been clarified to reflect the new location of paragraph 39E in Part Suitability.
- 5.31 The definition of ‘permission’ has also been clarified to reflect it means either permission to enter or permission to stay and includes settlement.
- 5.32 These changes are part of a broader simplification initiative in line with the recommendations made by the Law Commission on Simplification of the Immigration Rules in January 2019, to make the rules more accessible and easier to navigate.

Amendments to Appendix FM, Appendix Private Life, Appendix Adult Dependant Relative and Appendix Settlement Family Life to apply Part Suitability.

- 5.33 Family and Private Life rules have, until now, not applied Part 9:Grounds for Refusal, and instead had their own suitability requirements which have resulted in a more generous approach where there are suitability considerations to be made.
- 5.34 This amendment will apply common suitability provisions to the family and Private life routes - deleting the suitability rules that were bespoke to the Family and Private Life rules and applying Part Suitability (which is replacing Part 9: Grounds for Refusal) to Appendix FM, Appendix Private Life, Appendix Adult Dependant Relative and Appendix Settlement Family Life.

Changes to Appendix Temporary Work – Seasonal Worker

- 5.35 Changes are being made to the rules concerning the number of months a seasonal worker must be outside the UK before being permitted to apply for a new seasonal work visa. These changes will permit seasonal workers to spend no more than six months working in the UK during any rolling 10-month period, rather than any rolling 12-month period under the previous rules.

Changes to the Ukraine Permission Extension Scheme

- 5.36 The Ukraine Permission Extension Scheme (UPE) was launched on 4 February 2025. It provides a route for Ukrainians (and their eligible family members), who have already been living in the UK with Ukraine Scheme permission, to make a further application to extend their temporary sanctuary in the UK whilst the conflict in Ukraine remains ongoing.
- 5.37 Since the launch of UPE, children who apply with their parent who is either granted Ukraine Scheme permission at the same time as, or holds Ukraine Scheme permission, will have their period of permission aligned to that parent. Where both parents meet the criteria, the child's permission is aligned with the parent whose permission expires last.
- 5.38 As part of ongoing safeguarding measures, we have identified a need to allow for a child's permission to be aligned to that of their legal guardian. As such, we are updating the UPE eligibility requirements to ensure children can be granted permission in line with their legal guardian. As an additional safeguarding measure, in the eligibility requirements we are specifying that the adult (parent or legal guardian) must be in the UK for a child's permission to be aligned.
- 5.39 We are also amending the residence requirement to allow an application to be refused where a child born in the UK or Islands (Jersey, Guernsey, and the Isle of Man) to a Ukrainian national parent who holds, or is eligible for, Ukraine scheme permission, has been outside the UK or Islands since birth.
- 5.40 Lastly, we are making minor drafting changes to the validity requirements, in addition to the nationality and relationship requirements to clarify the current policy intention as reflected in the rules.

Other Minor Changes

Changes to Appendix Global Talent

- 5.41 The Global Talent category is for talented and promising individuals in the fields of science, digital technology and arts and culture wishing to work in the UK. 'Talent' applicants are already leaders in their respective field, while 'promise' applicants have shown the potential to become leaders in their field.
- 5.42 As agreed with Arts Council England and their sub-endorsing body, Royal Institute of British Architects (RIBA), we are expanding some requirements to allow individuals within the architectural field to provide evidence of their achievements as a named member of a group or contributor, as well for their work as an individual.

Additionally, we are allowing applicants to provide evidence of significantly contributing to being shortlisted or nominated for an international architectural award to qualify. Both of these changes more closely align the criteria for architects with other sections of the arts and culture requirements.

Changes to Appendix Global Talent: Prestigious Prizes

- 5.43 Applicants who hold a qualifying prize can qualify without the need to obtain an endorsement from one of the Global Talent endorsing bodies. Our expert bodies consider the prizes listed demonstrate irrefutable evidence of prize holders being at the pinnacle of their profession. To be eligible, prizes must be given to named individuals, and therefore the list does not include prestigious awards for specific works, such as an award-winning film, or to whole organisations. Prizes included must also be open to all nationalities and winners must be determined by experts or peers, rather than a public vote.
- 5.44 Following consultation with the Global Talent endorsing bodies, a further 27 prizes have been added to the list and one prize has been deleted as it is no longer awarded and there are no living former winners. In addition, a number of small corrections have been made to existing prize names and the order they are listed in the tables.
- 5.45 The list will be kept under review and may be revised in future updates to the Immigration Rules.

Changes to the EU Settlement Scheme (EUSS)

- 5.46 The EUSS in Appendix EU enables EU, other European Economic Area and Swiss citizens living in the UK before the end of the post-EU exit transition period at 11pm on 31 December 2020, and their family members, to obtain the immigration status they need to continue living in the UK.
- 5.47 The changes clarify the drafting of the change made from 16 July 2025 by Statement of Changes HC 836, enabling a holder of pre-settled status under the EUSS to be granted settled status where they have been resident in the UK for at least 30 months in total in the most recent 60-month period. They also bring the grounds for cancelling pre-settled status on or before the holder's arrival in the UK into line with those for curtailing it in-country, so that, where proportionate, this can be based on the fact that the person never met, as well as where they have ceased to meet, the requirements of Appendix EU.

Deletion of obsolete Immigration Rules pertaining to the Tier 1 (Entrepreneur) visa.

- 5.48 This change will delete obsolete Immigration Rules pertaining to the Tier 1 (Entrepreneur) visa. Applications for entry clearance or for leave to remain cannot be made after 6 July 2025. Given that 6 July 2025 has passed, these Rules, which only apply to entry clearance and leave to remain applications, are no longer needed. It remains possible for those already in the route to apply for indefinite leave to remain until 6 July 2027, where they previously held leave as a Tier 1 (Graduate Entrepreneur). Related changes have also been made to delete general requirements for points-based system routes in Part 6A of the Rules.

Changes to Appendix Sports Governing Bodies

- 5.49 These changes reflect the fact that British Kendo Association and Great Britain Wheelchair Rugby have met the requirements to become Home Office Approved Sports Governing Bodies.

Changes to Appendix Government Authorised Exchange schemes

- 5.50 These changes update the names of two visa schemes following requests from the endorsing government departments, the Ministry of Justice and the Department for Business and Trade, of each scheme. These changes also delete the Khebrat Leadership for Change Programme scheme endorsed by the Department for Education as the scheme is no longer in use.

Changes to Appendix Child Student - Safeguarding

- 5.51 A nominated guardian is a carer that looks after a Child Student for less than 28 continuous days and is not a close relative. The definition of nominated guardian in the introduction section of the Immigration Rules requires the length of care to be less than 28 days. This has been amended to clarify that the 28 days must be continuous days. The definition has also been expanded to include guardians that care for Child Students during periods of term-time. These amendments have also been reflected within Appendix Child Student to the Immigration Rules.
- 5.52 A new definition has been added to the introduction section of the Immigration Rules to describe a guardianship organisation, which is now mentioned in Appendix Child Student to the Immigration Rules, as a company that arranges a nominated guardian for a Child Student.
- 5.53 Clarifications are being made to paragraph CS5A.2 and CS5A.3 regarding those living with a nominated guardian. The Child Student's application can be refused if their nominated guardian regularly lives with someone that has a criminal conviction. This has been amended so that this only applies if the person living with the nominated guardian is an adult. This clarifies that the rule does not apply to children.
- 5.54 Certain requirements are applied to ensure children have safe living arrangements. The 'living arrangement requirement' has been amended to clarify the permitted living arrangements on the route, including that as a boarding student you are able to stay with a parent who has permission as a Parent of a Child Student, if the Child Student is over 12 years of age and the parent is caring for their younger sibling who holds permission as a Child Student. The different types of boarding arrangements (flexi, weekly, and full boarding) have now been amalgamated under a single boarding category for simplicity when reading the rules and to formalise a concessionary arrangement permitting flexi and weekly boarders to be in the care of a nominated guardian when they are not staying at school.
- 5.55 A new paragraph has been added to Appendix Child Student to the Immigration Rules to cover the information guardianship organisations need to provide where an applicant does not have the details of their nominated guardian at the point where they apply for permission on the Child Student route. A new paragraph has also been added for this scenario so the named contact from the guardianship organisation must be British or Settled in the UK.

- 5.56 Paragraph CS9.4(g) has been amended to explain details that we require to be listed on the letter of undertaking relating to adults that regularly live with a nominated guardian.

Student Route Maintenance Requirement Annual Uplift

- 5.57 There is a maintenance requirement for student applicants to demonstrate they have funds to support themselves for each month of their course (up to 9 months). This level of funds is aligned with the maintenance loans available for home students, which is reviewed every year. This change increases the maintenance requirement to match the maintenance loans available for home students for the 2025/2026 academic year. We will ensure it continues to align with home students' maintenance loans in future.
- 5.58 We have updated the maximum amount for the accommodation offset in line with the changes to the maintenance requirement. The accommodation offset allows students to demonstrate less maintenance funds if they have paid a deposit for their accommodation in the UK.

Changes to the continuous residence rules

- 5.59 Tier 1 (Entrepreneur) and Tier 1 (Investor) are being added to the list of provisions to which Appendix Continuous Residence applies, as part of changes to Part 6A of the Immigration Rules. The rule concerning the breaking of continuous residence is also being corrected.

Changes to align drafting across the Immigration Rules

- 5.60 Minor changes are being made to align the drafting across the Immigration Rules. These are not policy changes and are minor presentational changes that are intended to provide greater transparency, clarity, and consistency.

Other drafting changes

- 5.61 The Statement of Changes also introduces minor drafting changes to correct incorrect paragraph references and minor errors. It also clarifies and amends technical points relating to occupation tables in the changes laid on 1 July 2025 (HC 997).

6. Legislative and Legal Context

How has the law changed?

- 6.1 The Immigration Rules, as laid before Parliament by the Secretary of State, constitute a statement of practice to be followed in the administration of the Immigration Act 1971 for regulating the entry into, and stay of, persons in the United Kingdom.
- 6.2 This Statement of Changes in Immigration Rules will be incorporated into a consolidated version of the Immigration Rules. This can be found on the GOV.UK website, where all the Statements of Changes in Immigration Rules issued since May 1994 are published.⁴

⁴ <https://www.gov.uk/guidance/immigration-rules>

- 6.3 The changes will be implemented on various dates from 14 October 2025 as detailed in the implementation section of the accompanying Statement of Changes.
- 6.4 For the changes that introduce a visa requirement on Botswana, those changes will come into effect at 1500 BST on 14 October 2025. The changes regarding appendix HPI, will come into effect on 4 November 2025, the changes relating to Students transitioning to the Innovator Founder route come into effect on 25 November 2025 and the changes to English language requirements for economic migration routes will come into effect on 8 January 2026. All other changes will come into effect on 11 November 2025 and are detailed in the implementation section of the Statement of Changes.
- 6.5 Appendix Statelessness changes have been informed by *Asylum Aid v SSHD [2025] EWHC 316 (Admin)*, which quashed previous provisions on dependants as unlawful.

Why was this approach taken to change the law?

- 6.6 This is the only possible approach to make the necessary changes.

7. Consultation

Summary of consultation outcome and methodology

- 7.1 The specific changes in this Statement have not been the subject of a formal public consultation, as this would be disproportionate given the nature of the changes.

8. Applicable Guidance

- 8.1 Guidance relating to these Rules changes will be updated and placed on the GOV.UK website when these changes take effect.
- 8.2 It is our practice to only publish guidance updates when Rules changes take effect to mitigate the high risk of users referring to the wrong version.

Part Two: Impact and the Better Regulation Framework

9. Impact Assessment

- 9.1 A full Impact Assessment for the changes that relates to the various White Paper changes made in this Statement of Changes will be published alongside the Explanatory Memorandum and Statement of Changes on the Gov.uk website.⁵

Change to reduce the duration of stay under the Graduate route to 18 months

- 9.2 The Graduate route changes are expected to have a modest impact on Student visa demand. It is provisionally estimated a long-term reduction of approximately 12,000 Student visa applications per annum. Short-term impacts may also arise following the announcement. Financial implications include reduced visa fee and Immigration Health Surcharge revenue, with provisional estimates of £27m from the Student route and £23m from the Graduate route.

⁵ <https://www.gov.uk/government/collections/immigration-rules-statement-of-changes>

Other changes

- 9.3 Although there is a degree of impact as a result of the changes being made, a full Impact Assessment has not been prepared for the changes listed below because the level and effects of the changes do not meet the threshold for producing an Impact Assessment or Economic Note:

Introduction of a visit visa requirement for nationals of Botswana

- 9.4 The changes are likely to have a meaningful impact on the public sector. High volumes of asylum claims, if left unchecked, can represent significant cost to the public sector, though overall costs for this population would be a small proportion of overall asylum costs.
- 9.5 As a result of a visa introduction on nationals of Botswana, there may be an impact on the number of genuine visitors coming from Botswana to the UK due to the requirement to obtain a visa before travel.
- 9.6 These changes therefore may represent a meaningful indirect impact on business, charities or voluntary bodies. The ONS estimated that in 2023, on average, nationals from Botswana arriving by air spent £983 per visit to the UK.⁶ Any reduction in spending resulting from a reduction in visitors to the UK is likely to represent a cost to business through a reduction in revenue.

German school groups travel: easing travel requirements for German school groups visiting the UK

- 9.7 The impact of the agreement on Border Force is assessed as low. It is possible that Border Force may experience minor fluidity issues due to the intended increase in German school group travel to the UK, but steps will be taken to mitigate this. The impact of the agreement on border security is low due to the robust authentication measures in place and the low-risk cohort involved.

Changes to the Ukraine Permission Extension Scheme

- 9.8 An Impact Assessment was prepared for the Ukraine Permission Extension Scheme more broadly and was published on 26 November 2024, following the laying in Parliament of the Statement of Changes to the Immigration Rules setting out the associated changes.⁷ No further economic impacts, beyond those set out in the already published impact assessment, have been identified as a result of these changes.

All other changes

- 9.9 A full Impact Assessment has not been prepared for the other changes in this instrument because the level and effects of the changes do not meet the threshold for doing so.

⁶ Source:

<https://www.ons.gov.uk/peoplepopulationandcommunity/leisureandtourism/adhocs/2901averagenightsspendandfarebymodeoftravel2023>

⁷ Source: <https://www.gov.uk/government/publications/statement-of-changes-to-the-immigration-rules-hc-334-26-november-2024>

Impact on businesses, charities and voluntary bodies

- 9.10 For all other changes there is no, or no significant, impact on business, charities or voluntary bodies.
- 9.11 For all other changes the legislation does not impact small or micro businesses.
- 9.12 For all other changes there is no, or no significant impact on the public sector.

10. Monitoring and review

What is the approach to monitoring and reviewing this legislation?

- 10.1 The approach to the monitoring of these changes is to review the operation and effect of all the relevant Immigration Rules, including any Rules amended or added to by the changes in this Statement, and lay a report before Parliament within five years of 6 April 2017, and within every five years after that. Following each review, the Secretary of State will decide whether the relevant Immigration Rules should remain unchanged or be revoked or amended. A further Statement of Changes would be needed to revoke or amend the relevant Rules.
- 10.2 A statutory review clause is included in the instrument.

Part Three: Statements and Matters of Particular Interest to Parliament

11. Matters of special interest to Parliament

Introduction of a visit visa requirement for nationals of Botswana

- 11.1 The changes to introduce a visit visa requirement on nationals of Botswana will come into effect at 1500 BST on 14 October 2025, and therefore depart from the usual convention that changes to the Immigration Rules come into force no earlier than 21 days after their being laid in Parliament.
- 11.2 Controlling migration and securing our borders are Home Office priorities. After deciding to introduce a visit or transit visa requirement, it is necessary and reasonable to implement this as quickly as possible. The rationale for breaching the 21-day rule is that prior notification of implementation of a visa requirement could trigger a substantial increase in nationals of Botswana impacted by this change travelling to the UK prior to the visa requirement coming into effect, triggering an unpredictable and unmanageable strain upon the UK's migration and borders system. This action continues to respect our international obligations.
- 11.3 Immediate implementation of a visa requirement is accompanied by a six-week transition period to prevent general unfairness and to mitigate the risk that people who arranged travel to the UK prior to the introduction of the visa requirement suffer a financial loss. Additionally, this period prevents serious operational difficulties. This approach has been successful on previous occasions and the Government is clear that implementing changes in this way is necessary and proportionate to protect the UK immigration system from abuse.

Recognition of Palestine: changes to the visa national list

11.4 Unlike previous changes that introduce a visit visa requirement, for this particular change, it is not necessary to depart from the usual convention that changes to the Immigration Rules come into force no earlier than 21 days after their being laid in Parliament. This is for the reasons set out in section 5 above.

11.5 For all other changes there are no matters of interest.

12. European Convention on Human Rights

12.1 As this Statement of Changes in Immigration Rules is subject to negative resolution procedure and does not amend primary legislation, no statement is required.

13. The relevant European Union Acts

13.1 This instrument is not being made under the European Union (Withdrawal) Act 2018 or the Retained EU Law (Revocation and Reform) Act 2023 (“relevant European Union Acts”). It does, however, relate to the withdrawal of the United Kingdom from the European Union because it supports further implementation of the EUSS.

13.2 For all other changes, this instrument does not relate to withdrawal from the European Union or trigger the statement requirements under the European Union (Withdrawal) Act 2018.

14. Consolidation

14.1 The Government has committed to the consolidation of the Rules as part of its response to the Law Commission recommendations on simplifying the Immigration Rules.

