THE ROYAL SOCIETY

16 July 2018

Independent Chief Inspector of Borders and Immigration call for evidence in to the Home Office approach to charging for services

Summary

- The UK's reputation for excellence attracts people from around the world, and allows it to compete with other scientifically excellent nations for international talent. This international talent plays a key role in enabling the UK to maintain the strength of its research base, putting it in a good position to benefit fully from emerging technologies such as Artificial Intelligence, that have the potential to improve the lives of people in the UK and around the world.

- Choosing where to live and work is a personal decision as well as a professional choice and factors such as cost and perceptions play an important role. The total cost of Home Office charges for immigration services and associated mandatory charges that would be incurred by an academic staff member, with a partner and two dependant children entering the UK on a Tier 2 general visa for 3 years, represents 11% of their average annual salary. Table 2 sets out the impact on other professions key to UK research and innovation. The scale of these costs can negatively influence individuals with highly sought after skills from choosing to come and work in the UK. The costs to employers of recruiting international talent should also be considered.

- To secure the sustained health of UK research and innovation, the UK must ensure that there are the lowest possible barriers to practising scientists seeking to move across borders. The Society recommends the implementation of an immigration system for people with skills relevant to research and innovation that is fair, transparent and efficient. As part of this, the costs of any necessary visas should be commensurate with typical academic salaries and with the length of stay being requested – from a day visit to long term appointments. Current fees are clearly too high and, if these are to be applied to EU citizens in the future, will inhibit recruitment within academia and other sectors dependent on scientific and engineering expertise.

Introduction:

1. The Royal Society welcomes the opportunity to submit evidence to the Independent Chief Inspector of Borders and Immigration's call for evidence in to the Home Office approach to charging for services. The Society is the National Academy of Science for the UK and the Commonwealth. It is a self-governing Fellowship of many of the world's most distinguished scientists working across a broad range of disciplines in academia and industry. The Society draws on the expertise of its Fellows and Foreign Members to provide independent and authoritative scientific advice to UK, European and international decision makers.

2. The Society's fundamental purpose is to recognise, promote, and support excellence in science and to encourage the development and use of science for the benefit of humanity. Following directly from this the Society works to ensure the health of the UK's research and innovation ecosystem, and the ability of the UK to attract and support excellent researchers, wherever they

are from, and support UK-based researchers to move and collaborate internationally is key to this.

3. This submission focuses on the Home Office Charges in respect of its immigration functions and is informed by the experience of researchers seeking to move during the course of their scientific activity. It includes evidence of the costs incurred, including the real cost to individuals and organisations, and an insight into the personal cost relative to individual salaries. It also seeks to provide some insight into the impacts that these costs, and the incentives and disincentives that they create within the system, have on UK research and innovation.

The nature and extent of mobility for research and innovation

4. The following paragraphs seek to illustrate how UK researchers may interact with Home Office immigration services by highlighting the international nature of the UK workforce and how researchers collaborate and move internationally. They also illustrate why such interactions are important to the conduct of science and strength of UK research and innovation.

5. Research and innovation is increasingly global. In 2015 over half of the UK's research output was the result of an international collaboration and these collaborations are increasing – both in absolute terms and as a proportion of the UK's research output[1]. UK-based researchers most frequently partner with scientists from the US, with seven EU countries also among the UK's top ten strongest collaborators. Mobility plays a role in building collaborations; 40% of foreign-born researchers in the UK report continuing research collaborations with researchers in their country of origin[2].

6. The UK's reputation for excellence attracts people from around the world, and allows it to compete with other scientifically excellent nations for international talent. 29% of academic researchers working in the UK are from overseas, of which 12% are from outside the EU and therefore currently use Home Office immigration services[3]. Postgraduate researchers also play an important role in the UK's research and innovation ecosystem. 57% of postgraduate researchers working in the UK are from overseas, of which 37% are from outside the EU[4]. It is difficult to gather clear and comprehensive data on the mobility of researchers working in

[1] The Royal Society (2016) UK research and the European Union: The role of the EU in international research collaboration and researcher mobility (see: https://royalsociety.org/topics-policy/projects/uk-research-and-european-union/role-of-euresearcher-collaboration-and-mobility/)

[2] RAND Europe, 2017, *International mobility of researchers: A review of the literature*

[3] Higher Education Statistics Agency. 2017 Staff numbers and characteristics. See https://www.hesa.ac.uk/data-and-analysis/staff (accessed 14 March 2018). Figures include academic staff with functions in research, in teaching or neither. Numbers are rounded

[4] Higher Education Statistics Agency via Heidi Plus. See https://heidiplus.hesa.ac.uk (accessed 02 March 2018). Postgraduate researchers include students undertaking research masters' and PhDs full-time. Part-time students are not included. Numbers are rounded

industry but anecdotally we know that many companies value the opportunity to recruit staff from UK universities, which themselves offer a highly international pool of researchers.[5]

Case study: Nationality of researchers working in a leading UK scientific institution

The Francis Crick Institute is a biomedical discovery institute in London dedicated to understanding the fundamental biology underlying health and disease. Its work is helping to understand why disease develops and to translate discoveries into new ways to prevent, diagnose and treat illnesses such as cancer, heart disease, stroke, infections, and neurodegenerative diseases. The Crick currently has 65 different nationalities in its 1500 strong workforce. This varies by career stage, with for instance, 81% of postdoctoral researchers at the Institute being non-UK nationals[6].

7. International researchers may interact with Home Office immigration services in a number of ways. Both short-term and temporary movement to the UK, as well as longer term moves for permanent employment, are important to the health of UK research and innovation. For researchers, international mobility takes a range of different forms; international experiences can vary in terms of their duration, purpose, the number and frequency of moves, and when moves occur in a researcher's career. A survey on international mobility, commissioned by the Society from RAND Europe showed that the postdoctoral period is an important time for mobility, with significant increases in the number of researchers having spent time overseas, particularly for longer stays, between the early and mid-career stages.[7] A recent survey of the population of over 600 Italian academics in the UK—the second largest national group—found that 56% were senior researchers or lecturers and 29% were Professors and 48% of respondents had been in the UK for over ten years.[8] Many of these individuals may have dependants who wish to move with them.

8. International talent plays a key role in enabling the UK to maintain the strength of its research base, putting it in a good position to benefit fully from emerging technologies such as Artificial Intelligence and many others. Access to the best international talent ensures that the UK has access to a mix of skills, a wider supply of well-qualified researchers and supports the development of valuable international networks[9]. This makes an important contribution to the ability of UK scientists and entrepreneurs to remain at the forefront of developing new science, new technologies and their applications.

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[5] RAND Europe. 2017 International mobility of researchers: Supplementary report: Perspectives from industry. See https://royalsociety.org/topicspolicy/projects/international-researcher-mobility/international-mobility-researchers-industry/ (accessed 29 March 2018).

[6] The Campaign for Science and Engineering response to Migration Advisory Committee's "EEA Workers in the UK Labour Market" call for evidence. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/698330/Professional_Services.pdf

[7] RAND Europe (2017) International mobility of researchers: a survey of academics in the UK (see: https://royalsociety.org/topics-policy/projects/international-researcher-mobility/international-mobility-researchers-surveyacademics-in-UK/)

[8] Embassy of Italy in the United Kingdom (2017) The Impact of Brexit on the Italian Academic Community in the United Kingdom (accessed 4 September 2017, see: http://www.amblondra.esteri.it/Ambasciata_Londra/resource/doc/2017/06/the_impact_of_brexit_on_the_italian_scientific_community_in_the_united_kingdom_final.pdf

[9] RAND Europe, 2017, *International mobility of researchers: A review of the literature*

9. However it is important to recognise that the UK is competing with other scientifically excellent nations to attract this valuable international talent. Therefore it is important for the health of UK research and innovation to consider the impact that Home Office charges for immigration services, and any perceptions that they may have about these processes, may have on their decisions.

The impact of Home Office charges for immigration services on researchers

10. Visa fees are themselves a substantial expense for scientists and researchers wishing to move to the UK to work. However to better understand the impact that these have on individual's decisions to do so, it is also important to view them in context alongside the package of related fees and costs that fall on visa applicants to work in the UK, such as the NHS Surcharge and language tests, and how they compare to average salaries in the sector that they are joining.

11. The majority of scientific researchers and engineers entering the UK to work, and who require a visa, use the Tier 2 route and for this reason, the calculations in this paper focus on the costs of navigating Tier 2. Scientific researchers and engineers may also enter the UK to work via Tier 1 and Tier 5 – further detail about these routes and Home Office charges for immigration services incurred by those utilising these routes is provided in paragraph 15.

12. In 2014/15, scientists and engineers accounted for 21% of general Tier 2 visas and 7% of Inter Company Transfer (ICT) routes[10]. Table 1 provides an overview of the costs that a researcher with dependants seeking to work in the UK through each of these routes might incur.

    For the purposes of cost estimates, two hypothetical science/research case studies are presented:

    - Case study A – University: Researcher arriving on a Tier 2 (General) visa to undertake research on a 3-year contract, with a partner and 2 dependant children; and
    - Case study B – Industry: Scientist arriving on a Tier 2 (Intra-company transfer) visa to undertake analysis on a 5-year contract, with a partner and 2 dependant children.

[10] The Campaign for Science and Engineering response to Migration Advisory Committee's "EEA Workers in the UK Labour Market" call for evidence. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/698330/Professional_Services.pdf

Table 1 – Home office fees and costs in relation to visa application procedures[11]

	Case A (£)	**Case B (£)**
	Tier 2 (General) visa, 3 years, 3 dependants	Tier 2 (ICT) visa, 5 years, 3 dependants
A: Payable by applicant		
Visa fees		
Applicant's visa fee	610	1,220
Dependants' visa application fees	1,830	3,660
Total visa fees	**2,440**	**4,880**
Additional mandatory charges to applicant		
NHS surcharge[12]	600	1,000
Dependants' NHS surcharge	1,800	3,000
TB Test (where required)	150	150
English language test (where required)	150	150
Document translation (where required)	Not estimated	Not estimated
Total additional mandatory charges	**2,700**	**4,300**
Total fee/charges payable by applicant	**5,140**	**9,180**
B: Payable by employer		
Certificate of sponsorship	199	199
Immigration Skills Charge[13]	Nil	5,000
Total costs to employer	**199**	**5,199**
Total fees and charges payable (A + B)	**5,339**	**14,379**

[11] Costs related to visa fees, NHS surcharge and charges to dependants are taken from Home Office website and related links: https://www.gov.uk/browse/visas-immigration (site accessed May/June 2018).Costs of TB tests and English language tests are estimates for illustration purposes.

[12] NHS Surcharge: The Government has announced plans to double the NHS surcharge later this year from £200 to £400 annually per migrant worker/dependant. In the above examples, this would increase total costs by £2,400 (case A) and £4,000 (Case B).

[13] Immigration Skills Charge: Those undertaking a PhD level role are exempt from this. For the purposes of the above examples, it is assumed that the researcher working in academia is exempt and that the industry analytic scientist is not. In practice, the Immigration Skills Charge may apply to researchers/scientists working in either academia or industry (as may the exemptions from it).

13. Researchers may often choose to move between institutions, for example moving from a fixed-term contract in a UK university to take up a job in another UK university or a UK-based industry. Anecdotally we know that many companies value the opportunity to recruit staff from UK universities, which themselves offer a highly international pool of researchers.[14] Higher fees are in place where there is an application from within the UK to extend or switch to a Tier 2 visa (general or ICT). In-country applications cost £704 or, for a premium service, £1,314 for visas up to 3 years and £1,408 (premium service £2,018) for visas longer than three years. Other than where the priority or premium service application route is used, the Home Office also estimates that the expected time for a decision on in-country applications is 8 weeks as compared with a general expected time period of 3 weeks to reach a decision for applications from outside the UK.

14. The potential impact that these charges may have on a scientific researcher or engineer's personal decision over whether to come and work in the UK are better understood by considering them as a proportion of the their likely future salary in the UK. Table 2 provides the visa related costs payable by an applicant as a percentage of typical annual salary in various science/research related roles. The total cost of Home Office charges for immigration services and associated mandatory charges that would be incurred by an academic staff member, with a partner and two dependant children entering the UK on a Tier 2 general visa for 3 years, represents 11% of their average annual salary. Table 2 sets out the impact on other professions key to UK research and innovation).

[14] RAND Europe. 2017 International mobility of researchers: Supplementary report: Perspectives from industry. See https://royalsociety.org/topicspolicy/projects/international-researcher-mobility/international-mobility-researchers-industry/ (accessed 29 March 2018).

Table 2: Visa fees and costs payable by an applicant as a percentage of salary

	Archaeology profession[15]	Experienced senior science technician[16]	Academic staff[17]	Engineers[18]
Typical salary (£)	26,000	30,000	47,500	40,000
Visas costs payable by applicant (£5,140) as %age of annual salary in Case study A	20%	17%	11%	13%
Visas costs payable by applicant (£9,180) as %age of annual salary in Case study B	35%	31%	19%	23%

[15] Chartered Institute for Archaeologists (CIFA) response to Migration Advisory Committee's "EEA Workers in the UK Labour Market" call for evidence. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/694500/Chartered_Institute_for_Archaeologists.pdf . CIFA publishes salary minima for different levels of qualifications (set at; £18,000 for PCIfA, £21,000 for ACIfA, £27,100 for MCIfA). CIFA state that the median salary for jobs in UK archaeology was calculated in 2012/13 at £26,000.

[16] Russell Group response to Migration Advisory Committee's "EEA Workers in the UK Labour Market" call for evidence. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693442/Russell_Group.PDF. Response states that, "According to the Annual Survey of Hours and Earnings 2014, the experienced salary rate for technicians is £30,764 or lower."

[17] Department for Education response to Migration Advisory Committee's "EEA Workers in the UK Labour Market" call for evidence. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/695109/Department_for_Education.pdf. The response states that, "The median contract salary for EU academic staff is lower than the median for staff from the UK. HESA provide salary information in bands. The median salary band for EU staff is between £35,001 and £40,000 and the median for UK staff is between £45,001 and £50,000. Salary levels reflect the subject area, region and experience of staff." In the worked example, the salary used is at the midpoint of the UK staff salary band. Given that the average salary for EU workers is significantly less, it is likely that the impact as a % of salary will be greater on overseas workers. Post-Brexit, EU staff, who make up 17% of academic staff in UK HEIs, will be subject to the above visa fees if the current system for non-EU immigration is applied to them.

[18] "Engineering UK 2018 – Synopsis and recommendations". Available at: http://www.engineeringuk.com/media/1576/7444_enguk18_synopsis_standalone_aw.pdf , Report states that, "Our analysis found that the median salaries of full time employees working in engineering occupations in 2016 – ranging between £32,987 for environment professionals and £47,394 for electronic engineers…". In the worked example, the salary used is the midpoint between the quoted median salaries for these specialisms.

15. International researchers may also use Tier 1 and Tier 5 to enter and work in the UK, each of which have different Home Office charges associated with them. Tier 1 visas require a 2 stage application with an endorsement fee of £456 and initial application fee of £152, with applications to extend Tier 1 visas costing £608. The Tier 5 visa application fee is £244. As with Tier 2 visas, Tier 1 and Tier 5 visa fees will be mirrored for dependants. NHS surcharges will also be payable by the main applicant and each dependant. The Tier 1 Research and Innovation Talent Visa enables individuals with exceptional talent and exceptional promise in the fields of science, medicine, engineering, social science and humanities to live and work in the UK. Unlike Tier 2, this visa is not tied to a sponsoring institution, however it is not appropriate for all individuals with highly sought after skills that the UK may wish to attract, many of whom will not demonstrate exceptional talent and promise, but still form an important part of the skills mix that the UK needs. The Tier 5 visa is only available for temporary workers (periods of up to 12 or 24 months depending on the scheme) and is, therefore, not a route that can be adopted for many research contracts.

The costs for employers

16. In addition to the costs payable by employers on a case by case basis in relation to individual visa applications, the fixed costs outlined in Table 3 arise annually to employers wishing to maintain licensed sponsor status.

Table 3: Infrastructure costs to employers of the visa and immigration system

	University (charitable status) £	**Medium or large employers £**
Tier 2 and Tier 5 licence fee	536	1,476
Premium customer service scheme (not mandatory but paid by a number of science/research organisations)	25,000	25,000
Total licence related costs	25,536	26,476

17. Employers also often provide HR support for visa and immigration functions. This can take different forms. In a large research focused university this might typically result in between 2 and 4 staff being engaged full time on visa and immigration related matters. Further recruitment costs are incurred as a result of having to comply with the additional duties imposed by the Resident Labour Market Test where non-EEA nationals are appointed (these have been estimated by some institutions as approximately doubling the normal costs of recruitment). These additional costs are not reflected in the calculations provided and the impact they may have on a UK organisation's ability to recruit internationally should be considered.

The impact of these costs

18. Choosing where to live and work is a personal decision as well as a professional choice and factors such as cost and perceptions play an important role. This is particularly pressing when the UK is competing with other scientific nations around the world to attract highly sought after researchers and can have impacts on the ability of employers to attract top talent. The following case study illustrates the impact that Home Office charges for immigration services can play in informing highly sought after researchers' decisions over where they choose to work.

Case study: the impact of Home Office charges on the recruitment of international scientists with specialist skills

Earlier this year, a research group at University College London (UCL) identified a highly-talented Russian scientist to join their team as a postdoctoral researcher for a period of 3 years to take part in a project to develop computer modelling software in materials chemistry. The candidate had a very unique set of specialist skills and was selected from a wide pool of scientists from around the world. The individual was already working as a researcher in Northern Ireland, living in the UK with his partner and one child on a Tier 2 visa.

As a non-EEA national, the job offer from UCL required him to apply for a new Tier 2 visa for him and his two dependants at the cost of £704 for each person – amounting to a total of £2,112 (3 x £704) in visa fees alone. On top of visa fees, non-EEA nationals must also pay the immigration health surcharge of £200 per person per year, which in this case would incur a total cost for the family of £1,800 for the 3-year period of the contract offer. When combined with the initial outlay for rented accommodation (estimated at around £3,000 by the University, the total upfront costs for the Russian scientist to join the UCL research group would be £6,580.

UCL was able to cover the costs of the employee's visa (£704) but all other expenses would need to be paid by the individual. Faced with this, the individual rejected the job offer, meaning that the research group was unable to recruit this top scientist to the project. Following this, UCL was forced to re-advertise the position, and eventually recruited. This however resulted in a serious delay to an element of the project.

19. The Society has called for the UK to ensure that there are the lowest possible barriers to practising scientists seeking to move across borders. We recommend the implementation of an immigration system for people with skills relevant to research and innovation that is fair, transparent and efficient. As part of this, the costs of any necessary visas should be commensurate with typical academic salaries and with the length of stay being requested – from a day visit to long term appointments.

20. Currently Home Office charges for immigration services apply to 12% of the UK's academic research workforce. As the UK leaves the EU a further 17% of the UK's academic research workforce who are from elsewhere in the EU will be subject to the UK's immigration system. The impact on UK research and innovation of any Home Office charges for immigration services that this community are required to navigate should be carefully considered and any costs should be commensurate with typical academic salaries and with the length of stay being requested. Current fees are clearly too high and, if these are to be applied to EU citizens in the

future, will inhibit recruitment within academia and other sectors dependent on scientific and engineering expertise.

The Society would be happy to provide further information. Please contact Becky Purvis on becky.purvis@royalsociety.org