We will probably never know if it was the unexpected decision to call a General Election that saved the Graduate Route. However, it could easily have been a different outcome (it had an earlier near death experience during the 2023 review of the International Education Strategy).

A trenchant last-minute defence finally got cut through as the data was clear and unambiguous. In particular, the London Economics report on economic contribution1, and the PwC report identifying how many universities were at risk of going bankrupt2, were repeatedly cited. The International Higher Education Commission (IHEC) also provided evidence, specifically data and insights from our March 2024 report “Evidence versus Emotion: The facts about international student recruitment and what they mean”, which addressed 11 major areas of misinformation.

However, the Graduate Route was finally only ‘saved’ following the unexpectedly positive outcome of a hasty review by the Migration Advisory Committee (MAC) delivered the coup de grâce, and it was the data-driven evidence submitted to the MAC that made the difference. One of the powerful pieces of evidence was the Enrolly data showing that the Government had already achieved its key policy objective; having been spoken by the rate of growth since Covid, the elimination of the right of PG students to bring dependents has reversed the dramatic rise in international student numbers and in the intent to study. This will automatically see net migration numbers fall substantially.

It was telling that the MAC Chair, Sir Brian Bell, said in his conclusion: “It really shouldn’t be up to the MAC to have to go around finding out data for the Government. That should be something that they do as part of their business as usual”.

“That sums up the huge problem facing us, as it is far from clear that there is a recognition, let alone acceptance, politically or intellectually, that UK international higher education cannot become sustainable without access to the data and insight necessary to ensure effective policy development and good decision making at sector and institutional levels. A few voices have been vocal on this for a decade or more, this is not a new issue, but the urgency is new and the time for debate is past, commentary and descriptions of deficiency are not enough, the focus needs to be action.

With the immediate threat to the Graduate Route eliminated, we see, understandably, the re-emergence of calls for increasing domestic fees and redrawing the line between public and private funding, as well as universities being urged to make more of their own money through spin-outs, and the need for properly funding research. However, there is no corresponding call to establish the tools to continue to be world-class at overseas student recruitment. Worse, given that it is emotion rather than evidence that is driving this debate over overseas students, it is far from clear whether the measures being flagged by the current Government – a mandatory and more demanding agent monitoring and management framework, augmented compliance measures, different maintenance requirements, changed English language expectations – will be abandoned by the next Government or implemented in ways that support the sector. So, despite the retention of the Graduate Route, we may yet see recruitment to the UK becoming more not less difficult.

Other than the laudable efforts of the British Council’s Higher Education Strategy Group chaired by Sir Steve Smith, it is difficult to see who or what will drive the strategic and operational changes we need.

It was in response to this vacuum that IHEC was established, as a data-led apolitical forum, where experts from all the key stakeholder communities can review evidence, source new research and make recommendations without representing any specific interest group.

In this report we detail why we must put measures in place to support effective policy formulation and ensure that data triumphs over prejudice when it comes to the big calls over the UK’s international higher education strategy. However, most importantly, we make concrete recommendations as to how this can be achieved.

It is simply not good enough that we do not know for at least 18 months, and currently it is 2 years, how many overseas students have been recruited or that we rely on institutional surveys to record the impact of increasingly volatile student recruitment markets. Why are the economic benefits of higher education not routinely considered, or implemented in ways that support the sector. So, should we have to commission bespoke third party reports to assess the vital importance of overseas student recruitment to the financial sustainability of universities that are otherwise heading towards bankruptcy.

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1 https://londoneconomics.co.uk/blog/publication/the-benefits-and-costs-of-international-higher-education-students-to-the-uk-economy-analysis-
for-the-WBC/Whitepaper-2024/

Executive Summary

This paper identifies the major issues arising from significant UK higher education data deficiencies. These hold back effective strategy formulation and decision-making at both sector and institutional levels:

- HESA provides comprehensive, high-quality data, but there is a systematic 15-year lag, currently extended to 2 years, in making the data available. The Graduate Outcome survey data is not representative for international students.
- The Home Office provides quarterly student visa statistics, which may be an appropriate interval, but the data is only broadly indicative of student study intentions. It holds significant other data sets that are not shared or not shared in a timely fashion.
- The Office for National Statistics (ONS) reports that education exports are part of a broad basket of exported services dominated by travel, which makes the economic contribution of HE to the UK economy invisible to policymakers and taxpayers.
- Devolution has opened up regional differences in recording of student data, there is need to rebalance the relationship between HESA and the statutory organisations with whom it works.
- The Department for Education and the (now) Department for Business and Trade play no significant role in exploiting the power of data in policy formulation.
- The OfS is failing to ensure that there is an appropriate data ecosystem in place to appropriately measure the progression outcomes for overseas students.

This paper recommends the following:

- Addressing the lack of an effective data architecture for the official statistics collected on behalf of the Government.
- Accelerating the implementation of the Data Futures programme to provide in-year data collection and reporting.
- A commitment must be entered into and appropriately resourced in order to address the low response rate of international students to the Graduate Outcome survey.
- Systematising and embedding access to private sector data in the national overseas student data ecosystem to enhance the insights provided to the sector and policy makers.
- Mandating an existing sector body or establishing a new body, potentially through a tender exercise, to provide timely and easily accessible relevant data to enable institutions to make effective plans for the future as required by the regulators.

- Requiring the Home Office to share with universities the detailed information they have on overseas students and their visa status. Access to real-time immigration status data, as is available in Australia, combined with the universities’ held information on student enrolments, would streamline this process and establish who has left the country.

- Net migration statistics should accurately reflect the number of international students who are in the country for longer than 1 year. To do that, the following considerations should be taken into account:
  - Only long-term trends on the above basis should inform policymaking. Quarterly and monthly immigration statistics are a useful indicator of the interest in UK study, but they reflect the highly dynamic nature of international student mobility including the increasing tendency of students to make multiple applications to different destination countries. Making policy on this flawed basis is detrimental to policy effectiveness and sector stability.
  - Under Data Futures in-year data collection and reporting will be available. This will allow a more accurate estimate of the long-term international student population in the UK for immigration purposes. Specifically, the following fields from the student record can be used as an indication of the number of international students who are to be included in the net migration numbers, and only those with periods of study exceeding one year should be included:
    - Start date of the course – this field indicates the date of the student’s initial commencement of studies.
    - End date of the course – this field records the date of a student’s last scheduled activity.
    - Non-continuation and drop-out rates – students who have discontinued their study should be excluded.
    - Full-time new student entrants, who meet the criteria above, should replace the current immigration statistics on issued visas.
- The value of education exports needs to be a category in its own rights in the Balance of Payments.

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1. The data landscape

This paper has been prepared in the wake of the Home Office statement that the Graduate Route will be retained following the MAC rapid review. Whilst this paper does not focus on the Past Study Work (PSW) visa, or Graduate Immigration Route, the comments of the MAC Chair, Professor Brian Bell, were telling, when he said: “It really shouldn’t be up to the MAC to have to go around finding out data for the Government. That should be something that they do as part of their business as usual.”

The reason that the MAC report was so much more impactful than the sector had expected was because it was based on evidence despite the committee only having 8 weeks to undertake the review.

In hindsight, it was perhaps predictable that the demise of HEFCE – as the English sector funder and buffer body with a remit to help develop and implement higher education policy, based on research and consultation – to be replaced by the OfS – as a regulator and competition authority focussed on managing a primarily domestic student market – would leave some ambiguity about whose role it was to ensure that the sector had the data necessary to make the right choices about overseas student recruitment. It could be claimed that overseas recruitment markets were not seen as volatile, so the need to understand, in detail, current and potential future performance was not so apparent. However, this is to overlook the impact on student numbers of the 1997 Asian financial crash, which was an early wake-up call as to the volatility of global student markets – albeit that the impact was calculated as only £300 million at the time, reflecting how much more significant is overseas recruitment to UK universities currently.

We talk, rightly, about UK higher education being world-class on almost any measure – except the data and information available to support planning and strategy development. If the data does not quickly improve, then performance can be expected to rapidly decline.

Therefore, it is essential that the sector acquires the tools to do the job. Clearly, some elements will be easier than others, and the NHS offers salutary lessons in the difficulties of successfully implementing large-scale data transformation projects. However, much can be achieved by building on what we have while we move over time to a more appropriate “fit for the future” digital architecture.

One opportunity, and driver for change, is the rise of private sector data providers. By offering a service to large segments of the sector these organisations are increasingly operating as shared services providers, able to detail in real-time changing student behaviours, market dynamics and institutional performance. From that comes value-added opportunities for policy-makers and institutional leaders to respond to this rich new stream of information on the scope, scale and effectiveness of current activity and what we can expect in the future.

2. The data gap

This paper is not an exhaustive review of all that is wrong with international student data and its reporting, we focus on the major overseas student data issues relating to the delay in publishing information, lack of access to essential unpublished data, information that is conflated with other measures and an overall lack of coherence in availability that makes effective planning and forecasting almost impossible.

i. An area which needs to be addressed as a matter of urgency is the international graduates’ response rate to the Graduate Outcome survey. At present, the response rate is very low.

ii. Student visa statistics focus on prospective students who hold a “Confirmation of Acceptance for Studies” (CAS) from their educational provider. These statistics show the sponsored student visas granted to the main student applicant. However, they are only indicative of the students’ intention to study in the UK, and do not capture the actual enrolments. Further, the latest data release published on 23 May shows that 66 per cent of the granted visas were issued to master’s students. However, UK master’s degrees are typically less than a year long. This means the current student immigration numbers heavily overestimate the international student contribution to the net migration figures (based on individuals who spend 12 months or more in the UK). Significant improvements in these data sets are required.

iii. Immigration rhetoric blaming international students for the high immigration in the UK has surrounded the quarterly publications of the net migration figures. This has resulted in eroded global confidence in UK HE as a country for individuals to consider as a priority study option. To address this, UK-wide cross-departmental Support for International Education marketing and messaging is required.

iv. The financial impact of international students is not properly reported due to the conflation of IHE export earnings with travel data. This has made the impact of education exports invisible to the government and taxpayer.

v. OFS has a mandate from the Government to regulate and monitor the sector in England, but is essentially absent from the process that generates the information on which decisions at the institutional or sector level about overseas students can be made, and where it does engage it does not do so in a way that is demonstrably helpful.

vi. HESA collects international student data that provides detailed, high-quality statistical information. Around 200 data points are available for each enrolled student. However, there is a systematic 1.5-year lag in publication of the data and the delay is currently 3 years.

In conclusion, there is an urgent need to improve the quality and availability of overseas student data. This will need to happen in a collaborative manner between the sector and government, and this paper provides a framework for improving data availability and coherence in the future.
2.1 International student enrolments

The Higher Education Statistics Agency (HESA) collects, assures and disseminates data about higher education (HE) in the UK and is now part of Jisc – the Designed Data Body (DDB) for higher education in England, as mandated by the Higher Education and Research Act 2017 (HERA). It also has a statutory role in Wales, Scotland and Northern Ireland. HESA collects and publishes comprehensive statistical information on all aspects of UK higher education and includes the following data collections: students, staff, graduates, business and community interactions and estates management. Data collections across the devolved nations vary to reflect changes in the regulatory requirements of the respective regulatory and funding bodies.

The higher education student record captures a year-long reference period, which runs from 1st August of the respective year (Year N) to 31 July of the following year (Year N+1). The higher education student record collects approximately 200 pieces of information for each student in UK HE. However, given the data covers an entire academic year, by the time the data is collected, the quality verified, and published, the data is almost 15 years out of date.

To rectify this, there is a move to in-year reporting through the Data Futures programme, meaning a change to two reference periods per year. The reference periods will run from 1 August in Year N to 31 December in the current year (Year N) and 1 December (Year N) of the current year to 31 July of the following year (Year N+1), with data collected and reported at the end of each reference period.

HESA sets out its mission to be “the trusted source of HE data and analysis” and plays “a key role in supporting and enhancing the competitive strength of the sector”. It is recognised that in many areas accuracy of data will be key, particularly where data feeds into published performance measures and externally generated league tables. So, a robust process that takes some time to execute will be required. However, whether in-year reporting on overseas student numbers requires the same level of data processing and cleansing as, say, finalised data sets, is a question worthy of debate as it is essential that we secure earlier and better access to overseas student recruitment information.

One approach would be to develop better integration between education data and immigration statistics. This has been done in other countries and has enabled more timely publication of statistics, admittedly at a fairly high level, but these show broadly how markets and providers are performing almost in real time. The case study below draws on monthly data collections on international students in Australia which is made available through PowerBI to facilitate interrogation and analysis. Unlike publications from the Home Office, such as the report on 23 May 2024 titled “Why do people come to the UK? To study” the purpose of this Australian initiative is to provide the data on which people can act, rather than to answer political questions.

Australia has some of the most up-to-date statistics on international enrolments globally. Monthly statistics are derived from the Australian Government Provider Registration and International Student Management System (PRISMS) database, which includes data across all education sectors.

Education providers upload the data into PRISMS when they make an offer to a prospective student before a visa is granted.

The Department of Home Affairs updates PRISMS as student visas are granted or cancelled and students enter or leave Australia.

This has enabled Australia to have almost real-time information on international students entering or leaving the country.

Education institutions update PRISMS if students change courses or fail to comply with student visa requirements.

### Case study: International students and international enrolments in Australia

The Department for Education publishes finalised annual higher education statistics. For example, the data on Higher Education Statistics 2022 for Students was published in January 2024. The details of the UK student record provide a robust and accurate estimate of the international student flows to the UK, but the delay in publication means they have little value in planning and strategic development. Using them alongside more timely aggregate data and sponsored study visa statistics would allow the 18-month – 2-year data gap to be filled with actionable information on the number of international higher education students in the country, where they are and what sort of provider they are studying with. Home Office visa data will still be based on applications rather than enrolments as in Australia, but a period of policy stability would allow new estimates to be established for Application to Enrolment ratios increasing the predictive accuracy of the applications data. If the Home Office were to further open up the data sets it chooses to share, significant additional insight would be available to the sector during this crucial period before HESA data is available.
2.2 Graduate outcome data

Graduate Outcome (GO) data is another area that would benefit from significant improvement. GO is collected through a survey issued to graduates who have obtained their higher education qualifications from a UK higher education institution.10

The most recent data from the academic year of 2020/21 shows that the response of international graduates to GO halved compared to the previous year – from 36 per cent in 2019/20 to 18 per cent in 2020/21. HESA stopped calling international students to save costs; the UK government mandated a 10% efficiency saving for HESA, and telephone follow-up to save costs; the UK government mandated a 10% efficiency saving for HESA, and telephone follow-up with international students was a significant expense.11

The decision to stop phoning international graduates has raised concerns among universities and student bodies. Low response rates make it difficult to get a reliable picture of international graduates’ employment outcomes. Evidence of their employability is critical for the institutions to review the relevance of their courses and for the government to develop effective policies to support them.

Equally, employability is a critical decision-making factor for students choosing the UK as a study destination. Limited evidence will weaken the appeal of the UK education system as a study destination leading to good employment prospects.

2.3 Sponsored study visas

The Office for National Statistics (ONS) publishes quarterly immigration statistics.12 More recently, monthly monitoring of entry clearance visa applications has been published, and this frequency is expected to be maintained until the end of 2020.13

While timely data is always welcome, the published statistics are top-level and based on monthly applications for ‘sponsored study’ visas. Given the high proportion of students in the immigration figures, they have attracted considerable interest from the government, the national media, and the general public.

The ONS has adopted the UN definition for long-term international migration, which includes “any person who has changed his or her country of usual residence” for at least a year.14 The long-term migration data is used in the calculation of the net migration statistics in the UK, which refer to the balance between people immigrating to the UK and those emigrating.

It is worth noting the cyclical nature of international student mobility, which relates to the academic year and the duration of courses. Using issued visas to measure who is in the UK is highly likely to overlook critical details for accurately estimating long-term migration flows to the UK. The following details need to be considered alongside the publication of student visa statistics:

- Granting visas indicate student intent to study in a country at a particular higher education institution (HEI). However, in an uncertain environment, prospective international students are increasingly applying to HEIs in more than one country to study.
- A recent survey of HE students from India in the UK shows that 18 per cent had applied for student visas to another country.15 Using enrolment data for new HE entrants will produce a more accurate estimate of who is de facto in the UK. Student enrolment is an accurate capture of international students vs. granted visas, which will not have been used when the students chose other countries over the UK.
- A recent IHEC report indicated that two-thirds of the student entrants to UK HE were at the master’s level.16 These students are typically expected to complete their academic degree within a year or shorter period. The sponsored study visas, used in the net migration figures, should exclude students expected to complete their course within a year. If the master’s students are switching to the PSW route upon completing their studies, then the PSW visas are reported separately.

In this context, the HESA Student Record can be used to refine these estimates. The expected course length is recorded in the HESA Student Record under the following data collection fields:

- Start date of instance – this field indicates the date of the student’s initial commencement of studies.17
- End date of instance – this field records the date of a student’s last scheduled activity.18
- A recent survey of HE students from India in the UK applying to HEIs in more than one country to study.

Another necessary correction to the student visa dataset concerns the international students non-continuation and drop-out rates. While most international students have comparatively low dropout rates, considering non-continuation would contribute to more accurate estimates of student visa statistics. Students who did not complete their degree do not qualify to access the PSW route.
2.4 Building global confidence in UK HE and creating a data ecosystem that signals the value of international education

International students are an integral part of UK higher education. However, their contributions have remained broadly invisible to the Government, taxpayers and the broader public. Defining the economic value of students has been left to special reports commissioned by the sector as part of its defensive strategy in the face of Government policy threats. Even these reports do not capture all of the direct economic benefits and there are a raft of intangible, but real benefits, that arise from the fact that many international students become lifelong ambassadors for the UK, promoting British education, culture, and business practices in their home countries. They foster international connections that can be leveraged for future trade deals and collaborations.

Notwithstanding the decision to maintain the Graduate Route, recent immigration changes to international students’ ability to bring dependants to the UK and the fact that many international students become lifelong ambassadors for the UK, promoting British education, culture, and business practices in their home countries. They foster international connections that can be leveraged for future trade deals and collaborations.

Further, this consistency in approach should be applied across international and domestic students. International education generates economic wealth, fosters cultural exchange, and promotes intercultural understanding, which in turn positions the UK as a leader in the global education space. Therefore, more should be done to ensure international students attract the same attention and support across all UK nations as their domestic counterparts. Historically, HE monitoring was focused on home students to ensure public funds were being used effectively to deliver quality education. As a result, HE key performance indicators focused on UK students only.20 In England, whilst some of the key performance measures in the OFS’s student outcomes data dashboard on continuation and completions include international students, the progression outcomes only cover the home student population. The reason behind this, as explained in section 2.2, relates to the poor response rate of international graduates to the Graduate Outcome survey.

To ensure that UK education and research continues to attract global learners, policymakers must ensure domestic policy continuity and signal stability to international partners. To address this, there are two main areas where more can be done:

- UK-wide cross-departmental consistency in approach.
- recording international education as an export category in its own right.

These are discussed below.

2.4.1 UK-wide cross-departmental consistency in approach

Education is devolved across the nations of the UK, and there is a growing divergence in the regulation of higher education and some of the data collected. For example, the summative question in the National Student Survey (NSS) was removed for England but not for the devolved nations.21 The growing differences between the HE systems across the devolved nations can be confusing for international stakeholders and students. To achieve this, consistency in data collected is required across the 4 nations, UK-wide support for international education outcomes in this way will support all universities and colleges.

Australia’s approach offers such consolidation, where all education exports are a single category.22 This comprehensive data allows for more informed policy decisions that recognise the significant economic contributions of international education. The UK should prioritise improving data collection and reporting to accurately capture and communicate the full economic impact of international students.

The current approach also underplays the wider academic and cultural contributions international students make to UK higher education and society. One way to capture those would be to apply all metrics used to record home students’ outcomes to international students. The former was rationalised as a means to justify the spending of UK taxpayers’ money. International students make significant contributions to the UK economy and so should receive the same attention.

Similarly, there is little knowledge about the academic contribution of international researchers and doctoral students to the UK research outputs. These can be systematically captured and communicated.

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3. A way forward – building a data alliance

There is a need to harness the potential of private sector data sources. For example, Enrolly, Studyportals and IDP Connect have all been involved on an ad hoc basis in reviewing the performance of the sector by policy-makers and regulators. This needs to be systematised and a platform developed that allows those private sector organisations committed to working in partnership with the sector, who share our values and vision, to work coherently and consistently in partnership with us on an ongoing and systematic basis. Such a group has already been established in Australia. Although in its early stages, it is already showing how beneficial such an approach can be. There is an urgent need to form a data group in the UK, which draws on information from public and private providers across the HE sector in the UK and internationally. Australia also benefits from a digitally enabled visa management and monitoring system which allows immigration and specifically overseas student numbers to be tracked in real-time as entry to the country under an issued visa triggers a record going live. Moving away from the International Passenger Survey (IPS) is going to be challenging, but it is essential. The IPS, as its title suggests, is implemented through traditional “clipboard and paper” random interviews of people travelling across the UK border. As the ONS themselves state, its purpose is “to produce estimates of overseas travel and tourism”. The results are primarily used to measure the impact of tourism expenditure on the UK economy and provide information about international tourism and how it has changed over time. Its purpose is not to inform migration policy or assess overseas student numbers – these are purposes to which it has been belatedly co-opted.

This change will be a major digital transformation project with multiple stakeholders, but its complexity and challenge does not mean that we can decide not to implement such a change. Further, it is vital as TNE becomes an even greater strategic priority for the sector, that it is coherently wrapped into the future data architecture. We noted in our report on transnational education (TNE), that HESA is reviewing the Aggregate Offshore (AOR) record, the official data collection for students studying wholly outside the UK while registered at UK HE providers or registered on their programmes. As this activity grows in scale and scope, and particularly as new models develop, it is essential that the data record underpinning the monitoring of activities is fit-for-purpose in terms of enabling management and strategy formulation at sector and institutional levels. The AOR includes online delivery, but this is an area beset by ambiguities around reporting and comparisons on a like-for-like basis. It should be noted that the Government is proposing restrictions on remote delivery to ensure all overseas students are predominantly undertaking face-to-face courses (presumably they had in mind those potentially taking advantage of the Graduate Route). However, it is increasingly likely that blended learning will become an even more significant part of “traditional” TNE programmes and the taxonomy needs to be sophisticated enough to distinguish between major classifications, but not so complex that we get lost in the weeds of minor technical differences. Making early and substantial progress on this as part of the new data architecture will be vital to ensure that all mechanisms of delivery are included to provide a coherent view of the current picture and how it is changing over time.

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Conclusion and recommendations

This paper identifies the major issues arising from significant UK higher education data deficiencies which are holding back effective strategy formulation and decision-making regarding international student recruitment to the UK at both sector and institutional levels. As a recent OFS report identified the absence of an effective basis on which to make reasonable plans on likely future student numbers is a major threat to the financial sustainability and academic vitality of the sector and its ability to drive economic and social development. This is especially true with international student numbers (given the greater contribution they make to surpluses and significant volatility in market dynamics and the policy environment).

Addressing these deficiencies is an essential part of creating an improved understanding of global higher education demand for UK degrees and how potential market changes and policy measures will impact on demand and overall numbers (as well recruitment by geography, level, and subject area).

We do not provide an exhaustive list of the deficiencies, we identify the major issues requiring immediate attention:

- **HESA** provides comprehensive, high-quality data, but has a systematic 1.5-year lag between publication and the start of the academic year it refers to. This delay has been extended to almost 2 years in this most challenging of years.

  The delay in the publication of the 2022/23 HESA statistic may have helped to achieve the “right” outcome from the Graduate Route Review, given the particular context in which the decision was being made. However, that should not distract from the need for access to timely data on the changing dynamics and make-up of the overseas student cohort in the UK.

- **Another serious deficiency** is the lack of data from international students in the Graduate Outcome survey since a cost-cutting decision by HESA not to chase overseas students by telephone after they graduate. We note that student behaviour is increasingly driven by both sentiment and information on the returns that students achieve in respect of their “investment” in coming to the UK to study. If neither we nor they have access to systematic knowledge of the outcomes of graduating from UK universities on what basis do we think they are going to keep coming? So, we recommend this is an area for immediate remedial action to improve data gathering.

- The Home Office has also chosen to release details on the level of study for overseas students, details it has previously refused to disclose. Freedom of Information requests are routinely rebuffed when this information should be in the public domain.

- **Talk of the perils of “boom and bust” in UK international student recruitment have been largely brought about as a result of ill-thought through policy changes and it is still unclear how this will be avoided in the absence of effective means to monitor and manage the system in something approximating to real-time. The current Government has flagged a number of planned changes – a mandatory and more demanding agent monitoring and management framework, augmented compliance measures, different maintenance requirements and changed English language expectations. With a General Election on 4 July, it is not clear whether these will be abandoned by the next Government or implemented in ways that support the sector and which the sector can support.

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To tackle the deficiencies we recommend the following:

1. **The Office for National Statistics (ONS) reports that education exports are part of a broad basket of exported services denominated by travel, which makes the economic contribution of HE to the UK economy invisible to policymakers and taxpayers.**

2. **Devolution has opened up differences in the way in which the regions of the UK approach the recording of student data, there is a growing need for the re-implementation of a truly comparable approach across the UK – it is recognised that HESA is a UK-wide body – whilst ONS is not – and that requires a rebalancing of the relationship between HESA and the statutory organisations with whom it works to ensure that a comparable data set is established.**

3. **The Department for Education and the (now) Department for Business and Trade have been the lead organisations in developing the UK international education strategy but have shown no moves to exploit the potential to use data on current and potential future performance of the UK HE sector to inform policy or practice.**

4. **The ONS is not living up to its mission for “every student to have a fulfilling experience of higher education that enriches their lives and careers” and specifically it is failing to ensure that there is an appropriate data ecosystem in place to appropriately measure the outcomes for overseas students.**

5. **To deliver a fit-for-purpose UK HE data architecture and a system that properly records in real time who enters the country legitimately – and who formally leaves it – will require a major digital transformation project involving many other stakeholders. So, we will be largely dependent on the International Passenger Survey for some time to come, but it is worth noting that a system that effectively records who legally comes into a country, what they do (work, study, vacation) and then when they leave is entirely invisible to policymakers and taxpayers.**

6. **Only long-term trends on the above basis should inform policymaking. Quarterly and monthly immigration statistics are a useful indicator of the interest in UK study, but they reflect the highly dynamic nature of international student mobility, including the increasing tendency of students to make multiple applications to different destination countries. Making policy on short-term trends leads to flawed decision-making and is detrimental to policy effectiveness and sector stability.**

7. **Under Data Futures in-year data collection and reporting will be available. This will allow a more accurate estimate of the international student population in the UK for immigration purposes, and the estimates used in the net migration statistics. Specifically, the following fields from the HESA student record can be used as an indication of the number of international students who have been in the UK for longer than one year, and are to be included in the net migration numbers:**

   - Students in the UK on courses longer than a year. The expected course length is captured in the student record:
     - Start date of instance – this field indicates the date of the student’s initial commencement of studies.
     - End date of instance – this field records the date of a student’s last scheduled activity.
   - Non-continuation and drop-out rates – students who have discontinued their study will be excluded from the net migration statistics.
   - Full-time student enrolment data on new entrants should replace the current visa statistics on issued visas.
   - The value of education exports needs to be a category in its own rights in the Balance of payments.
   - Efforts should be made to address the low response rate of international students to the Graduate Outcome Survey by returning to using follow-up international telephone calls to contact graduates returning to their home country.

8. **Systematize and embed access to private sector data in the national overseas student ecosystem to enhance the insights provided to the sector and policy makers. This process has informed crucial decisions and it is arguable that the most significant facts around overseas recruitment affecting the Graduate Route discussions were the data from organisations such as Enrolly, Studyportals and IDP Connect, which proved invaluable in establishing the impact of planned and proposed policies on student intent to come to the UK to study.**

9. **Mandating an existing sector body or establishing a new body, potentially through a tender exercise, to provide timely and easily accessible relevant data to enable institutions to make effective plans for the future as required by the regulators. This body should be tasked with: (i) utilising all available data from public and private sources; (ii) bespoke analysis that responds to sector needs; (iii) continuous monitoring of the health of the UK HE with a strong focus on international student demand.**

10. **The Home Office should be told to share with HEIs the detailed information they have on overseas students and their visa status so institutions can make informed decisions with local public sector service providers in anticipation of their arrival and know when students have left the country. Access to real-time immigration status data, combined with the universities’ held information on student enrolments, would streamline this process and determine who has left the country.**

11. **The Government should accept the 2018 recommendation of the Migration Advisory Committee to bring the UK approach to migration targets in line with other countries.25 This doesn’t involve dropping students from the Net Migration figures but rather using a different, more appropriate data source, such as grants of settlement, to develop political or operational targets.**
Authors biographies

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David Pilsbury is Chief Development Office for Oxford International, a global educational services provider. He sits on the advisory boards of JISC, China-Britain Business Council, Times Higher Education, StudyPortals, EURIE, ECCTIS, Emirates Aviation University and Macao Millennium College. He is a member of the UK’s International Higher Education Commission. He was previously Deputy Vice Chancellor of Coventry University and led its transformation to become an internationally focussed university: as the UK’s 3rd largest recruiter of overseas students; the largest provider of programmes overseas; and host of the world’s largest global enhancement programme. His contribution to global higher education has been recognised by The Queen’s Award, EAEI’s premiere award and an Honorary Fellowship from Hong Kong’s VTC. Pilsbury was founding CEO of WUN, HEFCE Head of Research Policy and spent several years in the City after a D.Phil at Oxford.

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