

Summary: Intervention & Options

Department /Agency:
UK Border Agency (UKBA)

Title:
Impact Assessment of Fee Changes for Tier 4 and Tier 5
of the Points Based System for Immigration

Stage: Final

Version: 0.5

Date: 02/03/2009

Related Publications: Statements of Intent for Students and Temporary Workers under the Points Based System; Impact Assessments for Tiers 4 and 5; Tier 5 charging impact assessment

Available to view or download at:

www.ukba.homeoffice.gov.uk/sitecontent/documents/managingourborders/pbsdocs/

Contact for enquiries: Charging Policy, Vulcan House, Sheffield, PO Box 3468, S3 8WA

What is the problem under consideration? Why is government intervention necessary?

UKBA charges higher fees to migrant workers to subsidise reduced fees for Tier 4 and Tier 5 migrants. Economic circumstances means that it is harder to predict whether the numbers of migrants required to cross-subsidise these fees will apply to come to the UK. Continuing to offer the current level of subsidy carries an increased risk that UKBA may not recover costs, increasing the burden on the UK taxpayer.

What are the policy objectives and the intended effects?

The Government's general policy objectives on charging for immigration are:

- to charge fees that recover the true end-to-end costs of the system from those who use it;
- that those who benefit most should pay proportionately more, helping to reduce the burden on the taxpayer;
- that fees should be clear and straightforward, and easily understandable to our customers.

Balanced against this, the specific policy objective for Tier 4 is to maintain the UK's competitive position in the international student market so that the UK will continue to receive economic and cultural benefits from international students. The specific objective for Tier 5 is to ensure that the UK will continue to receive cultural, social, religious and international development benefits from Tier 5 migrants. Although the objective of end-to-end cost recovery will apply in aggregate, it will not, therefore, be a specific objective of Tier 4 and Tier 5.

What policy options have been considered? Please justify any preferred option.

Option 1: Do minimum, Retain current subsidised fee levels of £99 for Tier 4 visa applications and £100 for Tier 5 visas and leave to remain in the UK applications.

Option 2: Reduce the level of subsidy by setting the fee for initial entry under Tier 4 at £145, and for initial entry and leave to remain under Tier 5 at £125 (N.B. the Tier 4 fee includes a contribution to the Migration Impact Fund, which is impact assessed separately).

The preferred option is option 2 as this will help reduce the level of cross-subsidy from work routes where the numbers of migrants applying to come to the UK is uncertain, and will also reduce the burden on the taxpayer. Tier 4 and 5 fees are still set below cost, in support of specific Tier 4 and 5 policy objectives.

When will the policy be reviewed to establish the actual costs and benefits and the achievement of the desired effects? Regular review of volumes of applications against projected demand with assumption of fee change where necessary to reflect cost changes or significant demand impacts.

Ministerial Sign-off For Implementation Stage Impact Assessments:

I have read the Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.

Signed by the responsible Minister:

Phil Woolas.....Date: 10 March 2009

Summary: Analysis & Evidence

Policy Option: 2	Description: Set Tier 4 fee for initial entry at £145, and Tier 5 fee for both initial entry and leave to remain at £125
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COSTS	ANNUAL COSTS		Description and scale of key monetised costs by 'main affected groups'. The economy will lose £32m (PV) in combined output for Tiers 4 and 5 from a reduction in the numbers of migrants coming or remaining in the UK to work and study. UKBA will lose £0.3m (PV) from a net decrease in the volume of applications as a result of fee changes.
	One-off (Transition)	Yrs	
	£ 0	5	
	Average Annual Cost (excluding one-off)		
£ 6.9 million		Total Cost (PV)	£ 32.3m
Other key non-monetised costs by 'main affected groups' Reduced support for fulfilling Tier 4 and 5 objectives through modest decrease in flows of students and temporary workers resulting from higher fees.			

BENEFITS	ANNUAL BENEFITS		Description and scale of key monetised benefits by 'main affected groups' Higher Tier 4 and Tier 5 fees will increase UKBA fee income from those that still apply to come to the UK
	One-off	Yrs	
	£ 0	5	
	Average Annual Benefit (excluding one-off)		
£ 8.2 million		Total Benefit (PV)	£ 38.1m
Other key non-monetised benefits by 'main affected groups' Reduction of cross subsidy from migrant work routes at a time of economic downturn when volume predictions are at risk. Reduced burden on UK taxpayer.			

Key Assumptions/Sensitivities/Risks A price elasticity for the demand of higher education of -1.0 for Tier 4 Visa and Leave to Remain routes and a wage elasticity of labour supply of 0.5 for Tier 5 were used to estimate the likely decrease in numbers of applications as a consequence of the proposed fee increases. The range used below is -2.0 to 0 based on price and wage elasticities.

Price Base Year 2009	Time Period Years 5	Net Benefit Range (NPV) £ -27.1m to +38.2m	NET BENEFIT (NPV Best estimate) £ +5.9m
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What is the geographic coverage of the policy/option?	Worldwide
On what date will the policy be implemented?	April 2009
Which organisation(s) will enforce the policy?	UK Border Agency
What is the total annual cost of enforcement for these organisations?	£ 0
Does enforcement comply with Hampton principles?	Yes
Will implementation go beyond minimum EU requirements?	N/A
What is the value of the proposed offsetting measure per year?	£ 0
What is the value of changes in greenhouse gas emissions?	£ 0
Will the proposal have a significant impact on competition?	No
Annual cost (£-£) per organisation (excluding one-off)	Micro Small Medium Large
Are any of these organisations exempt?	No No N/A N/A

Impact on Admin Burdens Baseline (2005 Prices)		(Increase - Decrease)
Increase of £ 0	Decrease of £ 0	Net Impact £ 0

Key: Annual costs and benefits: Constant Prices (Net) Present Value

Evidence Base (for summary sheets)

1. BACKGROUND TO TIER 4 AND TIER 5

In 2006, following an extensive public consultation, we published proposals to modernise and strengthen our immigration system by bringing in an Australian-style points system comprising five tiers:

- Tier 1 Highly skilled individuals to contribute to growth and productivity.
- Tier 2 Skilled workers with a job offer to fill gaps in the UK labour force.
- Tier 3 Low skilled workers to fill specific temporary labour shortages.
- Tier 4 Students.
- Tier 5 Youth mobility and temporary workers: people coming to the UK to satisfy primarily non-economic objectives.

This Impact Assessment examines the costs and benefits of the different charging options considered for Tier 4 and Tier 5 of the Points Based System. Separate Impact Assessments considering the wider impacts of the policy for Tier 4 and Tier 5 have been published at:

www.ukba.homeoffice.gov.uk/sitecontent/documents/managingourborders/pbsdocs/.

For further information on Tier 4 and Tier 5, please refer to '*Students under the Points Based System*' and '*Temporary workers and youth mobility under the Points Based System – (Tier 5): Statement of Intent*'. Both documents are also published at the website address above.

2. BACKGROUND TO CHARGING

During the course of 2003 and 2004, the Home Office introduced charges for a range of immigration and nationality applications. The first phase of full cost recovery charging sought to ensure that those who use and benefit from the UK's immigration service met the costs of delivering the administrative service (including staffing and overhead costs) of processing applications to the point of making and conveying a decision.

The IND Review (<http://www.homeoffice.gov.uk/documents/ind-review-250706/ind-review-eng>) published in July 2006 stated that we should charge a fair and economic rate for our services but also one that reflects the true operational costs of the immigration system rather than just administrative costs.

As the UK Border Agency implements the various measures outlined in the Review, including the Government's plans to introduce the new Points Based System (PBS) for managed migration, we need to consider how these improved immigration services are paid for. We know that migrants contribute to our economy, and we are clear that any fees we set for migrants to come to the UK must not adversely impact on the many wider benefits that legal migration brings. But it is right to take the approach that our fees for immigration and nationality applications should better reflect the end-to-end cost of the whole immigration system, from initial application to enforcement and compliance activity.

3. RATIONALE FOR GOVERNMENT INTERVENTION

The IND Review signalled the biggest shake-up of the immigration system in its history, with a key component of the new approach being a step-change in the enforcement and compliance activity to ensure that the immigration laws are enforced.

The Government's position on this was laid out in the cross-Government enforcement strategy '*Enforcing the Rules: a strategy to ensure and enforce compliance with our immigration laws*' published on 7 March which committed around £100m extra for immigration policing, detention space, and systems to share data and intelligence on those here illegally, designed to bear down on those seeking to cheat the system and live illegally in the UK

It was agreed that there should be no increase to general taxation to fund this strategy. Resources are to be raised through a new flexible approach to the pricing of visas and immigration products where we set fees for different services in order to maintain competitiveness in certain areas, but to ensure that the

immigration system overall generates the revenue needed. This approach to pricing applies directly to Tier 4 and Tier 5, where lower fees are set in recognition of the Government's wider policy objectives. These lower fees are cross-subsidised by setting higher fees for work routes under the Points Based System (Tiers 1 and 2). The approach was fully outlined in the Government's response to its consultation on a new charging strategy for immigration and nationality fees:

<http://www.bia.homeoffice.gov.uk/sitecontent/documents/aboutus/consultations/closedconsultations/newchargingregime/responses.pdf>

The Government's policy objectives on charging are:

- To raise an extra £100m above administrative cost recovery to fund the true end-to-end costs of the immigration system from initial application to enforcement and compliance activities;
- That those who benefit directly from our immigration system should contribute proportionately more to the costs of the system and reduce the burden on the taxpayer;
- To develop a fees model that is clear, straightforward and easily understood to our customers.

The Government's policy objective on the implementation of Tier 4 is:

- To encourage people from overseas to study or train in Britain, whilst reducing risks of abuse of the immigration system.

The Government's policy objective on the implementation of Tier 5 is:

- To ensure that the UK continues to receive the cultural, social, religious and international development benefits of particular types of temporary workers and youth mobility, whilst reducing risks of abuse of the immigration system.

4. OPTIONS

We believe that the current economic climate means that we should reduce the level of cross subsidy from work routes to students and temporary workers applying under Tiers 4 and 5. Current economic circumstances make it harder for us to predict the numbers of migrants that will apply to come to the UK. But we need to manage the risk to UKBA's income so that the burden on the taxpayer does not increase. We have not considered increasing fees payable by UK businesses. In the current economic circumstances, UKBA wants to play its part by minimising the burden on UK businesses where possible.

We need to balance these aims against the specific policy objectives of Tier 4 and Tier 5. Consequently, we want to continue to use the fees from migrant work routes to cross subsidise the fees for Tier 4 and Tier 5 migrants. The different immigration routes and the complexity of inter-related factors involved means that there are a number of ways this could be done within our flexible approach to charging. To keep this impact assessment workable, we have narrowed this scope to considering 2 options:

Option 1: Retain current subsidised fee levels of £99 for Tier 4 visa applications and £100 for Tier 5 visas and leave to remain in the UK applications.

Option 2: Reduce the level of subsidy by setting the fee for initial entry under Tier 4 at £145, and for initial entry and leave to remain under Tier 5 at £125 (N.B. the Tier 4 fee includes a contribution to the Migration Impact Fund, which is impact assessed separately).

We believe that option 2 presents the best way of balancing the government's policy objectives on charging with specific Tier 4 and Tier 5 policy objectives, allowing UKBA to continue to provide a world class service.

5. COSTS AND BENEFITS

For Tier 4 a price elasticity of demand of -1.0 is applied to the expected non-EU student tuition fee for higher education in the UK. As a result of the fee increase application volumes are expected to decrease by 203 and 42 respectively for visa and leave to remain routes.

Under Tier 5 we assume a wage elasticity of labour supply of 0.5 is applied to the full expected wage during their stay in the UK, we expect volumes to decrease by 223 and 1 for these routes respectively for visa and leave to remain applicants in response to the rise in price.

This results in a combined decrease in output of £32 million over 5 years but an increase in government revenue from outside the UK of £38.1 million (discounted by 3.5% a year) for both Tiers 4 and 5. The NPV calculation is therefore +£5.9 million over 5 years. The NPV range of -£27.1m to £38.2m is calculated using a wage/ price elasticity range of -2.0 to 0 as indicated by available evidence in the annex to this assessment.

The key costs and benefits associated with each of the options are set out below:

Key Costs and Benefits of Tier 4 and Tier 5 Fee Increases

Key Monetised Costs

To economy

- **Reduction in fee income from deterred out of country immigration applications:** income to UK economy (UKBA) from overseas may be deterred as a result of Tier 4 and Tier 5 fee increases
Option 2: This is estimated at £55,000 for 2009/10 and £273,000 over the next five years.
- **Reduction in output from deterred migrants:** costs of lost productive output where migrants are deterred from coming to or remaining in the UK for work or study
Option 2: This is estimated at £6.8m for 2009/10 and £34.2m over the next five years.

Key Non- Monetised Costs

- Reduced support for fulfilling Tier 4 and 5 objectives through modest decrease in flows of students and temporary workers resulting from higher fees.
- Risks to UK economy of significant impact on volumes

Key Monetised Benefits

To economy

- **Increased fee income to the UK by reducing the level of subsidy to Tier 4 and Tier 5;** higher immigration fees will increase fee income to the UK from those that still apply to come to the UK
Option 2: This is estimated at £8.2m for 2009/10 and £40.8m for the next five years.

Key Non- Monetised Benefits

- Greater confidence that sufficient revenue will be raised to meet the end-to-end costs of running the immigration system.
- Reducing the level of cross subsidy means less risk of increasing the burden on the taxpayer should volumes of migrant workers fall.
- Supports the charging objective that those who benefit from the immigration system should pay more towards the cost of the system.
- Increased fees are still below the cost of processing the applications, in recognition of specific Tier 4 and Tier 5 policy objectives.

Under option 2, there is a potential net benefit to the economy of £1.3m in 2009/10 and £5.9m for the next five years (present value). That is, the value of benefit from increased fee income exceeds the value of output lost from those who decide to no longer apply to come to the UK.

Table 1: Summary results of cost-benefit analysis

	OPTION 2	
	09/10	09/10-13/14
Benefits		
Net Revenue raised from fee changes for those who continue to apply:		
Tier 4	£6,417,632	£32,088,158
Tier 5	£1,742,130	£8,710,649
Combined Net Revenue (Tier 4 and Tier 5)	£8,159,761	£40,798,807
Total Benefits (PV)	£8,159,761	£38,130,565
Costs		
Revenue from net decrease in the volume of applications as a result of fee changes:		
Tier 4	-£32,363	-£161,813
Tier 5	-£22,225	-£111,124
Combined Revenue Loss (Tier 4 and Tier 5)	-£54,587	-£272,937
Output loss from net decrease in migrants coming/ remaining in the UK:		
Tier 4	-£6,174,102	-£30,870,511
Tier 5	-£673,454	-£3,367,268
Combined Output Loss (Tier 4 and Tier 5)	-£6,847,556	-£34,237,779
Total costs (PV)	-£6,902,143	-£32,253,715
Net benefit (PV)	£1,257,618	£5,876,850

6. SENSITIVITY ANALYSIS

The key unknown variables are wage elasticity of labour supply and price elasticity of demand for higher education. A literature review of empirical studies suggests a wide range of aggregate wage elasticity of labour supply from -0.1 to 1.1 and price elasticity of higher education demand from -1.0 to -2.0 (see table 1 in the annex for further details).

A lower bound price elasticity of -2.0 for Tier 4 could result in 489 and 2445 fewer applications for option 2 in 09/10 and over the next five years respectively resulting in a net loss to the economy of £6.0m and £28.0m respectively.

For Tier 5 a lower bound wage elasticity of labour supply of -1.1 was used, resulting in 494 and 2470 fewer applications in 09/10 and for the next five years respectively generating a net gain to the economy of £0.2m and £1.0m respectively.

Some empirical studies suggest negative wage elasticity of supply indicating backward sloping or backward bending labour supply curve. For a higher wage, individuals can decrease labour supply and enjoy the same level of consumption. So this implies, for a lower wage, individuals would increase labour supply. This is unlikely to be the case here, for a lower wage in the UK, migrants who are not already in the UK are more likely to just go to another country. So for the purposes of this Impact Assessment, an upper bound of zero is used for the elasticity of labour supply and higher education demand. For option 2, this gives a combined expected net benefit of £38.2m over the next five years from the gain in revenue from overseas applications (there is no output loss).

7. OTHER SPECIFIC IMPACT TESTS

Having carefully considered the remaining specific impact tests, we conclude that this fee increase will have no significant effect in those areas.

Specific Impact Tests: Checklist

Use the table below to demonstrate how broadly you have considered the potential impacts of your policy options.

Ensure that the results of any tests that impact on the cost-benefit analysis are contained within the main evidence base; other results may be annexed.

Type of testing undertaken	<i>Results in Evidence Base?</i>	<i>Results annexed?</i>
Competition Assessment	No	No
Small Firms Impact Test	No	No
Legal Aid	No	No
Sustainable Development	No	No
Carbon Assessment	No	No
Other Environment	No	No
Health Impact Assessment	No	No
Race Equality	No	No
Disability Equality	No	No
Gender Equality	No	No
Human Rights	No	No
Rural Proofing	No	No

Annexes

Table 1a: Empirical studies of the wage elasticity of labour supply

Source	Estimate of wage elasticity of labour supply*	Measure
R. E Lucas and L. A. Rapping, "Real Wages, Employment and Inflation", <i>Journal of Political Economy</i> , 77 (1969).	Short run: 1.12 – 1.13 (95% significance) Long-run: -0.07 – 0.58	Change in real wages on labour supply using US data 1929-1965
Y. Chang and S. Kim, "On the aggregate labour supply", <i>Federal Reserve Bank of Richmond Economic Quarterly Volume 91/1 Winter 2005</i> .	1.0	Aggregate labour supply elasticity
L. Osberg and S. Phipps, "Labour Supply with Quantity Constraints: Estimates from a Large Sample of Canadian Workers", <i>Oxford Economic Papers, New Series, Vol. 45, No. 2. (Apr., 1993), pp. 269-291</i> .	Between +0.1 and -0.1	Wage elasticity of labour supply in the Canadian Labour Market
P. Bingley and G. Lanot, "The Incidence of Income Tax on Wages and Labour Supply", <i>National Centre for Register-based Research (NCRR), Version 5.002 31 October 2000</i>	-0.4	Elasticity of labour supply in the Danish Labour Market

*Note that the estimated wage elasticity of labour supply includes negative values indicating backward sloping or backward bending labour supply curve. This is due to the income effect outweighing the substitution effect. For a higher wage, individuals can decrease labour supply and enjoy the same level of consumption.

Table 1b: Empirical studies of the price elasticity of demand for education

Source	Estimate of price elasticity of demand	Measure
Tuition Elasticity of the Demand for Higher Education among Current Students: A Pricing Model Glenn A. Bryan; Thomas W. Whipple <i>The Journal of Higher Education</i> , Vol. 66, No. 5. (Sep. - Oct., 1995), pp. 560-574.	Between -0.12 to -0.3	Elasticity of demand for HE in a small private liberal arts college in Ohio, from increases in tuition fees between \$6000 to \$8000
Campbell, R. and B. Siegel. "The Demand for Higher Education in the United States, 1919-1964." <i>American Economic Review</i> , (June, 1967), pp. 482-94.	-0.44	Aggregate demand for attendance in 4-year institutions in the US from 1927 – 63
Hight, J. "The Supply and Demand of Higher Education in the U.S.: The Public and Private Institutions Compared." Paper presented to the Econometric Society, December, 1970.	Between -1.058 and -0.6414	Used Campbell and Siegel's data and split up for public and private sectors
Hoernack, S., W. Weiler, and C. Orvis. "Cost-Related Tuition Policies and University Enrollments." mimeo., Management Information Division, University of Minnesota, 1973.	Between -1.811 to -.837	Private demand for the University of Minnesota, using longitudinal data from 1948-72.

Table 2: Estimated impact on volumes on Option 2

Application type	A	B	C	D	E
	Change in fee	Annual expected wage	Expected wage over leave entitlement	% change in expected wage (A/C)	% change in volumes (D*elasticity of labour supply)
Visas					
Tier 4 Visa - Lead Applicant	£26	£9,324	£27,972	0.09%	-0.09%
Tier 4 Visa - Dependent Applicant*	£26	£0	£0	0.09%	-0.09%
Tier 5 Visa - Lead Applicant	£26	£7,985	£3,992	0.67%	-0.33%
Tier 5 Visa - Dependent Applicant*	£26	£0	£0	0.67%	-0.33%
UK-based Extensions of Leave					
PBS Tier 4 Extension	£5	£9,324	£18,648	0.03%	-0.03%
PBS Tier 5 Extension	£25	£7,985	£3,992	0.64%	-0.32%

* We assume an annual expected wage of £0 for dependent applicants

Table 3a: Option 2 – Full results of cost-benefit analysis Tier 4

	2009/10	2010/11	2011/12	2012/13	2013/14	Total
Benefits (£)						
Net Revenue raised from fee changes and introduction of MIF for those who continue to apply	£6,417,632	£6,417,632	£6,417,632	£6,417,632	£6,417,632	£32,088,158
Total Benefits (PV)	£6,417,632	£6,200,716	£5,990,859	£5,788,062	£5,592,324	£29,989,592
Costs (£)						
Revenue from net decrease in the volume of applications as a result of fee changes and introduction of MIF	-£32,363	-£32,363	-£32,363	-£32,363	-£32,363	-£161,813
Output loss from net decrease in migrants coming/ remaining in the UK	-£6,174,102	-£6,174,102	-£6,174,102	-£6,174,102	-£6,174,102	-£30,870,511
Total costs (PV)	-£6,206,465	-£5,996,686	-£5,793,735	-£5,597,610	-£5,408,313	-£29,002,809
Net benefit (PV)	£211,167	£204,029	£197,124	£190,451	£184,011	£986,783

Table 3b: Option 2 – Full results of cost-benefit analysis Tier 5

	2009/10	2010/11	2011/12	2012/13	2013/14	Total
Benefits (£)						
Net Revenue raised from fee changes and introduction of MIF for those who continue to apply	£1,742,130	£1,742,130	£1,742,130	£1,742,130	£1,742,130	£8,710,649
Total Benefits (PV)	£1,742,130	£1,683,246	£1,626,278	£1,571,227	£1,518,092	£8,140,973
Costs (£)						
Revenue from net decrease in the volume of applications as a result of fee changes and introduction of MIF	-£22,225	-£22,225	-£22,225	-£22,225	-£22,225	-£111,124
Output loss from net decrease in migrants coming/ remaining in the UK	-£673,454	-£673,454	-£673,454	-£673,454	-£673,454	-£3,367,268
Total costs (PV)	-£695,678	-£672,165	-£649,416	-£627,432	-£606,214	-£3,250,906
Net benefit (PV)	£1,046,451	£1,011,081	£976,862	£943,794	£911,878	£4,890,067

Table 3c: Option 2 – Full results of cost-benefit analysis Tier 4 and 5 combined

	2009/10	2010/11	2011/12	2012/13	2013/14	Total
Benefits (£)						
Net Revenue raised from fee changes and introduction of MIF for those who continue to apply	£8,159,761	£8,159,761	£8,159,761	£8,159,761	£8,159,761	£40,798,807
Total Benefits (PV)	£8,159,761	£7,883,961	£7,617,137	£7,359,289	£7,110,416	£38,130,565
Costs (£)						
Revenue from net decrease in the volume of applications as a result of fee changes and introduction of MIF	-£54,587	-£54,587	-£54,587	-£54,587	-£54,587	-£272,937
Output loss from net decrease in migrants coming/ remaining in the UK	-£6,847,556	-£6,847,556	-£6,847,556	-£6,847,556	-£6,847,556	-£34,237,779
Total costs (PV)	-£6,902,143	-£6,668,851	-£6,443,151	-£6,225,043	-£6,014,528	-£32,253,715
Net benefit (PV)	£1,257,618	£1,215,111	£1,173,987	£1,134,246	£1,095,888	£5,876,850

2009 02 05: Final/ Implementation Stage Impact Assessment.

Impact Assessment of Fee Changes for Tier 4 and Tier 5 of the Points Based System for Immigration.

Comments by Programme Director for Migration (in lieu Chief Economist)

I have examined the impact assessment for the proposals to increase the entry fees for tiers 4 and 5 of the Points Based System.

The Impact Assessment clearly sets out the rationale behind having lower fees for each individual under Tiers 4 and 5 when compared to other entry routes. The reason why fees for Tiers 4 and 5 should nonetheless increase slightly is also clearly explained.

The appraisal of the costs and benefits has had to make assumptions as to the extent to which individuals, entering the UK under Tiers 4 and 5, will be deterred by the fee increases from coming to the UK. These assumptions estimate that the charges will be roughly neutral for the UK economy as a whole (+£5.9m net benefit over 5 years). It will be important (as indicated in the Impact Assessment) to monitor the policy though it may be difficult to specifically attribute changes in migrant volumes to this specific policy change.

Matt Million
February 2009