

Immigration and Nationality Directorate

**Accreditation of Educational Institutions involved
in recruiting International students under the
Points Based System: Tier 4 - Consultation Report**

DOCUMENT CONTROL

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Distribution

Version	Name	Role
0.1	David Young	Consultancy Services North - Performance and Management Consultancy Services
0.2	Marc Owen John Larkins Suzanne Barnes Mike Taylor Phillipa Rouse Chris Cadman	Head of Student Task force – Managed Migration Business Architect - Managed Migration Student Task Force – Managed Migration Student Task Force – Managed Migration Managed Migration Customer Account Manager - Performance and Management Consultancy Services Head of Consultancy Services - Performance and Management Consultancy Services
1.0	Alan Bucknall James Quinalt Simon Lovett Marc Owen John Larkins Suzanne Barnes Mike Taylor	Customer Services Director – Managed Migration Office For Criminal Justice Reform Foreign and Commonwealth Office Head of Student Task force – Managed Migration Business Architect - Managed Migration Student Task Force – Managed Migration Student Task Force – Managed Migration

RELATED DOCUMENTS

Document List

Document Name
A Points Based System: Making Migration Work for Britain (The Command Paper)

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GLOSSARY

Terms used in this report	
PBS	Points Based System
UK	United Kingdom
DfES	Department for Educational Skills
REP	Register for Educational Providers
IND	Immigration and Nationality Directorate
OFSTED	Office for Standards in Education
ALI	Adult Learning Inspectorate
EIBAS	English in Britain Accreditation Scheme – British Council
BAC	British Accreditation Council
QAA	Quality Assurance Agency
ISI	Independent Schools Inspectorate
ABLS	Association of British Language Schools
ABE	Association of Business Executives
C&G	City and Guilds
IIP	Investors In People
ISO	Quality Assurance Standard
LSC	Learning Skills Council
OCR	Oxford and Cambridge and Royal School of Arts
SQA	Scottish Qualification Authority
US	United States
AQA	Assessment and Qualification Alliance
EAQUALS	European Association of Quality Language Services
BLA	British Learning Association
CSCI	Commission for Social Care Inspection
CDET	Council for Dance Education and Training
OTHM	Organisation for Tourism and Hospitality Management
ABLS	Association for the Recognition of British Language Schools
ACCA	Association of Chartered Certified Accountants
IFA	International Federation of Aroma-therapists

BACKGROUND

1. Following a public consultation, on the 7 March 2006, the Government published the Command Paper, 'A Points Based System: Making Migration Work for Britain'. The Command Paper sets out the Government's proposals for the introduction of a new five tier Points Based System (PBS) for managing migration in the United Kingdom (UK). The PBS will replace the numerous routes and concessions to work, train or study in the UK which are provided for under the existing Immigration Rules.
2. Tier 4 of the PBS relates to students. Tier 4 aims to make the student route both simpler and more robust. Integral to the new PBS is providing greater objectivity and transparency to the decision-making process. Under the current system Entry Clearance Officers are relied upon to make essentially subjective decisions about student's intentions and ability to study a particular course and their decisions are regularly challenged. Under the PBS, each establishment will be entitled to issue their prospective students with a certificate of sponsorship which will serve as a proxy to confirm the student's ability and intention to study with them.
3. In order to be confident that all educational establishments on the sponsors list are bona fide institutions, the Home Office has now sought the views of all educational institutions across the UK on the introduction of a mandatory accreditation requirement for all educational institutions across the UK. The consultation has also allowed an opportunity to gain a clearer picture of the likely numbers of institutions that will use the PBS.
4. As part of the consultation the Home Office proposed the following criteria for what might constitute acceptable accreditation for the purpose of becoming a sponsor on the new list of sponsors.
5. Appropriate accrediting bodies should:
 - Be able to clearly demonstrate that their function is completely independent of any membership-type scheme;
 - Undertake mandatory on-site inspections using inspectors who should be themselves appropriately qualified to inspect and have no conflict of interest in carrying out the inspection. The inspection should assess;
 - The premises and health and safety
 - Administration and staffing
 - Student welfare
 - Quality of teaching delivery and resources
 - Require information from institutions to show;
 - Legal status
 - Size of premises/ numbers of students
 - Staff and their qualifications
 - Courses offered and curricula
 - Course programmes/ timetables
 - Provide a clear report to inspected institutions on their strengths and any weaknesses with a clear rating and pass or fail mark;
 - Re-inspect or make interim visits and further full inspections at appropriate intervals;
 - Be prepared to inform Immigration and Nationality Directorate (IND) where they have removed an institution's accreditation as a result of a complaint received (NB. IND may still remove an institution from the register where it is causing

problems without referring to the accreditation body first according to the sponsorship criteria);

- Take prompt action to check any institutions they have accredited where IND staff report concerns;
- Possess sufficient resilience to meet any legal challenges regarding their accreditation decisions.

METHOD FOR THE CONSULTATION

6. The consultation was carried out via an on-line questionnaire on the Home Office website. In addition, the Home Office wrote to all 14,400 education establishments of the Department for Education & Skills (DfES) Register of Education Providers (REP) for the UK to raise awareness about the consultation and encourage their participation. The letter also contained background information and the Home Office website address.
7. The educational institutions were given around three weeks in which to complete the questionnaire. The completion date given to the educational institutions was, 28th April 2006. Questionnaire submitted up to two weeks later (12th May 2006) were also included in this consultation exercise.
8. On completion, the educational institutions returned the questionnaires electronically to a single Home Office mailbox (Accreditationquestion@homeoffice.gsi.gov.uk). The questionnaires returned by the educational institutions were then saved electronically for reference.
9. Information supplied by the educational institutions was taken from the questionnaires and transferred into a Microsoft 'Excel' spreadsheet. Once the data had been recorded onto the spreadsheet, the information was analysed. The findings of which are set out in this report.
10. The questionnaire used for the consultation exercise can be found at Annex A.

RESPONSE OVERVIEW

11. The total number of questionnaires returned to the Home Office was 834. 49 (5.88%) of the questionnaires had to be discounted from the consultation exercise. The reasons for this are set out below. This left 785 questionnaires.
12. 33 (3.9%) of the 834 questionnaires were duplicates. The reasons for this may have been;
 - Initial confusion caused by hosting a read only PDF document on the Home Office website;
 - No automated response on receipt of the questionnaires to confirm the Home Office had in fact received the questionnaire.
13. 16 (1.9%) of the 834 were voided. The reasons for this were;
 - Questionnaire did not contain enough meaningful information to complete any analysis;
 - Unable to open attachment;
 - Attachment not included;

- Format of the questionnaire document was unreadable or not compatible.

GEOGRAPHICAL RESPONSE OVERVIEW

14. The geographical locations for the educational institutions by type have been split into regions across the UK. There are 12 regions. These are as follows;

- Wales
- South West
- South East
- Scotland
- North West
- Northern Ireland
- North east
- Midlands
- London
- Isle of Man
- Eastern
- East Anglia

15. 1 of the 785 educational institutions who responded had their contact details as outside the UK. This was 'Home language International' in Monaco (Institution 576). The educational institution type was 'other'. This educational institution has not been included on the regional UK map.

16. Most questionnaires received by region was 'London' 304 (38.8%) followed by 'South East' 166 (21.2%). These two regions alone made up the majority of all the responses received 470 (60.0%). The only other real significant region was 'South West' 80 (10.2%).

17. There were 4 regions which made up about 4% to 6% of the total returned questionnaires. 'North West' 37 (4.7%), 'Scotland' 37 (4.7%), 'Midlands' 48 (6.1%) and 'Eastern' 44 (5.6%).

18. The remaining questionnaires from the other regions made up a small amount equal to about 7% (7.2%). 'Wales' 20 (2.6%), 'Northern Ireland' 7 (0.9%), 'Isle of Man' 2 (0.3%) and 'East Anglia' 27 (3.4%)

19. A map of the United Kingdom including pie charts of the educational institutions returns by type for each region can be found at Annex B.

QUESTIONNAIRE FINDINGS

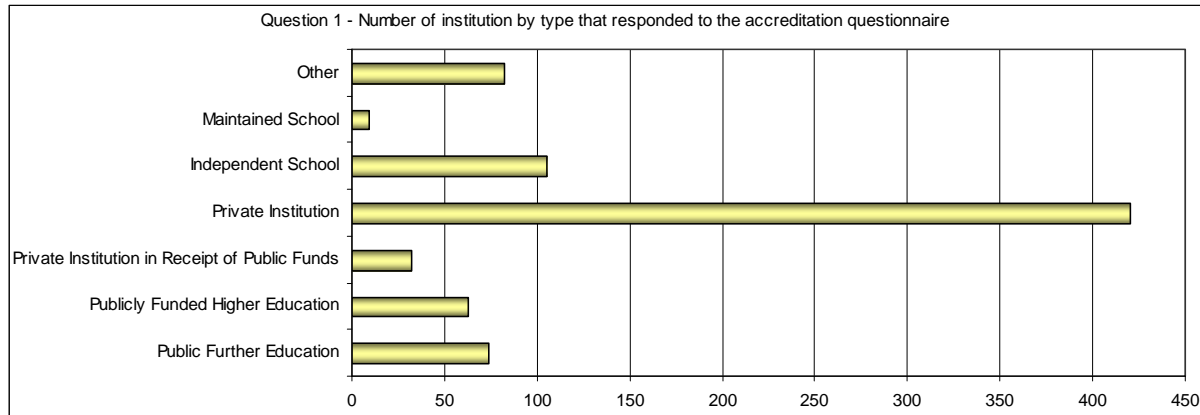
Question 1 – What category below best describes your Institution?

20. There were seven different classification types of educational institutions for this consultation. The responses of the 785 institutions by type are shown below.

- Public Further Education – 74 (9.4%)
- Public Funded Higher Education – 63 (8.0%)
- Private Institution in Receipt of Public Funds – 32 (4.1%)
- Private Institution – 420 (53.5%)
- Independent School – 105 (13.4%)

- Maintained School – 9 (1.2%)
- Other – 82 (10.5%)

Figure 1 – Graph showing the number of institutions by type that responded to the accreditation questionnaire



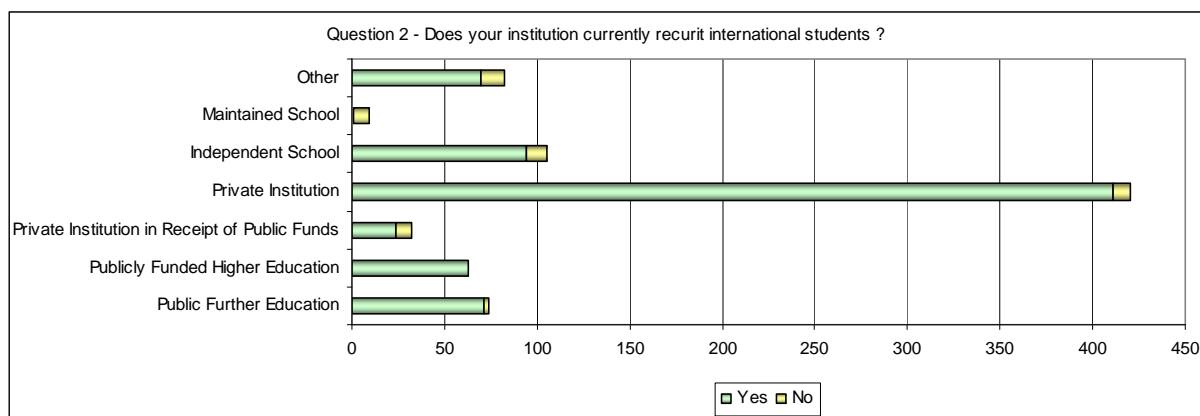
21. The majority of all the responses were from 'private institutions'. These responses made up more than half of all the returned questionnaires (53.5%).
22. There is about a 10% average response rate from three of the institution types. This includes the following educational institutions 'public further education (9.4%)', 'public funded higher education (8.0%)' and 'independent schools' (13.4%).
23. The lowest response rates were from 'maintained schools' (1.2%) and 'private institution in receipt of public funds' (4.1%). These two institution types in total made just over 5% (5.3%) of all the questionnaire returns.
24. The 'other' category of institution made just over 10% (10.5%) of all responses. The 'other' type of educational institutions can be summarised as follows;
- Charitable Trust or Organisation;
 - Religious College or Organisation;
 - Non Profit Making Educational Trust or Organisation;
 - Specialist Institutions;
 - Post Graduate Training Workshop for Silversmiths and Jewellers
 - Information Technology Training for New Deal
 - Apprenticeship Schemes
 - Assessment Centres
 - Industrial Related Training Organisation
 - Sports Related Academy
 - Adult or Community Learning Centres or Institutions.

Question 2 - Does your institution currently recruit international students?

- Yes – 734 (93.5%)
- No – 51 (6.5%)

25. This showed that an overwhelming majority of the 785 educational institutions who responded currently do recruit international students (93.5%). Only a small proportion of the 785 educational institutions did not (6.5%).

Figure 2 – Graph showing the number of institution by type who currently recruit international students



26. A breakdown by type for the 93.5% of educational institutions who do recruit international students is as follows;

- Public Further Education – 71 (9.7%)
- Public Funded Higher Education – 63 (8.6%)
- Private Institution in Receipt of Public Funds – 24 (3.3%)
- Private Institution – 411 (60.0%)
- Independent School – 94 (12.8%)
- Maintained School – 1 (0.1%)
- Other – 70 (9.5%)

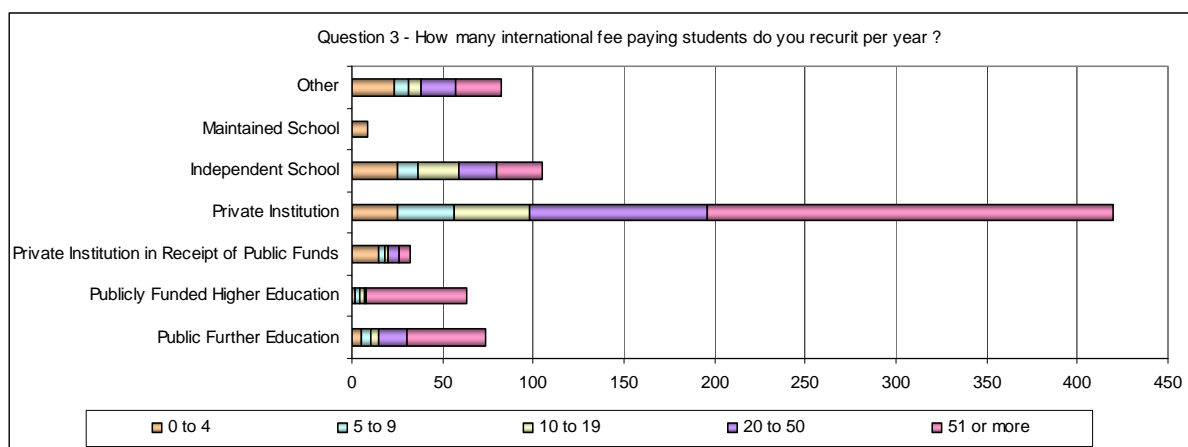
27. A breakdown by type for the 6.5% of educational institutions who do not recruit international students is as follows;

- Public Further Education – 3 (5.88%)
- Public Funded Higher Education – 0 (0.0%)
- Private Institution in Receipt of Public Funds – 8 (15.7%)
- Private Institution – 9 (17.7%)
- Independent School – 11 (21.6%)
- Maintained School – 8 (15.7%)
- Other – 12 (23.5%)

Question 3 - How many international fee paying students (students from outside the European Union) do you recruit in a year?

- 0 to 4 – 102 (13.0%)
[51 (6.5%) of educational institutions confirmed in question 2 that they do not recruit any international students]
- 5 to 9 – 60 (7.6%)
- 10 to 19 – 82 (10.5%)
- 20 to 50 – 161 (20.5%)
- 51 or more – 380 (48.4%)

Figure 3 – Graph showing the number of international fee paying students per year by institution type



28. Almost half of the 785 educational institutions who responded currently recruit '51 or more' (380 - 48.4%) international fee paying students per year. Of the 380 educational institutions responding, who recruit '51 or more' students, 224 (60.0%) are 'private institutions'.

29. The average number of international fee paying students for the educational institutions who recruit '51 or more' is about 570 (573.8) per year. The second largest category (20.5%) was educational institutions that recruited '20 to 50' international fee paying students per year.

30. The above two categories ('51 or more' (48.4%) and '20 to 50' (20.5%)) make up around 70% (68.9%) of all responses. This shows that around 70% of all educational institutions who responded to the questionnaire recruit at least 20 or more students per year.

31. The remaining 30% (31.1%) of all other educational institutions who responded recruit less than 20 students per year; '0 to 4' (13.0%), '5 to 9' (7.6%) and '10 to 19' (10.5%). Of the 13.0 who recruit '0 to 4', 6.5% recruit no international students and 6.5% are involved in recruiting very small numbers of international students.

Question 4 - How many international fee paying student intakes do you have in a year?

- Once a year – 124 (15.8%)
- Twice a year – 85 (10.8%)
- Three times a year – 144 (18.3%)
- Four times a year – 84 (10.7%)
- Once a month – 30 (3.8%)
- Once a week – 134 (17.1%)
- Other (please specify in box below) – 184 (23.4%)
[51 (6.5%) of educational institutions confirmed in question 2 that they do not recruit any international students]

Figure 4 – Graph showing the number of international fee paying student intakes per year by institution type

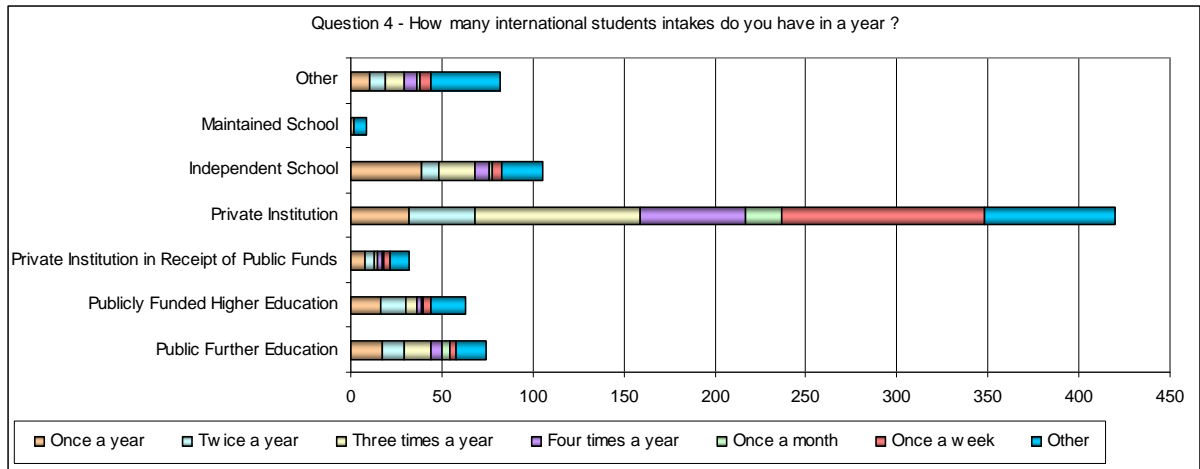
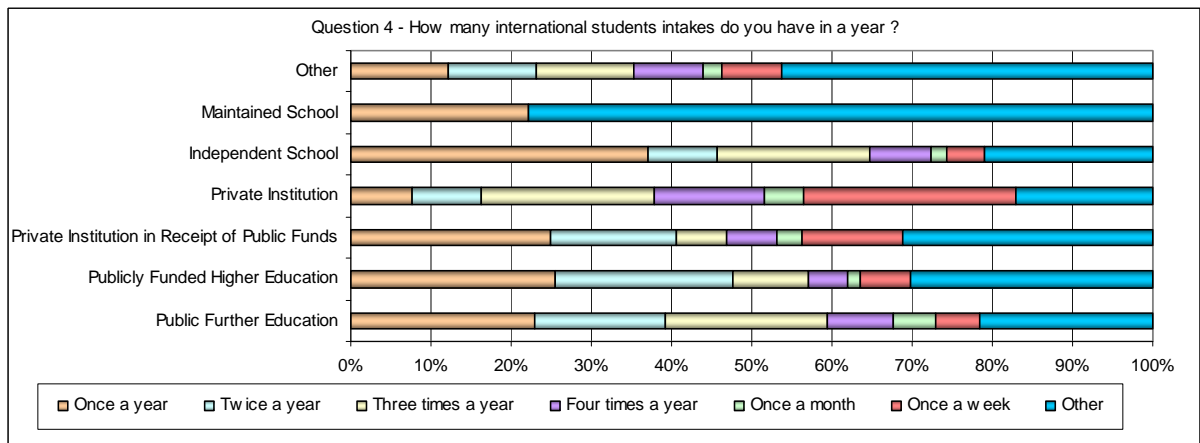


Figure 5 – Graph showing the percentage of international fee paying student intakes per year by institution type



32. This question showed varying differences in the intakes across all the 785 educational institutions who responded. The most common intakes were ‘three times a year’ (18.3%), ‘once a week’ (17.1%) and ‘other’ (23.4%). In total these made up almost 60% (58.8%) of all intakes.

33. The ‘other’ (23.4%) type of intake included the 51 (6.5%) educational institutions who do not recruit any international students. This means that 16.9% of all educational institutions have ‘other’ frequency types of intake. The ‘other’ types of intake can be summarised as follows;

- Rolling programmes/ open enrolments dates;
- Numerous intakes per year;
- Restricted to certain dates due to institution term times/ opening periods;
- Depends on course taken;
- Anytime no restrictions;
- Every couple of weeks;
- Restricted to certain dates due to course start and finish dates.

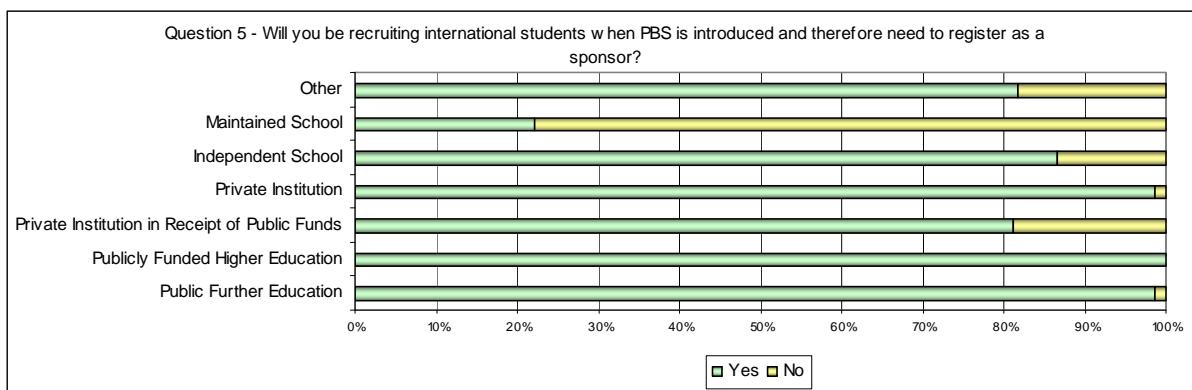
34. All the remaining listed intake types on the questionnaire made up just over 40% (41.2%) in total. This was 'once a year' (15.8%), 'twice a year' (10.8%), 'four times a year' (10.7%) and 'once a month' (3.8%).

Question 5 - Will you be recruiting international students when the Points Based System is introduced and therefore, need to register as a sponsor?

- Yes – 736 (93.8%)
- No – 49 (6.2%)

35. This showed that an overwhelming majority of the 785 educational institutions who responded will be recruiting international students (93.8%) under the PBS. There are a small proportion of the 785 educational institutions who will not be recruiting under the PBS (6.2%).

Figure 6 – Graph showing the number of educational institutions who will be recruiting international student under the Points Based System by institution type



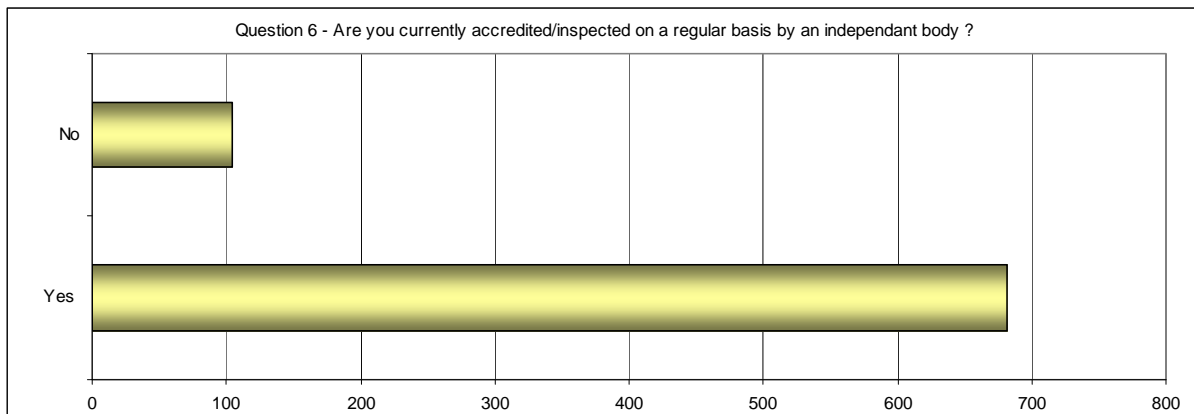
Question 6 - Are you currently accredited/inspected on a regular basis by an independent body?

- Yes – 681 (86.8%)
- No – 104 (13.2%)

36. This showed a significant amount of the 785 educational institutions who responded are currently inspected or accredited on a regular basis by an independent body (86.8%).

37. There is however a small proportion of the 785 educational institutions who responded that are not inspected or accredited on a regular basis by any independent body (13.2%).

Figure 7 – Graph showing the number of educational institutions who are currently accredited or inspected on a regular basis by an independent body



38. A breakdown by educational institution type for the 681 (86.6%) who are currently inspected or accredited on a regular basis by an independent body is as follows;

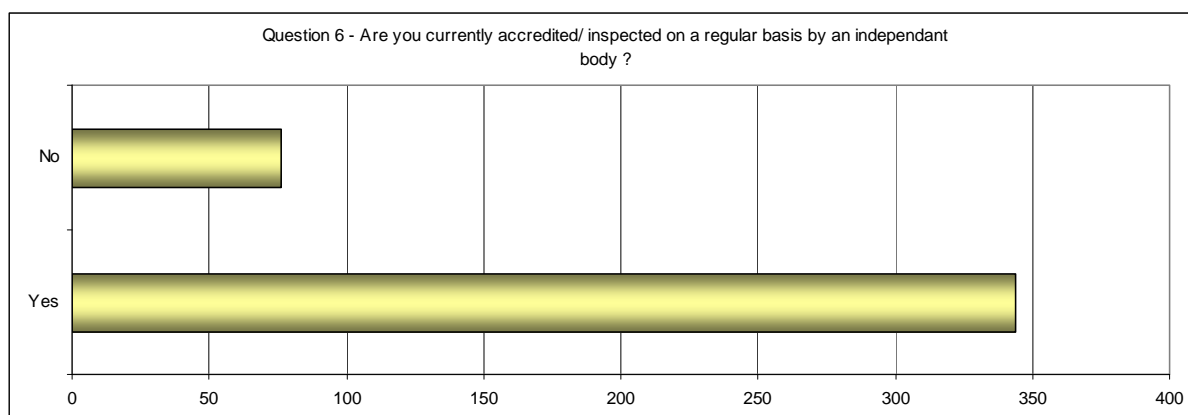
- Public Further Education – 73 (10.7%)
- Public Funded Higher Education – 63 (9.3%)
- Private Institution in Receipt of Public Funds – 32 (4.7%)
- Private Institution – 344 (50.5%)
- Independent School – 99 (14.5%)
- Maintained School – 9 (1.3%)
- Other – 61 (9.0%)

39. A breakdown by educational institution type for the 104 (13.2%) who are not currently inspected or accredited on a regular basis by any independent body is as follows;

- Public Further Education – 1 (1.0%)
- Public Funded Higher Education – 0 (0.0%)
- Private Institution in Receipt of Public Funds – 0 (0.0%)
- Private Institution – 76 (73.1%)
- Independent School – 6 (5.8%)
- Maintained School – 0 (0.0%)
- Other – 21 (20.2%)

40. The above shows that of all the educational institutions not inspected, 73.1% are from 'private institutions'.

Figure 8 – Graph showing the number of private institutions who are currently accredited or inspected on a regular basis by an independent body



41. By taking the responses from question 4 (How many international fee paying student intakes do you have in a year?) it is possible to make a comparison against the educational institutions that are not currently inspected or accredited.

42. A breakdown of the 104 educational institutions who are not currently inspected or accredited, when compared to the number of international fee paying students recruited shows as follows;

- 0 to 4 – 13 (12.5%)
- 5 to 9 – 10 (9.6%)
- 10 to 19 – 17 (16.4%)
- 20 to 50 – 31 (29.8%)
- 51 or more – 33 (31.7%)

43. The above shows that just over 60% (61.5%) of all educational institutions who are not inspected or accredited also recruit over at least 20 international fee paying students per year ('20 to 50' (29.8%) and '51 or more' (31.7%)).

44. The average number of international fee paying students specifically for the educational institutions who recruit '51 or more' students and are not currently inspected or accredited is about 390 (387.4) per year.

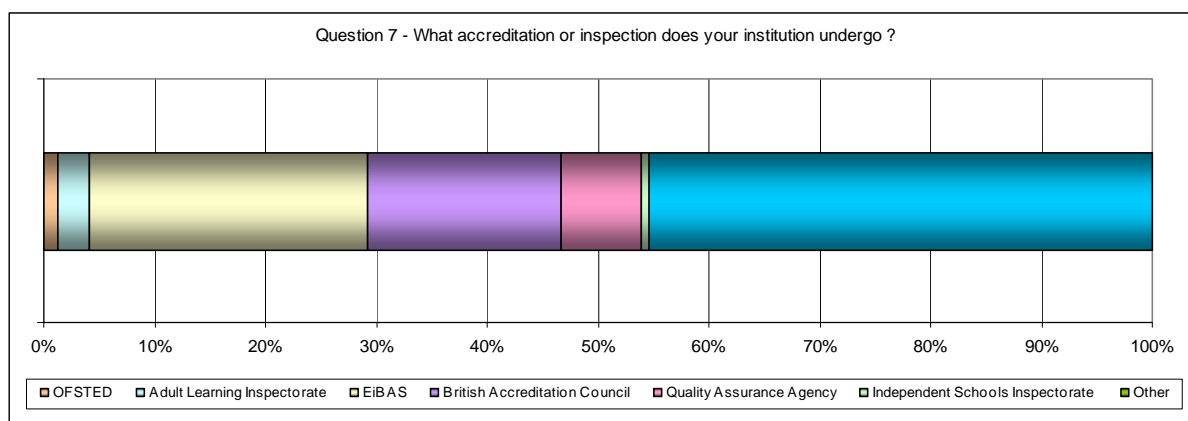
45. The highest amount of international fee paying students' recruited by an educational institution that is not inspected or accredited is 2500 per year. This was a 'Summer Sports and Language School' (Institution 658).

Question 7 - What accreditation or inspection does your institution undergo?

- OFSTED (Office for Standards in Education) – 121 (13.2%)
- Adult Learning Inspectorate (ALI) – 77 (8.4%)
- English in Britain Accreditation Scheme (EiBAS) – British Council - 168 (18.4%)
- British Accreditation Council (BAC) – 87 (9.5%)
- Quality Assurance Agency (QAA) – 110 (12.0%)
- Independent Schools Inspectorate (ISI) – 66 (7.2%)
- Other - 285 (31.2%)

46. The answers to this question do not have a direct correlation with the number of questionnaires returned (785) by the educational institutions. The reason for this is some educational institutions are inspected by more than one type of accreditation or inspectorate body.
47. Just over 30% (31.2%) of accreditations or inspections currently carried out across all the educational institutions are 'other' types.
48. The 'other' type of accreditations or inspections for 'private institutions' is however, significantly higher than the average 31.2% across all educational institution types. It is almost 50% (45.4%).

Figure 9 – Graph showing the percentages for private institutions that are currently accredited or inspected by type



49. The most common 'other' types of accreditation or inspection made can be summarised in a high-level form as follows;

- Association of British Language Schools (ABLS);
- Association of Business Executives (ABE);
- City and Guilds (C&G);
- Department for Educational Skills (DfES);
- Investors in People (IIP);
- ISO accreditation (Quality Assurance Standards);
- Learning Skills Council (LSC);
- Oxford and Cambridge and Royal School of Arts (OCR);
- Scottish Qualification Authority (SQA);
- Other universities or colleges;
- United States of America affiliated inspections;
- Examining Boards.

50. A more comprehensive list of the 'other' different types of accreditations or inspections listed by the educational institutions can be found at Annex C. This list now needs to be checked by the Home Office against its final criteria for an appropriate body to ensure that any additional suitable bodies listed in Annex C are not overlooked.

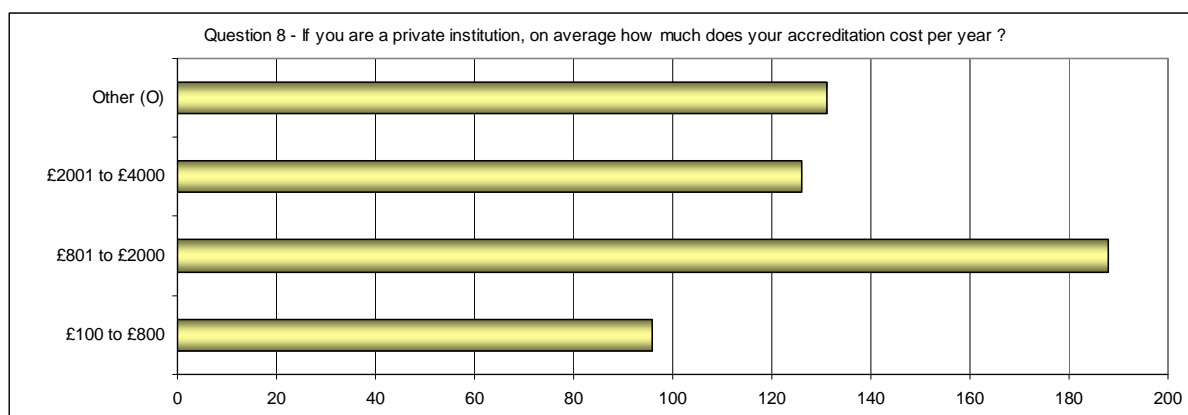
51. The second most common type of accreditation or inspection made was the 'EiBAS – British Council'. This was just under 20% (18.4%) of all accreditations or inspections completed.

52. 'OFSTED' and 'QAA' together made up just over a quarter or 25% (25.3%) of accreditation or inspections undertaken.
53. The three remaining types of accreditation or inspections listed on the questionnaire made up a quarter or 25% (25.2%) of the accreditation or inspections undertaken. These are as follows; 'BAC' (9.5%), 'ALI' (8.4%) and 'ISI' (7.2%).

Question 8 – If you are a private institution, on average how much does your accreditation cost per year?

- £100 to £800 - 96 (17.7%)
 - £801 to £2000 – 188 (34.8%)
 - £2001 to £4000 – 126 (23.3%)
 - Other – 131 (24.2%)
54. This question led to responses from more than the actual defined 'private institution' type of educational institution. The types of educational institutions who responded to this question were;
- Private Institution in Receipt of Public Funds;
 - Private Institution;
 - Independent School;
 - Maintained School;
 - Other.
55. Of the 785 educational institutions who responded, 541 said they currently pay for some type of inspections (refer to figure above). This is equal to about 70% (68.9%). The figure 541 should however, be treated with caution, this figures include some anomalies. An example of this is;
- A proportion (38) of the 131 educational institutions that selected 'other' for question 8, are also not accredited or inspected as per answer given by some educational institutions to question 4.
56. Other reasons why the overall figure 541 should be treated with caution is because;
- Not all educational institutions knew or were sure of the costs/ fees;
 - Some educational institutions inspections cost nothing due to;
 - Self inspection by affiliated or main organisation body
 - Costs paid by affiliated or main organisation body
 - Funded through royalties
 - One off payment for registration with accreditation or inspectorate body and no additional costs for future inspections
 - Some educational institutions chose not to disclose or state any of their costs;
 - In some cases, educational institutions stated their inspection costs in (\$) US Dollars due to their affiliation with the United States (US) colleges or universities.

Figure 10 – Graph showing the cost for private institutions on how much their accreditation costs on average per year



57. The most common answer relating to costs associated with the undertaking of inspections for a 'private institutions' was '£801 to £2000'. This was equal to more than a third of all responses 35% (34.8%) received.

58. The types of inspections within the '£801 to £2000' cost category included;

- Assessment and Qualifications Alliance (AQA);
- Oxford Cambridge and Royal School Arts (OCR);
- ISO 9001:2000 (Quality Assurance Standards);
- Scottish Qualification Authority (SQA);
- City and Guilds (C&G).

59. The second most common answer related to 'other' cost amounts. For reasons already highlighted it is difficult to take out all the anomalies and produce clear findings.

60. It is possible to provide an average cost for the educational institutions who selected 'other'. The average for educational institutions who selected 'other' cost is about £10,500 (£10,540.30). It should be noted that this figure does not take into account the costs for educational institutions who stated their inspection costs in (\$) US Dollars.

61. The third most common answer relating to costs associated with the undertaking of inspections for 'private institutions' was '£2001 to £4000'. This answer made up just under a quarter of all responses 25% (23.3%).

62. The types of inspections within the '£2001 to £4000' cost category included;

- European Association of Quality Language Services (EAQUALS);
- British Learning Association (BLA);
- City and Guilds (C&G);
- Commission for Social Care Inspection (CSCI);
- Council for Dance Education and Training (CDET).

63. The least common answer relating to the costs associated with the undertaking of inspections for 'private institutions' was '£100 to £800'. This answer still makes up a

significant amount of all the responses, nearly 20% (17.7%). This shows that there are cheaper inspections but which may not meet criteria set down for the PBS.

64. The types of inspections within the '£100 to £800' cost category included;

- Organisation for Tourism and Hospitality Management (OTHM);
- Association for the Recognition of British Language Schools (ABLS);
- Association of Chartered Certified Accountants (ACCA);
- City and Guilds (C&G);
- International Federation of Aroma-therapists (IFA).

65. It should be noted in addition to the above findings some inspections have been listed as having several different costs associated. For example City and Guilds is in the three costs categories '£100 to £800', '£801 to £2000' and '£2001 to £4000'. Reasons for this may be that;

- Educational institutions were unsure of the exact cost and may have stated estimated cost;
- Inspection may incur different costs dependant on the size of the organisation or number of students it has.

Question 9 - How often is your institution inspected?

- Once a year – 182 (17.7%)
- Every 2 years – 60 (7.6%)
- Every 4 years – 172 (21.9%)
- Every 5 years – 78 (9.9%)
- Other – 293 (37.2%)
[104 (13.2%) of educational institutions confirmed in question 6 that they are not inspected in any capacity]

66. Of the 785 educational institutions who responded, there is a significant difference in how often educational institutions are inspected.

67. The majority and just over a third of educational institutions answered 'other' (37.2%).

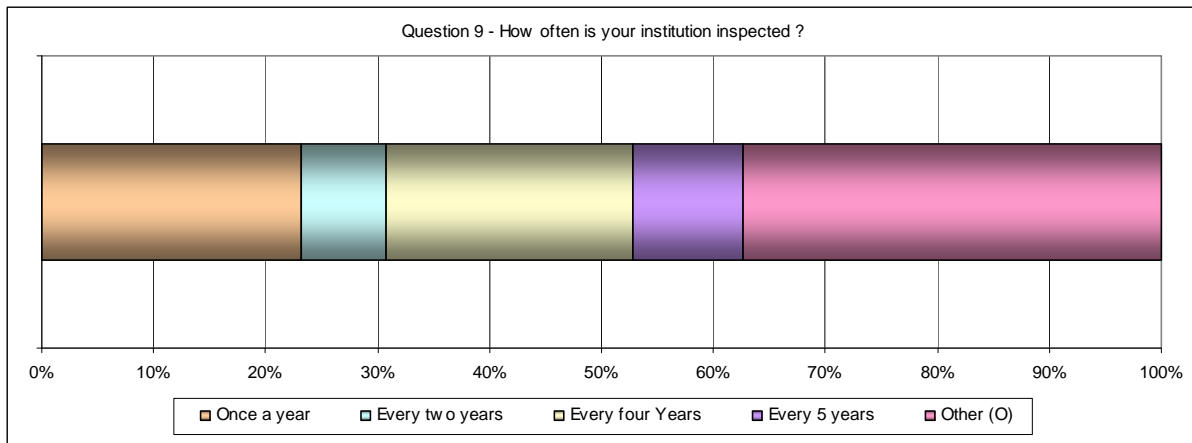
68. Looking closer at the educational institutions who selected 'other' there is a need to discount 104 educational institutions who responded 'No' to question 6 (Are you currently accredited/inspected on a regular basis by an independent body?). The 104 educational institutions who responded 'No' is equal to about 13% (13.2%) in total of all responses to question 9. This would therefore, suggest that only about 24% (24.1%) of the educational institution have a different frequency of inspection compared to those options presented in the consultation questionnaire.

69. The 'other' different frequency type of inspections can be summarised as follows;

- Dependant on accreditation or inspection type;
(Educational institution may have more than one or accreditation or inspectorate body who visits within any given period of time)
- Every;
 - 6 months
 - 3 years
 - 6 years
 - 10 years

- Rolling programmes or continuous inspection;
- Random or spot checks;
- Beginning or end of courses;

Figure 11 – Graph showing the percentages for how often educational institutions are inspected



70. The second most common answer relating to the frequency of inspection was 'every 4 years'. This answer made just over a fifth or 20% of all responses (21.9%).

71. The third most common answer relating to the frequency of inspection was 'once every year'. This answer made close to a fifth or 20% of all responses (17.7%).

72. The least two common answers relating to the frequency of inspection were 'every 2 years' (7.6%) and 'every 5 years' (9.9%). Adding these two answers together (17.5%) still fails to make them add up to or equal any other frequency stated on the consultation questionnaire.

Question 10 - Having read the proposed criteria for accreditation for the purposes of the Points Based System, do you think these are appropriate?

- Yes – 661 (84.9%)
- No – 118 (15.1%)

73. 6 of the 785 educational institutions who responded to this question failed to make any response or add comments in the box provided on the consultation questionnaire. Therefore, this means there were only 779 responses to this question.

74. Responses to this question showed a majority of the 779 educational institutions think the proposed criteria for accreditation, for the purposes of the PBS is appropriate (84.9%).

75. It is at this point worth making a comparison to the educational institutions who selected 'other' for question 7 (What accreditation or inspection does your institution undergo).

76. Of the 285 educational institutions who answered 'other' for question 7, 216 (75.8%) answered 'other' on its own. 69 (24.2%) educational institutions selected 'other' and

one or more options. 2 of the 216 educational institutions failed to answer or make any comments to question 10.

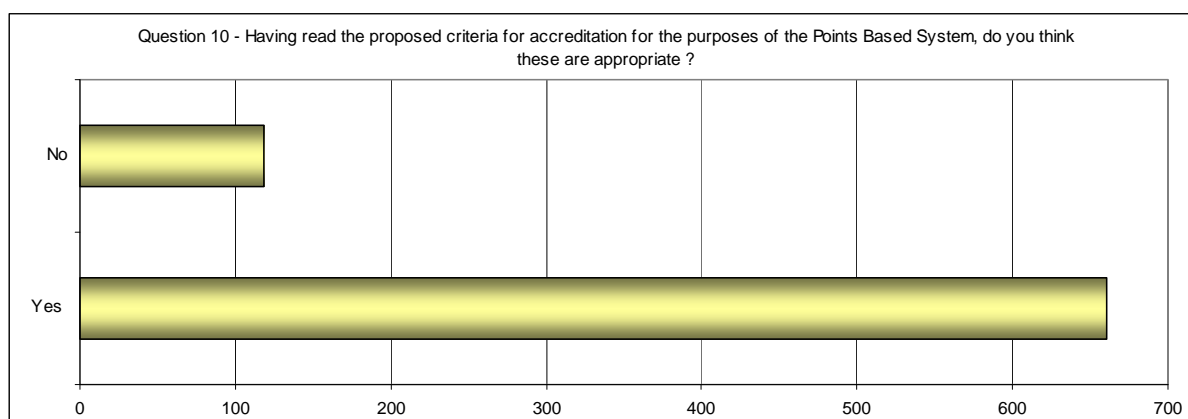
77. There are 170 (79.4%) of 214 educational institutions who only undertake an 'other' type of accreditation or inspection on its own, agreed with the proposed criteria for accreditation, for the purposes of the PBS is appropriate.

78. 44 (20.6%) of the 214 educational institutions who only undertake an 'other' type of accreditation or inspection on its own, did not agree with the proposed criteria for accreditation for the purposes of the PBS is appropriate.

79. The above shows a significant amount, 80% (79.4%) of educational institutions who only undertake an 'other' type of accreditation or inspection on its own, agreed with the proposed criteria for accreditation, for the purposes of the PBS is appropriate. This is just 5% (84.9%) under the average for all responses received.

80. Overall for question 10 there were however, a small proportion of the 779 educational institutions who think the proposed criteria for accreditation, for the purposes of the PBS are not appropriate (15.1%).

Figure 12 – Graph showing the percentages of educational institutions who agreed or disagreed with the proposed criteria for accreditation for the purposes of the Points Based System



81. A breakdown by type for the 661 (84.9%) educational institutions who think the proposed criteria for accreditation, for the purposes of the PBS are appropriate is as follows;

- Public Further Education – 69 (10.4%)
- Public Funded Higher Education – 50 (7.6%)
- Private Institution in Receipt of Public Funds – 29 (4.4%)
- Private Institution – 365 (55.2%)
- Independent School – 86 (13.0%)
- Maintained School – 9 (1.4%)
- Other – 53 (8.0%)

82. A breakdown by type for the 118 (15.1%) of educational institutions who think the proposed criteria for accreditation, for the purposes of the PBS are not appropriate is as follows;

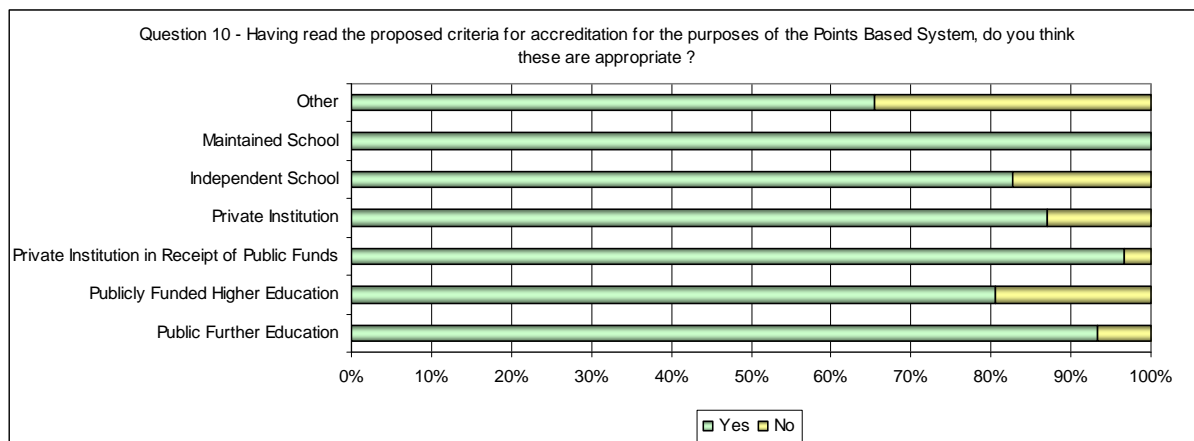
- Public Further Education – 5 (4.2%)
- Public Funded Higher Education – 12 (10.2%)
- Private Institution in Receipt of Public Funds – 1 (0.8%)
- Private Institution – 54 (45.8%)
- Independent School – 18 (15.3%)
- Maintained School – 0 (0.0%)
- Other – 28 (23.7%)

83. The above relates to how the response was spilt across the different educational institutions. It does not provide details of what percentage for each educational institution type thought the proposed criteria for accreditation, for the purposes of the PBS is not appropriate.

84. The below shows a comparison in relation to the total number of educational institutions by type who responded, that think the proposed criteria for accreditation, for the purposes of the PBS is not appropriate are as follows;

- Public Further Education – 5 out of 74 (6.8%)
- Public Funded Higher Education – 12 out of 63 (19.0%)
- Private Institution in Receipt of Public Funds – 1 out of 32 (3.1%)
- Private Institution – 54 out of 420 (12.9%)
- Independent School – 18 out of 105 (17.1%)
- Maintained School – 0 out of 9 (0.0%)
- Other – 28 out of 82 (34.1%)

Figure 13 – Graph showing the percentages of educational institutions by type who agreed or disagreed with the proposed criteria for accreditation for the purposes of the Points Based System



85. Question 10 on the consultation questionnaire, the educational institutions were given a chance to explain their reasons for their answer or add appropriate comments if they wished. The table below shows the number and percentage of responses by institution type.

Institution Type	Question 10	
Private Institution	61	54%
Other	21	19%
Independent School	13	12%
Public Funded Higher Education	10	9%
Public Further Education	4	4%
Private Institution in Receipt of Public Funds	3	3%
Total	112	

86. There was a significant amount of different themed responses from the educational institutions. The most common ones being as follows;

- It is (or could be) another layer of unnecessary bureaucracy and/ or duplication of existing accreditation;
- There is a need to recognise the US department of education approved agencies and study abroad programs;
- There should be just one accrediting body per sector;
- The accreditation process may be too expensive for small institutions and/ or may make some institutions too expensive for students;
- A single accrediting body would be less confusing for students and staff;
- There is a need to recognise Register for Educational Providers (REP) criteria and/ or approved study abroad programs.

Question 11 - Are there any additional criteria for accreditation you would like to see added to the list we have proposed?

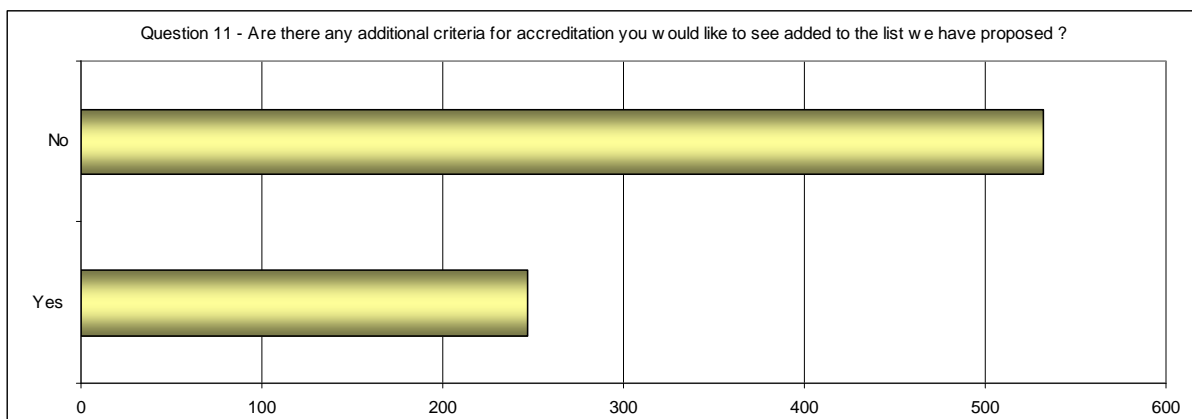
- Yes - 247 (31.7%)
- No – 532 (68.3%)

87. 6 of the 785 educational institutions who responded to this question failed to make any response or add comments in the box provided on the consultation questionnaire. Therefore, this means there were only 779 responses to this question.

88. Responses to this question showed that just over two thirds of the 779 educational institutions who responded did not have any additional criteria for accreditation they would like to see added to the list proposed by the Home Office (68.3%).

89. There was however a significant proportion of the 779 educational institutions that have additional criteria for accreditation that they would like to see added to the list proposed by the Home Office (31.7%).

Figure 13 – Graph showing the percentages of educational institutions who would add or not add additional criteria for accreditation to the list proposed by the Home Office



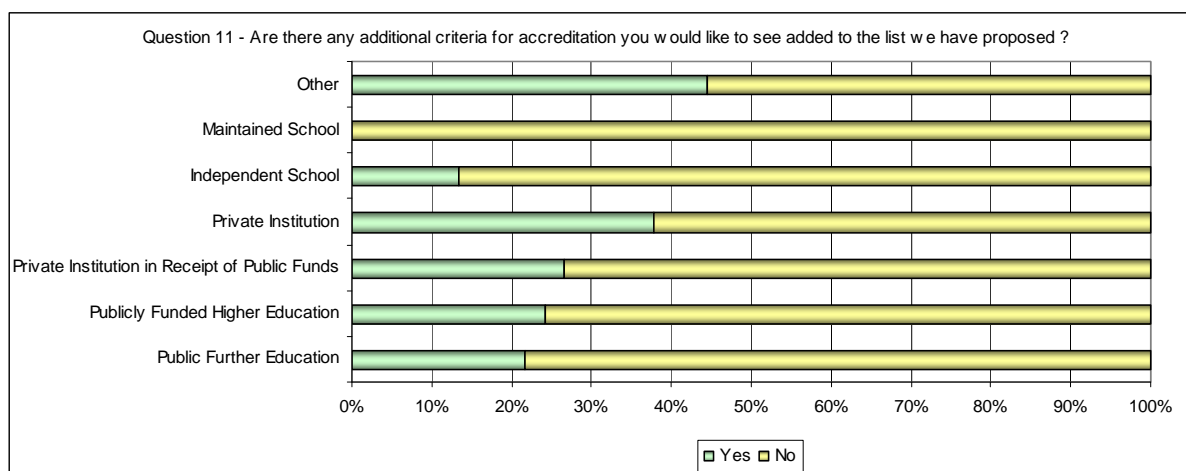
90. A breakdown by type for the 532 (68.3%) educational institutions who would not add additional criteria for accreditation to the list proposed by the Home Office is as follows;

- Public Further Education – 58 (10.9%)
- Public Funded Higher Education – 47 (8.8%)
- Private Institution in Receipt of Public Funds – 22 (4.1%)
- Private Institution – 261 (49.1%)
- Independent School – 90 (16.9%)
- Maintained School – 9 (1.7%)
- Other – 45 (8.5%)

91. A breakdown by type for the 247 (31.7%) educational institutions who would add additional criteria for accreditation to the list proposed by the Home Office is as follows;

- Public Further Education – 16 (6.5%)
- Public Funded Higher Education – 15 (6.1%)
- Private Institution in Receipt of Public Funds – 8 (3.2%)
- Private Institution – 158 (64.0%)
- Independent School – 14 (5.7%)
- Maintained School – 0 (0.0%)
- Other – 36 (14.6%)

Figure 14 – Graph showing the percentages of educational institutions by type who would add or not add additional criteria for accreditation to the list proposed by the Home Office



92. Question 11 on the consultation questionnaire, the educational institutions were given a chance to explain their reason for their answers or add appropriate comments if they wished. The table below shows the number and percentage of responses by institution type.

Institution Type	Question 11	
Private Institution	134	67%
Other	22	11%
Independent School	12	6%
Public Funded Higher Education	12	6%
Public Further Education	11	6%
Private Institution in Receipt of Public Funds	9	5%
Total	200	

93. The most common suggestion made by the educational institutions was to have 'one accrediting body per sector'. There were 46 suggestions for this. The 46 responses were predominately from 'private institutions', 37 of 46 (67%). The preferred type of accreditation was for 'EiBAS'. This type of response made up more than seven times the second most common suggestion.

94. Some of the benefits highlighted by the educational institutions are as follows;

- Criteria, inspectors and costs would be standardised;
- It would give the industry a good name again and there would be an Internationally-renowned quality level;
- There would be truly independent inspection - not by membership or peer review;
- It would be simpler and easier to understand;
- Agents, parents and students know they will receive a certain quality of tuition;
- Policing of the scheme would be simpler;
- Home office costs would be minimised;
- The risk of fraud would be reduced.

95. One of the other main themed responses included two main existing accreditation bodies being refer to as capable to undertake this task. Accreditation UK and the recognised accreditation bodies of other countries, such as the six in the US.

96. The other additional themed suggestions included the following;

- The accreditation body should be financially strong enough to withstand legal challenges to their scheme;
- Foreign accreditation bodies should be included;
- The IND should consider some flexibility or another body for small seasonal organisations and similar that use methods that do not fall under Accreditation UK;
- There should be some measure of achievement or results gained by students at the institution;
- IND should introduce regular spot checks, for example into attendance keeping;
- The DfES register does not deal adequately with the accreditation process;
- Inspectors should have an educational background or understanding of the skills being taught, and take into account student satisfaction.

97. PMCS recommends that the Managed Migration Directorate Student Taskforce takes on further investigation of the comments received. This is because the Taskforce has far superior knowledge and understanding of the educational institution types and of the education system. A document with the comments received for both questions 10 and 11 can be found at Annex E.

ANNEXES

Annex A – Consultation Questionnaire

Annex B - Geographic locations for educational institution type by region

Annex C - A list of the ‘other’ different types of inspections listed by the educational institutions in addition to the six main inspections listed on the consultation questionnaire

Annex D - An overview spreadsheet of the final statistical analysis data

Annex E - Comments received from educational institutions to questions 10 and 11 of the consultation questionnaire

Annex F – List of educational institutions who responded to the consultation questionnaire