Home Office

Consultation for fees and charging

Immigration and visas

Response form

Please ensure you have read the supporting information in consultation document before completing this form

Completed consultation form should be sent no later than midnight on 3rd December 2013 to the following address:

Electronic:
Charging.Consultation@homeoffice.gsi.gov.uk

By Post to:
Charging Consultation Team
8th Floor Lunar House
Wellesley Road Croydon
CR9 2AB

This document is available in electronic format on the GOV.UK website:
https://www.gov.uk/government/consultations/fees-and-charging-immigration-and-visas-consultation

If responding electronically, please ensure you highlight your specified response to multiple choice questions.

Your Details:

Name:

Immigration Law Practitioners' Association

Position:

Company/Organisation:

Immigration Law Practitioners' Association

Contact Details:

Postal Address:

Lindsey House, 40-42 Charterhouse Street, London EC1M 6JN

Telephone number:

020 7251 8383

Email:

info@ilpa.org.uk

Please feel free to provide comments on additional sheets if there is not sufficient space on this form. Please specify which question(s) you are responding to on any additional sheets.

:

Simplifying our fee structure

Q1. Do we have the right balance between simplicity and the need to differentiate fee levels for different products and services?

The balance is about right

- ☐ **Fees should be simplified, even if this means that some customers pay higher fees**
- ☐ **There should be more price points to differentiate fees further**
- ☐ **Don't know**

NB – we have been unable to make the tick boxes work so for each question we have copied our chosen response below them.

There should be more price points to differentiate fees further

Please provide comments to explain your answer above:

The Immigration Law Practitioners' Association welcomes the opportunity to respond to this consultation but regrets that no wider consultation, for example with persons who have made applications over the past few years, has been was carried out.

The reasons for decisions about which immigration fees are set at above or below cost should be more clearly explained.

Fees should bear some relation to the applicants' ability to pay. See more details about this point in answer to question three.

Family settlement visa fees should be lower. They are currently set at around twice the cost of providing the service given. The reason for coming to the UK is to be with a family member; there will often be strong reasons why the family could not be together in another country and no alternative to keep the family together. It is government policy to support family unity[1]; high fees to be together undermine this aim.

Partners now have to apply for an initial visa, which may be granted for 30 months, then for an extension of stay for a further 30 months, then for settlement and, ignoring any possible future fee increases, would pay £2207 in fees if this all took place in the UK, and £2480 if the series of applications includes entry clearance. The Home Office costs for dealing with the series of applications as listed for April 2013, in the UK are £965 and £1091 when including entry clearance. People who have been granted discretionary leave to remain in the UK with their families will have to apply for four 30-month periods, to reach ten years before they can qualify for settlement, at a cost to them of £3363 and to the Home Office of £1527 (a mark-up of 220%). These fees should be closer to the actual cost.

[1] For example, the Prime Minister stated on 15 August 2011, in his speech *We are all in this together* that he would consider any policy matters against a 'family test': *"From here on I want a family test applied to all domestic policy. If it hurts families, if it undermines commitment, if it tramples over the values that keeps people together, or stops families from being together, then we shouldn't do it."* See (accessed 29 November 2013) http://www.conservatives.com/News/Speeches/2011/08/David_Cameron_We_are_all_in_this_together.aspx

The Home Office must make it clearer that a fee can be waived in certain circumstances, for example for persons applying under the domestic violence rule who are destitute. Applications for a waiver must be dealt with quickly and consistently. In some cases, survivors of domestic violence are put off making an application for the Destitute Domestic Violence Concession because of fears that they will have to pay the stated fee. If an application is made without the required fee, it may be rejected as invalid, and the person may thus become an overstayer.

In the case of *R(Osman Omar) v SSHD* [2012] EWHC 3448 (Admin) (30 November 2012) it was held that a fee cannot be required where to do so is incompatible with the respect for the applicant's rights under the European Convention on Human Rights. It is possible to secure a waiver of a fee, in particular on human rights grounds following that case, but it is very difficult and involves a persistent legal representative, even in cases of, for example, domestic violence.

Although the Home Office has recently set up a procedure for people applying outside the rules to ask that their fee should be waived, this is a cumbersome and insecure procedure and persons cannot place any reliance on when they may qualify under it.

Clear information on the circumstances in which a fee will be reduced would also be helpful.

We consider that it is necessary to waive or reduce fees in some applications for indefinite leave to remain. The Home Office has set out its belief that those who cannot afford the fee can remain in receipt of limited leave – see the guidance to fee waivers on form Appendix 1 FLR(O) and Chapter 1A of the Immigration Directorate Instructions at paragraph 1.2.3. However, there are specific benefits to obtaining indefinite leave and disadvantages in not doing so. The disadvantages of not having indefinite leave to remain will be increased if, for example, only those with indefinite leave are permitted to access the National Health Service without incurring charges as has been canvassed in the recent Department of Health consultation *Migrant Access to the NHS* 3 July 2013.

The new charging arrangements envisaged by the Immigration Bill (Clauses 60 and 61 of Bill 128 of 19 November 2013) will mean that fees can be set and changed at short notice. If these clauses become law and are implemented, it will be important that any changes to fees are clearly publicised with sufficient lead-in time. A person may be budgeting carefully for his or her move to the UK, taking into account any relevant maintenance requirements, and then find out at the last minute that the fee has increased, which will mean their having to delay and to change their plans.

Frequent changes to application fees with insufficient lead-in time are likely to result in higher proportions of invalid applications being submitted in-country, with the unwitting applicant relying on the previous published fee. This may lead to the individual not being able to work until a fresh application is approved. Either a fresh valid application would be submitted within 28 days' of the person's leave expiring or, for example, a delay on the part of the Home Office in rejecting the application may result in the person's having to leave the UK and apply from overseas. In either case the person risks being unable to work, possibly for many months. Some persons applying from overseas may also be subject to the 12 months' "cooling off" period between successive applications and will therefore be prevented from submitting an application for leave from outside the UK until this period comes to an end.

Q2 What changes, if any, would you introduce to ensure the immigration fee system is both simple for applicants to understand, and flexible enough to cater for different circumstances?

It should be clear exactly what people are paying for – i.e. what the service standards are for

dealing with their applications. Not only should there be a refund or partial refund when the Home Office does not meet its publicised service standards, but the fee should be set with regard to the level of service being provided.

The concern that more premium services will mean a second class service for everyone else is widespread, see for example "Immigration Fast Track plans a "Ryan Air" approach to raising cash" in The Telegraph on 13 November 2013: http://www.telegraph.co.uk/travel/travelnews/10446682/Immigration-fast-track-plans-a-Ryanair-approach-to-raising-cash.html

It is increasingly the case that people are having to pay premium fees to get a level of service that is no more than adequate. For example many of the benefits associated with the £25,000 fee for premium sponsors are no more than sponsors were promised at the outset of the Points-Based System. People pay premium fees for same day service at the Public Enquiry Office, or use the premium postal services, because if they do not then they have no idea how long it will take to deal with their applications and they are unable to obtain progress reports.

Nor is the service received when one does pay a premium fee always adequate. There have been frequent occasions when the IT on the biometric premium 'super bus' has not worked, requiring a subsequent visit. Some 'fast track' applications at the Croydon Public Enquiry Office have been delayed over a period of days due to systems failures with no apologies given to the applicant and no partial or full refund of the additional premium fee paid.

The November 2013 report of the Home Affairs Select Committee *The work of the UK Border Agency*[2] sets out just some of the problems with the standard of service that the former Agency provides, including detailing backlogs that entail persons are waiting in limbo for lengthy periods, with no idea when their applications will be resolved.

Fee Levels

Q3. Do you feel that fees should, in part, be determined by where or when an applicant applies? Please explain why.

- ☐ **Migrants should pay a single fee for a particular product, wherever they apply**
- ☐ **Migrants should pay different fees for products depending on where they apply**
- ☐ **Another approach should be used (please give details)**
- ☐ **Don't know**

People should pay different fees for products depending on where they apply.

Please provide comments to explain your answer above:

The level of the entry clearance fees is much more onerous for applicants in some countries than others. When people are in the UK, their salaries for similar jobs will soon be equalised; outside the UK, they are not. Setting levels of fees that do not take account of this differential in earnings levels risks excluding people the UK would wish to attract and entails risks of indirect discrimination on the grounds of race.

[2] House of Commons Home Affairs Committee, *The work of the UK Border Agency* (January-March 2013), Eighth report of session 2013-14, HC 616.

Entry Clearance fees above cost could be varied in relation to the average income in the applicant's country of origin/current residence, the cost of living and exchange rates. The actual amount of fees could be calculated in bands of countries; in a similar way as a conversion multiplier was previously used in relation to the previous earnings attribute for people making initial applications under Tier 1 (General) of the Points-Based System (see eg Table 2A of Appendix A in the Immigration Rules as at 3 March 2010 http://webarchive.nationalarchives.gov.uk/20100216113750/http://www.ukba.homeoffice.gov.uk/policyandlaw/immigrationlaw/immigrationrules/appendixa/). We recognise that this is not without complexity and that there will be anomalies, but do not consider the complexity or anomalies would be greater than those that previously applied to Tier 1 (General).

Q4. Are there any immigration products where you feel that fees should be reduced, or where an increase would provide a more balanced range of fees? (Please see Appendix A for current fees)

- ☐ **Some fees should be reduced (please give details below)**
- ☐ **Some fees should be increased to allow for reductions elsewhere (please give details below)**
- ☐ **Don't know**

Some fees should be reduced.

Please provide comments to explain your answer:

- *The fees for family entry clearance, extensions of stay and settlement should be reduced*.

These fees are onerous for many families to meet. ILPA is aware of instances where an adult has applied for settlement and has deliberately not applied for a child or children at the same time because they cannot afford the fee. The current settlement fee in the UK, £1051, is nearly a month's net salary for a person earning £18,600. The extra settlement fee for any child in the family is £788, nearly a fifth of the extra £3800 required to sponsor the first child, a third of the extra £2400 required for subsequent children and twice the cost to the Home Office of the application.

Under section 55 of the Borders, Citizenship and Immigration Act 2009 the Secretary of State must have regard to the need to safeguard and promote the welfare of children who are in the UK in carrying out any function in relation to immigration, asylum or nationality. This duty entails making it affordable for children and their families who meet the criteria to make immigration applications for a secure status.

- *The fees should cover the actual costs of the service given; and not Home Office mistakes.*

ILPA would welcome clarification of which expenditure on IT is covered when immigration fees are calculated. *Managing public money* advises that IT costs should be included when calculating fee cost recovery. The 'overhauling and replacement' of IT systems is mentioned in the Foreword to the consultation. The Home Office in the exercise of its immigration and nationality functions has a history of making extremely costly mistakes, especially in expenditure on information technology. One of the latest examples is the e-borders project. As the Chief Inspector of Borders and Immigration wrote in his report *An inspection of eborders*

(2013):

> *The e-Borders programme has been in development for over a decade now, and has cost "nearly half a billion pounds of public money, with many millions more to be invested over the coming years."*

The Chief Inspector's report catalogues a litany of costly failures. For example

> *9. We found that the e-Borders programme had failed to deliver the planned increases in API and this had a detrimental impact on the delivery of all anticipated benefits. In light of these difficulties, revised data collection targets were set in early 2012, but by the time of our inspection even these targets had been dispensed with, primarily because of:*
> - *Legal difficulties surrounding the collection of API on travel routes within the European Union; and*
> - *a failure to test the e-Borders concept in the rail and maritime sectors.*
>
> *10. The failure to identify these risks in the 2007 business plan meant that the original data collection targets, set out in the e-Borders delivery plan, were unrealistic and were always likely to be missed. As a result, at the time of our inspection API was collected in respect of just 65% of total passenger movements; this is against an original target of at least 95% by December 2010. However, since April 2012, API was being received in relation to all non-EU flights.*
>
> *11. The failure to meet key programme milestones resulted in the contract with the IT supplier being terminated in July 2010. This meant that e-Borders continued to rely on the original pilot Semaphore IT platform, although enhancements had been made over time to ensure continuity of service.*

We should welcome express assurance that such mistakes and expenditure do not and will not affect the level of fees.

The fee a person pays should not be affected by other expenditure that the Home Office chooses to incur which is not directly related to their application. People should not have to pay for a significant package of investment in infrastructure, which may or may not bear fruit in future months/years, when they may well not themselves receive any of the benefit of that investment.

Legislation

Q5. How should the Home Office use the new framework to make the legislative process for fees and charges more responsive to change?

The Factsheet on fees published at the same time as the Immigration Bill sets out that the intention behind this clause is to make it easier to change levels of fees more rapidly and "in line with the government's objectives and priorities." It records that "we want to increase income from fees, to ensure that those who use and benefit directly from our services pay more towards them, while UK taxpayers pay less." The government has decided to consider more factors than those enumerated in *Managing public money.*

People under immigration control making applications for leave or further leave are already benefiting or will benefit the UK, by working, by studying and researching and by caring for

children and the elderly. The factsheet repeats a false dichotomy between people under immigration control and taxpayers; those under immigration control are taxpayers too, whether this is through working and paying income tax and national insurance, or in paying VAT on most purchases they make. New taxes are envisaged, such as the health levy for which provision is made in clause 33 of the Immigration Bill (Bill 128).

The Home Office should use this opportunity to make provision to refund appeal fees when it withdraws a refusal decision before the case goes to an appeal before an immigration judge. Since 19 December 2011, fees have been payable when certain immigration appeals are lodged, as provided in the First-tier Tribunal (Immigration and Asylum Chamber) Fees Order 2011 (SI 2011/2841) and rule 23A(2) of the Tribunal Procedure Rules. If an immigration judge allows the appeal, he or she may make an award to refund all or part of the appeal fee paid.

The President of the Tribunal has issued guidance to immigration judges on deciding on fee awards. This includes:

> *"If an appellant has been obliged to appeal to establish their claim, which could and should have been accepted by the decision-maker, then the appellant should be able to recover the whole fee they paid to bring the appeal."*

This guidance has been followed, and the practice has generally been that when an appeal is allowed because of new evidence submitted after the refusal, or to the judge, the fee will not be refunded, or only be partially refunded.

The refund is made by HM Courts and Tribunals Service, as this is the body to which the fee was paid, but HM Courts and Tribunals Service recoups the money monthly from the Home Office. The Fees Order makes no provision for refunds when the immigration decision appealed against is withdrawn and the case never goes to hearing. Lord Avebury raised this omission in the debate on the First-tier Tribunal (Immigration and Asylum Chamber) Fees Order 2011 in the House of Lords on 12 October 2011,[3]

> *"Where the UKBA decides to revoke the decision that it has made before the appeal has been heard, presumably on the basis that it cannot justify the refusal, it would be manifestly unfair not to refund the fee that has been paid, and in any case the administrative costs in these cases must be even less than in the cases that are determined on paper alone."*

The Lord McNally's response did not fully address this issue:

> *"...the order provides that the tribunal may instruct UKBA to refund the fees of successful appellants, thus ensuring that they do not have to pay to correct the errors of the agency. That in itself will incentivise the agency to improve its initial decision-making - I take the point made by my noble friend Lord Avebury about that - and will reduce the rate of successful appeals to the tribunal."*

The Home Office has consistently refused to refund appeal fees in cases where it has concluded, without the case going before the Tribunal, that its decision is wrong. Official correspondence has set out[4] the view that

> *"…fee awards are not payable when a decision is withdrawn. If a decision is taken to withdraw a case, it is not an acknowledgement that the case could and should have been accepted by the initial decision-maker. It does not follow that the initial decision was*

[3] House of Lords *Hansard*, 12 October 2011, cols. 1796 - 1808
[4] E.g. in a letter to Fiona Mactaggart MP of 2 October 2013

incorrect. Decisions may well have been taken correctly at the time of the original decision but been rendered unsustainable because new information has been received which was not available to the original decision maker. In situations where new evidence has been made available by the applicant, it is appropriate to withdraw the case so as to avoid the unnecessary public expense. It is for these reasons that it would not be reasonable for us to adopt a policy of refunding fees where a decision has been withdrawn."

When the appellant or sponsor provides new information later, this refusal to refund the fee may be justified. But when the grounds of appeal reiterate the information and evidence which was submitted with the application but not properly considered or understood, it is not. A recent example if that of a wife who was refused entry clearance because she had provided evidence of her English language exams showing that she had passed the relevant listening and speaking and reading tests but not the writing test. Reading and writing were not required under the rules and she had achieved more than was required by the rules. She was refused because she had failed the writing test. After she lodged an appeal, and following repeated representations from her legal representatives, the entry clearance manager realised the mistake and withdrew the refusal. But the Home Office has refused a refund of the fee because the case had not gone before an immigration judge. This is unjust. People should not have to pay a fee for Home Office mistakes. We understand that it is proposed that the fee for Administrative Review applications proposed in place of the rights of appeal intended to be removed by Clause 11 of the Immigration Bill should be refunded if the decision is overturned on review. The same reasoning should be applied to appeal fees.

Premium and optional services

Q6. Do you think customers should only be able to subscribe to a complete package of end-to-end premium services at a single fee, or should customers continue to have the option of paying for individual products and services (with separate fees, which would have a higher total cost)?

- ☐ **Premium services should be packaged together as a single product**
- ☐ **Customers should be able to choose from a menu of different premium services**
- ☐ **Both- customers should have the choice of either option**

Customers should be able to choose from a menu of different premium services

Please provide comments to explain your answer:

Persons should be able to choose which elements of a premium service they purchase. We are also concerned that, given the failures described above, if an applicant were to purchase a package of premium services, elements of the package would fail at some point during the process making the overall cost of a refund difficult to calculate.

As described above, part of the need for premium services arises because of the delays and the unpredictability of dealing with the Home Office in the normal way by post. Thus the premium postal service for some applicants is popular because it provides the standards that all should expect as a matter of course.

Q7. Are there any premium services or business support services that you would like to

see, or that you would use if available (for example, bespoke or mobile services, or one-to-one business support services)? Please set out any differences, if any, between the services you would like to see for small and medium enterprises, and larger.

Insufficient information has been provided to allow us to answer this question. The main demands are not for premium services but for an adequate level of service and in particular:

- Timely processing of applications
- Essential documents such as passports being returned promptly.
- Certainty and predictability in timescales
- Clear information
- Communication with a legal representative where a matter appears unclear or where additional information is needed.
- An ability to obtain information on the progress of a case
- Rapid response to enquiries.

The ability to travel while an application is pending would be a useful service.

Border Force

Q8. Should Border Force provide or facilitate enhanced services at the border?

☐ **Yes**

☐ **No**

No.

Please provide comments to explain your answer:

The levying of fees is a case-working function, it would appear to fall within UK Visas and Immigration, not the Border Force.

The Border Force appears to us not to be adequately resourced to carry out its current functions. Passengers arriving in and departing from the UK, whether persons under immigration control or not, often face long delays. We highlight the queuing time at Heathrow which is off-putting for business and tourist visitors and therefore has the potential to damage the economy.

The UK's joining Schengen or provision of European-wide visas would be the most helpful way of facilitating services to tourists, business people and others under immigration control. Shorter application forms, for example for visitors, would also be a huge improvement.

Q9. Should the charges for these enhanced services reflect their value to ports, airlines and passengers, depending on the nature of the service provided, or should we apply a single national rate?

☐ **Charges should reflect the value of the product to the passenger**

☐ **Enhanced services should be charged at a single national rate**

☐ **Other**

Other

Please provide comments to explain your answer:

It is not possible to respond without knowing what 'enhanced services' are proposed. Again, however, the fee levels charged should relate to the level of service an individual actually receives. Queuing time must be acceptable for all. It should not be necessary to pay extra to avoid unreasonable delays.

Q10. What do you consider to be an enhanced service and under what circumstances do you think it is appropriate for Border Force to charge?

See responses above. We consider it is necessary to look closely at whether a proposal is for an enhanced level of service or a normal, adequate level of service.

Commercial Partnerships

Q11. Should we charge third party organisations that we contract with for the advice and support we provide, to ensure they comply with our standards?

- ☐ **Yes**
- ☐ **No**
- ☐ **Don't know**

Don't know

Please provide comments to explain your answer:

We are unclear which "third party organisations" are envisaged by the question.

Approved English language test providers, for example, receive a commercial advantage for being so approved. For this they should pay.

Existing 'commercial partners' dealing with visa applicants have many opportunities to make money out of people, from charging for photocopying to placing vending machines in their premises and this should be taken into account when negotiating agreements with them. We observe in passing that they should be acting simply as post boxes. We have seen and brought to the UK Border Agency's attention in the past cases of suspected fraud where they have attempted to do more than that for payment. In other cases that we have seen staff have attempted, wrongly but in good faith, to advise people on whether they should submit all the documents they have brought to a Visa Application Centre, or have refused to take in applications which they believe are misguided and these actions have prejudiced applicants.

Refunds and administration fees

Q12 Do you agree that an administration charge should apply where a refund is made in respect of withdrawn or rejected applications in certain circumstances? Please provide comments to explain your answer.

No.

The Home Office frequently rejects applications for inappropriate or unlawful reasons and people should not have to pay for the Home Office's mistakes. Application forms are extremely long and complex. Without advice it is very easy to get things wrong. If the Home Office were to carry out its long-standing project of simplifying immigration law and procedures, so that they are clear to applicants and decision-makers alike, there might be some argument for what is proposed but at present, no.

ILPA has previously written to the Home Office on several occasions with details of the problems that arise where an application is declared invalid- often through the fault of a third party (e.g. a bank) or a minor inadvertent error on behalf of the applicant. A more flexible approach to this issue was suggested by ILPA in our letter of 29 July 2011 which set out our substantive concerns. A copy is appended hereto. In particular we suggested that the former twenty-eight day 'grace period' be reinstated in the event that an application is rejected as invalid for failure to comply with a procedural requirement or to pay the application fee.

A follow up letter was sent by us on 1 June 2012 in which we highlighted the Upper Tribunal's dissatisfaction with the Home Office's approach to invalidity and payment procedures in the decision of *Basnet (validity of application - respondent)* [2012] UKUT 00113(IAC). For example, the Upper Tribunal recommended that "in cases of a failure to collect the fee in an application made in time, there is prompt communication with the applicant to afford an opportunity to check or correct the billing date".

A further follow-up letter was sent in October 2012.

In his letter to ILPA of 21 November 2012, the previous Chief Executive of the UK Border Agency, Mr Whiteman, stated that the Agency was taking forward work to try to address this problem, including consideration of the specific proposals that we suggested. ILPA spoke with representatives of the Home Office by telephone in June 2013 during which conversation the problems surrounding invalid applications were discussed, including the problems for both individuals and employers when an application is returned as invalid. We understood that the Home Office would then discuss internally how the issue would be addressed. As yet we have heard nothing further. The problem remains a live one.

An example of a failure to correct an obvious inadvertent error was an applicant whose cheque bore the figures £561 but the words 'five hundred and sixty-one pence'. Instead of sending the cheque back for a quick correction, the Home Office declared the application invalid, after her leave had run out. As a result she waited for nearly a year, unable to work, while the Home Office considered and then granted the application.

We should ask that this issue is revisited and addressed, including with appropriate amendments made to the Immigration Rules.

Q13 If so, at what level should this charge be set?

- ☐ **At cost (the average cost of administration to the point the refund is made)**
- ☐ **Below cost**
- ☐ **Above cost**
- ☐ **Another amount**

Another amount.

Please provide comments to explain your answer:

No extra administration charge should be set for the reasons given in response to question 12.

Wider impacts & additional information

Q14 Do you think that any of the proposals outlined above could have an impact upon community relations? Please provide comments on why you think this is the case and how this impact might be minimised.

Yes; some communities have higher proportions of people subject to immigration control than others and they will be particularly affected. There are higher refusal rates for some nationalities than for others and people will lose money.

Q15 Do you think that any proposals outlined would adversely affect small and/ or medium sized businesses? Please provide comments on why you think this is the case and how this impact might be minimised.

If the fees for being approved as a sponsor for workers are increased this would have a proportionately greater effect on small than on large businesses.

Q16 Do you think any proposals outlined above would have a disproportionate effect upon any particular group according to:

- **Race** ☐
- **Gender** ☐
- **Age** ☐
- **Disability** ☐
- **Religion** ☐
- **Belief** ☐
- **Sexual orientation** ☐

Race
Age
Gender
Disability

Please provide comments to explain your answer:

If more money is put into premium services and facilities this risks having a knock-on effect on everyone else unless the fees for such services cover all the costs or are subsidised by government or third parties.

Increases in fees have a greater effect on poorer people. Race, age, gender and disability are all associated with differences in income. Persons from countries where the currency is weak relative to sterling or where wages are lower are affected most, and thus some races affected more than others.

About you

Q17 Do you represent one of the following?

- ☐ **Public sector body**
- ☐ **Private sector body**
- ☐ **Voluntary/not for profit organisation**
- ☐ **Other (please specify)**

Voluntary/not for profit organisation (Professional Association)

Q18 Which best describes your organisation/company?

- ☐ **Micro company (1-9 employees)**
- ☐ **Small-medium enterprise (10-249 employees)**
- ☐ **Large company (over 250 employees)**
- ☐ **Not applicable**

Not applicable. ILPA is a membership organisation.

Q19 Approximately what percentage of your total workforce or student body is from outside the UK?

- ☐ **Not applicable**
- ☐ **None**
- ☐ **Less than 10%**
- ☐ **Between 10% and 50%**
- ☐ **More than 50%**
- ☐ **Don't know**

Not applicable.