

MIGRATION ADVISORY COMMITTEE INTERNATIONAL STUDENTS COMMISSION

GuildHE Written Evidence Submission

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About GuildHE

1. **GuildHE** is an officially recognised representative body for UK Higher Education. Our members include universities, university colleges, further education colleges and specialist institutions from both the traditional and private (“for profit” and “not for profit”) sectors. Member institutions include some major providers in professional subject areas including art, design and media, music and the performing arts; agriculture and food; education; maritime; health and sports.
2. The **United Kingdom Arts and Design Institutions Association (ukadia)**, a sub-association of GuildHE, is a group of specialist arts and design institutions from across the UK’s higher and further education sectors. We aim to promote, nationally and internationally, the key contributions of specialist colleges to the UK’s world-renowned reputation in visual arts, performance and the creative and cultural industries.
3. The **Consortium for Research Excellence, Support and Training (CREST)**, a sub-association of GuildHE, exists for institutions that have achieved high levels, or aspire to achieve high levels, of research excellence concentrated in smaller communities of research practice. It is the only non-geographic collaborative research network based within the UK.

Opening Comment

4. GuildHE recognises and celebrates the financial, cultural and intellectual value of international students to the UK. We believe that this should be reflected in the government’s immigration policy. GuildHE also believes that UK higher education is world-leading, and that increasing the range of people with access to it can have benefits, both in the UK and globally.
5. International students contributed more than £25 billion to the UK economy in 2015/16, and make-up significant proportions of the student body at UK HEIs. They support local economies and enhance social and cultural capital among UK students, while placing a relatively minimal burden on public services.
6. Participation in world-leading higher education develops students’ skills and opportunities, enhancing UK soft power, while benefiting those countries which international students move to following their studies.
7. This positive view of international students is shared by UK students, who value the diversity which international students bring to UK higher education.¹

¹ NUS, [Student perspectives on international students](#) (2017).

8. GuildHE welcomes the provisional agreement on the UK's separation from the EU reached by the UK Government and the EU, which has given certainty to EU students in the UK, or those aiming to participate in Erasmus+ exchanges, until the end of the current EU budget period in 2020.
9. It is important that UK higher education be given certainty regarding the outlook beyond this horizon. Any reshaping of the immigration system beyond Brexit should therefore:
 - 9.1. Support the continued recruitment of suitably qualified international students by UK HEIs, maintaining an internationally competitive offer, including on post-study work rights for overseas students.
 - 9.2. Support smaller providers, including those in the FE and alternative sectors, who may find Tier 4 requirements particularly burdensome.
 - 9.3. Ensure that the UK continues to be seen as an attractive destination by overseas students, for example, through government support for the #WeAreInternational Campaign.
 - 9.4. Remove international students from migration reduction targets, in line with public perceptions of international students as different to other migrants. Figures for international student migration should be reported separately to other migration types.
10. We would be happy to facilitate the MAC in meeting our members to gather further evidence about the effects of current and potential migration systems and would be willing to act as a conduit for information between our members, the MAC and the Government.
11. In responding to this call, we also cross-refer the MAC to evidence submitted by Universities UK.

International Students in UK Tertiary Education

12. In 2015/16, there were approximately 310,000 non-EU students and 130,000 non-UK EU students in the UK, accounting for ~13.5% and ~5.5% of the student body respectively.² Analysis by London Economics suggests that the UK receives 10% of the world's international students.³
13. These international students make substantial contributions to the institutions at which they choose to study. Most obviously, overseas students make substantial, direct contributions to the financial sustainability of Higher Education Institutions.⁴ Non-EU students, in particular, tend to pay fees substantially above those charged to home and EU students, subsidising the teaching offered to UK and EU students and the costs of research.

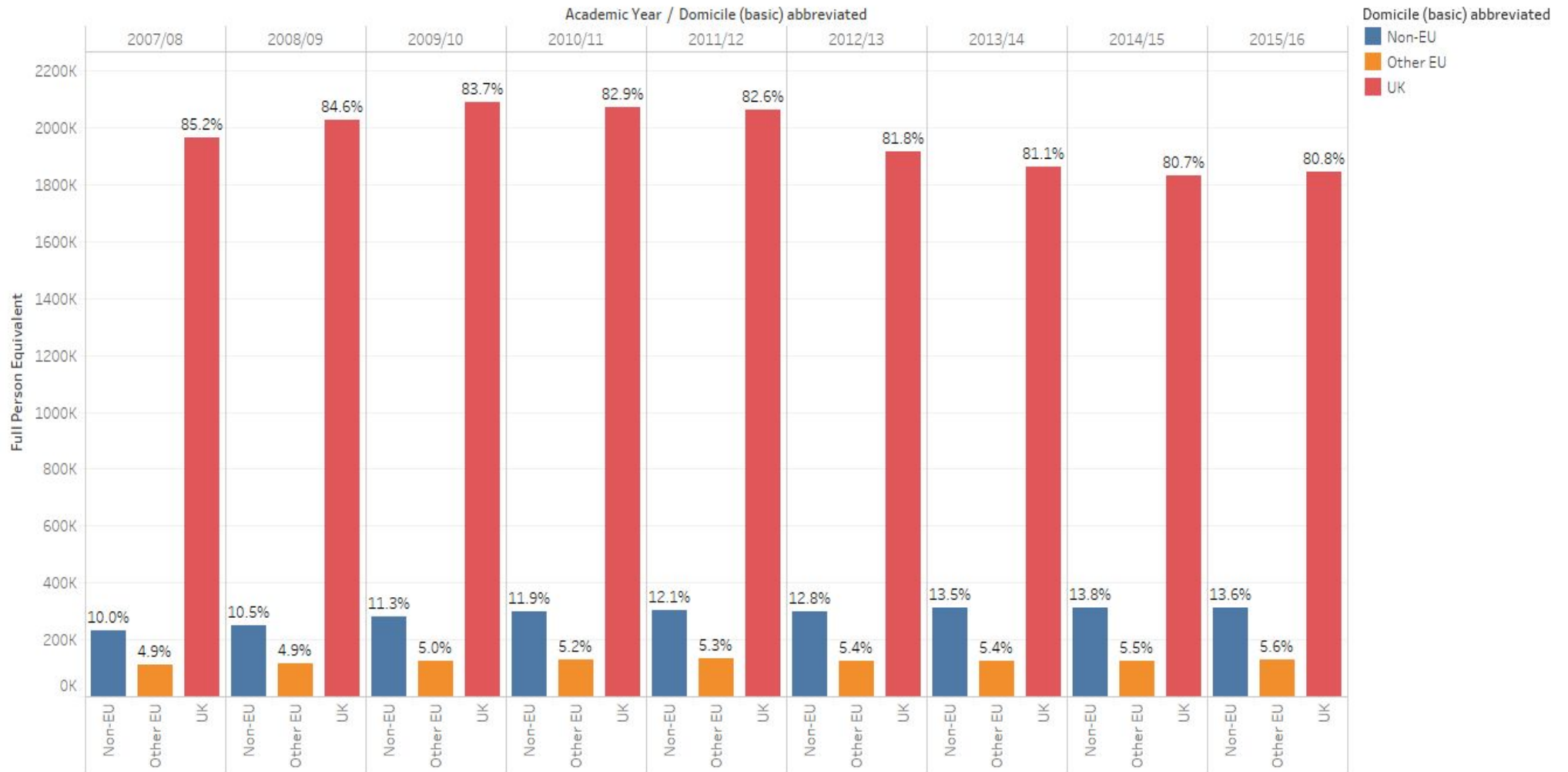
² HESA, *Student Record* (2015/16).

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³ Gavan Conlon, Rohit Ladher and Maike Halterbeck, [The determinants of international demand for UK higher education](#) (HEPI Report 91, 2016).

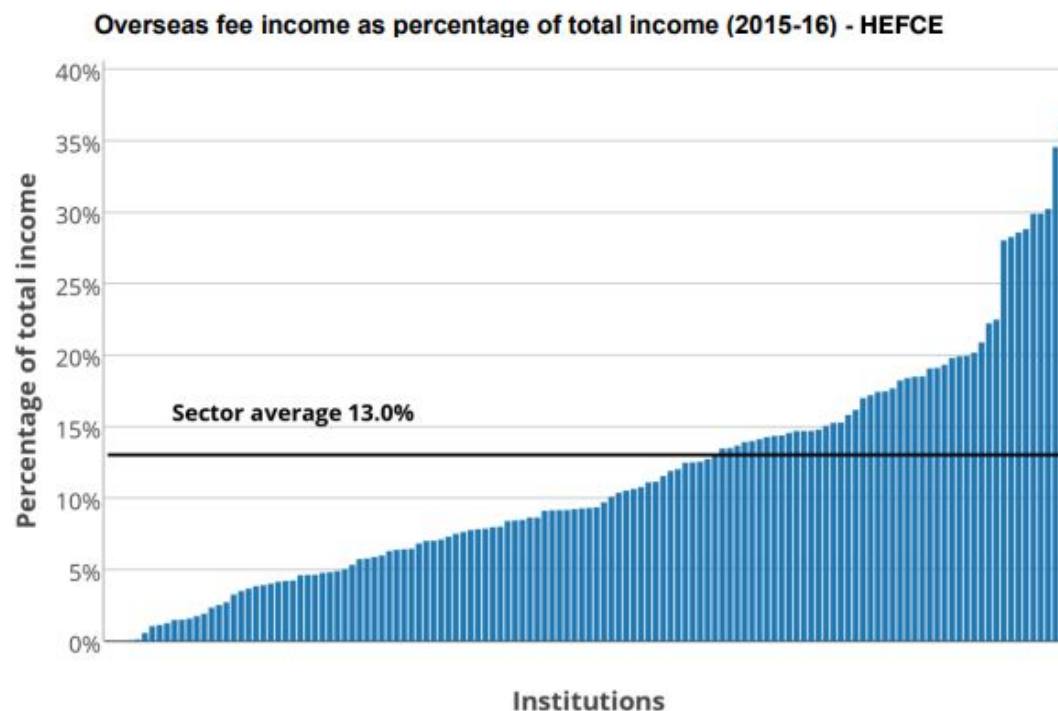
⁴ HEFCE, [Financial health of the higher education sector](#) (2016).

Students in UK Higher Education by Domicile - HESA Student Record



Full Person Equivalent for each Domicile (basic) abbreviated broken down by Academic Year. Color shows details about Domicile (basic) abbreviated. The marks are labeled by Full Person Equivalent %. The view is filtered on Domicile (basic) abbreviated, which keeps Non-EU, Other EU and UK.

14. The Higher Education Policy Institute (HEPI), recently reported that research in the UK higher education sector is under-funded by nearly 40% (£3.3 billion in 2014/15), and that this shortfall is made up in part by surplus income from teaching (non-EU) international students.⁵ In 2014/15, this surplus funded around 13% of all UK university research.
15. Analysis by the Higher Education Funding Council for England (HEFCE), indicates that overseas fees are an important and growing aspect of institutional income, accounting for over a quarter of all student fee income, and over 10% of the total income for the sector. Between 2014/15 and 2015/16, overseas fees grew by 6.3%, outstripping the sector's overall 3.8% growth.⁶
16. EU students make a less significant financial contribution directly to institutions than those from outside the EU for two reasons. Firstly, they are a smaller part of the UK student body, and secondly, they pay 'home' fees. They are also eligible to access student loans, and are not subject to the visa requirements of non-EU students in the UK.
17. The lower fee rate, access to student support and ease of entry positively incentivises EU students to study in the UK, in comparison to their non-EU peers. Were these incentives to be lost, the numbers of EU students coming to the UK could fall substantially.
18. Analysis by London Economics suggests that the removal of student tuition fee support, and harmonisation of EU with other international student fees, would cost UK higher education institutions around £40 million.⁷ This would disproportionately affect smaller, less research-intensive, newer and lower-tariff HEIs.



⁵ Vicky Olive, [How much is too much? Cross-subsidies from teaching to research in British universities](#) (HEPI Report 100, 2017).

⁶ HEFCE, [Financial health of the higher education sector](#) (2017).

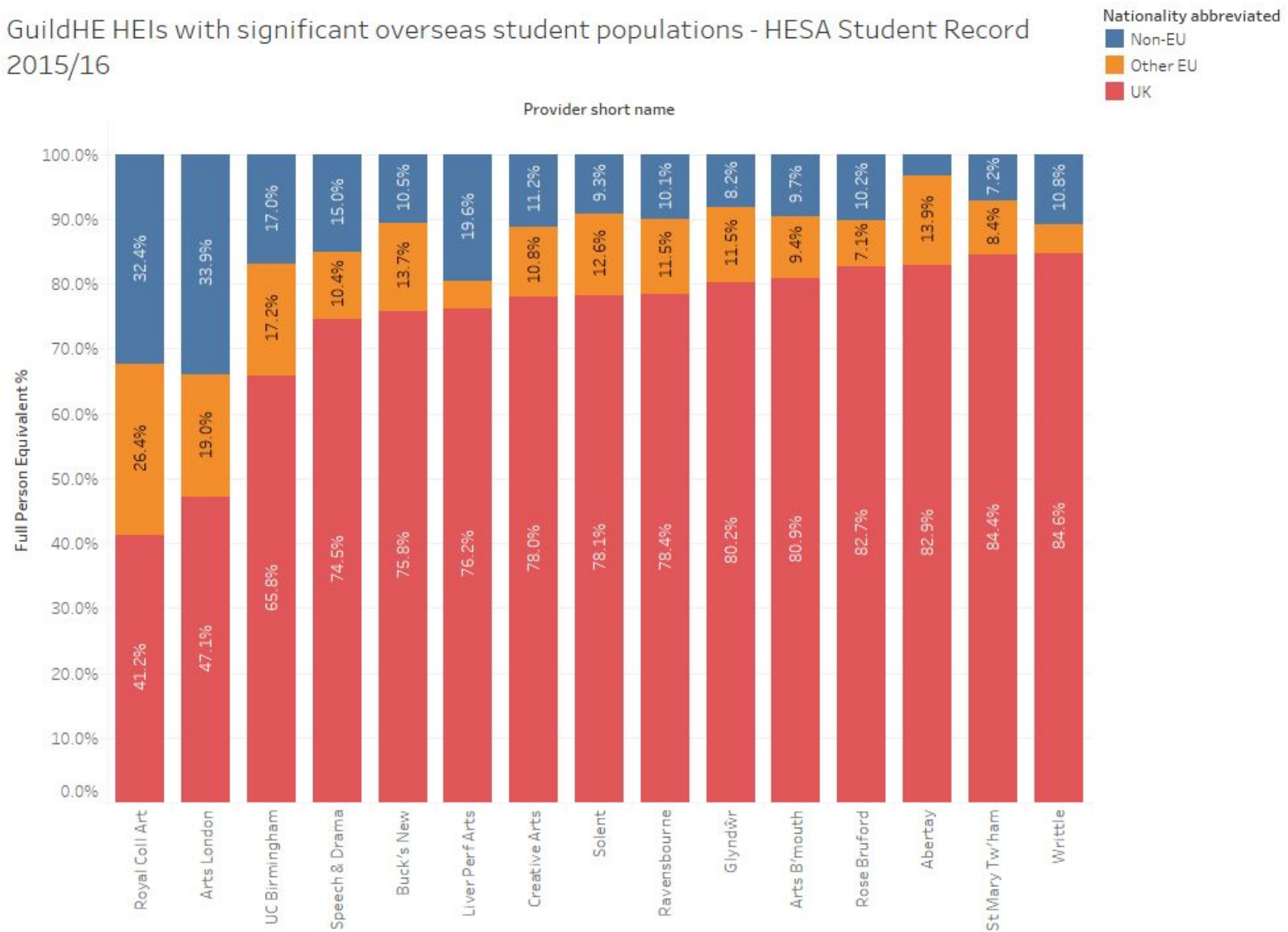
⁷ Conlon, Ladher and Halterbeck, [The determinants of international demand for UK higher education](#) (HEPI Report 91, 2016).

19. According to UNESCO, for every internationally mobile EU student, there are three internationally mobile non-EU students.⁸ We might expect this to be reflected in the relative representation of EU and non-EU students in UK HE, however, internal analysis of GuildHE, CREST and ukadia members for which HESA data is available, shows that the two groups are in fact very similar in size, with 8.7% of students domiciled in the EU, and 10.3% outside the EU in 2015/16.⁹
20. We may conclude that pull factors (e.g. a relatively lower fee rate, access to student support and ease of entry) are inflating the number of EU students relative to non-EU students, and that, were the incentives for EU students removed, their numbers would fall to around one third of the number of non-EU students (in line with their representation in the global pool of internationally mobile students). For GuildHE member institutions, this would mean a decline from around 8.7% of student bodies, to around 3.4%, a decline of over 50%.
21. Any decline in international student numbers would not be equally felt across institutions. Some institutions would be more severely affected. For example, at the University of the Arts, London, a specialist creative arts institution, over 50% of students are non-UK nationals. Nine other institutions have over 20% non-UK domiciled students.
22. It seems likely that in the context of Brexit, EU student numbers are at higher risk than non-EU student numbers. This is potentially significant, given that ten of the 34 GuildHE, CREST and ukadia institutions analysed have more than 10% EU domiciled students.
23. It is also worth noting that the institutions likely to have the most substantial numbers of EU students - those located in Northern Ireland, which has a common travel area with the Republic of Ireland - do not record data on student nationality. It is therefore impossible to determine how severely they might be impacted by a decline in EU student numbers.
24. International students not only provide additional fees income to UK HEIs, they also boost the demand for courses.
25. Certain specialisms, and therefore the wider creative economy, are particularly reliant on overseas students - for example, among the creative institutions within ukadia, some 35% of students come from outside the UK.

⁸ UNESCO does not provide data on the EU as a bloc, however data for Europe may be used as an approximation for the EU (albeit slightly inflating the share of internationally mobile students from the EU). See UIS.Stat, [Outbound internationally mobile students by host region](#) (2018).

⁹ HESA, *Student Record* (2015/16).

GuildHE HEIs with significant overseas student populations - HESA Student Record 2015/16



Full Person Equivalent % for each Provider short name. Color shows details about Nationality abbreviated. The data is filtered on Academic Year and Level of study (basic). The Academic Year filter keeps 2015/16. The Level of study (basic) filter keeps Postgraduate and Undergraduate. The view is filtered on Provider short name and Nationality abbreviated. The Provider short name filter keeps 16 of 171 members. The Nationality abbreviated filter keeps Non-EU, Other EU and UK.

26. Among GuildHE member institutions, 25% or more of students on veterinary science, business and administrative studies, creative arts and design, and engineering and technology are from outside the UK. This additional demand may be crucial in ensuring the continued viability of a course, increasing the range of subjects open to UK students, and supporting the employment of academics.
27. Even if the UK is able to agree a favourable deal with the European Union in regards to student mobility, which would continue to support high rates of inward mobility from the EU to the UK, reason for concern remains. As recently highlighted by Universities UK International, inwards migration by international students to the UK is stagnating.¹⁰ Since 2011, the number of internationally mobile students in the world has risen by almost 20%, yet the number of international students in the UK is just 3% higher in 2016–17 than it was in 2011.¹¹ This stagnation is a threat to the international competitiveness of UK higher education which should not be ignored.
28. Significantly, those nations with the largest populations of internationally mobile students are those with which the UK has, or aims to develop strong trading relationships, including the USA, China, India, and several EU member states. A more receptive attitude to international students may have wider benefits in terms of overseas trade and investment.
29. Successful higher education sector relies on well-developed pathways, including through schools, further education, and foundation degrees, to ensure that talent is able to access qualifications at level 6 (Bachelor's Degrees) and above. International students should not be excluded from these pathways, but rather encouraged and supported to enter and progress through the UK education sector at any level.
30. There is also little evidence to support the idea that international students 'crowd out' home students. Prior to 2015, UK student numbers were capped, yet research has found that, even in this situation, international students did not have a negative impact on home student admission.¹² Where student numbers are uncapped, increases in the number of international students were positively connected with domestic student numbers.
31. The more diverse environments created by international students in UK higher education is also valuable to students, offering them the opportunity to engage with new ideas and meet people with different life experiences. This can enhance active citizenship, helping to foster global awareness and civic engagement among students, and preparing them to work in a global marketplace.¹³
32. Even more valuable to UK students than being part of an international student body is the opportunity to study overseas themselves. Recent research by Universities UK International (UUKi) found that students who complete some form of overseas work, study or placement have better outcomes than those who do not, yet at present only 6.6% of UK students complete an overseas placement.¹⁴ This is supported by evidence from

¹⁰ Eleanor Jubb, [*You say stability. I say stagnation*](#) (Universities UK, 2017).

¹¹ UIS. Stat, [*Outbound internationally mobile students by host region*](#) (2018).

¹² Stephen Machin and Richard Murphy, [*Paying Out and Crowding Out? The Globalisation of Higher Education*](#) (2015).

¹³ GuildHE and NUS, [*Active Citizenship: The role of higher education*](#) (2017).

¹⁴ Universities UK International, [*Why more UK students should work, study or volunteer overseas*](#) (2017).

students, such as through NUS's #StudentsoftheWorld campaign, which highlights the benefits of international educational experiences.¹⁵ If the UK is to compete in a globalised marketplace, the skills gained through international experience will be hugely valuable to graduates. These benefits are particularly felt among more disadvantaged students. Such overseas experience also helps boost UK soft power, as students act as ambassadors for the UK.

33. GuildHE welcomes UUKi's *Go International: Stand Out* campaign, which aims to double the percentage of outwardly mobile UK students, and which has been endorsed by the UK Government and each of the devolved administrations.¹⁶ This goal will be harder to achieve if exchange programmes, which are generally built on mutual collaboration, are curtailed by a tightening of the UK student immigration system.
34. GuildHE also supports the #WeAreInternational campaign, supported by more than 160 universities and organisations across the UK. The campaign was established in 2013 to celebrate and highlight the importance of our diverse international student and staff communities.¹⁷
35. Research by Hobsons has found that a country's attitude to international students was the second most important factor in international students' decisions of where to study, and that social media messaging could play a significant role in attracting students.¹⁸ For example, the #WeAreInternational campaign could help mitigate the impression that the UK is not welcoming to international students following the country's vote to leave the European Union.

¹⁵ Yinbo Yu, [We are #StudentsoftheWorld](#) (NUS, 2017).

¹⁶ Universities UK International, [UUKi calls for students to Go International: Stand Out](#) (2017)

¹⁷ For more information, see <http://www.weareinternational.org.uk/about/>.

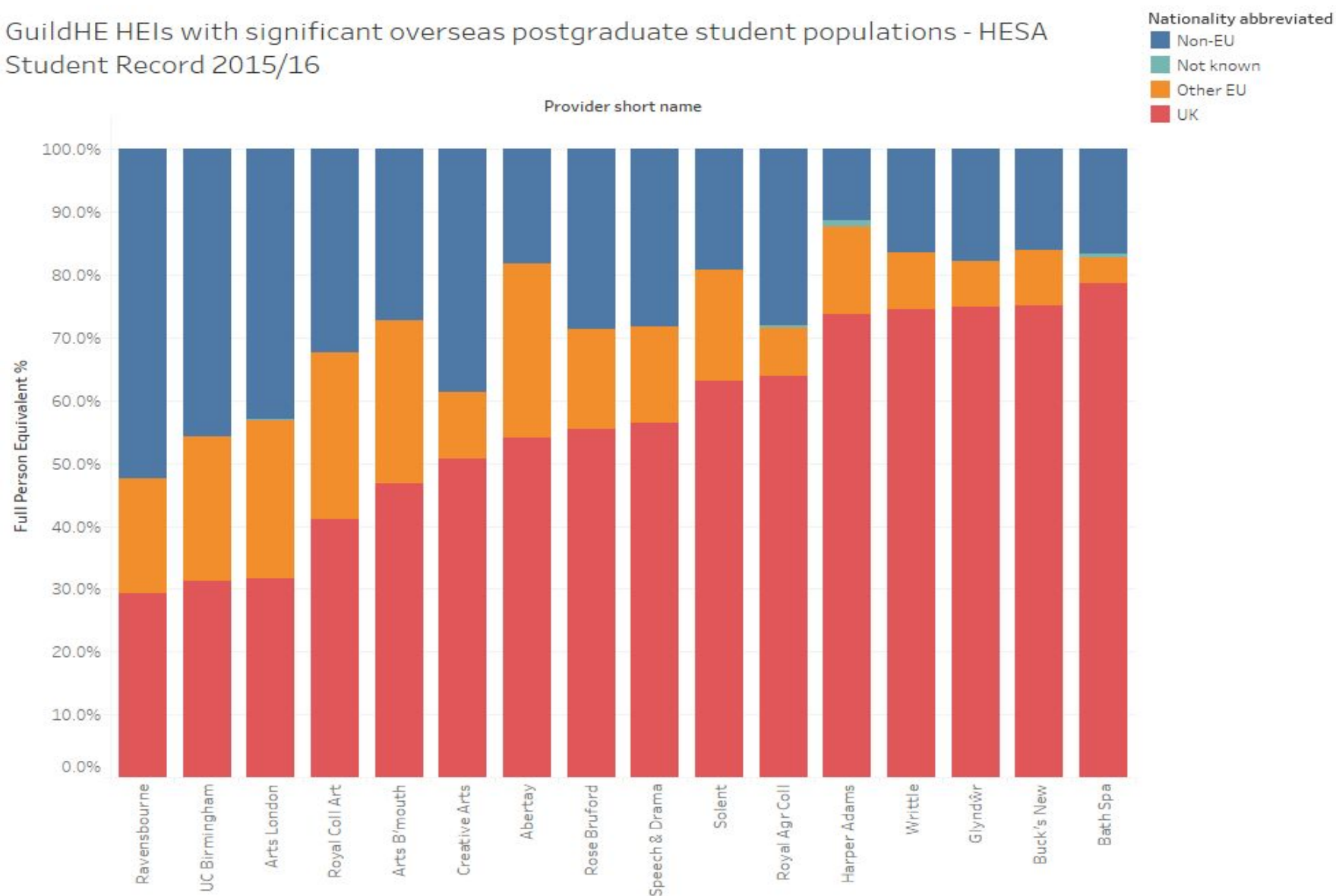
¹⁸ Hobsons, [International Student Survey 2017: Welcoming the World](#) (2017).

International Students at Postgraduate Level

36. At postgraduate level, the contribution of international students is particularly significant.
37. Across GuildHE member institutions, 30% of Postgraduate students are from outside the UK; at certain institutions, this figure is as high as 70% of postgraduate students. Again, these international students play a crucial role in supporting the viability of courses, ensuring that UK students are offered the widest possible range of opportunities.
38. Research by NUS found that a quarter of students (including 35% of postgraduates), felt their course would not be viable without international students. Over 30% of students (including 43% of postgraduates) felt the loss of international students would lower the quality and value of courses, with 53% of postgraduates worried that a loss of international students would negatively impact on course resourcing.
39. Importantly, international postgraduates also have a significant role to play in producing world-leading research. There is an expectation within the research community that the best researchers are internationally mobile, and it is far easier to build this record of mobility and the associated networks early in a career, including through postgraduate study.¹⁹
40. Increased bureaucracy around movement could more severely impact such researchers. This is a particular cause of concern for members of GuildHE and CREST. Many postgraduate students at member institutions are often embarking on their research career whilst either working in another sector or having made a career switch. This means that many students will be starting their research career later in working life and that there is therefore an increased need to establish research networks quickly.
41. Achieving a favourable migration system therefore provides UK researchers with the opportunity to build and expand upon relationships not only with EU colleagues but also world colleagues to sustain and enhance the UK's world leading system and thus carry out the best research possible.

¹⁹ S. Guthrie, C. A. Lichten, E. Harte, S. Parks, S. Wooding and J. Corbett, [*International mobility of researchers: A survey of researchers in the UK*](#) (2017).

GuildHE HEIs with significant overseas postgraduate student populations - HESA Student Record 2015/16



Full Person Equivalent % for each Provider short name. Color shows details about Nationality abbreviated. The data is filtered on Academic Year and Level of study (basic). The Academic Year filter keeps 2015/16. The Level of study (basic) filter keeps Postgraduate. The view is filtered on Provider short name, which keeps 18 of 171 members.

International Students in the Wider Economy and Society

42. International students contribute a great deal to wider British society. Recent research by Universities UK has found that international students contributed more than £25 billion to the UK economy in 2014-15.²⁰ Research conducted by London Economics, using slightly different modeling, found that the average EU domiciled student brings a net economic benefit of £68,000 to the UK per year, while the average non-EU student brings a £95,000 benefit.²¹
43. The Government's published Industrial Strategy white paper emphasises the role of international students as part of its aims to develop people with the skills needed by UK business and industry.²²
44. A recent economic impact study found that international students at creative arts institutions alone contribute over £77 million to the UK economy.²³ This is equivalent to creating some 2,860 average wage jobs in the UK economy. Creative institutions as a whole contribute some £8.4bn to the economy, so their success as a key sector should not be overlooked.
45. Currently the creative arts skills pipeline is under pressure, with fewer UK students choosing to study these subjects.²⁴ International students therefore play a key role in supporting this crucial sector of the economy.
46. The Industrial Strategy also emphasises the importance of place, and sharing growth across the UK. In this context, international students play a significant role, as their contributions are spread across institutions throughout the UK. Analysis has shown that the parliamentary constituencies which benefited most from international students were Sheffield Central and Newcastle Upon Tyne East, with a net benefit across these two constituencies of over £400m from the 2015/16 cohort of international students.²⁵ While more could be done to attract greater numbers of international students to institutions outside major cities, there is no doubt that their economic benefits are geographically diverse.
47. GuildHE institutions in particular tend to be embedded in local economies, frequently outside the core areas of economic activity in the UK. They provide crucial sources of local employment, supporting local business and industry, and upskilling local citizens. International students make significant contributions to this local impact, helping to boost 'left behind' areas, the very areas the government is committed to helping through the Industrial Strategy.

²⁰ Universities UK, [The Economic Impact of International Students](#) (2017).

²¹ London Economics, [The costs and benefits of international students by parliamentary constituency](#) (HEPI report 102, 2018).

²² HM Government, [Industrial Strategy: Building a Britain fit for the future](#) (2017).

²³ EMSI, [The Economic Value of Creative Focused Universities and Colleges](#) (2016).

²⁴ John Last, [A crisis in creative arts in the UK](#) (HEPI policy note 2, 2017).

²⁵ London Economics, [The costs and benefits of international students by parliamentary constituency](#) (HEPI report 102, 2018).

48. Universities in areas of little migration are likely to bring greater diversity to their local communities and increase cultural awareness. International students are likely to bring tourism (visiting friends and family), further boosting local economies.
49. Information is not readily available on the participation of international students undertaking tertiary study in a Further Education setting. However, it is likely that, given differential visa burdens placed on these providers (and the more limited rights afforded to international students in such institutions), international students make up a smaller share of the student body.
50. GuildHE does not believe that this damaging artificial divide between FE and HE can be justified. This is a view shared by over 80% of UK students, according to research conducted by NUS.²⁶
51. It is worth noting that, whilst the number of international students in the UK has grown since 2012/13, from 560,000 to 575,000, this growth has not been uniform, with several more disadvantaged geographies, including the East of England, Wales and Yorkshire and the Humber, seeing declines in their overall number of overseas students.
52. International students further benefit the UK economy if they are able to remain in the UK to work following study. At present, this is far easier for EU students than others. However research conducted by NUS, found that 75% of current UK students agree or strongly agree that international students should have the right to work in the UK after graduation.²⁷
53. Analysis conducted by UCL's Centre for Research and Analysis of Migration (CReAM) has found that migrants arriving since 2000 have been net contributors to UK public finances.²⁸ This means that the relatively small burden international students place on public services is more than outweighed by the additional income they generate within the economy.
54. It is true that the UK has an undersupply of housing, and it could be argued that international students add to this problem. However, it is worth noting that, since 2013/14, GuildHE member institutions have increased their average number of bed-spaces per student by 50%, with over £16.8bn in capital spending on buildings from 2013/14-2015/16.²⁹ International students may be precluded from accessing private accommodation, as they may not be able to provide guarantors, meaning that most live in university accommodation. Building of such accommodation in turn contributes to the local economy (eg through the construction industry).

²⁶ NUS, [Student perspectives on international students](#) (2017).

²⁷ NUS, [Student perspectives on international students](#) (2017).

²⁸ Christian Dustmann and Tommaso Frattini, "[The Fiscal Effects of Immigration to the UK](#)", *Economic Journal*, Vol.124, Issue 580 (2014)..

²⁹ HESA, *Estates Record* (2013/14-2015/16), *Finance Record* (2013/14-2015/16).

- 55. The majority of international students leave the UK after completing their studies.³⁰ They take with them the values gained whilst studying in the UK, along with their positive impressions of life in the UK. This enhances the UK's global standing and soft power.
- 56. The Soft Power 30 ranking of leading soft power states has placed the UK at number two for the past two years; a significant factor in this is the UK's consistent ranking at number two in terms of education, based on "the quality of universities, their ability to attract international students, and contribution to academic research publishing."³¹ A significant decline in international student migration would clearly impact on the UK's soft power.

The Outlook for International Students

- 57. The UCAS End of Year Cycle Report for 2017 shows that, for the first time since 2011, the number of EU students applying to, and accepted by UK HEIs has fallen.³² This fall in EU student acceptances was offset by an increase in the number of non-EU students accepted, however the pool of non-EU applicants was also smaller than in previous years.
- 58. It is likely that the ongoing process of the UK's exit from the EU will continue to negatively impact the numbers of EU applicants over the coming applications cycles. It is not clear to what extent this can be offset by increases in non-EU student acceptances. However, a fair and welcoming international student immigration policy could go some way towards addressing this uncertainty.
- 59. A recent survey of GuildHE member institutions found that changes to the visa system have increased the financial and administrative burdens on small HEIs and limited their recruitment to lower-risk markets.³³
- 60. More significantly, the research found that half of respondents have been negatively impacted by reductions in the visa refusal threshold, while 87% of respondents are concerned about the possibility of further reductions. The threshold is currently set at 10%, and visas may be refused on the basis of factors beyond institutional control. This means an institution with only 20 international students may lose its license if only two prospective students are refused visas, even where these refusals were not the fault of the institution. This percentage threshold is not proportionate to the low level of risk of abuse possible through the visa license of smaller providers.
- 61. GuildHE welcomes the recent expansion of the streamlined international Masters student visa pilot to a more diverse range of institutions.³⁴ This expansion from 4 to 27 universities will provide a more robust evidence base on which to be able to consider how the policy could be rolled out to

³⁰ Office for National Statistics, [What's happening with international student migration?](#) (2017).

³¹ Portland, [The Soft Power 30: A global ranking of soft power](#) (2017).

³² UCAS, [End of Cycle Report 2017: Summary of applicants and acceptances](#) (2017).

³³ Uniac, [Research Note: GuildHE member views on UKVI visa regulations](#) (2017).

³⁴ See <https://www.gov.uk/government/news/twenty-three-universities-join-student-visa-pilot>.

the sector as a whole. However it is important that this pilot is strictly limited to the shortest time necessary to gather the data, as it gives competitive advantage to those institutions included in the pilot scheme, and so should be expanded to all universities as soon as practicable.

62. The classification of international students as immigrants is at odds with public perception. Recent polling conducted for Universities UK revealed that only 24% of British adults think of international students as immigrants. Of those that expressed a view, 75% said they would like to see the same number, or more, international students in the UK; this jumped to 87% once information on the economic benefits of international students was provided.³⁵ This suggests that treating international students as immigrants, and restricting their rights or freedom of movement, will not address the public's concerns over immigration.

Recommendations to the MAC

63. Recognising the economic, social and cultural benefits brought to the UK by international students, and the positive perception of international students among the public, GuildHE recommends that:
- 63.1. The immigration system should not be complex or difficult for students or staff to navigate or for organisations to administer. Rather, students genuinely entering the UK to study should be warmly welcomed.
 - 63.2. International students, as skilled workers, should be able to remain in the country where they have an offer of work. The transition from a student to a working visa should be streamlined. This is especially important for developing research and creative industries talent pipelines.
 - 63.3. The post-Brexit visa system should be standardised, so that overseas students are treated equally, regardless of whether they study in the FE or HE sector.
 - 63.4. UKVI should take a risk-based approach to regulation, recognising that percentage thresholds are problematic for small providers, and do not take account of the fact that visa refusals may not be the fault of the HEI. UKVI should also consider moving to a tiered subscription charge for the premium service.
 - 63.5. The committee should communicate to government the economic benefits of international students and the potential negative impacts of any decline in international student numbers, which may result from a stricter immigration system or negative perceptions of the UK.
 - 63.6. International students are removed from migration reduction targets, in line with public perceptions of international students as different to other migrants. Figures for international student migration should be reported separately to other migration types.

³⁵ ComRes, [Universities UK International Student Poll](#) (2016).

APPENDIX 1: HESA DATA

Data in this written response is drawn from the Higher Education Statistics Authority (HESA). It includes HESA Student Record (2007/08-2015/16), HESA Finance Record (2013/14-2015/16), and HESA Finance Record (2013/14-2015/16). HESA data is Copyright Higher Education Statistics Agency Limited. Neither the Higher Education Statistics Agency Limited nor HESA Services Limited can accept responsibility for any inferences or conclusions derived by third parties from data or other information obtained from Heidi Plus.

HESA holds data on the following 34 HEIs which are members of GuildHE or of one of its sub-associations, CREST and ukadia.

Arts University Bournemouth	Royal College of Art (ukadia member only)
Bath Spa University	Southampton Solent University
Bishop Grosseteste University	St Mary's University College, Belfast
Buckinghamshire New University (CREST member only)	St Mary's University, Twickenham
Falmouth University	University College Birmingham
Harper Adams University	University for the Creative Arts
Leeds Arts University	University of Abertay, Dundee
Leeds College of Music	University of Chichester
Leeds Trinity University	University of Cumbria (CREST member only)
Liverpool Institute for Performing Arts	University of St Mark and St John
Newman University	University of Suffolk
Norwich University of the Arts	University of the Arts London (ukadia member only)
Plymouth College of Arts	University of Winchester
Ravensbourne	University of Worcester
Rose Bruford College of Theatre and Performance	Wrexham Glyndwr University (CREST member only)
Royal Agricultural University	Writtle University College
Royal Central School of Speech and Drama	York St John University