

What is your organisation?

University College Birmingham Guild of Students'

- 1. Are there any circumstances not specifically mentioned in the technical consultation document, for which it is unclear whether a provider is or is not in scope?**

No

- 2. Do you foresee any challenges with the definition of international students included in the technical consultation document?**

No

- 3. Are you aware of any additional student, course or provider types, which are not already included in the technical consultation document, that you think we should consider before the introduction of the levy?**

No

- 4. Do you think the proposed restrictions to the scope of the levy would have any unintended consequences on the behaviour of students or providers?**

At UCB Guild of Students, we have a large number of international student cohorts from diverse backgrounds with varied needs. We are concerned that the cost of the levy will be passed on to our students, on top of the increased international health surcharge (IHS) and Visa costs. We firmly believe that it is unfair to place the burden of decades of underfunding of higher education and the unsustainable funding model this government has inherited onto international students. Research by the public first¹ shows that the modelling used to shape the levy fails to outline the negative impacts it has on higher education and the student experience.

Additionally, we believe that the introduction of the levy contravenes the government's own international education strategy, which aims to position the UK as a 'competitive' market for high-quality education. The reduction to the graduate route visa and the continued cost of IHS has meant that the UK is a less attractive place to study in comparison to its European counterparts. We are concerned that the fees will

inadvertently impact the reputation of British higher education, and therefore potentially losing out on the high quality international students that is outlined in the government's own international education strategy.

¹ Public First 'Counting the cost Modelling the economic impact of a potential levy on international student fees'; September 2025

5. Do you foresee any difficulties with the method for calculating the levy, which is outlined in the technical consultation document?

As noted by Public First, the model that is used to project future international student numbers is based on the price elasticity demand of EU students from 2021, this modelling cannot be fairly applied to non-EU students in 2025. This modelling has meant that there is a drastic underestimation of the 'impact of price increases on demand, with over 'three times of non-EU students being put off coming to the UK' than the prediction outlined'. This means that the sector is expected to lose over 16,100 international students in the first year the levy is introduced, and over the course of the 5 years, the total number of international student enrolments could decrease further, costing the sector around £2.2bn. This would be a huge cost to the sector and therefore impact on the financial viability of higher education as a whole. Not only that, but international students are a gateway to cultural enrichment. This helps broaden and shape the experiences of domestic students; without international students, domestic students will miss out on opportunities to diversify their experiences. This is something that higher education has been proud of for decades, yet the concerning numbers predicted by Public First indicate that these positives may well be falling should the levy be introduced.

Finally, counting eligible students accurately will be a challenging and burdensome tasks – especially given that many international students will face interruptions, either through transfers, repeats, withdrawals or in non-standard course. The 220 student allowance seems quite arbitrary and does not reflect the institutional demographic. For instance, there is a large international student cohort, and therefore, there is an increased likelihood that the above interruptions may occur. It is difficult to see how OfS are able to accurately collect the payment fees for each provider, if a provider finds it challenging to give an accurate account of how many students, they have currently enrolled. Additionally, it is unclear why the government has picked the 220-student mark. This seems like a drastic proposal which fails to recognise the complexity and institutional capacity of the higher education provider, and it is unclear within the technical consultation guide that the government has taken into consideration the different business models that Universities have adopted in accordance to their international recruitment.

6. Are there any circumstances, not specifically mentioned in the technical consultation document, in which it is unclear whether a learner should or should not be counted in the calculation of the levy?

Whilst we appreciate the government's commitment to ensuring that a provider does not double count a student if a student's academic year runs across two levy academic year reporting, however, it is still unclear the impact the levy may have on students who are repeating modules, or studying additional credits for top-ups. This uncertainty means that students may have to pay for visa costs as well as additional required costs associated with the levy charge. We are concerned that providers may pass this to international students, and therefore leave the onus on them to pay for their studies on top of the increased visa and IHS charges.

In addition, these calculations fail to take into account the regional and local economic impacts within the region. At UCB, many of our international students are employed locally. In the 2020-21 academic year, the spending of the University's international students supported a further 725 FTE jobs across the UK economy, of which 510 are in the West Midlands.² This accumulated in a total impact of £48 million was

² The economic and social impact of University College Birmingham; October 2022

generated across the West Midlands. If Public First are correct with their modelling, the predicted decrease of international student numbers will have a significant impact to the local economy. It would be advisable that the government take a more strategic look into their calculations through taking into account the local and civic impact of the levy.

7. Are there any alternative payment options, other than those outlined in the technical consultation document, which would be preferential to your organisation and that you think we should consider?

Whilst we understand that the government is exploring avenues to fund maintenance grants for UK home students in key programmes, we fundamentally disagree that the burden should be placed on international students. Firstly, this is not the most effective, nor efficient way of future-proofing the financial support package offered to UK students. Research from Public First have indicated a that the levy will reduce the numbers of international students has indicated that the levy will reduce the number looking to study in the UK. In i has indicated that the levy will reduce the number of international students' current proposal, this will have a significant impact on the funding made available for maintenance grants. Secondly, we international students already face an increase costs associated with studying in the UK, including restrictions to work. The introduction of the levy will increase the likelihood that international students will face further measures that will squeeze them into precarity. Fundamentally, we take the position that the levy should not be introduced, and the government should explore alternative methods that contribute to the funding of maintenance grants.

8. Does the timing of payment outlined in the technical consultation document coincide with any key financial processes that may impact a provider's ability to pay within the proposed timings?

No

9. Does the approach to payment outlined in the technical consultation document pose any challenges for providers with alternative academic years?

No

Other Comments

10. Are there any other comments on the design of the International Student Levy, as outlined in the technical consultation document, which you wish to raise?

The levy represents a concerning shift in how international students are framed in UK higher education. International students already contribute significantly through high tuition fees, living costs and wider cultural and academic enrichment. The levy treats them primarily as a revenue source to be taxed for other priorities, rather than partners in the system. This approach conflicts with the UK Government's international education strategy, which aims to grow international enrolments and promote the UK as a welcoming, world-class destination.

Additionally, sector bodies and representative organisations warn of serious unintended consequences, including cuts to staff and services or further fee rises. NUS warns the levy could make UK study an option only for the wealthiest students³. UKCISA highlights that diverting international tuition away from education and support towards a central levy is ethically and practically damaging, especially given rising visa, IHS and living costs⁴. By constructing international students as a group whose presence needs to be "offset" by an extra charge, the policy risks reinforcing narratives that migrants must pay extra to justify their place in UK society.

This connects to a wider pattern of stricter migration rules and financial barriers that normalise treating international students as transactional revenue sources or risks rather than community members. In this context, the levy risks legitimising and emboldening far-right and anti-migrant rhetoric that portrays our presence as a problem to be controlled rather than an asset to be valued. We believe a more compassionate system, one built on equitable support for all students should be at the heart of future strategies..

The levy, as designed, may deepen inequalities within the sector. Providers committed to widening participation, applied education and regional development, often reliant on international fee income, may have to reduce courses, close services or further increase fees. For international students from lower-income backgrounds, from the Global South or from already marginalised communities, this compounds barriers and signals that their presence carries an ever-growing financial premium. If the Government proceeds, it must carry out a robust equality and impact assessment including international student and students' union voices.

There must be safeguards to stop costs being passed on to students, and protections for financially vulnerable and specialist providers. Any mechanism must align with the international education strategy's

³ National Union of Students reacts to Autumn Budget 2025; [National Union of Students reacts to Autumn Budget 2025 - NUS UK](#)

⁴ The Budget 2025: UKCISA's response to the levy on international student fees in England; [The Budget 2025: UKCISA's response to the levy on international student fees in England](#)

aim of openness and partnership, not suspicion and penalisation. In its current form, the levy risks undermining the UK higher education as an unattractive destination to study.