

# **Submission to the Migration Advisory Committee on Salary Threshold and Points-Based System (PBS) Commission**

## **Introduction**

Colleges Scotland is the membership body representing all 26 of Scotland's colleges based in 13 regions across the country. Sited in local communities, colleges offer education, skills, and training in the right place and at the right time to support the needs of individuals, their communities, and the labour market. Colleges are both the first-choice destination for school leavers and provide the second opportunity at education including for adult returners.

We welcome the publication of the call for evidence, and we are pleased to have the opportunity to share our thoughts on how the commission can advise and inform the development on the future system of salary thresholds and the level at which they could be set.

## **Key Points**

### **Students**

As an organisation, we wish to express our concerns about the impact on the college sector and its ability to support future economic growth and the meeting of societal needs in Scotland, if it stands at a disadvantage in attracting students from overseas locations. Any graduate of a college would face considerable difficulty in applying for Tier 2 (General) visas with the proposed salary threshold in place, as the average salary of a college graduate is much lower than this, and would most likely need to progress to university to acquire a role which would enable them to claim that status, severely undermining the value of a college education to this student cohort.

We believe that college graduates from outside the United Kingdom (UK) will be disproportionately affected by the proposed minimum salary requirements for experienced full-time employees. This would in effect require college students to articulate and/or progress into university education in order to increase their chance of accessing work with those salary levels. In our opinion, this would impact of value of colleges to wider economy and impact upon perceptions held of colleges by prospective students.

We believe this would also have a significant impact on the ability of colleges to play their crucial role in addressing specific skills gaps, in areas such as health and social care, early years and childcare and hospitality and tourism, to support the wider economy in Scotland.

### **Staff**

Colleges Scotland believes that the proposed salary thresholds could have a severely detrimental impact on the future ability of the college sector to attract and retain staff in Scotland.

Those support staff, who are vital in supporting learners, are particularly vulnerable as a consequence of the proposed changes, as their salaries would not enable them to acquire the Tier

2 (General) status. It is these members of staff who play a crucial role in helping those hardest to reach learners from deprived backgrounds, as well as those adult learners returning to education, to succeed.

This role is emphasised in the latest data published by the Scottish Funding Council in their Student Satisfaction and Engagement Survey 2018-19. Both HE and FE students studying on full time and part time basis' felt that staff regularly discussed progress with them, and that staff encouraged them to take responsibility for their learning.

Of the Tier 2 (General) employees, the current income threshold (£35,800) is generally above the current average salary of support staff in colleges across Scotland. Subsequently we believe that the Tier 2 (General) visa settlement income requirement is too high and will negatively impact upon the delivery of college education in Scotland.

Subsequently if there are salary thresholds, we would agree that there would need to be a range to reflect the needs of colleges in Scotland.

### **'Australian-Style' PBS**

An 'Australian-style' points based system (PBS) will penalise those members of staff with industry level qualifications, yet who may not have the salary to meet the threshold requirements, inhibiting their ability to both secure settled status and to contribute to the success of their students and institutions in contributing to economic growth.

### **Regional Impact**

On a point more specific to colleges in Scotland, in light of their geographic locations, encompassing a wide range of both rural and urban settings, and the possible impact of increased salary thresholds, we would question to what extent have existing regional incentives and pay variations been considered in the setting of those thresholds. If there were tailored salary thresholds, we would strongly agree that they should be varied by region, to take into account the existing frameworks already in place with regards to regional incentives.

Colleges Scotland  
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