

Ed Humpherson  
Director General for Regulation – UK Statistics Authority  
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24 November 2017

Dear Mr. Humpherson,

I wanted to write to you following the events over the summer, and congratulate you on the impact that your work has made. As you know, we have been working hard to challenge the statistical basis for the arguments that Government has made regarding international students. I recognise that you cannot take a position on Government policy, but I do believe that your work criticising the quality of international student data has been beneficial in highlighting the weakness of the International Passenger Survey (IPS) and the 'experimental' nature of the statistical evidence that currently exists.

Like you, I take a broad view about the importance of statistics in informing government, and indeed private sector, policy-making. Government departments express a commitment to evidence-based policy making. Because of your work, we are moving towards much greater clarity on the number and nature of student migration.

Our argument has always been that that international students do not belong within the political debate about migration, and so should be excluded from the Government's net migration target. But international students are a part of the migration statistics that the ONS produces. Following your review, the ONS has now conceded that the difference between the estimate for Long-Term International Immigration for Study and long-term emigration of those who originally came to study in the UK is far lower than the IPS suggested, and than Home Office ministers have previously claimed. And yet, the ONS continues to assert that the overall integrity of migration data has not been called into question. In their words:

*"...doesn't provide evidence of an issue with overall net migration figures for two reasons; because (a) students emigrating might have stated their original reason for migration under the work category or other categories; and (b) a tendency for a particular group of migrants to change their intentions in one way may be offset by a different group of migrants with a tendency to change their intentions in the opposite way."*

I do not understand how this can continue to be the ONS' position. Their reasons appear entirely speculative: "might", "may". Surely it would be more appropriate for the ONS to commit to further work to explore how the clearer understanding of the shortcomings in the IPS have impacted overall migration figures. Given the range of policy issues and political debate that rests on migration figures, I would have hoped that the ONS would maintain the rigorous

approach that has been adopted to international student statistics when considering migration overall.

I would therefore urge you to use the authority of your office to encourage the ONS to commit to further work to understand how their findings on international students might impact migration statistics overall. As I know you appreciate, it is critical that the public has trust in the overall integrity of migration statistics. This summer's revelations have shaken confidence in the claims that have been made regarding immigration in recent years. It is important that we are all able to move forward with as much clarity as possible.

As always, I would be happy to meet with you to discuss these concerns further.

I am copying this letter to the relevant Select Committees, and to the Home Office.

Best wishes,

**James Pitman**

Managing Director, Study Group (on behalf of Destination for Education)

Cc: Home Affairs Committee  
Public Administration Select Committee  
Treasury Select Committee