

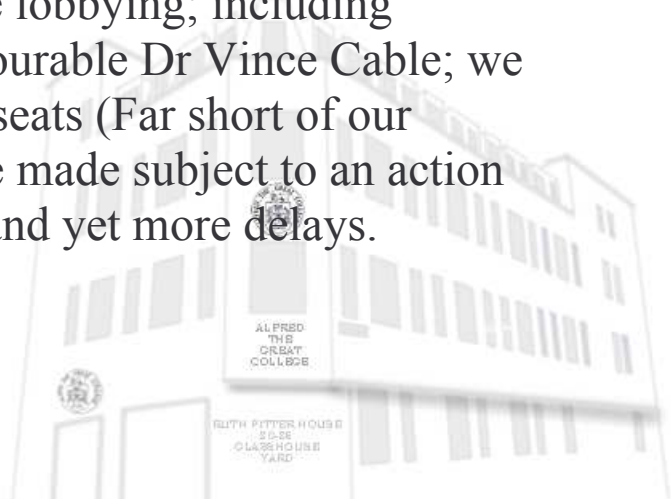
## **An open letter to the policy makers and those charged With implementing their policies**

As the Principal of Alfred the Great College, a private college in central London, teaching international students, I am moved to write this letter detailing and deploring the huge iniquities and abuses that still persist in our sector of the educational industry. Whilst one cannot but applaud efforts to correct years of an unfettered open-door policy; encouraged for whatever reasons by the previous government; the resulting landscape of inconsistency and uncertainty is proving prejudicial to our business and the repute of British education as a whole.

Having been granted a provisional accreditation by ASIC in May 2010 with a recommendation of 800 seats, Alfred the Great College was inspected by the UKBA on 14<sup>th</sup> July. The visit went well and we were led to believe by the UKBA Inspector that we would be granted an 'A' rating and 1500 seats.

On 18<sup>th</sup> August our application as a Tier 4 sponsor was granted but we were designated as a 'B' college and allocated no seats whatsoever. As a result we were unable to function as a working institution.

After several weeks of intense lobbying; including application to The Right Honourable Dr Vince Cable; we were grudgingly granted 500 seats (Far short of our capacity). In addition we were made subject to an action plan that involved more fees and yet more delays.



As I write, we await our third inspection visit from ASIC, being the first prerequisite of the action plan and our attempts to attain an ‘A’ rating.

I will now quote directly; with apologies; from the UKBA guidelines on Tier 4 of the Points Based System on the subject of B-rated sponsors:

**“ If you are a B-rated sponsor, a visiting officer has found evidence that the correct systems are not in place or not adequate to meet your duties, or there may be previous evidence of abuse.**

**We will award a B rating if:**

**You, or another relevant person, have been issued with a penalty for one of the offences listed in Appendix C of the full policy guidance of the policy guidance within the five years ending on the date of application, unless:**

**We withdrew that penalty or it was cancelled on appeal; or**

**You or another relevant person has been issued with a maximum civil penalty within the previous six months, in which case we will refuse the application instead; or**

**You are an existing sponsor applying to renew your licence and are already B-rated unless we are satisfied that you have successfully finished your action plan);  
or**



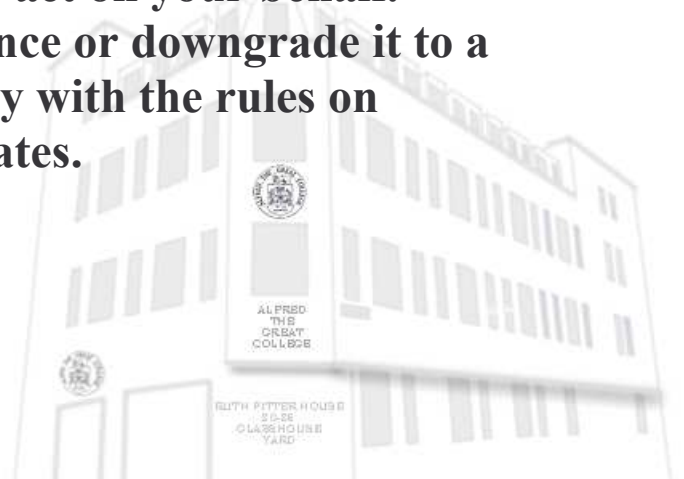
**You are a new, private further education institution (trading for less than 18 months) with a provisional (Stage 2) accreditation from an approved accreditation body. We will review your B rating when you have obtained Stage 3 accreditation.**

**We may award a B rating if:**

**You, or another relevant person, have a conviction for serious offences to do with how you run your business and this makes us doubt your suitability as a sponsor ( such as a conviction under the National Minimum Wage Act or for benefit fraud). We will not take into spent convictions under the Rehabilitation of Offenders Act 1974. (Convictions may become ‘spent’ after specified periods of time from the date of conviction if there are no further convictions during that time. Spent convictions are disregarded for certain purposes).**

**We consider, among other things, how serious the offence is, the penalty the court imposed and, if the offence was committed by an individual member of staff, any action you took against that person.**

**We hold you fully responsible for anything done by an employee who appears to act on your behalf. We may withdraw your licence or downgrade it to a B rating if you do not comply with the rules on issuing or allocating certificates.**



So there we have it. Our newly formed College nestling amongst persons issued with penalty for various listed offences, others accused of civil penalty, conviction for benefit fraud and the invocation of the Rehabilitation of Offenders Act 1974.

In such company the charge that ‘we do not have the correct systems in place or not adequate to meet our needs, or there may be previous evidence of abuse’, seems quite minor but is no less telling and deadly to our fledgling reputation as an educational institution.

Can it be right to surround us with such instances of abuses to the system?

Can it be right to grant us a licence, but a licence with a taint that makes us not B rated but second rate?

There should be a category for a new private College formed with the best intentions and aiming for an A rating on the way to ‘Highly Trusted’ status.

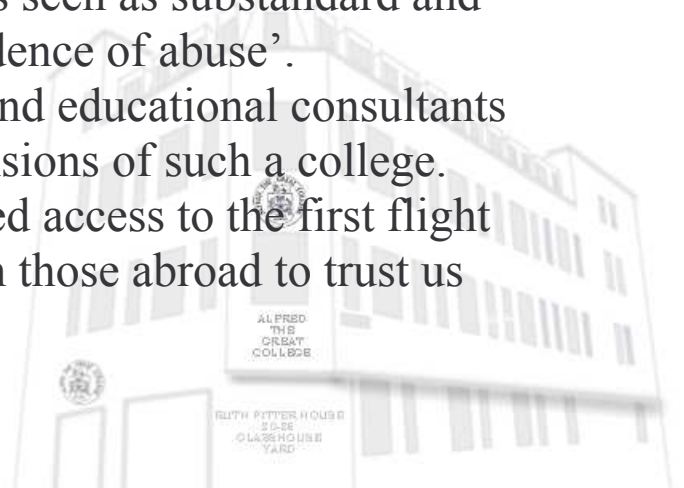
Such pejorative classification is grossly unfair and against everything that this country stands for be it legally or commercially.

Make no mistake this dry and insulting bureaucratic prose is not for a small audience; the words of the UKBA are avidly devoured worldwide, delineating as they do educational standards and the immigration policy of the British government.

As a result a B rated college is seen as substandard and inefficient ‘with previous evidence of abuse’.

Thus, students, their parents and educational consultants alike, view askance the pretensions of such a college.

This results in our being denied access to the first flight of students and a reluctance in those abroad to trust us



with direct payment of fees. It also makes us a target for the large disreputable element among the educational consultants overseas who imagine that we will be more 'flexible' in our admission procedures due to our B rating.

Ironically we are charged directly by the UKBA to recruit good students, ensure prompt fee payment and maintenance and only work with reputable agents. We are not however told how to do this with a savaged reputation.

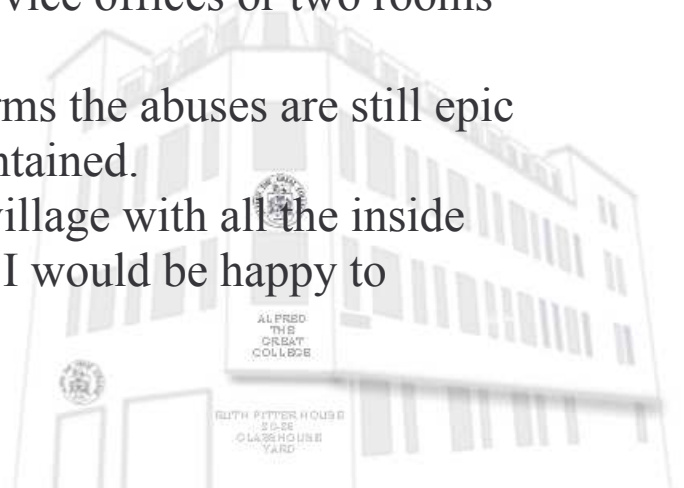
In addition to these commercial disadvantages we find ourselves in direct competition with many British Colleges rated A or 'Highly Trusted' who do not actually teach their students. They form the core of what have become known as 'Bogus or Fake' colleges who sell their services as a cheap door of entry into Britain and its world of work. For as little as £1000 they assign a CAS letter (Confirmation of Acceptance for Studies) to students who have no intention of studying.

Because their paperwork seemingly conforms to ASIC and UKBA requirements; there are many outside companies that provide such a service; they are granted licences to operate. How?

Alfred the Great College is located in a five storey independent building in the Barbican but many of these fake colleges operate from service offices or two rooms above a chip shop.

Despite much trumpeted reforms the abuses are still epic and show no sign of being contained.

Every industry is basically a village with all the inside information that involves and I would be happy to



volunteer my team with all its years of experience to help in cleaning up the flagrant flouting of the rules that is proving impervious to all the rhetoric.

My position is not of course entirely altruistic as I wish Alfred the Great College to flourish and grow but I wish it to do so on a level playing field not handicapped by the authorities and unfair competition.

I also sincerely believe in education and the restoration of my country's reputation in this sphere.

I would also beg our masters in Westminster not to demonise and punish the private colleges in the name of the over compensation of the immigration pendulum.

Well run and fairly regulated we can contribute to the economy and reputation of this country.

Simon Creese-Parsons

