Coalition for Language Education:
Response to UK Parliament's Call for Evidence (3795) on the UK Government's proposed changes to the immigration system

This is the Coalition for Language Education's response [1] to UK Parliament's recent call for evidence regarding UK Government's proposed changes to the immigration system. Please note that in addition to grave concerns about the content of the Government's proposed changes, the Coalition also has serious reservations about the language used throughout this call for evidence, and the way in which language competency is considered not from a human rights perspective, but as a requirement for settlement and citizenship.

The text in **Times New Roman** font derives from the Call itself, and instead of a summary, key points in each paragraph are highlighted in **bold** to facilitate a rapid reading.

Applying for Citizenship and its impact on integration and social cohesion

2. Does the UK have an 'integration problem'?

Our expertise centres on language and language education. Before addressing their relevance to the question of integration it is vital to recognise that integration is not a one-sided process, where the 'problem' is assumed to be migrants being unwilling to integrate and contribute. **Integration is a two-way process, where the responsibility for good relations and social cohesion lies both with migrants *and* the settled population**. Integration is, therefore, a matter of inclusion and equal opportunities, as widely recognised in international frameworks. There are different dimensions to the process of integration / inclusion (see 2.1), and we need to recognise that migrants, just like settled populations, are diverse and have different levels of linguistic, educational, cultural and social capital. They also come to the UK under different circumstances, with some of the most vulnerable coming as refugees fleeing war or persecution.

2.1 Policy plays a key role in facilitating two-way integration. This is **complicated by the distribution of policy responsibilities across the UK**. *Immigration* and *citizenship* policy – who is allowed into the country, to settle/naturalise – is reserved to the UK Government, while *integration* policy – what happens once they arrive – is largely a matter for the devolved administrations of Scotland, Wales and Northern Ireland, and for devolved local authorities in England (Gilardini et al 2019). This results in major local differences: Wales has developed its own Migrant Integration Framework (2023), covering both refugees and migrants, and Scotland has had its own New Scots Integration Strategy since 2014, focussed on refugees only. This creates **major inconsistencies and challenges**, not least because "the implementation of integration at the local level is affected by non-devolved policies" (Gilardini et al 2019: 699). Devolved governments and local authorities hold powers and responsibilities for areas like education, housing, health and community planning that impact on migrant integration, but they strive to achieve this *despite, rather than because*

[1] This was drafted by Mike Chick, Francesca Stella, Ben Rampton and Christina Richardson, with input from Carmen Silvestri, Constant Leung and Tracey Costley.

of, UK government policies, when the latter promote short-term stays, increase barriers to settlement and naturalisation, and create long-term instability for refugees and migrants. Similarly, UK-wide austerity policies have in effect devolved penury, asking local governments to do more with less (Gilardini et al 2019).

2.2 Across OECD countries, language education is a central component in national integration policies, and "represents the bulk of government expenditures on immigrant integration in almost all OECD countries" (OECD 2021:8-9). In the UK, English language teaching is provided through ESOL (English for Speakers of Other Languages) for adult migrants (16+) and EAL (English as an Additional Language) for school-age children; the former is delivered in FE colleges and community classes, while the latter is delivered as part of the mainstream school curriculum. Research commissioned by the UK government shows that language and cultural knowledge facilitate social connections and other indicators of integration, such as access to education, health, housing and the job market (Ager and Strang 2008). But there is no UK-wide policy for ESOL. Wales currently has a national ESOL strategy, while Scotland's successful ESOL strategy was discontinued in 2020 and England has never had one. Where ESOL policy exists, it is formed at a local level in the absence of a UK-wide direction, and this impacts on the coordination and funding of ESOL provision ; indeed there is also a lack of joined-up thinking between devolved ESOL and the immigration policies reserved to Westminster (Simpson and Hunter 2023) Recent research covering the four nations (Cox et al 2025) points to a **crisis in ESOL provision overal**l, with unprecedented levels of unmet demand and a lack of long-term vision. There is also a **high-level of unmet needs across EAL**, which is organised and delivered differently across the four UK nations (see Bell Foundation). Organisations such as NALDIC have been advocating for many years for a change in how EAL pupils are conceptualised and supported within the mainstream curriculum. Although EAL is part of the mainstream schooling provision, in practice pupils are expected to learn English through exposure to English in school with no curricular guidance and teaching provision. The complete lack of system-wide EAL provision means schools and teachers are expected to find their own way without dedicated financial resources, curricular advice and specialist teacher development (Leung 2001, 2014).

2.3 This lack of vision about language education reflects a **misleading but influential 'monolingual, one-nation/one language ideology'** in which the UK is imagined as a monolingual country where English is the social glue and multilingualism is viewed as a threat to integration and social cohesion – despite the multilingual approach taken by the devolved nations. Migrants are defined by their lack of English, and from this 'deficit' perspective, the other languages they speak are seen as of little value and an impediment to their integration. But this 'either/or' thinking misses the realities and the potential of migrant multilingualism. Although they may have different levels of proficiency in different parts of their linguistic repertoire (Pavlenko 2005), there is extensive research showing that migrants routinely use two or more languages in their everyday lives. There is strong evidence that those with weaker English want to improve it, seeing this as key to their life in the UK (Cooke 2006; Stella and Kay 2023). Instead of viewing English language skills and multilingualism as antithetical, **language and education specialists like ourselves advocate "the development of competence in the dominant language as part of a multilingual repertoire**" (Simpson and Whiteside 2015:3). Demographic realities are also at odds with the monolingual ideology: according to the latest national census, in London in 2021, 40.6%

of the population was born overseas,[2] 57% of new babies had a non-UK born mother,[3] and this diversity has spread far beyond just urban centres (Guardian 17.1.23).[4] When the four UK-wide National Academies[5] suggest that "monolingualism is the illiteracy of the 21st century" (2019:3), it is clear that multilingualism is important for the UK's long-term well-being (see the next section).

2.4 The narrative of migrants as a threat to British culture and values is currently amplified in news headlines, and it is weaponised by political actors who scapegoat migrants and play on people's fears to stoke tensions and divisions. Yet **there is** also a **very widespread and sustained commitment in civil society to supporting migrants and refugees with English language learning**, and this tells us a very different story about 'integration': a story of hospitality, of communities willing to come together, and of local resilience against attempts to stoke hatred and division. State-funded ESOL classes, delivered by FE colleges and local authorities, are oversubscribed with long waiting lists, and in this context both third sector organisations and ordinary citizens frequently have to step in to fill this gap (Stella and Kay 2023). English language support, through community classes and more informal initiatives such as conversation clubs, activity-based clubs, and volunteer-led English lessons, is typically integral to local communities' responses to new immigration, and volunteers have been key to ESOL provision for the past 50 years, both in the UK and in other European countries (Rosenberg 2007; Gooch and Stevenson 2020). It is impossible to provide an accurate figure of the scale of volunteering, but the activities of just one project – the STAR (Student Action for Refugees) network – give an indication: according to a study commissioned by the Ministry of Housing Communities & Local Government, "each year, around 2,000 student volunteers support around 4,000 refugees through 80–90 projects at around 50 universities and colleges across the UK" (Gooch and Stevenson 2020: 18)

2.5 'Does Britain have an integration problem?' There is ample evidence that demand for ESOL far outstrips funded support and this demonstrates that migrants are generally very keen to learn English to integrate. Long-term residents are also enthusiastic about helping, finding English teaching very rewarding. In fact, contrary to the idea that migrants need good English before they can communicate with locals, **the process of learning and teaching English is itself a relationship-building, community-affirming activity**. But ESOL and EAL urgently need adequate resources and a clear policy steer from the central UK government that draws on experience across the four nations to develop a flexible approach – one that recognises the complexity of the integration process and acknowledges the vital 'brokering' role played by teaching-&-learning English. We elaborate further on this in our response to Question 4.

[2] https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/internationalmigration/bulletins/internationalmigrationenglandandwales/census2021#:~:text=London%20has%20remained%20the%20region,had%20a%20non%2DUK%20passport

[3] https://data.london.gov.uk/dataset/births-by-mothers-country-of-birth-in-london#:~:text=In%202021%2C%20the%20region%20with,all%20live%20births%20in%20London

[4] https://www.theguardian.com/uk-news/2023/jan/17/ethnic-segregation-in-england-and-wales-on-the-wane-research-finds?CMP=Share_iOSApp_Other

[5] The British Academy; the Academy of Medical Sciences; the Royal Academy of Engineering; and the Royal Society

3 Can a system which emphasises high skills and English language afford to be more generous in terms of integration policy?

3.1 There must be **doubts about the pace and possibility of setting up a system that insists on high skills and high levels of English**. In essential areas like agriculture and social care, high levels of English proficiency are unnecessary to undertake the work. Given that their replacement with British workers is unlikely to be rapid, there will continue to be lower-paid UK migrant residents needing ESOL support for the foreseeable future, and ESOL will also be needed for forced migrants, to whom a high proficiency/high skills requirement cannot be applied (see 4.1.1 below).

3.2 If we take a more rounded and 'ecological' view of the UK's linguistic needs, there is **a strong argument for *welcoming* migrants with limited proficiency in English**. The UK desperately needs its children to be proficient in different languages, and language acquisition happens best at home in childhood. In this way, **multilingual homes contribute to the nation's linguistic capital**, and their bi-/multilingualism is continuously nourished by the arrival/presence of household members who are more comfortable speaking a language other than English. Indeed, much can be learned from institutions such as libraries and schools where projects, signage and displays frequently reflect the multilingual nature of their communities. Insisting that immigrants have a high level of English on arrival diminishes this national resource and belies the lived realities of large numbers of citizens.

3.3 Viewing society from a multilingual perspective is not an eccentric view – it finds high-level support from the four UK-wide National Academies in *Languages in the UK: A Call for Action* (2019). **The UK is experiencing a well-recognised crisis in the learning of languages other than English**, but "the good news is that the UK already has untapped reservoirs of linguistic capacity…. [and] valuing and recognizing the learning of 'community', 'heritage', or 'home' languages that goes on in many households and complementary (or supplementary) schools would strengthen social integration as well as national linguistic capacity (including in security and diplomacy)" (2019:6). The nation's linguistic reservoirs are replenished by newcomers who speak another language much better than English, and they complement the commitment in many settled families to the bi-/multi-lingual maintenance of their heritage languages.

3.4 This is also much more than just a token acknowledgement of what domestic linguistic diversity can offer. 'Family language policy' is a well-established field that addresses the strategic development of multilingualism at home (see e.g. King 2023; https://naldic.org.uk/; https://www.bilingualism-matters.org/), and **ways for formal education to tap into these reservoirs of linguistic capacity are now gaining recognition,** potentially supporting the development *both* of young Britons' multilingualism *and* of new migrants' English (Kenny 2025). The four National Academies propose a "spectrum" (or 'ladder') model of linguistic competence, flexibly assessing a language learners' proficiency as it develops throughout schooling and beyond (2019:6), and this is now echoed in the UK Government's recent response to the 2025 Curriculum & Assessment Review: "we will learn from models such as the Languages Ladder" and "we want to recognise pupils' [linguistic] achievements earlier than GCSE and motivate them to continue studying and developing their language abilities" (UK Gov 2025:33).

3.5 The UK needs policies for language that look beyond the English proficiency of individuals to the 'sociolinguistic' ecologies that can nurture our national capacity in a range of languages. People without high levels of English play an important role in this, and 'respect for family life' should extend to celebration of the household bi-/multi-lingualism that they stimulate and its potential contribution to national language resources. In sum, **it is very much in the UK's own interests to accept migrants with low levels of proficiency in English.**

4. Should it be a requirement that everyone is able to speak some English before they come to the UK? How do we ensure once they come to the UK, they can speak English within a reasonable time frame?

This is two questions.

4.1 Should it be a requirement that everyone is able to speak some English before they come to the UK?

No. Partly for the reasons given in Section 3 above. But also because in the UK Government's proposals, there are other omissions and misconceptions about the role of language in the promotion of integration, inclusion and social cohesion, and these also undermine their viability and value.

4.1.1 Migrants and refugees certainly bring a wide range of skills, ambitions and experiences, and often have two, three or four languages in their linguistic repertoire. However, historically, the UK immigration requirements have not always made entry contingent upon being able to speak English for voluntary migrants. What is more, the requirement to speak some English is **completely unreasonable for forced migrants**, those coming to the UK as refugees or on resettlement schemes. We know that many such migrants have little or no English. For example, only around one third of Ukrainian refugees arriving in the UK in 2022 reported being able to speak any English (ONS 2022), but did speak both Russian and Ukrainian and nearly everyone on the Syrian Vulnerable Persons Scheme was recorded as having little or no English (NAO 2016) but many could speak Kurdish or other minority languages in addition to Arabic. This is consistent with broader trends in ESOL classes – demand is usually greatest at lower levels (Learning and Work Institute 2024:4) – and there are other categories of migrant, such as participants in family reunion schemes, who come from zones where they cannot access English language learning support before making the journey to the UK. **Different learners' needs to be acknowledged and addressed**, not swept under the carpet with the belief that raising English language requirements will filter out 'problem' migrants. Finally, and crucially, an unnecessarily high language bar for migrants, from whichever route they arrive, is both wasteful of human capital and discriminatory.

4.1.2 The proposals treat language education as little more than a set of assessment tools to evaluate readiness for citizenship, and **there is no acknowledgement of the crucial role that effectively organised language learning and teaching can play in fostering social cohesion and a sense of belonging** (Chick 2023, 2025; Cooke & Peutrell 2019; see 2.3

above). Language education is an essential element in integration policy, and it can (and should) be designed and delivered to take into account English language learners' backgrounds, challenges and needs. Rather than ignoring or penalising multilingualism, effective teaching acknowledges and builds on learners' existing language repertoires, draws on trauma-informed pedagogies where relevant, and aligns with the advice of the 2017 Report of the APPG on Social Integration, linking language education to human rights and aspiration, recognising that whilst factors such as race, class and gender mean that competency in English is not a passport to social mobility, 'the ability to speak English is required in order to enjoy the basic freedoms which British society is built upon and is crucial to social mobility' (2017:5).

4.1.3 If Government seeks to promote integration and avoid exclusion and inequality, **it is therefore essential to invest in effective English language teaching provision and teacher development**. Recent research from both Wales (2023) and Scotland (2023) outlines an integration-focussed approach to migrant language education, but, alarmingly, the UK Government proposals make no reference to its tremendous potential.

4.2 How do we ensure once they come to the UK, they can speak English within a reasonable time frame?

4.2.1 It is impossible to specify any one-size-fits-all time frame for migrants' development of English. A very substantial research literature demonstrates that the rate of second language acquisition depends on a number of complex variables including age, educational background, existing language repertoire, and crucially, the quantity and quality of language provision available (Pica 2005). **There is no reasonable way of setting a single time frame in which all migrants are required to reach a certain level of English** – it can only be arbitrary.

4.2.2 Setting higher language requirements and extending settlement waiting periods runs counter both to integration and the national interest. People do not need high levels of English to make worthwhile contributions to the country (Section 3 above), but there is growing anecdotal evidence that the Government's White Paper is already making migrants feel less welcome, included and integrated. Extending the settlement period to 10 years and telling people with discretionary leave to remain that they may have to quit the UK if they fail a high level (B2) English assessment will deter people from investing in houses, careers, or expensive university study for their children.

4.2.3 In place of obliging migrants to undertake years of stressful high-stakes English language assessments, the UK needs effectively organised provision of the kind outlined in 4.1.2, supported by **enhanced models of language teacher education that equip teachers with the confidence and tools to make the migrant language classroom a place of belonging**, where issues of social justice, citizenship, and inclusion can be addressed and explored.