From public to commercial service: State-market hybridisation in the UK visa and immigration permit infrastructure, 1997–2021

Forthcoming in *The British Journal of Sociology*

(Author Accepted Manuscript)

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Acknowledgements
Early ideas of this article were presented at the 2017 IMISCOE spring conference at Middlesex University, UK. We thank the participants for their helpful comments. We also gratefully acknowledge the funds from The Sociological Review seminar series, which enabled us to host an event in which an earlier draft of this article was presented. Daniel Nehring has received financial support from The Fundamental Research Funds for the Central Universities in China for this research.

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Abstract

This article charts the transformation, between 1997 and 2021, of the family visa and immigration permit infrastructure from a public into a commercial service in the United Kingdom (UK). In doing so, it reveals a process of state-market hybridisation underpinning the commercialisation of migration regulation. Drawing on the analysis of legal archives, policy reports and marketing materials directed at family migrants spanning 1997–2021, it presents fresh, systematic evidence of how, since 2007, a commercialised state-market hybrid migration infrastructure for visas and immigration permits has developed in the UK. We show how the trend of state-market hybridised commercialisation has cascaded through three dimensions of migration infrastructure: (1) state and public immigration agencies, (2) outsourcing visa application firms, and (3) private immigration advisers. Predicated on this hybrid public-private commercial infrastructure, application procedures for visas and immigration permits have become increasingly reconstituted as commercial, rather than public, services. This transformation has created a new transactional logic that stratifies individuals' right to family life along socio-economic lines.

Keywords: Commercialisation, hybridisation, market, migration infrastructure, state, visa

1. INTRODUCTION

Obtaining a visa or residence permit is an essential part of transnational migration. But what are the procedures involved and how much does it cost to obtain a visa or residence permit for the United Kingdom (UK)? How have the organisation of the UK's visa application procedures and its attendant fees system changed over time? What do these changes tell us about the changing nature and procedure of migration regulation in the UK and more broadly across Europe?

Visa and immigrant permit procedures constitute a core component of migrant regulation. Over the past decades, changes in migration regulation have been characterised by processes of marketisation and commercialisation (Gammeltoft-Hansen & Sørensen, 2013; Schierup et al., 2020). A growing body of research has focused on the emergence and subsequent boom of a migration industry located primarily in the private sector (Cranston, 2016; Schmidtke, 2012). In this article, we move beyond extant research to develop a new perspective on the commercialisation of visa and immigration permit procedures in the UK. We draw on the concept of migration infrastructure (Xiang & Lindquist, 2014) to highlight and systematically analyse the assemblage of and coordination between state and private commercial actors in jointly fashioning the process of commercialisation. Building on the concept of 'state-market hybridisation' (Aoyama & Parthasarathy, 2016; Evers, 2005), we chart the gradual transformation of migration regulation from a public into a private service. Scrutinising changes in the organisation of visa and immigration permit infrastructure between 1997 and 2021, we map the development, from 2007 onwards, of a hybrid public-private commercial infrastructure to prepare, receive and process applications for visas and immigration permits required to enter and remain in the UK.

As a testing case, we focus on family migration to and settlement in the UK, as a key site of efforts at immigration reduction, in response to anxieties about family migrants' social

integration and economic contribution to the host country (Bonjour & Kraler, 2014). Specifically, we ask:

1) How has the UK family visa and immigration permit infrastructure been subject to processes of state-market hybridised commercialisation?
2) How and to what extent are these processes indicative of a transformation of the UK visa and immigration permit infrastructure from a public into a private service?

To answer these questions, our empirical analysis systematically explores, first, the evolving system of fees related to preparing, receiving and processing applications for visas and immigration permits and, second, the socio-political legitimisation of these fees. Our analysis is primarily concerned with the structural transformation of migration regulation rather than with individual migrants' experiences of this transformation. We show that state-market hybridisation in the commercialisation of the UK's family visa and immigration permit infrastructure has cascaded through at least three sets of public and private actors: (1) the British state and public immigration agencies, such as the Home Office and the UK Visas and Immigration (UKVI; formerly the UK Border Agency [UKBA]); (2) private outsourcing firms processing visa and immigration permit applications on behalf of the British state; and (3) commercial immigration advisers, i.e. specialist legal firms and paid individual advisers in the UK or abroad providing applicants with assistance in preparing visa and immigration applications, lodging of appeals and so on. We highlight the coordination between these actors, as well as their interpenetration and shifting power dynamics, as part of progressive state-market hybridisation of the UK's visa and immigration permit infrastructure.

This research makes three distinctive contributions to sociological debates on the privatisation and commercialisation of migration regulation in the UK and Europe more

broadly. First, the commercialisation of procedures pertaining to the application for and processing of visas and immigration permits, particularly in the UK, has remained under-explored (Burnett & Chebe, 2020; Sánchez-Barrueco, 2017). We provide one of the first systematic analyses of the structural transformation of migration regulation at the state-market interface in the UK. Second, drawing on the concept of migration infrastructure, we adopt an inter-actor perspective to map the interpenetration between public services for migration regulation and the for-profit migration industry. In doing so, we consider how concomitant moves towards privatisation on the part of the British state and commercialisation in a transnational marketplace may transform the logic of migration regulation, and we develop further the concept of 'state-market hybridisation' (Evers, 2005) to explicate this transformation. Finally, we discuss the implications of the state-market hybridisation for migration regulation and the unequal distribution of the right to family life (United Nations General Assembly, 1948).

2. THEORETICAL CONSIDERATIONS

2.1 Visa and immigration permit infrastructure as public service

The visa and immigration permit infrastructure has long constituted a core public service. Drawing on existing research (e.g. Ongaro & van Thiel, 2018; Ongaro et al., 2018), we define public services as services provided by a state to its citizens, usually but not exclusively within its sovereign territory, or on behalf of its citizens according to what governments and policymakers judge to be in the public interest. Notably, different from private services, public services are not typically intended for profit generation, and they are typically characterised by the principle of equal access for those who need such services (Peck, 2013). Healthcare and education are common examples of public services delivered to citizens in modern welfare states such as the UK (Krachler & Greer, 2015; Voss, 2018). Migration

regulation falls under the remit of public services delivered in the interest of the public, insofar as it maintains a state's sovereign borders, regulates access to its territory by non-citizens, and helps fulfil citizens' basic human rights, such as the right to family life (Newman, 2016; van Houtum & van Naerssen, 2002). Thus, administrative and legal procedures rendered by governments to control and selectively facilitate immigration are frequently framed as appealing to the 'public interest' (Yuval-Davies, Wemyss & Cassidy, 2018).

The development of visa and immigration permit infrastructure as a public service has been bound up with the formation of modern states. Torpey (2018, p. 39ff.) traces the bureaucratic procedures of processing and issuing passports, to prove citizenship, and visas, as a means of legally legitimate border-crossing in the absence of citizenship, to the French Revolution. His analysis (2018, pp. 61ff.) suggests that early passport systems, for example in 18th-century France, were developed in reference to perceived public interest, to strengthen 'commerce' and 'communication' among French citizens, and to identify, monitor, and in some cases expel foreigners perceived to be a risk to public safety.

In its contemporary form, visa and immigration permit infrastructure not only encompasses visas, passports and residence permits, but also bureaucratic transactions between would-be migrants and representatives of their destination state that are required to obtain the aforementioned documents. The monopolisation by the modern nation-state of the legitimate means of movement, in particular across national borders, and of the ability to authorise such movement via a bureaucratic system of passports, visas and immigration permits lies at the root of the modern visa and immigration permit infrastructure (Torpey, 2018).

Visa and immigration permit infrastructure has long remained both a public service, enabling non-citizen immigrants to document the legal legitimacy of their migration to and

stay in their host country, and a public instrument of control over immigration (Horton & Heyman, 2020). Mongia (1999), for example, analyses their use as a means of weeding out immigrants considered undesirable for racial reasons in post-colonial Canada in the 20th century. Moreover, with the establishment and development of contemporary welfare states, visa and immigration permit infrastructure also serves the prominent function of gatekeeping access to other public services such as healthcare and education. The key point is that the bureaucratic means of migration regulation have predominantly remained, for most of the time since their invention, under direct public control. As visa and immigration services were typically provided by the state, not for profit, and equally accessible to people who need such services, the acquisition of a visa or immigration permit was not framed as a commercial transaction or involved private, commercial actors as intermediaries between the state and visa applicants.

2.2 Migration industry: Commercialisation in a marketplace

There is a growing academic literature on the migration industry, which explores the advent and expansion of commercial services pertaining to visa and immigration permit application and processing (Gammeltoft-Hansen & Sørensen, 2013). Hernández-León (2013, p. 25) defines the migration industry as 'the ensemble of entrepreneurs, firms and services which, chiefly motivated by financial gain, facilitate international mobility, settlement and adaptation, as well as communication and resource transfers of migrants and their families across borders'. To this definition, Baird (2017) further adds private entrepreneurs, firms and services that constrain international mobility, for instance by providing border security services to states. The conceptual lens of the migration industry zooms in on 'the ways in which the processes of migration become an economy; the production and circulation of knowledge, the offering of services, and so on' (Cranston, Schapendonk & Spaan, 2018, p.

544).

The development of the migration industry contributes to the commercialisation of migration regulation (Gammeltoft-Hansen, 2013). By rendering visas and immigration permits as commodities and immigration application preparation and processing as a service that helps merchandise the commodity, the migration industry extracts financial value from migration regulation (Baird, 2017; Schapendonk, 2017). In this context, some studies on the migration industry have documented privatisation and the state's outsourcing of the processing of visa applications to for-profit enterprises (Bloom, 2015; Menz, 2009; Sánchez-Barrueco, 2017). Further research has drawn attention to the influence, for example by way of strategic lobbying, of private commercial interests on migration policy (Baird, 2017).

Research on the migration industry has provided some illuminating insights into the commercialisation of the visa infrastructure as primarily located in the capitalist marketplace (Gammeltoft-Hansen & Sørensen, 2013). In their agenda-setting research, Hernández-León (2008), Menz (2009, 2011) and Bloom (2015) have comprehensively documented that private companies have come to be directly and indirectly involved in the regulation of distinct stages of transnational migration, in a largely unregulated private sector. A range of case studies further maps how the commercialisation of transnational migration cuts across geographical locations and migrant groups in diverse socio-economic positions. For instance, Hennebry (2008) shows how financial profit is extracted from Mexican migrant labourers by private migration brokers, through an array of fees in the visa application and migration process. In turn, Koh and Wissink (2017) analyse the operations of commercial intermediaries dedicated to facilitating the transnational mobility of the super-rich and global elites.

However, despite some references to the state in existing research on the migration industry (Baird, 2017; Bloom, 2015; Menz, 2011), there is yet to be a systematic analysis and

conceptualisation of how the trend of commercialisation takes place at the state-market interface. As we will demonstrate in this research, such an analysis promises to shed important new light on how the process of commercialisation may reconstitute migration regulation from a public to a commercial service, re-wire the logic underpinning migration regulation, and restructure the interrelations between distinct state and private actors involved in such regulation.

2.3 State-market hybridisation: Commercialisation through an infrastructure lens

To re-locate our examination of the commercialisation of the visa and immigration permit infrastructure from a marketplace or migration industry perspective to the state-market interface, we draw on the concept of migration infrastructure. Migration infrastructure refers to the 'systematically interlinked technologies, institutions, and actors that facilitate and condition mobility' (Xiang & Lindquist, 2014, p. S124). The concept is geared towards the mapping of the holistic assemblage of actors and operational logics of formal and informal spaces of mediation that structure migration. Xiang and Lindquist (2014) distinguish between regulatory, commercial, technological, humanitarian and social dimensions of migration infrastructure. In theoretical terms, we aim to show how state-market hybridised commercialisation of visa and immigration permit infrastructure may re-organise these dimensions, most importantly the regulatory and the commercial, and the interactions between them, in terms of their key actors and rationalities.

In contrast to the perspective of the migration industry, an emphasis on migration infrastructure highlights our primary interest in the changing roles of multiple actors, particularly the state and the market, and in the inter-actor coordination in the commercialisation of the visa and immigration permit infrastructure. The infrastructure lens thus equips us conceptually to bring together the somewhat disconnected literature on

migration regulation as a public service and that on the migration industry in terms of private services. This allows us to develop further the concept of 'state-market hybridisation' to capture the development of a partly-public, partly-commercial infrastructure—a distinctive trend of commercialisation characterised by an interpenetration between the state and the market over the past two decades.

The concept of state-market hybridisation is not new, but it is yet to be systematically developed in sociological research on procedures of migration regulation. In public administration and related fields, the concept refers to models of governance that seek to move beyond the divide between public and private sectors and, in doing so, to generate social innovation and economic development (Aoyama & Parthasarathi, 2016). More specifically, state-market hybridisation concerns efforts to enhance the productivity of public services by involving market-based private sector actors in their delivery, providing services on behalf of the state and being compensated with public funds (Clarke et al., 2007; Evers, 2005; Taylor-Gooby et al., 1999). Extant research has documented the state-market hybridisation of healthcare, education and other public services (Bach, 2016; Brennan et al., 2012; Tomlinson & Kelly, 2018). Researchers have described the scale of the recent outsourcing of immigration services and other border control functions to private for-profit providers across Europe (Infantino, 2016; Sánchez-Barrueco, 2017). Building on previous research, we focus on so far less-researched procedures of state-market hybridisation of the UK's visa and immigration permit infrastructure, as well as the underpinning logic for such procedures.

Considering the visa and immigration permit system as a crucial piece of migration infrastructure, our conceptual development and empirical analysis take place in three dimensions. First, we look at the commercialisation of the visa and immigration permit infrastructure as a structural transformation of state institutions, to understand the nature of

the commercialisation. Here, we examine the economic and political rationalities by which this process has been instigated and legitimised, for example in migration policy and legislation reforms and in the state's effort to market its services. We consider how the commercialisation of visa and immigration fees is bound up with the British state's privatisation of migration regulation.

In the context of public service reforms over the past four decades, influenced by neoliberal economic thinking (Harvey, 2007), privatisation has carried two meanings that are important to our analysis. To begin with, it refers to the transfer of public services and state functions, via their outright sale and transformation into for-profit commercial operations, or via the outsourcing of their management to for-profit enterprises (Lynch, 2016). Such reforms in public services have typically been justified in terms of cost savings towards public budgets and the enhanced efficiency of privately-operated services (Harvey, 2007; Ongaro et al., 2018). Concomitantly, privatisation refers to an ethical shift in the relationship between the state and the individual. The privatisation and reduction of public services have frequently been accompanied by claims, on the part of governments and policymakers, that individuals rather than the state should be held responsible for social welfare outcomes (Dardot & Laval, 2014). In other words, neoliberal politics has, over several decades, promoted an ethic of personal, rather than collective or political, responsibility; and it has exhorted individuals to become entrepreneurs of their own welfare (Dardot & Laval, 2014). The question then arises to what extent this neoliberal model of privatisation and ethical shift might apply to the procedures of visa and immigration permit application in migration regulation.

Second, to understand the processes of state-market hybridisation, we consider the roles and interactions of three types of actors in the commercialisation of the UK's visa and immigrant permit infrastructure. Specifically, we explore how the commercialisation has involved changing roles of the British state and public agencies within it, of outsourcing

firms providing immigration services on behalf of the state, and of private immigration advisers. We examine the increasingly complex, intertwined relationships between the distinct actors, their growing interdependencies, and shifting power dynamics. In doing so, we argue and will show that state-market hybridised commercialisation of migration regulation is not a process in which the state simply casts public services to a private marketplace (Bloom, 2015). Rather, it represents a structural transformation enabled by state-market coordination in producing, legitimising and diffusing a commercial transactional logic of migration regulation.

Third, to illustrate the implications and scope of the transformation, we portray how state-market hybridised commercialisation has transformed the organisation of migration regulation, through creating a partly-public, partly-private fees system for visas, immigration permits and related services, whose principles and ethics differ notably from its public-service counterpart. We discuss the ramifications of this transformation for the realisation of the universal human rights of citizens and migrants (United Nations General Assembly, 1948). Moreover, we chart the geographical scale of this transformation, from within the UK across its borders to offshore sites, such as consulates, outsourcing visa application centres, and private immigration advice firms.

3. METHODS

3.1 Family migration and settlement as a testing case

Empirically, we focus on family migration to and settlement in the UK as a testing case, which encompasses migration to the UK and migrants' visa extension and settlement within the UK for a wide range of family reasons such as marriage, care provision, and reunion with parents, children and other family members (Bryceson & Vuorela, 2002). Our inclusion of visa extension and settlement applications accounts for the fact that people may not need to

physically cross nation-state borders to come into contact with the family visa and immigration permit infrastructure. Particularly, we focus on non-European Union (EU) migration, because EU family migrants were not subject to visa and settlement application until the formalisation of Brexit.

We have chosen this case for three major reasons. First, practically, it is beyond the scope of this article to cover all forms of migration. Thus, limiting our focus to family migration renders our empirical analysis feasible. Second, despite extensive academic attention to the minimum income requirement for British citizens to sponsor a non-EU family member to migrate to and settle in the UK (Sirriyeh, 2015) and extensive discussion of the commercialisation of education, work, lifestyle and investment migration (Benson & O'Reilly, 2016; Džankić, 2018), research on the commercialisation of the visa and immigration permit infrastructure has so far had little to say about the implications of these processes for family migration and settlement. Third, admission of migrants for family reasons is often conceptualised along humanitarian lines, and thus its logic may be expected to be more at odds with the trend of commercialisation than that for the admission of economic migrants (Dardot & Laval, 2014). Indeed, migration regulation in the UK increasingly curtails family migration due to its 'non-economic' nature and lack of economic value to its host country (Wray, 2015). Therefore, evidence of the commercialisation of family visa and immigrant permit infrastructure is particularly telling of how far the trend of commercialisation has reached to subject family migration to a transactional logic underpinning state-market hybridised migration regulation.

Our case study of family migration is important also because family migrants constitute a major, important flow of international migration. Data from the Organisation for Economic Co-operation and Development (OECD) show that 38 per cent, or 1.8 million of all permanent migration to the OECD countries, is for family reasons in 2018 (Migration Data

Portal, 2019). While long-term family migration to the UK has remained stable over the past two decades, with an annual average of around 65,000, family migration often accompanies other, much larger flows of labour, skilled and business migration, but are often rendered invisible or secondary vis-à-vis these 'primary' migratory flows (The Migration Observatory, 2020).

3.2 Data and analysis

Our data set centres on three sets of actors that are key to infrastructuring family migration to and settlement in the UK, ranging from the state/public to the market/private: (1) public immigration agencies (e.g. the UKVI and formerly the UKBA), (2) private outsourcing firms that receive and process immigration applications on behalf of the public agencies (e.g. Visa Facilitation Services [VFS] Global), and (3) private immigration advisers.[1] While the first two are well-defined entities, the third refers to individuals and commercial enterprises that specialise in providing legal guidance on immigration-related matters, assist migrants in preparing relevant documents, such as visa and immigration permit applications or appeals against rejections, and represent them in relevant legal proceedings.

First, data on public immigration agencies were collected from the UK government's online database (legislation.gov.uk) and websites (gov.uk). We obtained immigration legislation passed and published between 1997 and 2020, i.e. starting from the new Labour government when the British state moved to a new stage of neoliberal public policy reforms (Harvey, 2007). A keyword search for 'fees' and associated words returned 124 documents within this period, which we analysed to chart the development of the public visa fees system. Evidence suggests a systematic expansion of fees in the visa and immigration permit infrastructure from the 2007/2008 reform of the UK border control system onwards. We focus on 62 relevant pieces of legislation passed between 1997 and 2020, to document the

constitution of the fees system before and after 2007. To complement the analysis of legislation, we obtained relevant impact assessments, i.e. government-commissioned analyses of the likely social impact of prospective legislation, and published summary schedules of visa fees, via official websites (e.g. gov.uk). Such documents are particularly useful for analysing the evidence and narratives provided by the government to rationalise fee changes.

Second, data on private outsourcing firms were collected from the firms' websites. Our analysis focuses mainly on VFS Global as the largest and major outsourcing firm used by the UK government to receive and process visa and immigration permit applications. According to Sánchez-Barrueco (2017, p. 9), VFS Global monopolises 87% of the market share for private visa processing across 124 countries in 2016. VFS Global's activities grew from processing visa applications in over 30 countries for the UK government in 2012 to over 70 countries in 2015 (Sánchez-Barrueco, 2017, p. 10). As of mid-2021, according to its website, VFS Global claims to have processed more than 230 million visa applications since its establishment in 2001, operating 3,523 application centres in 143 countries and representing 62 client governments (VFS Global, 2021a). Particularly, we collected materials detailing the fee schedules and the marketing materials outsourcing firms present to introduce and promote their services.

Third, we analyse the prevalence, fee schedules and marketing of services related to private immigration advice firms. Through a freedom of information request, we obtained the annual statistics kept by the Office of the Immigration Services Commissioner (OISC) on the number of immigration advisers. The OISC accredits immigration advisers operating within the UK. According to the OISC (2021), it 'is a criminal offence for a person to provide immigration advice or services in the UK unless their organisation is regulated by the Office of the Immigration Services Commissioner (OISC) or is otherwise covered by the Immigration and Asylum Act 1999'. The OISC incompletely records the number of private

immigration advisers, because members of some other specific professional bodies, such as the General Council of the Bar or the Law Society of England and Wales, may give immigration advice without registering with the OISC. Thus, the OISC data only provide an indicative baseline of the scale of the immigration advice industry in the UK. To document the fees and marketing of private immigration advice, we collected published fee schedules and marketing materials from the websites of 44 private immigration advice firms. We drew a random sample of 30 firms listed in the OISC's Register of Regulated Immigration Advisers within the UK (OISC, 2019). Additionally, we selected a small convenience sample of 14 overseas firms, which offer advice on how to apply for and obtain UK visas in different non-EU countries (India, Nepal, Pakistan, Ghana, Nigeria, and South Africa) with significant historical and contemporary, colonial and post-colonial, ties to the UK.

Data analysis involved three processes using MaxQDA. First, we generated structured summaries of relevant legal and governmental documents to describe patterns and trends in legislative changes in visa and immigration permit fees. Second, we systematically summarised specific visa fee schedules and fees for ancillary services by public immigration agencies and private immigration advice firms over time. Third, we used thematic analysis to draw out the rationales and strategies by which visa fees and supporting services are marketed to family migrants.

4. FINDINGS

4.1 Commodifying visas: Changes in immigration law and public immigration agencies

Our analysis of legislation, governmental documents and fee schedules spanning 1997–2021 shows that the commercial turn of the UK's public immigration agencies has been driven primarily by changes in migration policy and law from 2007 onwards. Within state agencies such as the legislative body, Home Office, and the UKVI (formerly the UKBA), the

constitution of a commercialised infrastructure for visas and immigration permits on the part of the British state can be evidenced through three aspects: (1) intensifying legislative changes to have created new fee categories and substantially increased the fees charged in each category; (2) stratification of service quality and speed using a new tiered fees system; and (3) a shift towards for-profit operation.

The beginning of the intensive privatisation and commercialisation of the visa and immigration permit infrastructure, in 2007, coincided with major border control reforms in the UK, including the establishment of the UKBA in 2008. In the decade prior, fees for visa and immigration permits were mainly specified in Consular Fees Orders, i.e. regulations that specify how much British consulates overseas should charge for a range of public services, including the processing and issuing of visas. From 2007 onwards, fees for visas and immigration permits began to feature instead in immigration legislation, and specifically in two new categories of legislation: 'Immigration and Nationality (Cost Recovery Fees) Regulations' and 'Immigration and Nationality (Fees) Regulations'. Visa and immigration permit fees continued to feature in Consular Fees Orders for Crown Dependencies and British Overseas Territories only and disappeared altogether from 2012 onwards. Table 1 demonstrates this shift.

[Insert Tables 1 and 2 Here]

Table 1 also highlights the expansion of the visa fees system. It shows that the period from 2007 to 2020 witnessed a total of 2,136 modifications to visa and immigration permit fees, compared with 111 such changes between 1997 and 2006. With these changes, there has been a notable increase in the number of new fee categories, in terms of the types of documents and bureaucratic transactions for which applicants are charged. Moreover, as illustrated in Table 2, there has been a continuous increase in the amount of fees charged in most categories. This dual growth in the diversity and amount of fees amounts to an

expansion of the public visa fees system.

As a result of this expansion, family visa applicants to the UK today pay a much wider array of fees than they would have done in 1997, at a much higher cost. The Consular Fees Order 1997 (Statutory Instrument 1997 No. 1314) specifies a total of 19 categories of fees according to which someone may be charged to join a family member in the UK, such as a visa application to enter the UK as a short-term, six-month visitor (£45), or to stay for a longer period of up to five years (£80). In contrast, the latest Home Office (2021) immigration and nationality fees of 31 January 2021 specify 93 fees potentially chargeable to family migrants,[2] covering a far more fine-grained set of fees for visas and immigration permits, alongside bureaucratic transactions necessary for their acquisition. An application for a five-year family visitor visa from outside the UK now costs £655, while one also needs to pay £141 for the receipt, preparation and forwarding of application documents, alongside an optional £142 fee for the services (call-out or out-of-hours) of a consular officer. None of the latter two transactions appeared in the Consular Fees Orders before 2007. The expansion of visa and immigration permit fees means that family migrants are liable to pay for a wider array of services and documents that were previously provided as (free) public services.[3]

While not all family migrants opt for the additional, new services, Table 2 charts the increasing fees for a family visa or settlement permit itself, which is a non-optional, essential component required for family migration. We focus on 2009 onwards because this is the period when visa and immigration permit fees have undergone a continuous, substantial increase. As the data show, except for short-term family visitor visas for less than 6 months, the fees for all other visa or permit categories have increased at a rate that far outpaced the inflation rate. Compared with the 2009 baseline, each fee had increased to at least 143 per cent by the middle of the 2010s and to at least 246 per cent by the end of the decade, with one increasing to as much as 556 per cent. We found no evidence of increases of a comparable

scale before 2009.

Beyond a set of basic mandatory fees and fees for optional services, as outlined above, successive governments have also established a tiered fees system marked as ‘priority’, ‘premium’, ‘super premium’ and ‘expedited’, particularly after 2010, which stratifies the speed and quality of service. As Table 3 presents, these fees furnish applicant-clients with additional advice in the preparation of a visa application, allow for the expedited processing of applications, and enable face-to-face, telephone or live-chat internet contact with the UKVI (formerly the UKBA) staff, who, as a rule, cannot be contacted directly in regular postal applications.

[Insert Table 3 Here]

We can see from Table 3 that, alongside an increase in the number of chargeable categories in the 2010s, the amounts charged in most of the categories have grown, too. The fees contribute to comprehensively monetising the visa application process, with successive legislation parcelling off into fees extending over ever more steps of applying for a visa or permit. It also renders explicit the commercial transactional logic that aligns how much service one gets to how much one pays. Thus, the expansion of fees for visas and associated services marks a significant dimension of their commercialisation, which transfers the costs of a visa or immigration permit and related services from the state to applicants.

Our analysis of impact assessment documents, i.e. reports commissioned as part of the legislative process to assess and justify changes to immigration legislation, provides further insights into the changing logic underpinning the above development. The logic of cost transfer is clearly visible in the assessments. For example, the Impact Assessment for the Immigration and Nationality (Fees) Regulations 2012 (p. 1) justifies an increase in visa fees as follows:

> UK Border Agency must ensure that there are sufficient resources to secure the UK Border and reduce migration. Government intervention is necessary to ensure a balanced budget. The Home Office budget will be reduced by 23% in real terms by the financial year 14–15, and there will be fewer fee-paying migrants as policy change to limit on migration comes into effect. After efficiency savings of £500m over the current spending review period have been factored, at current fee levels, we estimate an income shortfall of £50m in the financial year 2012–13. To address this, and as part of the Spending Review, HM Treasury has agreed that an increased contribution is to be made by migrants who benefit directly from the services offered by the UK Border Agency. […] The Government's general policy objectives on UK Border Agency fees are: (1) that those who benefit directly from our immigration system (migrants, employers and educational institutions) contribute towards meeting its costs, reducing the obligation on the taxpayer; (2) that we simplify the fees system where possible, aligning fees where entitlements are similar; (3) that we set fees fairly, at a level that reflects the real value of a successful application to those who use the service.

In line with our preceding observations, this statement sets out a twofold rationale for the expansion of the visa fees system. First, the costs of immigration are transferred from the state to those who supposedly benefit from it economically—migrants, their employers and educational institutions that benefit from international students' tuition fees. Unlike labour and business migrants whose migration is usually paid for by their sponsor institutions, individuals tend to bear the expanding costs of family migration. Second, fees are aligned to the alleged economic value of visas, as a commodity, to migrants, which is calculated partly based on an estimated 'market demand' of the commodity reflected through the volume of

applications. Importantly, since 2004, the British state is legally able to charge 'over cost' fees, allowing for the generation of revenue that exceeds the actual cost of visa applications and attendant infrastructure (Burnett & Chebe, 2020, p. 9).

The policy objectives as stated above may be taken to imply a commercial transaction, in the context of setting fees 'fairly' to reflect migrants' economic gain from access to the territory of the UK. The impact assessment acknowledges (pp. 9ff.) that increased visa fees will deter some migrants from coming to the UK, but it concludes (p. 14) that 'the migrant[s] affected by this policy change are indeed marginal, or have low [economic] value-added'. While non-economic dimensions of migration are not considered in the quoted statement or elsewhere throughout the document, the way in which 'value' is framed and enumerated points to an explicitly transactional logic that migrants pay for visa fees and related services in exchange for not just a visa or immigration permit, but also their (anticipated) economic gain after migration. This pattern cuts without significant variations across the 16 impact assessments we analysed.[4]

Underpinning the expanding fees system is a shift in the rationale from cost recovery to profit generation. All of the impact assessments we analysed included a section explicitly detailing the government's financial gains from revenue generated by increased fees. Although the reports justified the expansion of fees as a recovery of the operational costs, other independent assessments provide evidence of profit generation. Bulman (2019) shows that the amount the UK government 'makes on average per visa application has increased from £28.73 to £122.56' between 2014 and 2019, and that it 'has made £1.6bn from applicants looking to visit, study or be reunited with their families—a nine-fold increase on the five years prior to the start of the contract' with outsourcing firms. The non-governmental organisation Privacy International (2021, p. 8) shows that the UKVI in 2017/2018 spent £1.1 billion but earned £1.6 billion from fees. Equally, Burnett and Chebe (2020, p. 9) argue that

the expansion of visa and immigration fees 'suggest[s] not only an enthusiastic embrace of a desire for the "cost recovery"' discussed above but also 'demonstrate[s] a desire to exceed it, generating (in some contexts at least) substantial and unprecedented profit in the process'. They go on to show that, between 2009/2010 and 2017/2018, revenue from fees rose from 94 per cent to 195 per cent and from 134 per cent to 177 per cent for international and in-country applications, respectively, which went far beyond a mere recovery of operational costs.[5]

Taken together, family migration has been increasingly rendered as a commercial transaction and visa applicants as fee-paying customers. As a result, visas and immigration permits and the procedures involved in obtaining them are no longer a public service offered by the British state to support its citizens, residents and their family members to fulfil the basic right to family life and the public function of migration regulation. Rather, they have been reframed, through consecutive legislation, as a commodity imbued with economic exchange value. This has not only allowed public immigration agencies to expand their system of fees to extract profits from individual (family) visa applicants, but also paved the way for the development of private, commercial services to further legitimise, merchandise and promote the 'commodity'.

4.2 Gatekeeping and merchandising visas: Outsourcing visa application firms

The state sector and public immigration agencies have not only re-organised their own operations, they have also actively parcelled off and outsourced the public service of receiving and processing visa and immigration permit applications to private firms. Over the past two decades, outsourcing firms have become the main channel through which migrants submit their visa applications within the UK and the only channel of application submission offshore. Thus, outsourcing firms accrue stages of the visa application process previously performed by public immigration agencies, such as consulates. In the process of outsourcing,

these firms have become the gatekeeper of access to the commodity of visas and immigration permits. The process of outsourcing and the explicit commercial language used by outsourcing firms have further transformed visa applicants from individuals who had previously enjoyed public services into clients who must pay (enough) to access commercial services.

Paradoxically, outsourcing firms rely on both their close tie with and independence from the state to market their services. A typical strategy adopted by the firms to legitimise their services is to highlight their role as an agent acting on behalf of the state. On its website, VFS Global, the largest and major outsourcing firm used by the UK government, proudly proclaims itself 'an official partner of UK Visas and Immigration' (VFS Global, 2021a). Yet at the same time, against the backdrop of the state's creation of a 'hostile environment' in the UK and more broadly a 'fortress' across Europe (Karakayali, 2018; Webber, 2019), the firms also highlight their position as an independent 'non-judgemental' entity. Headquartered in Zurich and Dubai, VFS Global offers a range of services to receive and process visa applications, excluding final judgements as to the award of a visa, which is retained by government agencies (e.g. consulates and the UKVI). It characterises its operations as follows:

> VFS Global is the world's largest outsourcing and technology services specialist for governments and diplomatic missions worldwide. The company manages the administrative and non-judgmental tasks related to visa, passport, identity management and other citizen services for its client governments. This enables them to focus entirely on the critical task of assessment. With 3490 application centres and operations in 143 countries across 5 continents, VFS Global serves the interests of 65 client governments. The company has successfully processed

> over 227 million applications since its inception in 2001, and over 99.02 million biometric enrolments since 2007. VFS Global provides a wide range of services to visa applicants, all aimed at enhancing customer experience in public services with an automated and seamless process. (VFS Global, 2021a)

By outsourcing the processing of visa applications to firms such as VFS Global, the UK government has inserted migration regulation as its public duty into a globally operating service industry. In doing so, the UK participates in a broader international trend (Menz, 2011; Sánchez-Barrueco, 2017). Companies such as VFS Global are employed by a wide range of countries to outsource key elements of visa applications and attendant legal advice, as VFS Global's extensive client list demonstrates (VFS Global, 2019a). The patterns documented in this research therefore have broader international significance beyond our analysis and critique of the British family visa and immigration permit infrastructure.

VFS Global generates profit from the bundling of its own service fees with those charged by the UK government for basic and 'premium' visa applications, collecting official fees on behalf of the government and adding its own. It does so by re-packaging visa application as a shopping experience. The VFS Global website (see www.vfsglobal.co.uk) is designed like an online shop. Here, customers may select their country of origin and choose from a range of destination countries for which VFS Global handles visa applications. Then, they may choose from a range of services that can be added to an online shopping cart. Premium services offered by VFS Global are listed in addition to the UKVI 'premium' and 'priority' services discussed earlier, which adds a further layer of commercial stratification of service quality and speed. For example, for US $21, Argentinian customers may purchase an initial validation of visa applications, to get 'peace of mind that your supporting documents are correct and present, before you submit your final visa application'; Chinese customers

may pay ¥250 (approximately £29) for a 'Fast Pass', so that they can be 'escorted to the front of the queue for application submissions, and enjoy the support and assistance of a dedicated member of staff […]' (VFS Global 2021a).

These and other services, offered by both the UKVI and VFS Global, are also available in combined form, in 'bronze', 'silver' and 'gold' packages, and frequent travellers may register for a 'VFS Global Privilege' programme (VFS Global, 2019b). Marketing its services, VFS Global thus relies on a language that portrays it as a business broker that facilitates immigration by simplifying visa application processes, saving applicants time, and giving them 'peace of mind'. References to globality and privilege seem designed to convey to applicants a sense of class privilege. Other outsourcing firms specialising in the processing of visa applications, such as BLS International (2019), VisaMetric (2019) and Visa Central (2019), draw on a similar commercial language to market their services with allusions to socio-economic privilege. Through the commercialisation and outsourcing of public services, social and economic inequalities inherent in transnational migration are re-located from the sphere of the state to that of the marketplace. Consequently, the process of outsourcing has changed such inequalities from a public into a private issue—a series of financial transactions and privileges rather than a matter of equal rights in the context of public service provision.

The deepening of the outsourcing firms' penetration into the UK visa and immigration permit infrastructure has not only partly replaced the state's public services with commercial alternatives and additions, but also rendered the state increasingly dependent on commercial services in fulfilling its essential public function of migration regulation. For example, as VFS Global expanded over the past two decades, the firm's establishment of extensive technological infrastructure and professional expertise has gone hand in hand with the diminishment of such infrastructure and expertise in the public sector (Bloom, 2015). As a result, physical infrastructure for visa processing, from office space to technical equipment

and personnel skilled in the use of this infrastructure, have passed to a significant degree from the state to private firms (Sánchez-Barrueco, 2017). As the firms gradually take over the essential means of receiving and processing visa applications, the relationship between the British state and the outsourcing firms has shifted subtly from one of simple outsourcing to one of close interdependence and interpenetration. Such interpenetration is further evident in that while the UK government framed VFS Global as its 'service provider', VFS Global (2021b), on its website, has explicitly assimilated the UK government into its operation as one step in its extensive commercial pipeline, which ranges from '(1) research your visa type' and '(2) apply your visa through gov.uk' to subsequent steps of document uploading, service purchase and payment. It is in this interpenetration that the state and the market, public and private services have become hybridised.

4.3 Servicing the commodity: Private immigration advisers

Over the past two decades or so, the boom of legal firms that advise and represent clients in visa applications and appeal against unsuccessful applications and other migration-related dealings with the UK government constitute a further layer of state-market hybridisation within the UK's visa and immigration permit infrastructure. Limited free legal advice on immigration is available via Citizens Advice Bureaux, but access to this resource has severely diminished due to successive funding cuts (Citizens Advice, 2011, 2021). Although some immigration advisers work on a pro bono basis, such advisers work mainly on appeal cases rather than visa applications, and they are under increasing pressure from other commercial competitors to generate profit in order to survive (Barbero, 2019). Therefore, the advisory function previously assumed by public services, such as the now widely defunded Citizens Advice Bureaux, has been gradually replaced by private for-profit advisers operating in a fully commercial marketplace.

Evidence reflects an increase in the number of private immigration advisers. According to the OISC, immigration advisers encompass trained solicitors and barristers affiliated with professional bodies such as the General Council of the Bar and the Law Society of England and Wales (OISC, 2021). Individuals with no professional affiliation are allowed to act as immigration advisers insofar as they demonstrate specific professional knowledge and skills, such as an understanding of immigration legislation. The former group are not subject to accreditation and regulation by the OISC, whereas the latter are (OISC, 2021). It is therefore not possible to give an exact number of individuals or firms providing immigration advice in the UK. According to a Freedom of Information Request, the number of advisers regulated by the OISC grew from 2,333 to 2,571 between 2011 and 2016 and then to over 3,000 in 2021. According to the same request, the OISC deleted relevant statistics before 2011. Further advice regarding immigration to the UK is available through legal firms that operate offshore, in migrants' countries of origin, and the expansion of which is noted on a global scale (Gammeltoft-Hansen & Sørensen, 2013; Infantino, 2019).

The marketing strategies employed by private for-profit immigration advice firms differ from outsourcing firms, in part because of their differential relation to the British state. Acting on their own, rather than on behalf of the UK government, these firms justify their services through frequent allusions to the increasing severity of British immigration policy in successive legislation. The online marketing materials of the UK advice firms we analysed set out extensive, matter-of-fact descriptions of British immigration law and visa application procedures. Although a minority of the firms reference 'premium' services they offer to clients, they generally do not allude to socio-economic privilege in the same way as outsourcing firms do. While, for example, employers and education institutions tend to have their own legal and advisory staff to support labour and student migrants, individual family migrants who do not have access to such institutional support are a key target for private

immigration advice firms:

> ‘Bringing your loved ones to the UK is life-changing. While the marriage visa application process can be complex and daunting, we understand you want to start the next chapter in your family life quickly and with minimal disruption and expense’. (Davidson Morris, 2019)

‘**Family Visas**

Prior to July 2012, visa applications by family members were in most cases, quite straightforward, particularly in respect of the financial tests that had to be met. Essentially, as long as a family could demonstrate that they had the same or more disposable income than a comparator family in receipt of Income Support, then the financial tests were met.

However, in July 2012, the Government re-wrote the rule book when they introduced Appendix FM into the Immigration Rules. The requirements of Appendix FM have had a significant impact on the number of visa refusals for family members which have risen sharply since the change to the law. Appendix FM contains a very complex set of rules and regulations, and non-compliance with any aspect of these rules will result in a visa refusal.

Danger of DIY Applications

We would strongly recommend that anyone applying for a family visa seeks expert legal assistance from the outset. By obtaining specialist legal representation at an early stage, you are protecting your position and maximising the chances of a successful application’. (Drummond Miller LLP, 2019)

In these statements, terms such as ‘daunting’, ‘complex’, ‘disruption’ and ‘refusals’ emphasise the risk of being denied a UK visa, emphasising the need for qualified legal assistance. Strategically placing such terms in the online marketing of their services, private immigration advisers rely explicitly on affective manoeuvre to sell their services to family visa applicants. The disruption of family life is highlighted clearly as the outcome of a failed visa application, alongside its emotional consequences. This emphasis is made explicit in Davidson Morris’s claim of empathy that ‘we understand’ and in Drummond Miller’s warning against the dangers of do-it-yourself visa applications.

We find that offshore immigration advisers market their services along similar lines. Operating outside the UK, these firms must convince prospective clients that they possess the expertise required to broker UK visa applications. Thus, for example, Acheampong and Associates (2019), a firm based in Ghana, points out that they ‘have an in-house lawyer who holds a specialist certificate in UK immigration law from CILE [Chartered Institute of Legal Executives] Law School’. Visa Box (2019) in Cape Town in South Africa publishes testimonials by satisfied former clients. Harvard Consults (2019) in Lagos, Nigeria, also publishes testimonials and proudly claims that ‘we have grown in leaps and bounds since our emergence in 1995 and have bullishly retained our position as the number one visa/immigration service provider in Nigeria with proven record of competence, integrity, professionalism and international best practice’.

The 14 overseas firms analysed in this study, located in India, Nepal, Pakistan, Ghana, Nigeria and South Africa, all combined claims to specialist legal expertise with detailed summaries of application procedures and requirements for family, spousal and fiancé(e) visas and an emphasis on the difficulties of obtaining such visas. In a blogpost on their website, Lahore-based UK Visa Consultants (2018b) writes of ‘UK visa refusal fever’. Elsewhere, the firm explains that the high refusal rate of Pakistani applicants for UK visas is due to

applicants' lack of knowledge of British immigration regulations, making a pitch for its own superior expertise in such cases (UK Visa Consultants, 2018a). Mumtaz and Associates (2019), another Pakistani law firm, equally underlines their distinguished expertise and point out that the 'process of filing for a Visa Application for getting immigration abroad on any basis is not only difficult but a small mistake could lead to the rejection of the visa'. Acheampong and Associates (2019) points to the 'needless expense, time, and possibly the emotional trauma' that may follow the refusal of a visa application and document legally complex cases of visa refusal on their website.

The fees charged by advice firms add further to the considerable cost bore by visa applicants. For example, OTS Solicitors in London charge £300 per hour for the services of a solicitor with at least 4 years of professional experience and relevant expertise and £400–500 per hour for solicitors of still greater experience. They estimate that the preparation of a spouse or partner visa may cost £2,000 to £5,000 (OTS Solicitors, 2019). Latitude Law (2019) estimates that the preparation for an entry clearance application for a partner, spouse or child will cost £1,800 to £2,500, and that for the extension of the visa of a non-EU partner already in the UK will cost £1,800 to £2,200 in legal fees, in addition to the fees charged by the government and outsourcing application firms. Other British law firms examined in this study charge fees at a similar level, while none of the overseas immigration advice firms included in this study has published their fees schedules.

The interpenetration between the British state and private immigration advice firms takes place in a more symbolic than material dimension, compared with that between the British state and outsourcing firms. On the one hand, the perceived restrictiveness of the British family migration regulation fashioned by consecutive legislative and policy changes (e.g. the hostile environment [Webber 2019]) legitimises the role of commercial immigration advisers as necessary intermediaries in the visa application process. On the other hand, as

Abbott (1988) has argued, the processes of professionalisation and state-building are mutually constitutive. Through claims and monopolisation of legal expertise and affective manipulation, the commercial advisers serve to reinforce state authority over migration regulation by framing visa application as a formidable and highly specialised process. Thus, the British state and the market have become intertwined in legitimising and amplifying each other's power, insofar as immigration advisers are able to use the growing harshness of migration policy as a narrative ploy to attract fee-paying customers and the specialisation of their legal expertise reinforces the (perceived) authority and rigidness of the state's migration regulation.

5. DISCUSSION AND CONCLUSION

Over the past two decades or so, migration regulation has undergone drastic changes in the UK and worldwide (Schierup et al., 2020). At the same time, the migration industry, operating on a global scale, has come to play an increasingly prominent role in brokering transnational migration. While the changing roles of the state and the market in channelling migration have often been examined separately in previous research on migration regulation, we argue that neither perspective provides a comprehensive understanding of changing migration regulation. Rather, we have demonstrated the value of adopting the lens of migration infrastructure to bring together these two lines of research. In doing so, we have provided new insights into state-market synergies in establishing a holistic piece of infrastructure for visa and immigration permit production, application and processing. This has led to our discovery of a structural reconfiguration of the UK's (family) visa and immigration permit infrastructure from a public to a commercial service. As a result of this reconfiguration, migration regulation in today's UK (and many other countries) is sustained by a state-market hybridised commercial infrastructure.

[Insert Figure 1 Here]

As summarised in Figure 1, the hybrid state-market infrastructure has been established through and cuts across at least three dimensions, drawing to a significant degree on a multi-level commercial logic: (1) the state and public agencies, (2) private outsourcing firms, and (3) private immigration advisers. First, between 1997 and 2020, the UK's migration legislation and policy have transformed visas and immigration permits from a public good into a private commodity, through creating an expansive set of visa fees, continuously diversifying fees for mandatory aspects of the visa application process, increasing chargeable categories, and introducing tiered 'premium' services. While attendant legislation has been consistently framed in terms of cost recovery, it seems hard to dismiss arguments, in public debate and scholarship (Bulman, 2019; Burnett & Chebe, 2020), that exorbitant fee increases over time and revenues that far surpass the level of cost recovery are driven by the state's profit motive.

Second, immigration reforms have, from 2007 onwards (UKBA, 2008), enabled the outsourcing of visa application receipt and processing to for-profit firms, notably VFS Global, which partly privatised migration regulation in the UK. The outsourcing firms operate by a fully commercial logic, adding a further layer of fees to the visa application process. Over time, the outsourcing firms have gradually come to accumulate the physical infrastructure (e.g. offices, technological facilities and human resources) and expertise for receiving and processing visa applications. As the firms become the exclusive merchandisers and gatekeepers of visas and immigration permits, the relationship between the state and the firms is no longer characterised merely by a one-way outsourcing of public services from the former to the latter but also by close interdependence between the two.

Third, the public-to-commercial shift in visa and immigration permit services is also reflected in an increase in the number of private immigration advisers, alongside the

diminishment of public immigration advisers (e.g. Citizens Advice) due to successive funding cuts (Citizens Advice, 2011). Our findings show that, to sell paid-for services to visa applicants, private immigration advisers capitalise on uncertainty surrounding the success of family visa applications as a direct result of tightening immigration rules, at a time when visa applications are costly and immigrants are targeted by a hostile environment (Webber, 2019). This is not to suggest that all immigration advisers work for economic profits. But even though some advisers may be driven by altruism to work on a pro bono basis (Barbero, 2019), they work within a competition-based commercial market for legal services. In the public-to-commercial shift, the state and the market are hybridised insofar as private immigration advisers both rely on and amplify state power in migration regulation.

Our finding of state-market hybridisation tells of a structural reconfiguration of migration regulation, enabled by state-market coordination in producing, legitimising and diffusing a commercial transactional logic in the visa and immigration permit infrastructure. This reconfiguration has important implications for the realisation of the universal right to family life (United Nations General Assembly, 1948). On the one hand, the (re)production of state power in migration regulation has become increasingly intertwined with and dependent on commercial operations on a transnational level. In the resultant hybrid partly-public, partly-private infrastructure, the state and the market interpenetrate each other: while the state frames the market as its service provider (implying the state is still in control), the market increasingly positions the state as one part of a broader commercial pipeline. In this interpenetration, state-market hybridisation has cut through the reconfigured practical procedures of receiving, processing and applying for a visa or immigration permit as well as the transformed logics underpinning the procedures.

On the other hand, the shift towards a state-market hybridised visa and immigration permit infrastructure inextricably reconfigures the ethics of migration regulation. Such

reconfiguration has been partly reflected in the increasing income threshold for British citizens to sponsor a family migrant (Sirriyeh, 2015), which explicitly serves the economic stratification of people's family rights (Kofman, 2018). Our analysis further demonstrates that the ethical reconfiguration is not limited to substantive criteria pertaining to the admission of (family) migrants. Rather, it represents a systemic change that has permeated the whole, transformed assemblage of administrative and legal procedures of visa application and processing. Through the process of commercialisation, the hybrid state-market visa and immigration permit infrastructure recasts family migration to the UK as a form of commercial transaction. Thus, the ethical responsibility to afford the administrative and legal means for a family member to enter or remain in the UK, as well as the quality and speed of service one enjoys in accessing such means, has become firmly anchored in individuals' command of economic resources to pay for commercialised services. Consequently, inequalities in the access to administrative and legal services that gatekeep the universal right to family life and the differential quality and speed of service rendered to visa applicants are explained away by individuals' differential economic resources, instead of the state's liability for selectively distributing its public services and people's basic human rights.

In post-Empire, post-colonial Britain, as much as elsewhere in Europe, the human right to family life has long been offset by a host of racialised, gendered and class-based anxieties (Kofman, 2018; Mongia, 1999). To a hostile cultural and political environment for family migrants (Wray, 2015) and migration policies that focus on migrants' economic benefits to their host country (Džankić, 2018), the commercialised, fees-based infrastructure for visas and immigration permits adds another important dimension of stratification and exclusion. In this sense, fees for visas and related services and their impact on family migration have received far too little attention in academic debates. Here, we have documented the development and the structure of how this commercial infrastructure operates. A next step for

future research will be to explore how further developments of the infrastructure may result in more and more unequal access among transnational families to a joint life in the UK.

Finally, the state-market hybridised commercialisation reported here appears to be at odds with some prevalent claims about the logic of neoliberal public service reforms in the UK, in fields such as education, healthcare and social welfare services. McGimpsey (2016) describes this logic, as documented in the policies and proclamations of successive Conservative-led governments since 2010, such as the 'Big Society' programme, as one of reprioritisation of social investment, in which divestment in some public services is claimed to be strategically offset by spending in areas that are seen to be beneficial to the country's long-term socio-economic development. In contrast, the post-2007 (family) visa and immigration permit infrastructure relies much more directly on the extraction of profits from (family) migration through multiple layers of commercial transactions. As a large part of the profits are extracted by private, commercial entities, which are often headquartered outside the UK and operating on a transnational scale, evidence for re-investment in the UK public is meagre. Rather, in this process, public resources have been hollowed out by actors operating within and for transnational commercial empires beyond the confine and control of a specific nation-state. While it is beyond the remit of this article, future scholars are invited to systematically compare the nature, form and consequence of state-market hybridised commercialisation across different fields.

Endnotes

1 See online supplemental materials for detailed lists of legislation, legislation impact assessments, and immigration advice firms analysed.

[2] Detailed list available upon request from the authors.

[3] See Supplemental Table S5 for an overview of sample visa and immigration fees in early 2021.

[4] While there have been some modifications to visa fees after 2016, immigration legislation in this period seems primarily concerned with the consequences of Brexit, and it has little to say about visa fees and the political and economic rationales that underpin them. We have therefore not included post-2016 impact assessments in our argument.

[5] See Supplemental Table S6 for basic cost estimates for visa applications in different scenarios of family migration to the UK.

References

Abbott, A. (1988). *The system of professions: An essay on the division of expert labor*. University of Chicago Press.

Acheampong and Associates (2019). UK visa application in Ghana. Available at: http://acheampongassociates.com/uk-visa-application-in-ghana/ (accessed March 1 2019).

Aoyama, Y., & Parthasarathy, B. (2016). *The rise of the hybrid domain: Collaborative governance for social innovation*. Edward Elgar.

Bach, S. (2016). Deprivileging the public sector workforce: Austerity, fragmentation and service withdrawal in Britain. *The Economic and Labour Relations Review*, *27*(1), 11–28.

Baird, T. (2017). Interest groups and strategic constructivism: business actors and border security policies in the European Union. *Journal of Ethnic and Migration Studies*, *44*(1), 118–136.

Barbero, I. (2019). Legal aid services in Spain within the migration industry debate. Public policy, business or social compromise? *International Journal of the Legal Profession*, *27*(1), 45–61.

Benson, M., & O'Reilly, K. (2016). *Lifestyle migration: Expectations, aspirations and experiences*. Routledge.

Bloom, T. (2015). The business of migration control: Delegating migration control functions to private actors. *Global Policy*, *6*(2), 151–157.

BLS International (2019). BLS International. Available at: https://www.blsinternational.com/ (accessed February 13 2019).

Bonjour, S., & Kraler, A. (2014). Introduction: Family migration as an integration issue? Policy perspectives and academic insights. *Journal of Family Issues*, *36*(11), 1407–1432.

Brennan, D., Cass, B., Himmelweit, S., et al. (2012). The marketisation of care: Rationales and consequences in Nordic and liberal care regimes. *Journal of European Social Policy*, *22*(4), 377–391.

Bryceson, D., & Vuorela, U. (2002). Transnational families in the twenty-first century. In D. Bryceson & U. Vuorela (Eds.), *The transnational family new European frontiers and global networks* (pp. 3–30). Berg.

Bulman, M. (2019). How Home Office makes millions a week from outsourcing visas to Dubai-based firm accused of exploitation. *The Independent*, November 22, 2019. Available at: https://www.independent.co.uk/news/uk/home-news/home-office-vfs-visas-profit-subcontracted-contract-outsourcing-premium-services-exploited-a9056446.html (accessed August 16 2021).

Burnett, J., & Chebe, F. (2020). Towards a political economy of charging regimes: Fines, fees and force in UK immigration control. *The British Journal of Criminology*, *60*(3), 579–599.

Citizens Advice (2011). Cuts in CAB funding leaving thousands with nowhere to turn for help. Available at: https://www.citizensadvice.org.uk/cymraeg/amdanom-ni/about-us1/media/press-releases/cuts-in-cab-funding-leaving-thousands-with-nowhere-to-turn-for-help/ (accessed March 8 2021).

Citizens Advice (2021). How can we help? Available at: https://www.citizensadvice.org.uk/ (accessed March 8 2021).

Clarke, J., Newman, J., Smith, N., et al. (2007). *Creating citizen-consumers: Changing publics & changing public services*. SAGE.

Cranston, S. (2016). Producing migrant encounter: Learning to be a British expatriate in Singapore through the global mobility industry. *Environment and Planning D: Society and Space*, *34*(4), 655–671.

Cranston, S., Schapendonk, J. & Spaan, E. (2018). New directions in exploring the migration industries: introduction to special issue. *Journal of Ethnic and Migration Studies*, *44*(4), 543–557.

Dardot, P., & Laval, C. (2014). *The new way of the world: On neoliberal society*. Verso.

Davidson Morris (2019). Marriage visa UK. Available at: https://www.davidsonmorris.com/marriage-visa-uk/ (accessed February 13 2019).

Drummond Miller LLP (2019). Family visa applications. Available at: https://www.drummondmiller.co.uk/what-we-do/immigration/for-you/family-visas/ (accessed February 13 2019).

Džankić, J. (2018). Immigrant investor programmes in the European Union (EU). *Journal of Contemporary European Studies*, *26*(1), 64–80.

Evers, A. (2005). Mixed welfare systems and hybrid organizations: Changes in the governance and provision of social services. *International Journal of Public Administration, 28*(9–10), 737–748.

Gammeltoft-Hansen, T. (2013). The rise of the private border guard: Accountability and responsibility in the migration control industry. In T. Gammeltoft-Hansen & N. N. Sørensen (Eds.), *The Migration Industry and the Commercialization of International Migration* (pp. 128-151). Routledge.

Gammeltoft-Hansen, T., & Sørensen, N. N. (Eds.) (2013). *The mgration industry and the commercialization of international migration*. Routledge.

Harvard Consults (2019). Welcome. Available at: http://www.harvardconsults.net/ (accessed March 1 2019).

Harvey, D. (2007). *Neoliberalism: A brief history.* Oxford University Press.

Hennebry, J. L. (2008). Bienvenidos a Canadá? Globalization and the migration industry surrounding temporary agricultural migration in Canada. *Canadian Studies in Population, 35*(2), 339–356.

Hernández-León, R. (2008). *Metropolitan migrants: The migration of urban Mexicans to the United States*. University of California Press.

Hernández-León, R. (2013). Conceptualizing the migration industry. In T. Gammeltoft-Hansen & N. N. Sørensen (Eds.), *The migration industry and the commercialization of international migration* (pp. 24–44). Routledge.

Home Office (2021). Home Office immigration and nationality fees: 31 January 2021 Available at: https://www.gov.uk/government/publications/visa-regulations-revised-table/home-office-immigration-and-nationality-fees-31-january-2021 (accessed March 6 2021).

Horton, S. B., & Heyman, J. (Eds.) (2020). *Paper trails: Migrants, documents, and legal insecurity*. Duke University Press.

Infantino, F. (2016). *Outsourcing border control: Politics and practice of contracted visa policy in Morocco*. Palgrave.

Infantino, F. (2019). *Schengen visa implementation and transnational policy-making: Bordering Europe.* Palgrave Macmillan.

Karakayali, S. (2018). The Flüchtlingskrise in Germany: Crisis of the refugees, by the refugees, for the refugees. *Sociology*, *52*(3), 606–611.

Kofman, E. (2018). Family migration as a class matter. *International Migration*, *56*(4), 33–46.

Koh, S. Y., & Wissink, B. (2017). Enabling, structuring and creating elite transnational lifestyles: intermediaries of the super-rich and the elite mobilities industry. *Journal of Ethnic and Migration Studies*, *44*(4), 592–609.

Krachler, N., & Greer, I. (2015). When does marketisation lead to privatisation? Profit-making in English health services after the 2012 Health and Social Care Act. *Social Science & Medicine*, 124, 215–223.

Latitude Law (2019). About our fees. Available at: https://latitudelaw.com/our-fees/ (accessed February 13 2019).

Lynch, K. (2016). Neo-liberalism and marketisation: The implications for higher education. *European Educational Research Journal*, *5*(1), 1–17.

McGimpsey, I. (2016). Late neoliberalism: Delineating a policy regime. *Critical Social Policy*, *37*(1), 64–84.

Menz, G. (2009). The neoliberalized state and migration control: The rise of private actors in the enforcement and design of migration policy. *Debatte: Journal of Contemporary Central and Eastern Europe*, *17*(3), 315–332.

Menz, G. (2011). Neoliberalism, privatization and the outsourcing of migration management: A five-country comparison. *Competition & Change*, *15*(2), 116–135.

Migration Data Portal (2019). Data on family migration. Available at: https://migrationdataportal.org/themes/familienmigration (accessed October 16, 2019).

Mongia, R. V. (1999). Race, nationality, mobility: A history of the passport. *Public Culture*, *11*(3), 527–556.

Mumtaz and Associates (2019). Mumtaz and Associates. Available at: http://www.ma-law.org.pk/immigration_lawyer_immigration_consultant_Karachi_Lahore_Pakistan_Europe_UK_USA_Australia_newszealand_Canada_ireland.html (accessed March 1 2019).

Newman, D. (2016). Borders and bordering. *European Journal of Social Theory*, *9*(2), 171–186.

Office of the Immigration Services Commissioner (2019). Register of regulated immigration advisers. Available at: http://home.oisc.gov.uk/register_of_regulated_immigration_advisers/register.aspx (accessed January 29 2019).

Office of the Immigration Services Commissioner (2021). Guidance: How to become a regulated immigration adviser. Available at: https://www.gov.uk/government/publications/how-to-become-a-regulated-immigration-adviser/how-to-become-a-regulated-immigration-adviser (accessed March 6 2021).

Ongaro, E., & van Thiel, S. (2018). Introduction. In E. Ongaro & S. van Thiel (Eds.), *The Palgrave handbook of public administration and management in Europe* (pp. 3–10). Palgrave Macmillan.

Ongaro, E., van Thiel, S., Massey, A., et al. (2018). Public administration and public management research in Europe: Traditions and trends. In E. Ongaro & S. van Thiel (Eds.), *The Palgrave handbook of public administration and management in Europe* (pp. 11–40). Palgrave Macmillan.

OTS Solicitors (2019). Fees for immigration services. Available at: http://otssolicitors.co.uk/fees-for-immigration-services (accessed February 15 2019).

Peck, J. (2013). *Constructions of neoliberal reason*. Oxford University Press.

Privacy International (2021). *The UK's privatised migration surveillance regime: A rough guide for civil society*. Privacy International.

Sánchez-Barrueco, M.-L. (2017). Business as usual? Mapping outsourcing practices in Schengen visa processing. *Journal of Ethnic and Migration Studies*, *44*(3), 382–400.

Schapendonk, J. (2017). Navigating the migration industry: migrants moving through an African-European web of facilitation/control. *Journal of Ethnic and Migration Studies*, *44*(4), 663–679.

Schierup, C.-U., Likic-Brboric, B., Delgado Wise, R., et al. (Eds.) (2020). *Migration, civil society and global governance*. Routledge.

Schmidtke, O. (2012). Commodifying migration: Excluding migrants in Europe's emerging social model. *The British Journal of Sociology*, *63*(1), 31–38.

Sirriyeh, A. (2015). 'All you need is love and £18,600': Class and the new UK family migration rules. *Critical Social Policy*, *35*(2), 228–247.

Taylor-Gooby, P., Dean, H., Munro, M., et al. (1999). Risk and the welfare state. *British Journal of Sociology*, *50*(2), 177–194.

Tomlinson, M., & Kelly, P. (2018). A prize for a price? HE marketisation and the question of value. *Theory and Research in Education*, *16*(3), 351–367.

Torpey, J. C. (2018). *The invention of the passport: Surveillance, citizenship and the state.* Cambridge University Press.

UK Border Agency (2008). *A strong new force at the border.* London: UK Border Agency.

UK Visa Consultants (2018a). UK Visa Consultants. Available at: https://ukvisaconsultants.com/ (accessed March 1 2018).

UK Visa Consultants (2018b). The UK visa refusal fever. Available at: http://www.ukvisaconsultants.com/the-uk-visa-refusal-fever/ (accessed March 1 2018).

United Nations General Assembly (1948). Universal declaration of human rights. Available at: www.un.org/en/universal-declaration-human-rights/index.html (accessed March 15 2021).

van Houtum, H., & van Naerssen, T. (2002). Bordering, ordering and othering. *Tijdschrift voor Economische en Sociale Geografie*, *93*(2), 125–136.

VFS Global (2019a). Premium services: Making visa applications fast, simple & easy. Available at: https://www.vfsglobal.co.uk/us/en#latest-updates_o=Article%20Date,Descending (accessed February 1 2019).

VFS Global (2019b). World-class services for the world traveller. Available at: https://www.vfsglobal-privilege.com/ (accessed February 13 2019).

VFS Global (2021a). About VFS Global. Available at: https://www.vfsglobal.com/en/governments/about.html (accessed March 16 2021).

VFS Global (2021b). How to apply for a UK visa. Available at: https://www.vfsglobal.co.uk/us/en/how-to-apply (accessed March 13 2021).

Visa Box (2019). Testimonials. Available at: http://www.visa-box.co.za/testimonials/ (accessed March 1 2019).

Visa Central (2019). Embassy outsourcing. Available at: https://visacentral.com/embassy-outsourcing (accessed February 13 2019).

Visametric (2019). About VisaMetric. Available at: https://www.visametric.com/ (accessed February 13 2019).

Voss, K. (2018). The great defunding of public higher education in America. *The British Journal of Sociology*, *69*(2), 506–510.

Webber, F. (2019). On the creation of the UK's 'hostile environment' *Race & Class*, *60*(4), 76 –87.

Wray, H. (2015). The 'pure' relationship, sham marriages and immigration control. In J. Miles, P. Mody & R. Probert (Eds.), *Marriage rites and rights* (e-book chapter 7). Bloomsbury.

Xiang, B., & Lindquist, J. (2014). Migration infrastructure. *International Migration Review*, *48*(1_suppl), 122–148.

Yuval-Davis, N., Wemyss, G., & Cassidy, K. (2018). Everyday bordering, belonging and the reorientation of British immigration legislation. *Sociology*, *52*(2), 228–244.

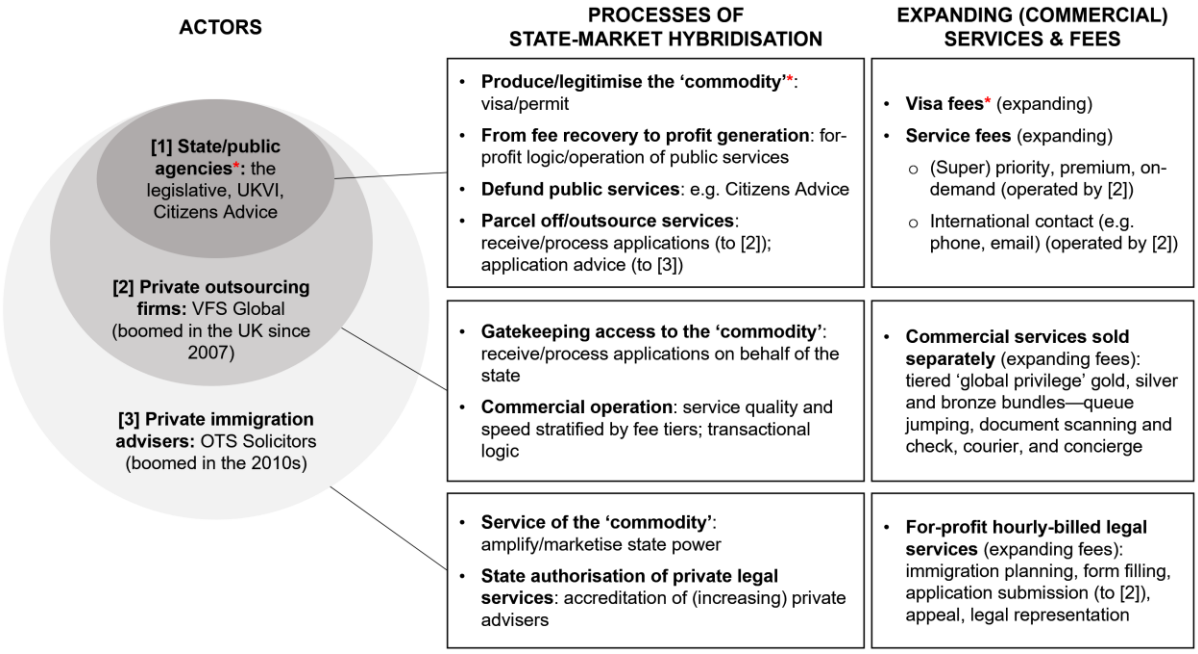

FIGURE 1 State-market hybridised commercialisation of family visa and immigration permit infrastructure in the UK, 1997–2021.

Note: Red stars indicate major components that existed in 1997, and the full graph depicts the infrastructure in 2021. Although private immigration advisers existed in 1997, it was not a major component of the infrastructure.

Table 1. Number of legislative changes related to immigration fees categories, 1997–2020

Year	Immigration legislation	Consular Fees Orders
1997	0	19
1998	0	14
1999	0	19
2000	0	0
2001	0	0
2002	0	9
2003	15	0
2004	0	0
2005	20	15
2006	0	0
2007	28	25
2008	50	13
2009	89	17
2010	223	39
2011	79	14
2012	184	0
2013	170	0
2014	173	0
2015	218	0
2016	252	0
2017	215	0
2018	233	0
2019	57	0
2020	57	0

Note: Legislation was selected through an online search on legislation.gov.uk, incorporating all available Acts, Orders, and Regulations. Legislation was selected for analysis insofar as it specified the monetary value of fees related to entry or immigration into the UK. The full available text of each selected Act, Order and Regulation was downloaded in PDF format and is available upon request. For the purpose of the table, all fees were counted for which a monetary value is specified in the analysed legislation, including subsidiary adjustments to certain fees. See Online Supplemental Table S1 for a full list of legislation.

Table 2. Fees for family visitor visas, settlement and leave to remain permits, 2009–2021

Fees schedule	2009	2014	2018	2021
Visit visa for less than 6 months (application made outside the UK)	215	83	93	95
(% vs. 2009 benchmark)	–	(38.6)	(43.3)	(43.3)
Visit visa for less than 5 years (application made outside the UK)	400	544	636	655
(% vs. 2009 benchmark)	–	(136.0)	(159.0)	(163.8)
Settlement – spouse (application made outside the UK)	585	885	1,523	1,523
(% vs. 2009 benchmark)	–	(151.3)	(260.3)	(260.3)
Settlement – other dependant relative (application made outside the UK)	585	1,982	3,250	3,250
(% vs. 2009 benchmark)	–	(338.8)	(555.6)	(555.6)
Indefinite leave to remain (application made in the UK)	820	1,093	2,389	2,389
(% vs. 2009 benchmark)	–	(133.3)	(291.3)	(291.3)
Other leave to remain (application made in the UK)	419	601	1,033	1,033
(% vs. 2009 benchmark)	–	(143.4)	(246.5)	(246.5)

Note: Data were selected for the period from 2009 to 2021 to document the period when visa and immigration permit fees have undergone a continuous, substantial increase; and our analysis shows that there was no evidence of substantial changes in the fees for a visa or immigration permit itself before 2009.
Sources: Official fees tables published at www.gov.uk and assets.publishing.service.gov.uk. Fees for 2021 refer to the Home Office immigration and nationality fees: 31 January 2021, Updated 26 January 2021. Fees for 2018 refer to the Home Office Immigration & Nationality Charges 8 October 2018. Fees for 2014 refer to the Home Office Immigration and Nationality Fees from October 2014. Fees for 2009 published in UK Border Agency Charging for Immigration and Nationality Services 2010–2011. See Online Supplemental Table S1 for a full list of legislation.

Table 3. Cost of priority and premium visa services for visa and immigration permit application, 2014–2020

Fees schedule	Home Office Immigration and Nationality Fees (from October 2014)	Home Office Immigration & Nationality Charges (2015/16)	Home Office Immigration & Nationality Charges (2016)	Home Office Immigration & Nationality Charges (2017)	Home Office Immigration and Nationality Charges (8th October 2018)	Home Office Immigration and Nationality Charges (29th March 2019)	Home Office Immigration and Nationality Fees (12th November 2020)
Applications made outside the UK							
Priority visa service	300	360	450	551	573	573	573
Super priority visa service	600	600	750	919	956	956	956
Prime-time visa application centre appointment	50	50	63	75	–	–	
International contact centre service: live chat (flat rate)	4	4	4	–	–	–	–
International contact centre: email service (commenced 1 June 2017, per query)	–	–	–	5.48	5.48	5.48	2.74
Applications made within the UK							
Priority service	300	300	375	459	477	500	500
Super premium service (mobile case working)	6,000	7,000	8,750	10,500	10,500	–	–
Application in person fee	400	400	500	590	–	–	–
Super priority service	–	–	–	–	610	800	800
Provision of an immigration officer at the border (hourly rate)	–	–	53.08	53.08	53.08	–	–
Premium status checks and advice (higher executive officer) (per minute)	–	–	0.97	0.97	0.97	0.97	0.97
On-demand service: mobile biometric enrolment (per hour per representative of the contractor providing the service)	–	–	–	–	–	650	650

Note: Fees enumerated in British pound sterling. This table covers the period of time for which premium fees schedules were publicly available at the time of writing, and we did not find official evidence of priority and premium services and related charges before 2014.

Sources: Official fees tables published at www.gov.uk and assets.publishing.service.gov.uk. See Online Supplemental Table S1 for a full list of legislation.

Supplemental Materials

for

From public to commercial service: State-market hybridisation in the UK visa and immigration permit infrastructure, 1997–2021

Table S1. Legislation analysed for this study

Year	Legislation	Date made
1997	The Consular Fees Order 1997	20 May 1997
1998	The Consular Fees Order 1998	11 February 1998
1999	The Consular Fees Order 1999	10 March 1999
2000	---	
2001	---	
2002	The Consular Fees Order 2002	26 June 2002
2003	The Immigration Employment Document (Fees) Regulations 2003	6 March 2003
	The Immigration Employment Document (Fees) (Amendment) Regulations 2003	9 May 2003
	The Immigration (Leave to Remain) (Fees) Regulations 2003	9 July 2003
	The Immigration Employment Document (Fees) (Amendment No. 2) Regulations 2003	24 September 2003
	The Immigration Employment Document (Fees) (Amendment No.3) Regulations 2003	8 October 2003
2004	The Immigration (Leave to Remain) (Fees) (Amendment) Regulations 2004	4 March 2004
2005	The Immigration (Leave to Remain) (Fees) (Amendment) Regulations 2005	10 March 2005
	The Immigration Employment Document (Fees) (Amendment) Regulations 2005	10 March 2005
	The Consular Fees Order 2005	7 June 2005
2006	---	
2007	The Consular Fees Order 2007	6 March 2007
	The Immigration and Nationality (Cost Recovery Fees) Regulations 2007	19 March 2007
	The Immigration and Nationality (Fees) Regulations 2007	1 April 2007
	The Consular Fees (Amendment) (No. 2) Order 2007	25 July 2007
2008	The Immigration and Nationality (Cost Recovery Fees) (Amendment) Regulations 2008	4 February 2008
	The Immigration and Nationality (Fees) (Amendment) Regulations 2008	28 February 2008
	The Consular Fees Order 2008	12 March 2008
	The Immigration and Nationality (Cost Recovery Fees) (Amendment No.2) Regulations 2008	20 May 2008
	The Immigration and Nationality (Fees) (Amendment No. 2) Regulations 2008	26 June 2008
	The Immigration and Nationality (Cost Recovery Fees) (Amendment No. 3) Regulations 2008	22 October 2008
	The Immigration and Nationality (Fees) (Amendment No. 3) Regulations 2008	19 November 2008
2009	The Immigration and Nationality (Cost Recovery Fees) Regulations 2009	10 March 2009
	The Consular Fees Order 2009	18 March 2009
	The Immigration and Nationality (Fees) Regulations 2009	29 March 2009
2010	The Immigration and Nationality (Cost Recovery Fees) Regulations 2010	4 February 2010
	The Consular Fees Order 2010	10 February 2010
	The Immigration and Nationality (Fees) Regulations 2010	10 March 2010
	The Immigration and Nationality (Cost Recovery Fees) (No.2) Regulations 2010	7 September 2010
	The Consular Fees (Amendment) Order 2010	10 November 2010

	The Immigration and Nationality (Fees)(No.2) Regulations 2010	21 November 2010
2011	The Immigration and Nationality (Cost Recovery Fees) Regulations 2011	14 March 2011
	The Consular Fees Order 2011	16 March 2011
	The Upper Tribunal (Immigration and Asylum Chamber) (Judicial Review) (England and Wales) Fees Order 2011	22 September 2011
	The First-tier Tribunal (Immigration and Asylum Chamber) Fees Order 2011	18 December 2011
2012	The Immigration and Nationality (Cost Recovery Fees) Regulations 2012	13 March 2012
	The Immigration and Nationality (Fees) Regulations 2012	27 March 2012
2013	The Immigration and Nationality (Cost Recovery Fees) Regulations 2013	14 March 2013
	The Immigration and Nationality (Fees) Regulations 2013	26 March 2013
2014	The Immigration and Nationality (Cost Recovery Fees) Regulations 2014	11 March 2014
	The Upper Tribunal (Immigration and Asylum Chamber) (Judicial Review) (England and Wales) Fees (Amendment) Order 2014	27 March 2014
	The Immigration and Nationality (Fees) Regulations 2014	2 April 2014
	The Immigration and Nationality (Cost Recovery Fees) (Amendment) Regulations 2014	4 September 2014
2015	The Immigration and Nationality (Fees) Order 2015	17 March 2015
	The Immigration and Nationality (Fees) Regulations 2015	18 March 2015
2016	The Immigration and Nationality (Fees) Order 2016	11 February 2016
	The Immigration and Nationality (Fees) Regulations 2016	23 February 2016
2017	The Immigration and Nationality (Fees) (Amendment) Order 2017	14 March 2017
	The Immigration and Nationality (Fees) Regulations 2017	30 March 2017
2018	The Immigration and Nationality (Fees) (Amendment) Order 2018	8 March 2018
	The Immigration and Nationality (Fees) Regulations 2018	15 March 2018
	The Immigration and Nationality (Fees) (Amendment) (EU Exit) Regulations 2018	19 July 2018
	The Immigration and Nationality (Fees) (Amendment) (EU Exit) (No. 2) Regulations 2018	12 September 2018
2019	The Immigration and Nationality (Fees) (Refund, Waiver and Amendment) (EU Exit) Regulations 2019	6 March 2019
2020	The Immigration and Nationality (Fees) (Amendment) (No. 2) Regulations 2020	11 March 2020
	The First-tier Tribunal (Immigration and Asylum Chamber) Fees (Amendment) Order 2020	16 March 2020
	The Immigration and Nationality (Fees) (Amendment) (No. 3) Regulations 2020	14 July 2020
	The Immigration and Nationality (Replacement of Tier 4 and Fees) and Passport (Fees) (Amendment) Regulations 2020	9 September 2020
	The Immigration and Nationality (Replacement of Tier 2 and Fees) (Amendment) (EU Exit) Regulations 2020	21 October 2020

Note: Legislation was selected through an online search on legislation.gov.uk, incorporating all available Acts, Orders and Regulations. The full available text of each selected Act, Order and Regulation was downloaded in PDF format and analysed using MaxQDA. For the purpose of the table included in the main article, all fees were counted for which a monetary value is specified in the analysed legislation, including subsidiary adjustments to certain fees to account for special cases. Detailed documents available upon request.

Table S2. Impact assessments analysed for this study

Year	Legislation	Impact Assessment Number	Date
2009	Impact Assessment for Parts 3 and 4 of the Borders, Citizenship and Immigration Bill (Common Travel Area, Studies, Fingerprinting, Detention at ports in Scotland, Appeals and judicial review, and Children)	n/a	15 January 2009
	Impact Assessment of Earned Citizenship Proposals Borders, Citizenship and Immigration Bill	n/a	15 January 2009
	Final Impact Assessment of Draft Immigration Bill	n/a	12 November 2009
2010	Impact Assessment of Fee Changes for Settlement visas, Long term visit visas, Tier 1 visas and Tier 2 visas & in-UK applications, Nationality, In UK LTR and ILR Applications and In UK Dependant Applications	HO009	14 July 2010
	Impact Assessment of Fee Changes for Tier 4 visas, Tier 1 post study visa, In UK Dependant Application, Nationality, Transfer of Condition, and Sponsor Action Plan	HO0010	7 September 2010
	Impact Assessment of Biometric Residence Permits - Tiers 1 and 5 of Points Based System	HO0019	8 October 2010
2011	Impact Assessment for The Immigration & Nationality (Fees) Regulations 2011	n/a	10 February 2011
2012	Impact Assessment for the Immigration and Nationality (Fees) Regulations 2012	HO0055	12 December 2011
	Impact Assessment for The Immigration & Nationality (Cost Recovery Fees) Regulations 2012	HO0056	12 December 2011
2013	Impact Assessment for the Immigration & Nationality (Fees) Regulations 2013	HO0082	17 December 2012
	Impact Assessment for the Immigration & Nationality (Cost Recovery Fees) Regulations 2013	HO0083	17 December 2012
2014	Impact Assessment for the Immigration & Nationality (Fees) Regulations 2014	HO0100	9 January 2014
	Impact Assessment for the Immigration & Nationality (Cost Recovery Fees) Regulations 2014	HO0101	6 March 2014
2015	Impact Assessment for the Immigration & Nationality (Fees) Order 2015	HO0139	January 2015
2016	Impact Assessment for the Immigration & Nationality (Fees) Order 2016	HO0216	November 2015
	Immigration and Asylum Chamber Full Cost Recovery	MoJ025/2016	8 September 2016
2017	---		
2018	Impact Assessment for Immigration and Nationality (Fees) Regulations 2018	HO0310	21 November 2018
2019	Impact Assessment for Immigration and Nationality (Fees) Regulations 2019	HO0334	February 2019
2020	The Immigration and Nationality (Fees) (Amendment) (No. 3) Regulations 2020	HO0369	7 July 2020
	Customer Contact Fees	HO0375	August 2020

Note: Impact assessments were selected through an online search on gov.uk and other relevant official UK sources. The full available text of each selected impact assessment was downloaded in PDF format and analysed using MaxQDA.

Table S3. UK immigration advice firms/entities included in this study

Name	URL
Private immigration advice firms	
Gok Immigration Service Ltd	http://gokis.co.uk
VRS Immigration Services	http://www.vrsimmigration.co.uk/
Samad And Company Immigration Consultants	http://samadandco.com
Day-Mer Turkish & Kurdish Community Centre	http://daymer.org
Cardiff Immigration Services	https://www.wmimmigration.com/cardiff-immigration-office/
Cromwell Wilkes	http://cromwellwilkes.co.uk
Overseas Immigration Services UK LTD	http://overseasimmi.co.uk
Gloucester Law Centre	http://gloucesterlawcentre.co.uk
Eden Law	http://edenlaw.co.uk
Immigration 4U Ltd.	n/a
Equ-All Ltd	http://equ-all.co.uk
Active Immigration Limited	http://activeimmigration.co.uk
City Law Associates	n/a
London Certifa Immigration Services	https://www.facebook.com/London-Certifa-Immigration-Services-228198824038795/
Carter Bedi McKay	https://carterbedimckay.co.uk/
R & R Law Associates Limited	n/a
Sara - Int Limited	http://saraint.co.uk/
Universal Fortune Limited	https://www.ufvisas.com/
UVIC Limited	http://uvic.co.uk
Morales Advisory Services	http://morales.uk
Cleveland Law Ltd	n/a
Ease Visas Ltd	https://www.easevisa.com
Smart Immigration Solutions	http://smartimmigrations.co.uk
H & S Legal LLP	n/a
Temp Inter Consult (UK) Limited	n/a
First Precedent & Visa Services	http://firstprecedent.com
Public immigration advice services	
Central London Law Centre	n/a
NCS Haringey Register Office	n/a
NCS North Yorkshire County Council	n/a
NCS Cheshire East Council	n/a

Note: The firms were randomly sampled from OISC's Register of Regulated Immigration Advisers within the UK. For entities that do not have an exclusive URL, their information was retrieved from companieshouse.gov.uk. The company H & S Legal LLP has closed since our data collection in 2019.

Table S4. Overseas immigration advice firms included in this study

Name	Country	URL
Acheampong and Associates	Ghana	https://acheampongassociates.com/uk-visa-in-ghana/
Visas Avenue	India	https://www.visasavenue.com/immigration-consultants-in-bangalore/
Y-Axis	India, Australia, United Arab Emirates	https://www.y-axis.com/migrate/uk/
SI-UK	Nepal	http://www.siuk-nepal.com/
C&C Travel Consults	Nigeria	https://travel.contractsandconsulting.com/
Harvard Consults	Nigeria	http://www.harvardconsults.net/
KHNL Immigration Consultants	Nigeria	http://www.khnl-group.com/immigration-consultants/
UK Visa Consultants	Pakistan	https://ukvisaconsultants.com/
Mumtaz and Associates	Pakistan	https://ma-law.org.pk/
Breytenbachs Immigration Consultants	South Africa	https://bic-immigration.com/
New World Immigration	South Africa	https://www.nwivisas.com/
Sable International	South Africa, Australia, United Kingdom	https://www.sableinternational.com/immigration
Visa Box	South Africa	http://www.visa-box.co.za/
MoveUp UK Visa Solution	South Africa	https://moveup.co.za/uk-visa-solutions/uk-visa-option-for-sa-passport-holders/

Note: The firms were selected to cover heterogeneous geographical areas, (post-)colonial links with the UK and the Commonwealth.

Table S5. Home Office Immigration and Nationality Charges 2021, select categories

Visa category	Fee
Visa for less than 6 months (application outside the UK)	95
Visa for less than 2 years (application outside the UK)	361
Settlement (application outside the UK)	1,523
Settlement (other dependant relative, application outside the UK)	3,250
Indefinite leave to remain (application made in the UK)	2,389
Leave to remain – other (application made in the UK)	1,033
Visitor extension – main applicant and all dependants (application made in the UK)	993
Point based system (application made outside the UK): Tier 1 (Exceptional Talent) – dependants only	608
Point based system (application made outside the UK): Tier 1 (General) – dependant	1,021
Point based system (application made outside the UK): Tier 1 (Post-study Work) – dependant	604
Point based system (application made in the UK): Tier 1 (Exceptional Talent) – dependants only	608
Point based system (application made in the UK): Tier 1 (General) – dependant	1,878
Naturalisation	1,330
Nationality registration as a British citizen – adult	1,206
Nationality registration as a British citizen – child	1,012
Arrangement of a citizenship ceremony	80
Life in the UK test	50
Nationality – supply of a certified copy of a notice, certificate, order or declaration	250

Note: Fees enumerated in British pound sterling.
Source: Home Office immigration and nationality fees: 31 January 2021, Updated 26 January 2021, https://www.gov.uk/government/publications/visa-regulations-revised-table/home-office-immigration-and-nationality-fees-31-january-2021. See Online Supplemental Tables 1 and 2 for a full list of legislation.

Table S6. Estimated cost of family migration to the UK, 2021 fees

Fees items	**Scenario 1** Family visa, to join partner or spouse; entry clearance; application from outside the UK	**Scenario 2** Indefinite leave to remain, to be with partner or spouse; application from within the UK	**Scenario 3** 3 family visas, to join partner or spouse in the UK, for 1 adult and 2 dependent children; application from outside the UK
Fee 1	Spouse visa	Indefinite leave to remain	1 spouse visa and 2 child dependant visas
	£1,523	£2,398	£1,523 * 3
Fee 2	English language test	English language test	English language test
	£150 approx.	£150 approx.	£150 approx.
Fee 3	Health charge	Life in the UK Test	Health charge
	£1,872	£50	£1,872 * 3
Fee 4	Priority visa service	Super priority service	Receiving, preparing and forwarding documents - consular functions
	£573	£800	£141
Fee 5	Receiving, preparing and forwarding documents - consular functions £141	Premium status checks, advice or training - Executive Officer (inside office hours) (per minute) (Twenty-minute phone call for application advice)	
		£0.88 * 20	
Estimated total	£4,118	£3,406.6	£10,476

Note: Calculations based on Home Office Immigration and Nationality Fees: 31 January 2021, Updated 26 January 2021 at: https://www.gov.uk/government/publications/visa-regulations-revised-table/home-office-immigration-and-nationality-fees-31-january-2021. All scenarios present minimum estimates, including the use of some premium services for expedited applications and advice. Additional fees may be incurred, as per the listing of fees and premium fees in Tables 2 and 3 in the main article. Moreover, the listed fees and charges do not account for the cost incurred by seeking legal advice from an immigration lawyer or adviser.