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| <b>Reason for development:</b>                      | As licensed sponsor of overseas students of the Student Route of the Home Office Points Based System, Bishop Grosseteste University is expected to play a part in ensuring the system is not abused. This policy specifies the roles and responsibilities for BGU as a licensed sponsor from the moment it agrees to sponsor a student by issuing a Confirmation of Acceptance for Study letter. |
| <b>Scope:</b>                                       | The policy relates to all undergraduate and post graduate applicants who are required to gain a visa to study within the UK under the Student Route of the Points-based system.  |
| <b>Author / developer:</b>                          | International Manager  |
| <b>Owner</b>  | International Manager  |
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| <b>Alternative Format:</b>                          | If you require this document in an alternative format, please contact <a href="mailto:governance@bishopg.ac.uk">governance@bishopg.ac.uk</a>   |

\*Please note, this document remains valid until formally revoked or replaced by the University.



## Student Route Compliance Policy

### 1. Purpose

- 1.1 The student route of the points-based immigration system is the primary route of entry to the UK for overseas students who wish to study full time in the UK. These students must be sponsored by an education provider which holds a Student Sponsor licence issued by the UK Visa and Immigration Directorate of the Home Office (UKVI).
- 1.2 One of the guiding principles of being a Student Sponsor is that it is a privilege not a right. Sponsors benefit directly from migration and are expected to play a part in ensuring that the system is not abused. Sponsors must therefore fulfil certain duties, in order to ensure that immigration control is maintained. As a holder of a UKVI Student Sponsorship Licence, Bishop Grosseteste University has a responsibility to act in accordance with the Immigration rules and all parts of the Student Route Sponsor Guidance. These rules can be found at <https://www.gov.uk/government/publications/student-sponsor-guidance>
- 1.3 These rules focus upon:
  - The Issuing of Confirmation of Acceptance for Studies (CAS)
  - Record Keeping
  - Reporting duties

### 2. Scope

- 2.1 Overseas students at BGU are governed by the same policies and procedures that relate to UK students but are additionally governed by compliance with the terms and conditions of a student's visa. This document defines the policy and procedures for compliance with the Home Office regulations relating to overseas students sponsored by the University. The policy relates to all undergraduate and post graduate applicants who are required to gain a visa to study within the UK under the Student Route of the Points-based system. The policies and processes defined in this policy relate to the responsibilities held by the University for each sponsored student from the moment it assigns a CAS until:
  - it withdraws sponsorship from the student;
  - the student leaves the UK; or
  - the student is given permission to stay in the UK with a different sponsor or in another immigration category.



### **3. Key Requirements of UKVI Policy Guidance**

- 3.1 The University must appoint an Authorising Officer. This person must be the most senior person responsible for the recruitment of students and ensuring all of the University's sponsor duties are met.
- 3.2 The Deputy Vice-Chancellor is the nominated authorising officer for BGU.
- 3.3. The University must appoint a Key contact. The Key Contact is the main point of contact with UKVI. The Registrar and University Secretary is the nominated Key Contact for BGU.
- 3.4 The University shall allow access to UKVI staff, apply their guidance, supply ad hoc data, use the UKVI on-line Student Management System (SMS) and strive to ensure the University's sponsored students arrive, enrol and complete their studies.
- 3.5 The University shall issue a CAS for any overseas student it wishes to sponsor. The CAS contains essential information on the student's programme, background, fees and English language ability, where required. The CAS is a key instrument used by the student to obtain their visa.
- 3.6 The University must keep copies of up to date passport (specific pages), visa (or BID), contact details, attendance date and key documents supporting their application.
- 3.7 The University must report students who do not enrol, cease contact, have their sponsorship terminated or have significant programme changes. The University must also report details of recruitment 'intermediaries' and students believed to be breaching or attempting to breach visa conditions or involved in terrorism or other criminal activity.
- 3.8 Failure to comply with UKVI requirements may result in the loss or suspension of the University's licence to sponsor overseas students. Furthermore, the UKVI sets certain performance indicators to measure CAS issuing, enrolment and completion. Underachievement against these indicators can lead to penalties against the University.

### **4. Specific Responsibilities at Bishop Grosseteste University**

- 4.1 As a licensed student sponsor, BGU has a responsibility for all its sponsored students while it is sponsoring them. This includes taking all reasonable steps to ensure prospective students are genuine students who can comply with their conditions of leave, and complete their course. This is achieved through a number of specific duties, including:
  - the issuance of a Confirmation of Acceptance for Studies (CAS);
  - specific record-keeping duties;
  - specific reporting duties; and
  - annual Sponsor duties.



## 5. Issuing a Confirmation of Acceptance for Studies (CAS)

| UKVI Requirement                 | Management Responsibility      | Managed by  |
|----------------------------------|--------------------------------|---|
| Issue CAS to new students        | Admissions Manager             | Admissions Team   |
| Issue CAS to continuing students | Faculty Administration Manager | Faculty Administration Office with support from Admissions Team |

5.1 The processes for issuing a CAS can be found in the standard operating procedures for ‘issuing a CAS statement’ held by the University’s Admissions Team.

## 6. Specific Record Keeping

6.1 There are a number of specific record-keeping duties with which licensed sponsors must comply. These include:

- Keeping evidence used for accepting a student and issuing a CAS
- Documents listed in [Appendix D](#) of UKVI Sponsorship Duties
- Contact details at enrolment
- Updating and maintaining a log of contact details
- Attendance and engagement monitoring
- Monitoring of passport and visa expiry dates.

## 7. Responsibilities for the management of these specific record keeping duties can be seen in the table below.

| UKVI Requirement                                  | Responsibility   |
|---|--|
| Evidence used for issuing CAS                     | Admissions Team  |
| Documents listed in Appendix D:                   | Admissions Team (before and up to enrolment)<br>Faculty Administration (after enrolment) |
| Contact details at enrolment                      | Admissions team  |
| Updating and maintaining a log of contact details | Faculty Administration   |
| Absence/Attendance                                | Faculty Administration   |
| Monitoring of passport and visa expiry dates      | Faculty Administration   |

## 8. Specific Reporting Duties

8.1 BGU has a duty to notify UKVI if:

- a. it becomes aware that students it is sponsoring have been granted leave with the incorrect conditions of stay, for example, if they have mistakenly been granted permission to work;



- b. anything it has reported through the UKVI Student Management System is incorrect, explaining why it is incorrect;
  - c. there are changes to a student's circumstances, including work placements;
  - d. there are any changes to the organisation which may affect its student sponsor license.
- 8.2 Responsibilities for the management and performance of these specific reporting duties can be seen in the table below. Further information on reporting duties and what to report can be found in the Home Office Student Sponsor Guidance – Document 2 – Reporting [Duties](#)

| UKVI Requirement  | Responsibility                  | Timeframe   |
|---|---------------------------------|---|
| Student visa refused  | International Manager           | Within 10 working days of knowing about it.         |
| Students fail to enrol  | International Manager           | Within 10 working days of knowing about it.         |
| Student withdraws / defers before enrolment   | Admissions team                 | Within 10 working days of knowing about it.         |
| Incorrect conditions of stay  | Admissions team                 | Within 10 working days of knowing about it.         |
| Student withdraws / defers after enrolment  | Faculty Administration Manager  | Within 10 working days of knowing about it.         |
| Student contact stops/Student stops attending/engaging  | Faculty Administration Manager  | See Student Attendance, Engagement & Absence Policy |
| Stop sponsorship – other reason:<br>E.g. change in immigration category/programme/work placement.<br>Completion of programme early. | Faculty Administration Manager  | Within 10 working days of knowing about it.         |
| Placements/Changes of Study location  | Placement Services Manager      | Within 10 working days of knowing about it.         |
| Organisation details including Educational oversight, material change in circumstances  | Head of Quality and Compliance  | See UKVI guidance                                   |
| Incorrect SMS entries   | International Manager           | As soon as we know about it.                        |
| Annual Student Sponsor Activities   | International Manager           | Annually, when contacted by UKVI                    |
| Renewing the Sponsorship License  | International Manager/Registrar | Every 4 years                                       |

- 8.3 Any need to report an applicant / enrolled student and withdraw sponsorship, after they have arrived in the UK, should be reported to and agreed by the University's registrar, International Manager and Pro-Vice Chancellor (Students) prior to the reporting taking place.



## 9. Recruitment and Admission procedures

9.1 The Standard Operating Procedures for recruitment and admissions can be found [here](#).

## 10. Enrolment Procedures

10.1 The processes for the enrolment of overseas students can be found in the standard operating procedures for 'Enrolling International students' and 'Enrolling a student onto a course' held by the University's Admissions Team.

## 11. Tracking and Monitoring of Overseas students

11.1 The processes and procedures for the tracking and monitoring of overseas students after they have enrolled can be found in 'The Process for identifying and supporting disengaged students' and 'The Process: Mid-Year Census Check of Student Route Students' documents held by the Faculty Administration Office.

## 12. Attendance Monitoring and academic engagement

12.1 The processes for monitoring the attendance and academic engagement of all students, including overseas students, can be found in the Student Attendance, Engagement & Absence Policy available [here](#).

## 13. Annual Student Sponsor Duties

13.1 There are three annual duties that a student sponsor must complete to maintain its license and continue to sponsor oversea students. These are:

- Renewing the annual CAS allocation
- Applying for the Basic Compliance assessment (BCA)
- Inform UKVI of any third-party organisations used to assist with the recruitment of students.

| UKVI Requirement   | Responsibility        |
|--|-----------------------|
| Renewal of the annual CAS allocation                     | International Manager |
| Applying for the BCA                                     | International Manager |
| Report the use of third-party assistance for recruitment | International Manager |

13.2 The International Office will make a recommendation on the number of CAS to apply for to the final meeting of the International Compliance Group each year. Once approved, the International Manager will apply for the annual CAS allowance via the SMS.

13.3 The University must apply for a Basic [Compliance](#) Assessment every 12 months. The International Manager will apply for the BCA at the end of September each year via the SMS.

13.4 The International Office maintains the list of third-party organisations, which are used to assist with the recruitment of overseas students. The International Manager will provide this list to the UKVI in October each year. This list will be emailed to [EducatorsHelpdesk@homeoffice.gov.uk](mailto:EducatorsHelpdesk@homeoffice.gov.uk)



#### **14. Compliance Monitoring**

- 14.1 The University's International Office will be responsible for organising a number of scheduled activities throughout the year to monitor the University's compliance with UKVI guidance for sponsoring overseas students. The key activities to be monitored include:
- a. Completeness of Appendix D documents records
  - b. Completeness of student contact details
  - c. Attendance records
  - d. Completeness of registry files
  - e. Changes to UKVI policies and regulations
  - f. Adherence to procedures set out in this policy guidance.

14.2 A record of key monitoring activities for each student will be maintained on the Student Visa Event log.

14.3 An internal student route compliance report will be submitted to each meeting of the University's International Compliance Group.

#### **15. Review and revision**

- 15.1 The University's International Compliance Group will receive and approve amendments in alignment with changes to the Home Office Guidance.