



<u>Policy Title</u>	Student Sponsor Licence Policy	
<u>Policy Category</u>	Compliant	
<u>Owner</u>	International Compliance Officer	
<u>Group Executive Lead</u>	Chief Operations & Compliance Officer and Secretary to the Board	
<u>Date Written</u>	June 2021	
<u>Considered By</u>	Executive Board	
<u>Approved By</u>	HE Governance Committee	
<u>Date Approved</u>	April 2023	
<u>Equality Impact Assessment</u>	The implementation of this policy is not considered to have a negative impact on protected characteristics.	
<u>Freedom of Information</u>	This document will be publicly available through the Groups Publication Scheme.	
<u>Review Date</u>	April 2024	
<u>Policy Summary</u>	This policy sets out to bring together a number of requirements linked to the administration and maintenance of the UKVI Student Sponsor Licence.	
<u>Applicability of Policy</u>	<u>Consultation Undertaken</u>	<u>Applicable To</u>
Newcastle	Yes	Yes
Newcastle Sixth Form	No	Yes
Carlisle	No	Yes
Kidderminster	No	Yes
Lewisham	No	Yes
Southwark	No	Yes
West Lancashire	No	Yes
Group Services	No	Yes
<u>Changes to Earlier Versions</u>		
<u>Previous Approval Date</u>	<u>Summarise Changes Made Here</u>	
	Applicability of Policy – Removed reference to InTraining and Rathbone as these organisations no longer exist. 2.2: Change to BCA submission dates 2.7: Add – “Agent Recruitment and Monitoring Procedure”. 5.2: Clarify, compliance work undertaken throughout the year, 5.4: Addition of International Admissions Manager as administrative support for UKVI inspection. 5.8 Remove “Work Placement Procedure”.	

<u>Linked Documents</u>	
<u>Document Title</u>	<u>Relevance</u>
English Language Policy (UKVI Student Sponsorship)	Both policies uphold and protect NCG’s Student Sponsor Licence
UKVI Compliance Policy	Both policies uphold and protect NCG’s Student Sponsor Licence
International Attendance Policy	Both policies uphold and protect NCG’s Student Sponsor Licence

1. Student Sponsor Licence Application

- 1.1 The Student Sponsor Licence must be renewed every four years.
- 1.2 The current Student Sponsor Licence end date is 30th March 2025 with the application renewal window opening on the 31st December 2024.
- 1.3 The current cost of renewal is £536.
- 1.4 The Student Sponsor Licence application must be submitted by a Level 1 User of UKVI's Sponsor Management System (SMS).
- 1.5 The International Compliance Officer is a Level 1 User and is responsible for submitting the Student Sponsor Licence application following receipt of approval from NCG's Authorising Officer.
- 1.6 The submission sheet for the Student Licence renewal application will be saved within UKVI shared folders.
- 1.7 The initial submission of the Student Licence renewal application does not require any formal supporting documentation.
- 1.8 If supporting documentation is required, UKVI will write to the Authorising Officer to request this.
- 1.9 The International Compliance Officer will collate any requested documentary evidence and consult with the Authorising Officer before submitting to UKVI.
- 1.10 Once approved by UKVI, new licence dates will appear within the Licence summary section of the SMS.

2. Basic Compliance Application (BCA) Process

- 2.1 The BCA must be submitted annually.
- 2.2 The next BCA window opens between 30th August 2023 – 29th September 2023.
- 2.3 The core requirements are that the sponsor must have:
 - A visa refusal rate of less than 10%.
 - An enrolment rate of at least 90%.
 - A course completion rate of at least 85%.
- 2.4 The International Compliance Officer monitors all three core requirements on an ongoing basis.
- 2.5 Visa refusal rate is monitored daily, while the enrolment and course completion rates are assessed on a monthly basis.

- 2.6 BCA statistics are reported to the Authorising Officer on a monthly basis.
- 2.7 There are linked policies and procedures which address any risk of the core metrics being breached. These are:
 - International Attendance Policy.
 - UKVI Compliance Policy.
 - English Language Policy (UKVI Student Sponsorship).
 - Agent Recruitment and Monitoring Procedure.

3. SMS User Policy

- 3.1 UKVI's Sponsor Management System is the online platform which is used to maintain the Student Sponsor Licence.
- 3.2 The SMS is the means by which a student specific CAS (Confirmation of Acceptance for Study) is generated.
- 3.3 A CAS is an electronic code number which is used within the Student Visa application process so the drafting and issuing of CAS can only be completed by authorised members of staff.
- 3.4 Each Student Sponsor is required to establish Level 1 (full system access) and Level 2 (read only system access) users of the SMS system.
- 3.5 NCG currently has four Level 1 Users and two Level 2 Users.
- 3.6 UKVI refer to a Sponsor's Authorising Officer, Key Contact and their Level 1&2 Users as 'Key Personnel'.
- 3.7 Key Personnel requirements:
 - Must be permanently based in the UK.
 - Must not have an unspent conviction for a relevant offence.
 - Must be a paid member of your staff.
 - Can be a UK-based representative.
- 3.8 Only permanent members of NCG staff will be selected to be a Level 1 or 2 User.
- 3.9 All staff at NCG are required to undergo a DBS check as part of their introduction to employment to check for criminal history.
- 3.10 Any requests to add further Level 1 or 2 Users must be authorised by the Authorising Officer.

- 3.11 Personal details of any proposed new Level 1 or 2 Users must be submitted to UKVI for consideration.
- 3.12 The International Compliance Officer checks the SMS regularly to ensure that Level 1 and 2 User details are up to date and remain appropriate.
- 3.13 The International Compliance Officer will remove any Level 1 or 2 Users from the SMS where they cease to be employed by NCG.
- 3.14 Level 1 and 2 Users must never share their username and / or passwords with anyone.
- 3.15 The Authorising Officer and Key Contact is the Executive Director and Secretary to the Board. This ensures that Key Personnel responsible for the oversight of the Student Licence sits at the most senior position within NCG.

4. CAS Allocation Renewal Process

- 4.1 Confirmation of Acceptance for Studies (CAS) are digital codes which are used in the Student visa application process.
- 4.2 A Student Sponsor must apply to the UKVI to renew their CAS allocation annually.
- 4.3 Each annual request must be based on the projected number of students that the sponsor intends to sponsor during any UKVI reporting period.
- 4.4 The International Compliance Officer will request projected recruitment numbers for the forthcoming year from the Head of International, Newcastle College, three months prior to the CAS renewal window opening.
- 4.5 The International Compliance Officer will then embed the recruitment projections into a report, including CAS used in the previous 12 months and submit to the Authorising Officer for approval.

5. UKVI Audit Procedure

- 5.1 This document demonstrates NCG's approach to a UK Visas and Immigration (UKVI) audit by describing the governance arrangements and documentation that demonstrates to the UKVI that NCG meets all of its Student sponsor licence requirements.
- 5.2 UKVI has not conducted a Tier 4 / Student audit of NCG since December 2015 however recognising the importance of continued oversight and compliance, in-house assurance activity is undertaken on a rolling basis, throughout the year.

5.3 In the event of a Student Sponsor audit, UKVI will require access to student files to assess retention of 'Appendix D' documentation.

5.4 In addition, UKVI will require access to NCG's policies and procedures and marketing materials linked to student sponsorship and compliance.

The following colleagues will be involved should NCG be audited by UKVI.

- Audit lead: Chief Operations & Compliance and Secretary to the Board, David Balme.
 - Audit coordinator: International Compliance Officer, Daniel Rose-Troup.
 - College lead: Head of International (Newcastle College), Laura Rose-Troup.
 - Audit administration and student records support: International Admissions Manager, Rebekah Pearce and International Admissions and Student Support Officers Sarah Devine (Newcastle College).
 - Curriculum Support: Heads of Curriculum within relevant sections.
 - Executive Support: Principalship of Newcastle College.
 - Hospitality, room bookings and access: PA to Executive Director.
- 5.5 UKVI lists the documents sponsors are required to hold within Appendix D of the Immigration Rules.

For the purposes of NCG's students these documents are:

- Passport.
 - Entry stamp into UK (normally appears on Entry Clearance visa).
 - BRP (Biometric Residence Permit).
 - Student contact details.
 - Evidence of student absence / attendance.
- 5.6 Student attendance records are retained digitally which is permitted within guidance. In the event of an audit the audit coordinator will work with audit administration support to print out physical copies of each sponsored Student's attendance.
- 5.7 Appendix D documents are retained as physical files at the International Office (Newcastle College) and on the International shared drive (Newcastle College). The physical files will be checked by the audit coordinator against the most recent internal audit to ensure all relevant documentation is present. The audit coordinator will then collate files prior to submission to UKVI auditors.

- 5.8 All additional non-student documents are saved centrally within NCG's UKVI shared files. These documents will be printed and collated by the audit coordinator in the event a UKVI audit. These documents include, but are not limited to:
- NCG International Attendance Policy.
 - NCG English Language Policy (UKVI Student Sponsorship).
 - NCG International Compliance Policy.
 - NCG Student Sponsor Licence Policy.
 - NCG Agent Recruitment and Monitoring Procedure
 - Controls mapping document.
 - International Admissions Policy (Newcastle College).
 - International student application form.
 - Compliance questionnaire.
 - Admissions interview form.
 - Immigration history request.
 - CAS approval form.
 - Authorised absence form.
 - Student prospectus / course information sheets.
- 5.9 UKVI may request to speak with sponsored students as part of their audit. The audit coordinator will contact the selected students on UKVI's request and arrange with the Executive PA to organise room bookings and related hospitality.
- 5.10 Should UKVI request further information such as student timetables, conditional offer or details of third-party recruiters, for example, the audit coordinator will liaise with College lead to collate these documents.
- 5.11 In all instances, the documentation collated by the audit coordinator will be submitted to the audit lead (Authorising Officer) for review before they are submitted to UKVI auditors.