POLICY / PROCEDURE TITLE		DATE OF APPROVAL
Student Sponsor Licence Policy		April 2024
APPROVED BY	**VERSION NO.**	**VALID UNTIL**
Executive Board	3	April 2027

OWNER	International Compliance Officer
GROUP EXECUTIVE LEAD	Deputy Principal, Executive Lead HE
DOCUMENT TYPE	Policy ☒ Group Procedure ☐ Local Procedure ☐
PURPOSE	This policy sets out the requirements linked to the administration and maintenance of the UKVI Student Sponsor Licence.
APPLICABLE TO	All NCG employees, as well as consultants, vendors, agency workers, contractors, service users, trainees/students, volunteers and/or any other parties who have a business relationship with NCG.
EQUALITY ANALYSIS COMPLETED [POLICIES ONLY]	Yes ☒ / No ☐ / N/A ☐
	(If EA not applicable, please explain)
KEY THINGS TO KNOW ABOUT THIS POLICY	• The Basic Compliance Application Process (BCA) must be submitted annually. The next BCA window opens between 30th August 2024 – 29th September 2024. • The core requirements that the sponsor must have are detailed within section 2 of the policy. • The key personnel requirements are set out within section 3.7.
EXPECTED OUTCOME	Readers are expected to understand the organisational position on the student sponsor licence requirements, know their responsibilities in relation to the policy and comply with the terms of the policy.

MISCELLANEOUS	
LINKED DOCUMENTS	• English Language Policy (UKVI Student Sponsorship) • UKVI Compliance Policy • International Attendance Policy
KEYWORDS	• Student Sponsorship • Licence • Application • Visa

Equality Impact Assessment

EQUALITY IMPACT ASSESSMENT			
	Yes	**No**	**Explanatory Note if required**
EIA 1 - Does the proposed policy/procedure align with the intention of the NCG Mission and EDIB Intent Statement in Section 2?	☒	☐	The answer to this must be YES
EIA 2 - Does the proposed policy/procedure in any way impact unfairly on any protected characteristics below?	☐	☒	
Age	☐	☒	The answer to this must be NO
Disability / Difficulty	☐	☒	The answer to this must be NO
Gender Reassignment	☐	☒	The answer to this must be NO
Marriage and Civil Partnership	☐	☒	The answer to this must be NO
Race	☐	☒	The answer to this must be NO
Religion or Belief	☐	☒	The answer to this must be NO
Sex	☐	☒	The answer to this must be NO
Sexual Orientation	☐	☒	The answer to this must be NO
EIA3 - Does the proposed policy/processes contain any language/terms/references/ phrasing that could cause offence to any specific groups of people or individuals?	☐	☒	The answer to this must be NO
EIA4 - Does the policy/process discriminate or victimise any groups or individuals?	☐	☒	The answer to this must be NO
EIA 5 - Does this policy/process positively discriminate against any group of people, or individuals?	☐	☒	The answer to this must be NO
EIA 5 - Does this policy/process include any positive action to support underrepresented groups of people, or individuals?	☐	☒	The answer to this could be yes or no as positive action is lawful. However, an explanation must be provided for clarity.
EIA 6 - How do you know that the above is correct?	The policy author has consulted with peers and appropriate groups of people in the Group and through the Policy Review Council.		

1. GENERAL POLICY STATEMENT

This policy sets out how NCG will manage the student sponsor licence process.

2. BASIC COMPLIANCE APPLICATON (BCA) PROCESS

2.1. The BCA must be submitted annually.

2.2. The next BCA window opens between 30th August 2024 – 29th September 2024.

2.3. The core requirements are that the sponsor must have:

2.3.1. A visa refusal rate of less than 10%.

2.3.2. An enrolment rate of at least 90%.

2.3.3. A course completion rate of at least 85%.

2.4. The International Compliance Officer monitors all three core requirements on an ongoing basis. The monitoring data is taken from the International admissions spreadsheet which includes a record of all CAS issued.

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 by the International Compliance Officer (ICO) 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:

2.7.1. International Attendance Policy.

2.7.2. UKVI Compliance Policy.

2.7.3. English Language Policy (UKVI Student Sponsorship).

2.7.4. 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 at least one Level 1 user of the SMS. This provides for full SMS access).There is also the option to establish Level 2 users which provides read only SMS access.

3.5. NCG currently has five Level 1 Users and no 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:

   3.7.1. Must be permanently based in the UK.

   3.7.2. Must not have an unspent conviction for a relevant offence.

   3.7.3. Must be a paid member of your staff.

   3.7.4. 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. Should the International Compliance Officer leave NCG, their Level 1 user account will be deactivated by the Authorising Officer. The Head of International is responsible for informing the Authorising Officer and/or International Compliance Officer of any staffing changes to Level 1 and 2 users.

3.15. Level 1 and 2 Users must never share their username and / or passwordswith anyone.

3.16. The Authorising Officer is the HE Academic Registrar. This ensures that Key Personnel responsible for the oversight of the Student Licence sits at the most senior position withinNCG.

3.17. Should the Authorising Officer leave NCG, there must be an immediate nomination for a replacement to ensure that NCG has an Authorising Officer at all times.

4. CAS ALLOCATION RENEWAL PROCESS

4.1. Confirmation of Acceptance for Studies (CAS) are digital codes which areused 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, NewcastleCollege, 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 anddocumentation

that demonstrates to the UKVI that NCG meets all of its Student sponsor licence requirements.

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

5.3. 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.

5.3.1. Audit lead: NCG's Authorising Officer for the Student licence.

5.3.2. Audit coordinator: International Compliance Officer.

5.3.3. College lead: Head of International (Newcastle College), Laura Rose-Troup.

5.3.4. Audit administration and student records support: International Admissions Manager, Rebekah Pearce and International Admissions and Student Support Officer Sarah Devine (Newcastle College).

5.3.5. Curriculum Support: Heads of Curriculum within relevant sections.

5.3.6. Executive Support: Principalship of Newcastle College.

5.3.7. Hospitality, room bookings and access: PA to Executive Director.

5.4. 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:

5.4.1. Passport.

5.4.2. Entry stamp into UK (normally appears on Entry Clearance visa).

5.4.3. BRP (Biometric Residence Permit).

5.4.4. Student contact details.

5.4.5. Evidence of student absence / attendance.

5.5. 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.

5.6. Appendix D documents are retained digitally on the International shared drive (Newcastle College). The digital 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 priorto submission to UKVI auditors.

5.7. 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, butare not limited to:

    5.7.1.   NCG International Attendance Policy.

    5.7.2.   NCG English Language Policy (UKVI Student Sponsorship).

    5.7.3.   NCG International Compliance Policy.

    5.7.4.   NCG Student Sponsor Licence Policy.

    5.7.5.   NCG Agent Recruitment and Monitoring Procedure

    5.7.6.   International Admissions Policy (Newcastle College).

    5.7.7.   International student application form.

    5.7.8.   Compliance questionnaire.

    5.7.9.   Admissions interview form.

    5.7.10.   Immigration history request.

    5.7.11.   CAS approval form.

    5.7.12.   Authorised absence form.

    5.7.13.   Student prospectus / course information sheets.

5.8.   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.

5.9.   Should UKVI request further information such as student timetables, conditional offer or details of third-party recruiters, for example, the auditcoordinator will liaise with the College lead to collate these documents.

5.10. 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.

6.   STATEMENT ON IMPLEMENTATION

Upon approval, this policy will be uploaded to the policy portal and communicated to staff via The Business Round-Up.

7.   STATEMENT ON EQUALITY AND DIVERSITY

NCG is committed to providing equality of opportunity. Further details or our aims and objectives are outlined in our [Equality Diversity Inclusion and Belonging Strategy](#).
This policy has been assessed to identify any potential for adverse or positive impact on specific groups of people protected by the Equality Act 2010 and does not discriminate either directly or indirectly. In applying this policy, we have considered eliminating unlawful discrimination, promoting equality of opportunity and promoting good relations between people from diverse groups.

8.   STATEMENT ON CONSULTATION

This policy has been reviewed in consultation with members of the Policy Review Council as part of the policy review and approval process.

VERSION CONTROL				
Version No.	**Documentation Section/Page No.**	**Description of Change and Rationale**	**Author/Reviewer**	**Date Revised**
1	New policy	N/A	International Compliance Officer	May 2022
2	Subject to full review	Minor amendments	International Compliance Officer	April 2023
3	Subject to full review:	Changes made: Removal of section on "renewal of Sponsor Licence". There is no longer a requirement to renew the Student Sponsor licence. 1.2 update BCA submission dates 2.5 update number of level 1 and 2 users of the SMS. 2.14 paragraph added to confirm removal of SMS users in the event that the ICO leaves NCG. 2.16 paragraph added to confirm the requirement for a replacement AO be nominated immediately in the event that the AO leave NCG. Removal pf paragraph 4.2 as not relevant to procedural oversight. 4.4 removal and replacement of Clerk role within UKVI inspection visit. 4.6 "physical" files replaced with "digital". 4.8 removal of "controls mapping document" as this is no longer in use.	International Compliance Officer	April 2024