

# Loughborough College

## *Student Sponsor Compliance Policy*

### 1. Scope and Purpose

Loughborough College has Student Sponsor Status, approved by the Home Office / UKVI. As such, Loughborough College is able to benefit from recruiting international students and therefore has an obligation to comply with the sponsor duties and responsibilities as prescribed by, but not limited to, the following Home Office / UKVI guidance:

Student Sponsor Guidance (four documents): <https://www.gov.uk/government/publications/sponsor-a-tier-4-student-guidance-for-educators>

Document 1: Applying for a Student Sponsor Licence

Document 2: Sponsorship Duties

Document 3: Student Sponsor Compliance

Document 4: Higher Education Regulatory Reform

### 2. Policy Statement

Loughborough College has an inclusive culture and will ensure that all applications are dealt with on an individual basis and are considered fairly in line with the college's Equality and Diversity Policy and Equal Opportunities legislation.

The college has strong links with local authorities and complies with current SEND (Special Educational Needs and Disabilities) legislation to ensure best endeavours are applied throughout a learner's journey. Reasonable adjustments will be made at any stage of the recruitment process as appropriate, to ensure equality of access for all. These reasonable adjustments may be necessary at various stages to include advertisement, information, invitation, open day, interview and enrolment.

### 3. Impact Assessments

3.1. This policy/procedure has been assessed for its impact on equal opportunities and will be informed by the aim to eliminate all forms of discrimination in all strands of the equal opportunities legislation.

3.2. This policy/procedure has been assessed for potential risk on data subjects due to the processing of personally identifiable information. All processing has been reviewed and is in line with all current Data protection laws and appropriate safeguards implemented to ensure that the policy has privacy by design as its underlying approach.

#### 4. Policy/Procedure

##### **SUMMARY OF HOME OFFICE / STUDENT SPONSOR GUIDANCE – SPONSOR DUTIES**

The college has a duty to record and maintain the following information on file for each student sponsored on the Student / Tier 4 visa route, in accordance with Appendix D: Part 6 of the Sponsor Guidance, which can be found at:

<https://www.gov.uk/government/publications/keep-records-for-sponsorship-appendix-d>

Passport and BRP. International Office staff to check original and a scanned copy is retained in the student's electronic file. If Covid-19 restrictions (such as lockdown at a local or national level) mean the originals cannot be checked and scanned, the student will be asked to email a copy, until such time as the original can be checked. For EU / EEA nationals, their immigration status will be checked online and a copy of this saved to the student's file, along with a scan of their passport.

Attendance information. Register information is available on ProSolution, and also monitored using absence reports three times per week, and monthly attendance reports.

Contact details. These are captured at application stage, checked at enrolment, and also checked in the International Student Census. Students can also update their contact details via the ILP system. ProSolution also retains previous contact details, so a full history is available.

All documents used to assess each student's application. A scanned copy is kept on file and authenticity is checked wherever possible, such as verifying IELTS online.

The college will assign a CAS to each student who it decides, after thorough assessment of their application, to sponsor via the Student route. A CAS will only be assigned to a student who the college has assessed to be willing and able to follow their offered programme of study, and who is a credible, genuine student. All relevant information to be included in the CAS will be checked and verified wherever possible, and the college undertakes to enter all information in as accurate a manner as possible.

The college will use the SMS to report all relevant information including, but not limited to, the following. These reports will be submitted in accordance with the Student Sponsor Guidance: Document 2: Sponsorship Duties, which can be found at:

<https://www.gov.uk/government/publications/student-sponsor-guidance>

- Students who do not enrol within the permitted time
- Students whose poor attendance has resulted in them being withdrawn from their studies
- Students who are finishing their studies earlier than expected
- Students whose sponsorship is being withdrawn for any other reason, for example transferring to another institution
- Students who move to another immigration category and so are no longer sponsored under the Student route
- Students whose behaviour is in breach of the Immigration Rules

The college will thoroughly vet all third parties (such as agencies) that it works with to recruit students, and third-party information will be reported to the Home Office / UKVI when required. Please refer to the International Recruitment Policy for further details.

## ADMISSIONS

### General Admissions Procedures

International applications can be submitted using either the college's online international application form, at: <https://www.loucoll.ac.uk/apply/international> or via UCAS. The following documents will be required in support of the application:

- All relevant academic documents (certificates if qualification is complete, or most recent academic transcript for pending qualifications) along with certified translation(s) if necessary
- English Language test results – in accordance with the UKVI SELT list at: <https://www.gov.uk/government/publications/guidance-on-applying-for-uk-visa-approved-english-language-tests>
- Passport and any previous UK visas, plus associated CAS Statement(s) for any previous Tier 4 / Student visa(s) and details of any previous UK visa refusals

Once an application is received, it will be logged on ProSolution (the college's student records system) and a unique folder set up in the secure *Admissions* area of the *International Student Records* folder (file name: *SURNAME First Name Student Number*). A copy of the application form will also be saved in the student's file, along with a copy of all supporting documents and any correspondence relating to the application.

The International Office will verify qualifications wherever possible. For example, by using the IELTS TRF verification service, or by requesting that IB results are referred to the college via the relevant official IBO website, or by verifying WAEC results on the WAEC Direct website.

Where there is a significant gap between the applicant's last course of study and proposed start date at Loughborough College, the applicant will be expected to provide an explanation, in the form of a personal statement, explaining how they have been occupied since leaving full-time education, and explaining why they intend to study on this particular course at Loughborough College. A personal statement will also be requested if there appears to be a change in direction of study (for example, previous study has related to the sciences, but the applicant is now applying for a business course). If there are any concerns that the applicant may not be a genuine student, their application will be logged and rejected.

If an offer is made, an offer letter will be issued by email to the student (or their designated representative), as a secure pdf, along with a copy of the following documents:

- International Tuition Fees - Terms and Conditions;
- Acceptance Form (including Parental Consent for under 18s);
- Care of Under 18s information (where relevant);
- Guidance for Student Visa Applicants.

The offer letter will request a tuition fee deposit of £2,000 (or the full course fee if the total amount is less than £2,000) once all conditions are met, and the applicant therefore holds an unconditional offer of a place. A copy of the letter will also be retained on file.

Upon receipt of a deposit, the student will be emailed a copy of their receipt. During the CAS issuing period, a daily report will be run by the International Office to identify any deposits that have been received. If the student holds an unconditional offer and their course is due to start in three months or less, their CAS will be assigned and a CAS Statement issued, along with

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Applicable to: Learners/Staff      Version 1.0  
Approved by: VP Learner Experience  
Accessible to: Learners/Staff/Public

Document Ref: **SR-P005**  
Last review: June 2023  
Next review: June 2024  
Owner: Student Recruitment

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information about credibility interviews, the visa application process and working whilst in the UK on a Student Visa, including working as a professional sportsperson. A copy of the CAS Statement will also be retained on file. If a deposit is received and the student's course is due to start in more than three months, a reminder will be scheduled in Outlook, to assign their CAS at the point three months prior to the course start date. This is to avoid students applying for their Student Visa too early, and the application therefore being rejected. Prior to the CAS being assigned, a CAS Checklist will be completed and saved to the student's file. A Bank Statement Checklist will also be completed and saved to the student's file, for students who are required to submit financial evidence in support of their visa application.

For students joining short courses and applying via the Visitor or Short-Term Study visa routes, a visa letter will be sent as a secure pdf.

Pre-Arrival information will be sent to students prior to their travel to the UK. This will include information on travelling to the UK, and more information about their course and the enrolment and induction procedures.

Students who do not meet the entry requirements and are not made an offer, or who decline their offer, will be rejected/ withdrawn on Pro Solution and their file will be moved to the *Withdrawals* folder.

A periodic report is produced and circulated to members of the International Office and senior management, which summarise the number of applications received, and their status i.e. whether offered, rejected, or on hold.

### **CAS Usage Monitoring**

To ensure that sponsor duties are fulfilled, CAS data will be exported from the SMS and all arrivals will be monitored. Any student who fails to enrol on time will be contacted for an explanation. In the instance of visa refusal or other reasons for non-enrolment (e.g. acceptance at an alternative institution), evidence will be requested and kept on file. Appropriate reports will be made via the SMS. Where students have not yet received a decision on their visa application, any possible enrolment extensions will be reported or added to unused CAS in the form of a sponsor note. Unused CAS will be withdrawn if the final enrolment deadline has passed.

### **Students Sponsored by another Institution**

If a student is sponsored by another institution, and is applying to the College for supplementary study, then written confirmation must be received from that institution, giving their consent for their sponsored student to undertake supplementary study with the College.

## **ENROLMENT**

All new international students must report to the International Office or designated international induction session on their first day with the following documents:

- Passport and visa / BRP card
- Original academic and English Language certificates
- Offer letter

They will complete the following forms:

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Document Ref: **SR-P005**  
Last review: June 2023  
Next review: June 2024  
Owner: Student Recruitment

- Contact details / medical form\*
- Once all of the required documentation has been completed and checked, students will be issued with a Programme Confirmation (Permission to Enrol) form\*. Once signed by their tutor, confirming course information, the student will present this to the enrolment staff and formally register for their course.

Students returning for second and subsequent years will also be required to bring their passport and visa / BRP card and complete the above forms.

*\*Forms will be scanned at enrolment and retained on the Document Management System (accessible via ProSolution).*

International Office staff will log the following details on Pro Solution:

- Visa type
- Visa validity dates
- Information relating to official sponsorship (e.g. overseas governments)

Reports will be generated from Pro Solution to enable this data to be effectively managed and regularly monitored to ensure Student Sponsor compliance – for example, to ensure that there are no missing visa types.

The student's electronic file will then be moved from *Admissions* to *Enrolments* section of *International Student Records*.

A copy of the student's passport and BRP will be scanned at the start of each academic year and held in their file.

### **Latest Date for Enrolment**

This date is stated on each CAS that is assigned, and is usually 19 days (i.e. three weeks less the final weekend) after the course start date, but may vary for different programmes. If the International Office receives notification that a student will be delayed, they may, at their discretion, extend this date via a sponsor note or report on the student's CAS on the SMS. The latest date for enrolment is not routinely stated on the student's CAS Statement, as experience has shown that this may encourage some students to arrive after the official course start date.

### **ABSENCE, ATTENDANCE MONITORING AND REPORTING**

Due to nature of the College timetabling system, a contact point will be defined as a day on which the student is expected to attend one or more classes / exams / tutorials, etc.

### **Responsibilities – Students**

All new international students will attend an induction with the International Office staff, to explain the importance of complying with the terms of their visa, with particular reference to work and attendance. Learners are reminded that they are in the UK to study and must engage with their studies and attend all timetabled lessons plus any other contact points, e.g. non-timetabled meetings, exams. If they are due to be absent for any reason then they must report this using the ILP without fail.

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Document Ref: **SR-P005**  
Last review: June 2023  
Next review: June 2024  
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Our Undergraduate students are directed to adhere to the “Academic engagement process”, contained within the Higher Education Enrolment and Withdrawal Policy [here](#) and to adhere at all times to the conditions of the Higher Education Student Contract ([here](#)), which is signed at their enrolment.

Information will be provided in the International Student Handbook regarding responsibilities for students to ensure compliance with the terms of their Student Visa, and a copy of the handbook will be provided to all international students at the start of each academic year.

### **Absence due to Illness**

Any student who will not be attending college due to illness must report the absence as soon as possible through the [ILP system](#), which will then notify the relevant teacher(s) and the International Office. Evidence to support any absence may be requested by the International Office, if deemed necessary.

### **Absence for Other Reasons**

Authorisation for absence during term-time will not usually be granted. If the need arises for a student on a Student Visa to be absent during term-time, a request for absence must be submitted in advance. This should be done by email to [international@loughborough.ac.uk](mailto:international@loughborough.ac.uk) and any relevant evidence also submitted. The request will be considered in line with the college’s Attendance and Punctuality Policy, which details acceptable reasons for Authorised Absence. The decision will be communicated to the student by return email, and a copy of the correspondence kept on file. If authorisation is granted, a comment will be logged on the ILP, so that all relevant curriculum staff are aware, and registers can be marked accordingly.

### **Responsibilities - Curriculum Staff**

Registers for all classes will be marked in accordance with the Attendance Marks and Register Marking Rules, to ensure that accurate and up-to-date registers are maintained for all learners.

Academic Tutors will monitor attendance and discuss below-target attendance with their students. If there are any concerns regarding an international student’s attendance, the International Office should be contacted.

### **Responsibilities - International Office**

#### Completion

Students on a Student Visa who have left the College ahead of schedule will be reported to the Home Office in accordance with the Sponsor Guidance. This includes students who complete their course more than three weeks earlier than the end date stated on their CAS. The student will be asked to provide evidence of either their flight home or acceptance (CAS) from another licensed sponsor. This will be recorded on their file and details provided on the SMS reporting screens. The Student Reporting spreadsheet will also be updated.

#### Withdrawal

The Senior Compliance Officer is the Key Contact and a Level 1 User for the Student Sponsor licence, and is responsible for monitoring and identifying any student who is in breach of their Student Visa obligations, whether for attendance or any other reasons, and therefore must have their sponsorship withdrawn, in accordance with the Sponsor Guidance.

The withdrawal of sponsorship will be reported via the SMS and evidence provided of either the student’s flight booking to leave the UK, or acceptance (CAS) from another licensed sponsor. This will be recorded on

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their student file and details also provided on the SMS reporting screens. The Student Reporting spreadsheet will also be updated.

#### Monitoring Consecutive Absence

Under current guidance, the college is required to report any instance where a student has missed ten expected contacts without permission or authorisation, whereby the college will subsequently be potentially withdrawing sponsorship of that students' visa.

To enable monitoring of consecutive absence, the "Three Days Absent" report will be generated two times per week, to identify any student who may be at risk, and to give sufficient time to investigate the reasons.

Where a student is absent for ten consecutive contact points without permission or authorisation, cases will be fully investigated and, where necessary, sponsorship will subsequently be withdrawn and reported to the Home Office / UKVI via the SMS reporting screens.

#### Attendance Monitoring

To prevent abuse of the Student Visa system and in accordance with its duties as a sponsorship licence holder, the College will monitor attendances, absences and academic engagement of its international student visa holders.

The College will submit reports to the UKVI as required.

The College will retain records of its students as required by the UKVI and make these available for inspection by the UKVI at any time.

In accordance with the section on Academic Engagement Policy for Higher Education Providers in Document 2: Sponsorship Duties of the Student Sponsor Guidance, a monthly attendance report will be run, to monitor the attendance of all students on a Student Visa. The International team will liaise with Curriculum staff to monitor engagement alongside attendance (See Attendance and Engagement Monitoring for International Students process).

#### Additional Reporting Duties

In addition to reporting non-enrolment, early completion and withdrawal of students, the college will report the following to the Home Office / UKVI via the SMS:

- Students who move to a different immigration category and are no longer sponsored by the College
- Work placement information (if not stated on CAS)
- Change of circumstances
- Any other information as required under current Student Sponsor Guidance

As information reported is only partially accessible via SMS at a later date, a full record will be kept on the Applicant SMS Reporting spreadsheet and the Student SMS Reporting spreadsheet.



#### International Student Census

A census will be conducted periodically, to check that the contact details held on file are correct for every student. This is in addition to students being reminded at enrolment of the importance of maintaining up-to-date contact details on the college's ILP system.

#### Training of Curriculum Staff

The International Office will work with curriculum staff, to ensure that all relevant staff are aware of the college's obligations, and how they can support compliance with these responsibilities.

#### **Students Taught at Other Sites**

Currently, no students on a Student Visa are taught anywhere other than the main campus. If a new site were to be added to the college's Student Sponsor licence, all of the same procedures and processes will apply for marking of registers and monitoring of attendance, as outlined above. This will ensure that the college can fulfil its Student Sponsor responsibilities for monitoring students that the college sponsors, regardless of their study location.

#### 5. Location and Access to the Policy/Procedure (delete as appropriate)

SharePoint  
College Website

#### 6. Persons Responsible for the Policy/Procedure

Vice Principal – Learner Experience

#### 7. Linked Policies and Procedures

International Recruitment Policy  
Attendance and Engagement Monitoring for International Students procedure  
Safeguarding Policy  
Equality and Diversity  
Data Protection Policy  
Fees Policy

#### 8. Change log

Date	Version	Details of change	Review / Revision by	
			Name	Title
27/01/2023	0.1	Number issued and Draft created	David Robertson	Student Recruitment Manager
26/06/2023	1.0	Switched to final document	David Robertson	Student Recruitment Manager

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Applicable to: Learners/Staff Version 1.0  
Approved by: VP Learner Experience  
Accessible to: Learners/Staff/Public

Document Ref: **SR-P005**  
Last review: June 2023  
Next review: June 2024  
Owner: Student Recruitment

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