



Home Office

# Student Sponsor Guidance

## Document 3: Student sponsor compliance

Version 06/2026 - This guidance is to be used from 01/06/2026

This guidance covers:

- Basic Compliance Assessment (BCA)
- Non-compliance
- UKVI investigation and sanctions process
- Sanctions
- How some sanctions affect a sponsor's Students and Child Students

Please also see the other Student Sponsor Guidance documents: Document 1 - 'Applying for a Student sponsor licence', Document 2 – 'Sponsorship Duties' and Document 4 – 'Higher Education regulatory reform'.

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## Changes since last publication

Current paragraph number	Previous paragraph number	Changes made
Throughout	Throughout	Replaced legacy Basic Compliance Assessment framework with new BCA framework, including changes to the core requirement thresholds, introduction of the Red-Amber-Green (RAG) rating system, new accompanying compliance actions, and transitional arrangements.
2.2	2.2	Removed reference to where UKVI may not be able to reach a conclusion on a previous BCA
2.3	2.4	Reordered paragraph number and amended wording to clarify where a BCA application has not been applied for in time that will result in being removed from the sponsor register in most cases.
2.8	2.7	Amended wording to “will be considered for licence revocation”.
2.11	2.10	Amended paragraph wording to clarify that an outstanding BCA application will be rejected where that sponsor’s licence has been revoked where the BCA application is still outstanding.
2.17	2.15	Amended paragraph wording to align the guidance to the existing operational consideration and policy intent of how Administrative Review cases are considered for the purposes of calculating the refusal rate
2.19	New paragraph	Clarification added for how cases where the sponsor withdraws their sponsorship of the student before the visa decision is made are considered for the purposes of the refusal rate calculation
2.76 & 2.77	2.25	Eligibility for Discretionary Assessments amended to reflect changes in the new framework from the legacy framework
2.79	New Paragraph	Added clarification on how sponsors continually relying on Discretionary Assessments to pass the Basic Compliance

		Assessment when core metrics have been failed will usually be considered
2.83 & 2.86	New Paragraphs	Added a limit to the number of years that a sponsor can retain their licence for the purposes of accreditation on the Visitor and Short-term Study (English Language) routes without using their licence to sponsor a Student on the Student route, and clarification on how this will be treated
N/A	3.13	Deleted paragraph regarding UKVI reporting concerns on course designations to regulatory bodies
3.12 & 3.15	3.13 & 3.16	Amended the list of breaches of sponsorship duties/sponsorship concerns, and the list of serious breaches of sponsorship duties/compliance failings to reflect the updated BCA framework and further clarify a sponsor may be considered to pose a threat to immigration control even where the Basic Compliance Assessment or audits have been passed
4.3	New Paragraph	Added signposting to the compliance action process for breaches of sponsorship duties related to BCA performance which sit outside of the regular compliance tracks
4.12	4.11	Amended wording to accurately reflect the process as per Track 2
4.14	New Paragraph	Added clarification that sponsors that do not breach the core requirements of the BCA, but are close to doing so, may still be considered to have committed a breach of their sponsorship duties in regard to their failure to do all they can in the recruitment of genuine students, and as such may receive an action plan to address recruitment concerns.
5.7	5.7	Removed reference to UKVI writing to the sponsor setting out the sanctions it has applied.
6.2	6.2	Wording amended to clarify how entry clearance applications will be considered at a sponsor who has been removed from the register pending investigation, and that permission to remain applications may still be refused where they do not otherwise meet the rules of Appendix Student while the sponsor has been removed from the register while under investigation

6.3	6.3	Amended wording to remove reference to Students being advised not to travel where a sponsor is removed from the register while under investigation.
6.8	6.8	Removed reference to sponsor type requiring a student to apply to study at a new sponsor from overseas

## 1. Introduction

- 1.1 This is Document 3 of the Student Sponsor Guidance, which sets out the requirements for education providers wishing to apply for and hold a licence to sponsor international students to study under the Student and Child Student routes. Document 1 covers applying for a Student sponsor licence, Document 2 covers sponsorship duties, Document 3 covers compliance assessments and sanctions for non-compliance, and Document 4 covers the effect of Higher Education regulatory reform on Student sponsors. Sponsors, and education providers who would like to apply for a Student sponsor licence, should read all four documents and ensure they understand them and comply with them.
- 1.2 All references to Students and Child Students in this guidance must be read as including those applying for, or who were granted leave, under the previous Tier 4 (General) and Tier 4 (Child) routes, as applicable.

## 2. Basic Compliance Assessment (BCA)

This section gives information on:

- Key points
- How to apply
- Core requirements
- Calculations
- Red-Amber-Green (RAG) rating system
- Discretionary Assessments
- Transitional Arrangements

### Key points

- 2.1 A sponsor must apply for a Basic Compliance Assessment every 12 months.
- 2.2 A sponsor must do this regardless of how long it took UKVI to decide the outcome of a previous assessment.
- 2.3 If a sponsor does not apply for a Basic Compliance Assessment within these timescales, it will normally be considered a serious breach of sponsorship duties and UKVI will begin licence revocation action. In most cases the sponsor will be removed from the Register of Student Sponsors and given 20 working days to make representations against the revocation decision.
- 2.4 For Basic Compliance Assessments applied for on or after 01/06/2026 the outcome of a Basic Compliance Assessment will be determined in a Red-Amber-Green (RAG) rating system. The RAG rating system gives the sponsor a single overall colour rating based on their performance across all 3 metrics. It reflects whether the sponsor has failed to meet a core requirement of the Basic Compliance Assessment or is at risk of doing so, as such the RAG rating system does not function as an aggregate of all 3 metrics.
- 2.5 The colour rating received as the outcome of a Basic Compliance Assessment does not preclude the same sponsor from subsequently being found to be non-compliant, and in breach of its sponsorship duties, for example as a result of a compliance visit or audit.

### How to apply

- 2.6 A sponsor must apply for a Basic Compliance Assessment every 12 months.
- 2.7 A sponsor must use the SMS to make an application for a Basic Compliance Assessment.
- 2.8 Applications can be made up to one month before they are due, but must be made by the date they are due, or the sponsor's licence will be considered for revocation.

- 2.9 A sponsor must pay the fee using its SMS account. The sponsor's Level 1 user must make the application. Once the application has been made, a sponsor can track its progress, including its current status and outcomes, using the 'Applications and Renewals' tracking function in SMS.
- 2.10 It is the sponsor's responsibility to make their application in time. The 'Licence summary' screen in SMS displays the sponsor's start date, end date and the date they can next make an application for a Basic Compliance Assessment. UKVI will send a reminder by email to the contact details provided by the sponsor no more than one month before the Basic Compliance Assessment is due. It is the sponsor's responsibility to ensure that all contact details are up to date and accurate and that email accounts are regularly monitored.
- 2.11 If the sponsor's Student sponsor licence has been revoked for any reason and the sponsor had an outstanding application for a Basic Compliance Assessment, UKVI will reject the BCA application automatically and without consideration.

## Core requirements

- 2.12 When UKVI carries out a Basic Compliance Assessment, it will assess the sponsor against the following core requirements. A sponsor must meet all of the core requirements on the date that it applies to obtain a green or amber rating. Failure to meet a core requirement will result in a red rating, and potentially licence revocation where paragraphs 2.47 and/or 2.48 apply.
- 2.13 The core requirements of the Basic Compliance Assessment are changing from June 2026.
- 2.14 For all Basic Compliance Assessments applied for before 01/06/2026, the sponsor must have:
- a visa refusal rate of less than 10 per cent;
  - an enrolment rate of at least 90 per cent; and
  - a course completion rate of at least 85 per cent.

For all Basic Compliance Assessments applied for on or after 01/06/2026 the sponsor must have:

- a visa refusal rate of less than 5 per cent;
- an enrolment rate of at least 95 per cent; and
- a course completion rate of at least 85 per cent.

For all Basic Compliance Assessments applied for on or after 01/06/2027 the sponsor must have:

- a visa refusal rate of less than 5 per cent;
- an enrolment rate of at least 95 per cent; and
- a course completion rate of at least 90 per cent.

2.15 If a sponsor delays reporting or fails to report information which may affect its application, that may be considered to be a serious breach of their sponsor duties, and compliance action may be taken.

## Calculations

### Visa refusal rates

2.16 A sponsor's visa refusal rate must be less than the required percentage. This means that of all the CAS they have assigned that have been 'used' in support an application for entry clearance or permission stay on the Student or Child Student routes<sup>1</sup>, the total number of applications we refused must be less than the required percentage. For these purposes, a CAS is 'used' when it has been submitted in support of an application for entry clearance or permission to stay on the Student or Child Student routes and that application has been decided.

2.17 Students with a live reconsideration of their application, as a result of a successful Administrative Review against the decision to refuse their Student or Child Student application will not be included in the calculation.

2.18 We will assess your refusal rate for the 12 month period immediately before you apply, using CAS data from the SMS. We will take into account all CAS that students have 'used' and applications we refused during this 12 month period.

2.19 Where a sponsor withdraws a CAS before a decision is made on the visa application linked to that CAS, the CAS status is changed from 'assigned' to 'withdrawn'. Where the CAS status has been changed to 'withdrawn', it will not be included for the purposes of the refusal rate calculation.

### Enrolment rates

2.20 A sponsor's enrolment rate must be at least the required percentage. This means that of all the CAS the sponsor has assigned to students who have been granted entry clearance or permission to stay (to study with that sponsor) on the Student or Child Student routes, at least the required percentage must have enrolled on their course within the enrolment period.

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<sup>1</sup> All references to Students and Child Students in this guidance must be read as including those applying for, or who were granted, leave under the previous Tier 4 (General) and Tier 4 (Child) routes, as applicable, and relevant Tier 4 migrants will be included in all Basic Compliance Assessment calculations.

2.21 UKVI will assess the enrolment rate using CAS data from the SMS for the 12 month period immediately before the application, taking into account all the CAS students have used in a successful application where the student has enrolled on their course within the last 12 months.

### Course completion rates

2.22 A sponsor's course completion rate must be at least the required percentage. This means that at least the required percentage of students they have sponsored under the Student or Child Student routes who enrol with them must complete their course.

2.23 UKVI will assess the course completion rate using all CAS data available from the SMS. To determine the course completion rate, UKVI will calculate the number of students whose course was due to end in the 12 month period immediately before you apply and who dropped out of their course before the end date. It does not matter when they started their course. UKVI will then calculate the percentage of drop-outs compared with all students who were due to complete their course.

2.24 The calculation will not include students who:

- have deferred their studies and have temporarily left the UK;
- switched institution;
- switched to another immigration category; or
- left the course and left the UK.

2.25 If none of the sponsor's students were due to complete their course in the 12 month period immediately before the date of application, then UKVI will not assess them against this requirement. If the sponsor meets the other requirements, they will pass.

2.26 If a sponsor has used the SMS to report that a student has left their course and that student has not been granted permission in another immigration category, granted permission for another institution or left the UK, that student will be counted when assessing the sponsor's course completion rate.

## Red-Amber-Green (RAG) Rating System

### General Principles

2.27 A sponsor's performance against the three metrics composing the BCA will be rated in a Red-Amber-Green (RAG) banding system.

2.28 Sponsors will receive their RAG rating in accordance with RAG Rating Table, unless they are eligible for a Discretionary Assessment, in which case they may receive a rating that does not correspond with the table.

## RAG Rating Table

Metric	Red	Amber	Green
Refusal Rate	≥5%	≥4% - <5%	<4%
Enrolment Rate	<95%	≥95% - <96%	≥96%
Course Completion Rate	<90%	≥90% - <92%	≥92%

- 2.29 The RAG rating system is not an aggregate system. A sponsor's rating will be determined by their lowest rated metric in line with the RAG Rating Table. For example, if the sponsor falls into the red category of the table for their refusal rate, yet falls into the green category for both their enrolment and completion rates, they will receive a red RAG rating outcome.
- 2.30 The outcome of a Basic Compliance Assessment will be communicated with the sponsor via a 'BCA Outcome Notice' letter.
- 2.31 The BCA Outcome Notice will confirm the RAG rating that is being given to the sponsor, as well as the associated compliance action that will be taken against the sponsor where applicable.
- 2.32 Should a sponsor receive a red or amber RAG rating, the BCA Outcome Notice will provide a list of cases that have been considered as counting negatively towards the metric(s) that caused the sponsor's red or amber RAG rating.
- 2.33 If a sponsor wishes to challenge their amber or red rating, they must be able to demonstrate through their representations that the data relied upon in the BCA Outcome Notice was materially flawed based on the facts at the time that the decision was made. In practice, this means that the sponsor must have evidence that the data has been incorrectly calculated (either by UKVI's calculation erroneously including students against the metrics that should have been excluded, or UKVI's calculation excluding students that would have positively contributed towards the metric calculation). UKVI will also consider any exceptional circumstances raised within the sponsor's representations, however unless these circumstances were material to causing the rating which is being challenged, the sponsor's RAG rating is unlikely to change on this basis.
- 2.34 The sponsor must submit any representations against their BCA outcome within 20 working days of the date they received their BCA Outcome Notice.
- 2.35 Any representations submitted against their BCA outcome made outside of the standard 20 working day period will not usually be considered. Representations outside of this period will only be considered in exceptional circumstances, where a sponsor has good reasons for needing further time to make representations and the sponsor informed UKVI before the 20 working day limit of their intention to submit representations but require more time to do so.
- 2.36 UKVI will normally conclude the consideration of a sponsor's representations within 20 working days of the date that it has received them.

- 2.37 UKVI will not reconsider individual visa application outcomes as part of the Basic Compliance Assessment.
- 2.38 A sponsor's RAG rating will be published on the Register of Student Sponsors at the end of the 20-working day period to submit representations against the BCA outcome calculation, unless the sponsor submitted representations against the outcome decision. In which case, the rating will be published upon the conclusion of the consideration of the representations submitted. [Transitional arrangements](#) will apply to when RAG ratings will be published in the sponsor's first Basic Compliance Assessment applied for on or after 01/06/2026, as per paragraph 2.87 of this guidance.
- 2.39 Where representations are made and UKVI accept there was a calculation error or exceptional circumstances which materially impacted the initial RAG rating result, UKVI will write to the sponsor to confirm their representations have been accepted and that upon review, their rating has been amended in line with any recalculation of their data.
- 2.40 Where UKVI do not accept that there was a calculation error or exceptional circumstances, or UKVI accepts a calculation error was made but that error did not impact the sponsor's overall RAG rating outcome, UKVI will write to the sponsor to confirm their rating will remain in place and provide the rationale for this decision.
- 2.41 Once a sponsor's rating is published on to the Register of Student Sponsors, that rating will remain in place until that sponsor receives the RAG rating in their next Basic Compliance Assessment, at which point the Register of Student Sponsors will be updated to reflect their latest outcome.
- 2.42 The rating received in the RAG system of the Basic Compliance Assessment will not impact considerations of whether the sponsor is otherwise compliant with their wider sponsorship duties. As such, a green or amber rated sponsor is not precluded from being found in breach, or in serious breach, of their general sponsorship duties outside of the Basic Compliance Assessment. Where such a breach occurs, the appropriate compliance action will be taken, including licence revocation where applicable.

## Colour Ratings

### Red rating

- 2.43 Where a sponsor fails to meet a core requirement of the Basic Compliance Assessment they will fall into the red category for that metric as outlined in RAG Rating Table. As a result, the sponsor will receive a red RAG rating unless any of the following apply:
- the sponsor is eligible for a [Discretionary Assessment](#) and, as part of the Discretionary Assessment, UKVI are satisfied that the sponsor's circumstances are such that a red rating is not appropriate; or

- operational discretion is applied under [transitional arrangements](#)
- 2.44 Where a sponsor receives a red rating for the first time, they will be placed on an action plan with a minimum duration of 12 months. For further information regarding Action Plans please see: [Action Plans](#).
- 2.45 UKVI will also reduce the sponsor's next CAS allocation when compared to their previous year's CAS usage. There is no upper limit of the percentage UKVI may reduce a CAS allocation by, but the minimum reduction will be no less than 10% of their previous usage. The amount UKVI will reduce a CAS allocation by will be determined on a case-by-case basis taking into consideration the compliance history of the sponsor and the nature and severity of their failure to meet the core requirement threshold(s).
- 2.46 UKVI will also notify the sponsor that they have been issued with a 'Final Warning' in their BCA Outcome Notice. This 'Final Warning' will remain active for the next 5 Basic Compliance Assessments, in which they must not be rated red again.
- 2.47 UKVI may also apply restrictions onto privileges associated with their status as a sponsor with a 'Track Record of Compliance'. Track record privileges that are restricted because of a red rating must be relevant to the cause(s) of the red rating.
- 2.48 The following are example scenarios demonstrating how certain privileges may be restricted. This is not an exhaustive list of privileges that may be considered for restriction:
- The ability for the sponsor to self-assess the English language ability of their Students may be restricted while the sponsor is red rated and there is evidence that Students with insufficient English language ability were being recruited by the sponsor.
  - The ability to provide remote delivery for courses in-line with published guidance may be restricted while red rated where course completion is low on courses that contain significant portions of remote delivery.
- 2.49 Where an English language self-assessment restriction is implemented, the sponsor will no longer be able to assign CAS to a student which relied upon a sponsor's self-assessment of the student's English language ability from the implementation date of such a restriction.
- 2.50 Where a remote delivery restriction is implemented, the sponsor will not be permitted to provide remote delivery courses in the 21-40% band in their next CAS request to UKVI after the implementation of such a restriction.

### **Red Rating – Serious breaches of sponsorship duties in a Basic Compliance Assessment**

- 2.51 Where a sponsor fails to meet the core requirement of multiple metrics simultaneously within a single Basic Compliance Assessment, UKVI will consider this to constitute a serious breach of sponsorship duties unless paragraph 2.60 applies.
- 2.52 Where a sponsor receives a second red rating as the outcome of their Basic Compliance Assessment in any of their next 5 Basic Compliance Assessments after previously being issued a Final Warning due to a previous red rating, UKVI will consider this to constitute a serious breach of sponsorship duties unless paragraph 2.60 applies.
- 2.53 If UKVI has evidence that a serious breach of sponsorship duties has taken place as stipulated in paragraph 2.51 and/or 2.52, UKVI will confirm via the BCA Outcome Notice that the sponsor has met the threshold to receive a red rating, but that their result equates to a serious breach of their sponsorship duties. As such, the BCA Outcome Notice will confirm that UKVI intends to revoke their sponsor licence rather than rate them red on the Register of Student Sponsors.
- 2.54 The sponsor may challenge this outcome by submitting representations in the same manner as outlined in the [General Principles](#) section of this guidance.
- 2.55 In the majority of cases, the sponsor will be removed from the Register of Student Sponsors. During this time, the sponsor will not be permitted to issue any CAS, and may be subject to other restrictions on its licence, but must continue to meet its sponsorship duties and the requirements of this guidance. Outstanding undecided visa applications will be handled in line with paragraph [6.2](#) of this guidance.
- 2.56 UKVI may exceptionally consider permitting a limited number of CAS to be assigned for permission to stay applications on a case-by-case basis where such a restriction would result in a Student becoming an overstayer through no fault of their own.
- 2.57 If, after representations have been considered, UKVI concludes that the core requirement(s) identified as not met in the BCA Outcome Notice remain unmet, and there are no exceptional circumstances outside of the sponsor's control that caused the serious breach of sponsorship duties, the sponsor's licence will be revoked.
- 2.58 There is no right of appeal against this decision.
- 2.59 If, after considering representations against the revocation decision, UKVI concludes that the core requirements were in fact met, the sponsor's licence will not be revoked. The sponsor RAG rating will be updated on the Register of

Student Sponsors to reflect the final recalculation in light of the representations that were accepted by UKVI.

- 2.60 If, after considering representations against the revocation decision, UKVI concludes that the core requirements remain unmet but accepts the sponsor's representations as demonstrating that there were exceptional circumstances beyond the sponsor's control that led to its metric failure(s), UKVI will not revoke the sponsor's license as the BCA metric failure(s) will no longer be considered a serious breach of sponsorship duties. UKVI will amend the sponsor's RAG rating outcome in line with any recalculation of the metrics which excludes the students UKVI have accepted to have been affected by exceptional circumstances.
- 2.61 Where a sponsor has failed to meet a core requirement of their Basic Compliance Assessment and therefore receives a red rating, but UKVI have also identified additional serious breach(es) of their sponsorship duties that sit outside of the Basic Compliance Assessment framework, UKVI will confirm via letter that the sponsor has received a red rating in their BCA, but due to the additional suspected serious breach(es) UKVI are initiating the standard [licence revocation](#) process in which the sponsor is normally removed from the Register of Student Sponsors, while allowing them to make representations against the revocation decision.
- 2.62 If, when representations are made, the additional serious breaches did not occur, but the sponsor has still failed to meet the core requirement(s) of the Basic Compliance Assessment, the sponsor must be reinstated on the Register of Student Sponsors, rated red, and the relevant compliance action taken as per this guidance. This is unless the sponsor still fails to meet the core requirement(s) of their Basic Compliance Assessment, and this failure constitutes a serious breach of sponsorship duties as identified in paragraphs 2.51 and 2.52, in which case their licence will instead be confirmed as revoked.
- 2.63 If, when representations are made, the other suspected serious breach(es) have not occurred and the sponsor also no longer fails to meet the core requirements of their Basic Compliance Assessment, the sponsor will be reinstated on the Register of Student Sponsors with their RAG rating amended in line with the recalculation.

### Amber rating

- 2.64 Where a sponsor falls into the amber category in one or more metric in RAG Rating Table they will be rated amber unless they have also fallen into the red category in any other metric in RAG Rating Table or the sponsor is eligible for a Discretionary Assessment and UKVI are satisfied that the sponsor's circumstances are such that an amber rating is not appropriate.

- 2.65 UKVI will not grant more CAS than what was previously used by the sponsor until an amber rated sponsor becomes green rated.
- 2.66 An amber rated sponsor will normally be required to attend formal engagement meetings as required with UKVI to review their Basic Compliance Action results, and discuss any mitigating action required.
- 2.67 Any engagement meeting between the sponsor and UKVI must be attended by the acting Chief Executive of the institution (such as, but not limited to: Executive Head, Vice Chancellor, Principal or Headteacher) alongside the Authorising Officer and Key Contact as named on the sponsor licence, and the head(s) of international student admissions and/or visa compliance where these posts are held by additional members of staff.
- 2.68 UKVI will normally contact the sponsor to arrange engagement meetings within 30 calendar days from the date of the final BCA Outcome Notice. Where there are compelling reasons that the sponsor cannot attend a session on the proposed date, the sponsor must inform UKVI of the reason for their non-attendance before the proposed date has passed.
- 2.69 Failure to engage in the required engagement session(s) will be treated as a serious breach of sponsorship duties under a failure to co-operate with the Home Office which will result in the initiation of the licence revocation process.
- 2.70 UKVI may impose an action plan of less than 12 months in duration where significant recruitment deficiencies are identified, which constitute a breach of sponsorship duties, while the sponsor is amber rated.

### Green rating

- 2.71 A sponsor will be rated green where they fall into the green category set out in RAG Rating Table across all 3 metrics.
- 2.72 A green rating will be treated as an indication of strong performance in regard to the Basic Compliance Assessment. No compliance action will be taken in direct response to a green rating outcome.
- 2.73 A green rating does not preclude the same sponsor from being found to be in breach of their general sponsorship duties and receiving the appropriate form of compliance action as a result, for instance as the result of a compliance visit or audit.

### Discretionary Assessments

- 2.74 If a sponsor is not rated green when assessed in accordance with RAG Rating Table, they may be eligible for a Discretionary Assessment.

- 2.75 Where a sponsor is eligible for a Discretionary Assessment, the outcome of this assessment may, but is not guaranteed to, change the sponsor's RAG rating from the rating they would have otherwise received had they been assessed in accordance with RAG Rating Table. UKVI will provide justification for the RAG rating given to a sponsor as the outcome of their Discretionary Assessment in their BCA Outcome Notice.
- 2.76 A sponsor will be eligible for a Discretionary Assessment in the following circumstances:
- the sponsor falls into a red or amber category of RAG Rating Table for their enrolment rate and fewer than 100 of the sponsor's Students or Child Students were due to start their course during the 12 month period being assessed.
  - the sponsor falls into a red or amber category of RAG Rating Table for their visa refusal rate and has used fewer than 100 CAS in the assessment period.
  - the sponsor falls into a red or amber category of RAG Rating Table for their completion rate and fewer than 100 of the sponsor's Students or Child Students were due to complete their course during the 12 month period being assessed.
  - the sponsor is an Independent School and has fallen into a red or amber category of RAG Rating Table in any metric.
- 2.77 Where a Basic Compliance Assessment application was applied for before 1 June 2026, Discretionary Assessments will be conducted under the legacy guidance and the previous eligibility criteria will apply for such assessments.
- 2.78 Discretionary Assessments will be conducted on a case-by-case basis, taking into account the individual sponsor's circumstances. UKVI will consider any relevant factors, including (but not limited to):
- reasons why applications for entry clearance or permission to stay were refused, students did not enrol or students did not complete their course;
  - whether the sponsor is complying with their general sponsor duties;
  - the sponsor's compliance history; and
  - whether the sponsor poses any threat to immigration control and is still suitable and eligible to hold a Student sponsor licence; and
  - how many times a sponsor has failed to meet the core Basic Compliance Assessment requirements but have subsequently been approved following a Discretionary Assessment.
- 2.79 Where a sponsor that is eligible for a Discretionary Assessment has failed to meet the core requirements of their last 3 consecutive Basic Compliance Assessments, but received a pass outcome by virtue of their Discretionary Assessment, such a sponsor is unlikely to receive another pass outcome as the result of their Discretionary Assessment, unless exceptional circumstances apply.

- 2.80 A sponsor that would receive a red rating in accordance with RAG Rating Table may receive either a red, amber or green rating as the outcome of their Discretionary Assessment, depending on the individual circumstances.
- 2.81 A sponsor that would receive an amber rating in accordance with RAG Rating Table may receive either an amber or green rating as the outcome of their Discretionary Assessment, depending on the individual circumstance. Such a sponsor will not be rated red as the outcome of their Discretionary Assessment.
- 2.82 Where the sponsor has either not used any CAS during the assessment period, or has only issued CAS to students who are yet to enrol, the sponsor will not normally be considered to have passed the Basic Compliance Assessment. However, where there are no reasons to revoke the sponsor's licence, UKVI may allow the sponsor to retain their Student sponsor licence with their current status as a Probationary Sponsor, Student Sponsor or Student Sponsor with a track record of compliance until their next Basic Compliance Assessment, providing there is reason to believe that they will assign CAS during the next assessment period, or require a Student sponsor licence to maintain their status as an accredited institution for the purpose of the [Visitor](#) or [Short-term study \(English language\)](#) Immigration Rules.
- 2.83 Where a Student sponsor is not using any CAS, but require their student sponsor licence to retain accreditation for the purposes of using the Visitor and Short-term Study (English Language) routes, they will only be permitted to retain their licence for a maximum of 3 Basic Compliance Assessments without using any CAS. After this period, UKVI will remove their licence if they continue to use no CAS. Should the institution wish to continue using the Visitor and Short-term Study (English Language) routes, they must obtain accreditation by the alternative methods available.
- 2.84 In limited cases, it may be possible for a sponsor who has not issued any CAS during the previous 12 months to pass their Basic Compliance Assessment. In such cases UKVI will consider any relevant factors from outside their role as a Student sponsor, including (but not limited to):
- any record of compliance as a Tier 2 or 5 sponsor; and
  - any previous record of Student sponsor compliance (previous licence holders - including Tier 4).
- 2.85 Where UKVI have conducted a Discretionary Assessment of the Sponsor's Basic Compliance Assessment, UKVI will confirm that the sponsor had a Discretionary Assessment in their BCA Outcome Notice. The notice will confirm which RAG rating was given as a result of the Discretionary Assessment and the justification for that rating along with any associated compliance action which applies to that rating.
- 2.86 Where UKVI have assessed a Sponsor's Basic Compliance Assessment in which there was no data to consider for the refusal or enrolment rate, UKVI

will confirm in their BCA Outcome Notice whether they are being permitted to maintain their current status, or whether the sponsor has forfeited their licence through inactivity as a student sponsor.

## Transitional Arrangements

- 2.87 For sponsors' first Basic Compliance Assessment under the new framework, individual sponsor RAG ratings will not be published to the Register of Student Sponsors until each sponsor has received their first RAG rating, at which point all sponsors will have their results uploaded simultaneously.
- 2.88 The new course completion rate of 90% will come into effect for Basic Compliance Assessments made on or after 1 June 2027. As such, course completion rate will not form part of the sponsor's first RAG rating under this guidance. During the period from 1 June 2026 to 31 May 2027, sponsors must meet the course completion rate of at least 85% and failure to meet this threshold will result in the appropriate compliance action.
- 2.89 In the first Basic Compliance Assessment that a sponsor applies for on or after 1 June 2026, UKVI will consider whether to exercise operational discretion for the purposes of the sponsor's RAG rating outcome, in the event that the sponsor falls to be red or amber rated on the basis of their metric performance when assessed in accordance with RAG Rating Table. The same consideration of whether to exercise operational discretion will apply to the Course Completion Rate metric in the first Basic Compliance Assessment a sponsor applies for on or after 1 June 2027.
- 2.90 While UKVI will consider whether to exercise operational discretion within the designated transitional periods, it will not necessarily do so. As such, a sponsor is not precluded from receiving the same red or amber rating they would have otherwise received if assessed in accordance with RAG Rating Table.
- 2.91 The following is a non-exhaustive list of factors that UKVI will take into account when making the decision of whether to exercise operational discretion in the transitional period:
- Previous general immigration compliance history, including outcomes from compliance visits and/or audits, the imposition of any action plans and the sponsor's adherence to them.
  - The direction BCA results are trending in compared to the sponsor's recent previous assessment results.
  - Previous performance in their Basic Compliance Assessments, including:
    - Whether the sponsor has passed previous BCAs by virtue of a Discretionary Assessment and how many times they have passed their Basic Compliance Assessment by these means.

- Whether the sponsor has previously failed any Basic Compliance Assessment(s).
- Improvements to recruitment practices that have recently been adopted but have yet to impact the data assessed in the Basic Compliance Assessment. However, new practices being implemented will not by themselves automatically lead to discretion being exercised. UKVI will consider when these practices were introduced, and what this demonstrates regarding the institution's wider recruitment approach.
- Whether the metric(s) failed under the new thresholds relied on data from students recruited (meaning assigned a CAS) before the new metrics were announced (on 12 May 2025) and that these students' data was the predominant cause of the sponsor failing to meet one or more of their core requirements.

### 3. Non-compliance

This section gives information on:

- Guiding principles
- Compliance action
- Breach of sponsorship duties
- Serious breach of sponsorship duties

#### Guiding principles

- 3.1 The ability to sponsor students to study in the UK is a privilege that must be earned. When a sponsor is granted a Student sponsor licence, significant trust is placed in them. With that trust comes a responsibility placed on sponsors to act in accordance with the Immigration Rules and the sponsor guidance. UKVI has a duty to ensure that all sponsors discharge these responsibilities, and that a sponsor's actions (or omissions) do not create a risk to immigration control.
- 3.2 UKVI will monitor sponsors' compliance and take action against those who:
- pose a threat to immigration control; or
  - breach their sponsorship duties, or otherwise fail to comply with the Immigration Rules or sponsor guidance.
- 3.3 Where there has been a breach of sponsorship duties, UKVI will assess the issue and decide on the most appropriate course of action to take.

#### Compliance action

- 3.4 UKVI will always take action when it considers that a sponsor poses, or may pose, a risk to immigration control. Compliance action may be taken on the basis of a reasonable suspicion that such a situation has arisen.
- 3.5 Where UKVI reasonably believes that a sponsor has breached its sponsorship duties, UKVI will consider the nature of the suspected breach.
- 3.6 Where the breach is an isolated issue, the sponsor is willing and able to correct it, and the sponsor poses no continuing threat to immigration control, UKVI will in most cases support the sponsor in making the relevant improvements by issuing an action plan, which sets out the steps that the sponsor must take in order to retain its Student sponsor licence.
- 3.7 However, where there is a serious breach indicating a significant or systematic failing, the sponsor no longer meets the eligibility or suitability requirements for holding a Student sponsor licence, or UKVI considers that the sponsor constitutes a serious threat to immigration control, UKVI may decide to revoke the sponsor's licence. This may also occur where there has been sustained non-compliance over a period of time, or where there have been a number of breaches which are isolated in themselves but taken together indicate a serious or systematic failing.
- 3.8 If UKVI has grounds to believe that such a situation has arisen, it may act immediately to remove a sponsor from the Register of Student Sponsors, stop the sponsor from assigning CAS and prevent the use of any assigned but unused CAS while it investigates the matter further.
- 3.9 UKVI will take into account any representations that a sponsor makes. However, as set out above, UKVI places great weight on the importance of trust in the operation of the Student sponsorship system, and the need to ensure that sponsors take their duties seriously.
- 3.10 Accordingly, if UKVI believes:
- a serious breach has occurred; and/or
  - that there has been sustained non-compliance over a period of time; and/or
  - that a number of isolated breaches have occurred which taken together indicate a serious failing;

it is unlikely to consider that the provider will retain its Student sponsor licence.

- 3.11 As set out below, this is the case even if action is proposed, or has been taken, in order to remedy the situation, which means that the sponsor no longer poses, or will no longer pose, a risk to immigration control. This is because where a sponsor has breached its duties in the past, the sponsor may not be trusted to comply with its duties in the future.

## Breach of sponsorship duties

3.12 The following is a non-exhaustive list of breaches of sponsorship duties which, when they occur in isolation and/or relate to a small number of students, and the sponsor is capable of correcting them, are unlikely to be regarded as serious. However, where a sponsor has committed a number of such breaches, they may be considered cumulatively to constitute a serious breach.

### Compliance concerns

- Failure to meet an individual core requirement of a Basic Compliance Assessment.
- Failure to keep records about the institution.
- Failure to keep records about Students and/or Child Students.
- Failure to report a change in the sponsor's circumstances to UKVI and/or the relevant Educational Oversight body.
- Failure to report that a required rating in a Statutory education inspection and/or Educational Oversight has not been achieved/maintained following an inspection by an Educational Oversight body.
- Failure to report a change in students' circumstances.
- Failure to withdraw sponsorship from non-compliant students.
- Failure to take steps to ensure that students have valid leave.
- Instances of the Sponsor Management System being misused.
- Failure of students to comply with their conditions of leave.
- Failure to register students with the appropriate awarding bodies.
- Failure to report that you want to, or are required to, surrender the whole or part of your licence.
- Failure to provide a list of all courses currently offered by the sponsor designated as research programmes and/or to ensure this list is reviewed and updated (where required) on a yearly basis.

### Eligibility concerns

- Institution's premises becomes unfit for use for teaching purposes.

### Suitability concerns

- Member of an institution's key personnel becomes bankrupt or prohibited from acting as a company director.
- Member of an institution's key personnel is linked to a sponsor whose licence is revoked.

## Serious breach of sponsorship duties

- 3.13 Any breach by a Probationary Sponsor will be regarded as a serious breach because the sponsor has not completed its probationary period.
- 3.14 Any breach of the sponsor guidance which suggests a serious or systematic failing, a sponsor is no longer eligible or suitable to hold a Student sponsor licence, or that a sponsor poses a risk to immigration control is likely to be regarded as a serious breach, including where this arises from the culmination of a number of isolated breaches.
- 3.15 The following is a non-exhaustive list of failings which are likely to be considered a serious breach:

### Compliance failings

- Failing to apply for a Basic Compliance Assessment.
- Failure to meet the minimum requirements of more than one metric simultaneously in a Basic Compliance Assessment.
- Failure to meet the minimum requirements in a Basic Compliance Assessment while subject to a live final warning due to previously failing to meet the minimum requirements of a Basic Compliance Assessment.
- Deliberately providing false information.
- Failing to disclose information.
- Acting dishonestly.
- Failure to co-operate with the Home Office, such as not allowing its staff immediate access to any of your sites on request (whether or not visits are prearranged), or failure to attend mandatory engagement sessions that were required as the result of a Basic Compliance Assessment outcome.
- Failure to report a significant change in your institution's circumstances, such as a change of ownership.
- Assigning CAS to students without properly assessing their English language ability in accordance with this guidance, or their academic suitability.
- Assigning CAS to a student for a course containing remote delivery outside the parameters permitted by this guidance, including where:
  - o a course comprises 21%-40% remote delivery without having obtained prior approval from UKVI, or
  - o 20% or less of the course is remote delivery but the sponsor does not hold track record status and the use of remote delivery is not due to engaging the Equality Act 2010
  - o the amount of remote delivery is more than 40% of the course.

- Failure to assess a student's academic progression properly, or falsely claiming that students meet the exception to the requirement to be moving up an academic level.
- Applying for, or assigning, Child Student CAS inappropriately.
- Providing courses to Students or Child Students that do not meet the requirements set out in this guidance. For example, courses which do not lead to an approved qualification or meet the requirements relating to work placements, minimum RQF levels, teaching locations, or provision of remote delivery.
- Failure to monitor student attendance or academic engagement, as applicable, effectively.
- Failure to comply with any of the child safeguarding duties.
- Failure to comply, as an employer, with illegal working requirements.
- Sponsoring a Student or Child Student who claims benefits with your knowledge.
- Failure to pay an action plan fee, demonstrate willingness/ability to comply with an action plan, or satisfactorily fulfil an action plan within the specified timescales.
- Giving UKVI cause to believe that you do not or cannot comply with a sponsorship duty, when failure to comply suggests a serious or systematic failing or indicates a threat to immigration control.
- Operating in a manner that poses a risk to immigration control, such as failing to take steps to ensure students who are subject to immigration control have leave to remain in the UK. For the avoidance of doubt, a sponsor may be considered a risk to immigration control even where the core requirements of a Basic Compliance Assessment or the requirements of an audit have been met.

### **Eligibility failings**

- Failure of a fire risk assessment conducted by a competent person, and being unable to operate at the relevant address.
- Losing appropriate planning permission or planning authority consent to operate at the relevant address.

### **Suitability failings**

- A member of an institution's key personnel is convicted of a relevant offence, and they have not been removed from their position.
- Failure to pay VAT when required to do so.

## 4. UKVI investigation and sanctions process

This section gives information on:

- BCA Compliance
- Compliance Track 1
- Compliance Track 2
- Action plans

- 4.1 The process that UKVI will follow when it suspects that a sponsor has breached its sponsorship duties, or can no longer be trusted to play its part in protecting immigration controls, will depend on the seriousness of the suspected breach.
- 4.2 This section sets out the processes that UKVI will follow when investigating a breach of sponsorship duties and determining the course of action to take. However, it may be necessary to vary this procedure, including the timescales involved, in exceptional circumstances. UKVI may move from Compliance Track 1 to Compliance Track 2 at any time.
- 4.3 Where a Student Sponsor is suspected of a breach, or a serious breach, of sponsorship duties in relation to their failure to meet the core requirements of a BCA they will be investigated and sanctioned outside of the two standard compliance tracks. More information on compliance action to be taken in circumstances related to breaches of sponsorship duties in the Basic Compliance Assessment can be found in the section titled '[red ratings](#)'.

### Compliance Track 1

- 4.4 Where a Student Sponsor is suspected of an isolated breach of the sponsor guidance, and it faces compliance action, UKVI will normally follow Track 1.
- 4.5 UKVI will carry out an investigation, which may include an announced or unannounced visit to the sponsor's site(s) and/or teaching partners' site(s). The sponsor may or may not be notified that there is an investigation. During the investigation, the sponsor will remain an active sponsor and be able to continue to assign CAS.
- 4.6 If no evidence of a breach is found, no further action will be taken, though the sponsor will be monitored by UKVI in the usual manner.
- 4.7 If UKVI finds evidence of a breach of sponsorship duties that falls short of a serious breach, it will write to the sponsor to inform it that the investigation has taken place and set out its findings. The sponsor will then have the opportunity to respond to the findings in writing within 20 working days. UKVI will consider any reasonable request from the sponsor to extend this period, but extensions will only be given in exceptional circumstances.

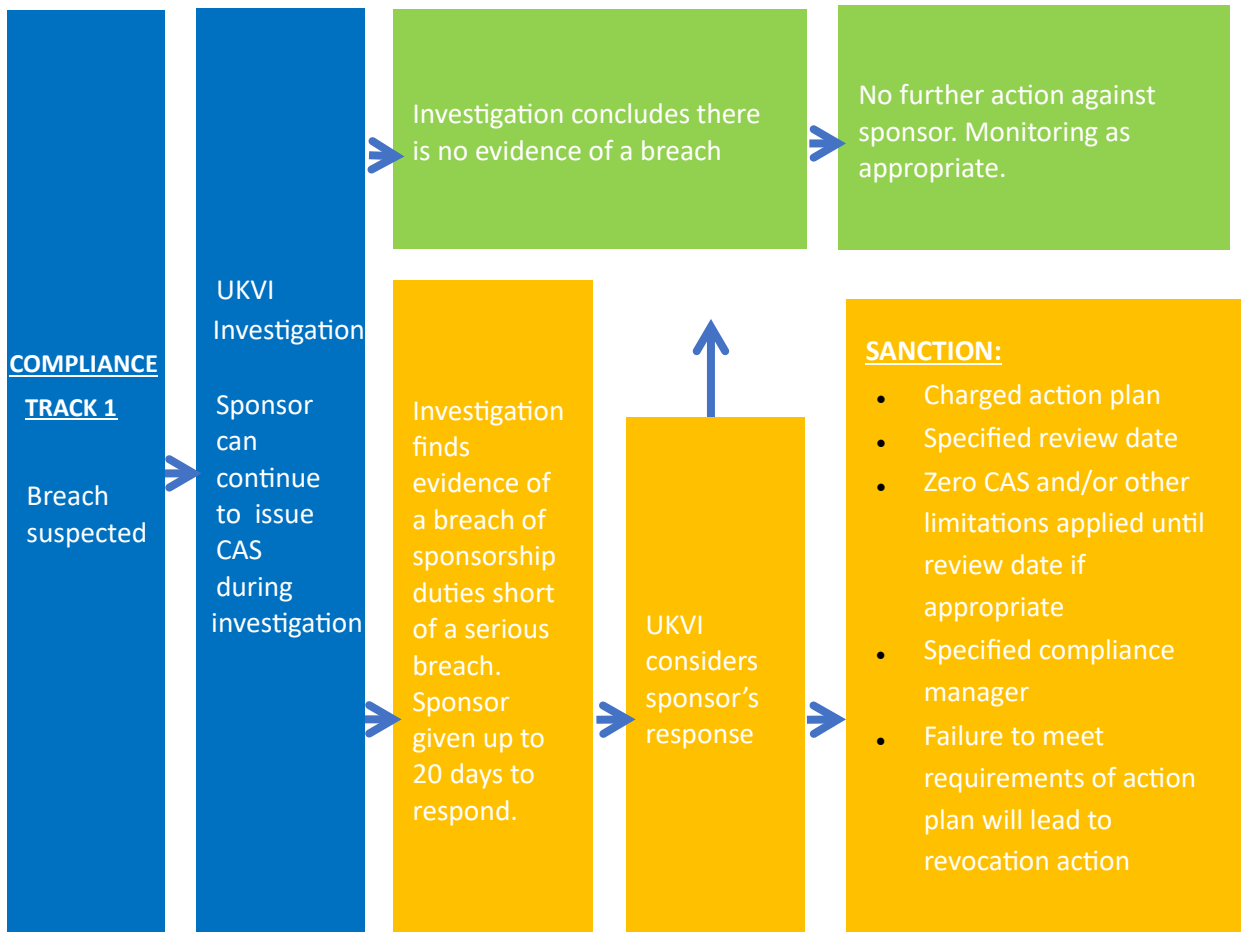
- 4.8 If the sponsor demonstrates, by way of evidence, that the findings are incorrect and that no breach has taken place, no further action will be taken, though the sponsor will continue to be monitored in the usual manner.
- 4.9 If no representations are received, or if, following any representations, UKVI still considers that a breach has taken place, it will require the sponsor to follow an action plan. The action plan will set out actions that the sponsor must take to correct the non-compliance by a specified date. For further information, see the section titled '[Action plans](#)' below.

## Compliance Track 2

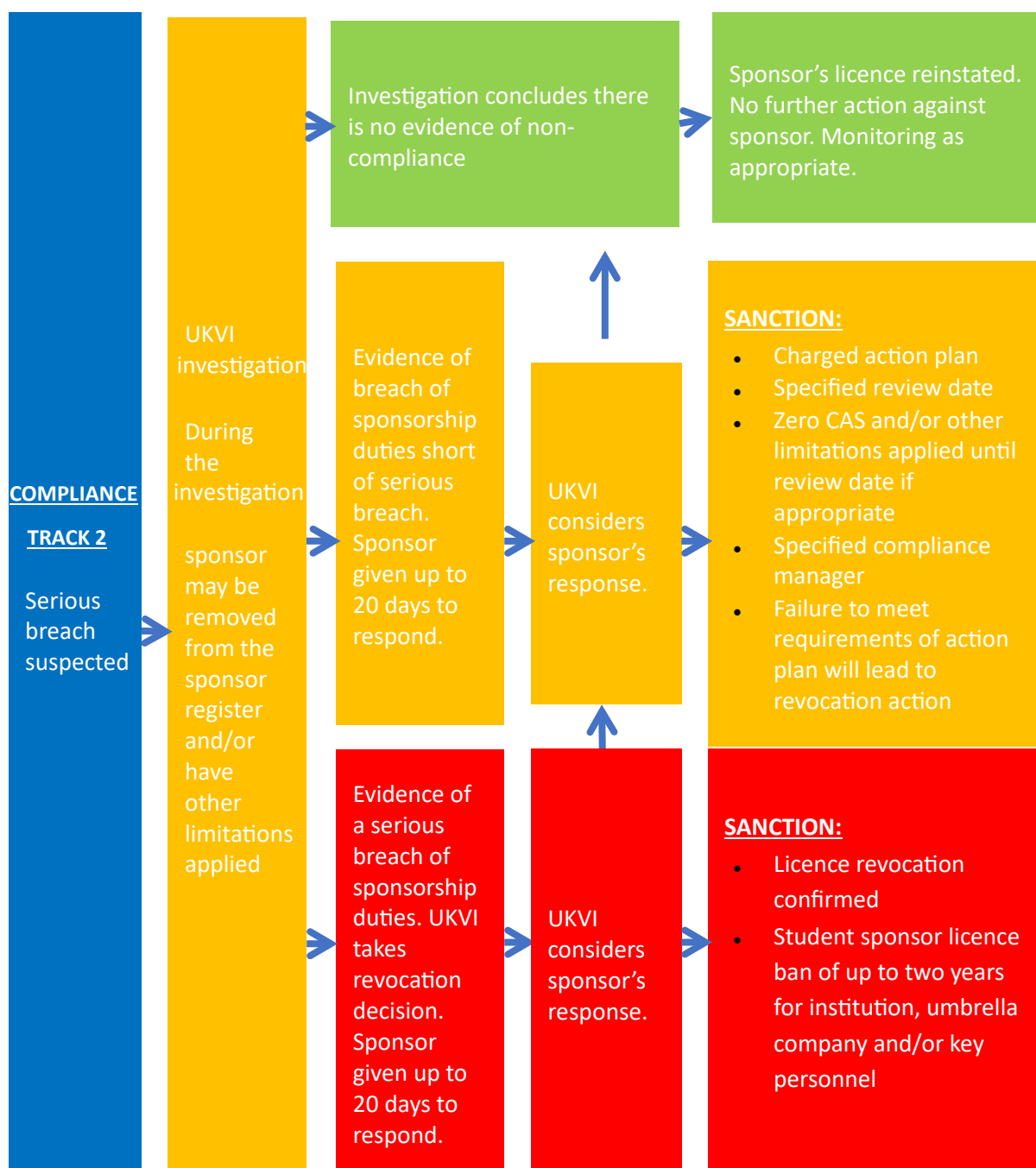
- 4.10 If UKVI suspects a serious breach of sponsorship duties, including when such a suspicion arises in the course of an investigation that began under Track 1, it will follow Track 2. A serious breach may arise either where there has been a single serious breach of sponsorship duties, or where the sponsor has committed a number of breaches which cumulatively reveal serious or systematic failings, or which taken together are deemed to be equivalent to a serious breach.
- 4.11 In the majority of cases, the sponsor will be removed from the Register of Student Sponsors whilst UKVI investigates. During this time, the sponsor will not be permitted to issue any CAS, and may be subject to other restrictions on its licence, but must continue to meet its sponsorship duties and the requirements of this guidance. UKVI will write to the sponsor to explain the course of action that is being pursued.
- 4.12 At the end of the investigation, if:
- **no evidence is found against the sponsor**, the sponsor's licence will be maintained (and where the sponsor was removed from the sponsor register while under investigation, reinstated to the register). No further action will be taken, though the sponsor will be monitored in the usual manner.
  - **a breach that falls short of a serious breach has taken place**, the sponsor's licence will be maintained (and where the sponsor was removed from the sponsor register while under investigation, reinstated to the register). However, UKVI will require the sponsor to follow an action plan.
  - **a serious breach has taken place**, UKVI will begin revocation action, and write to the sponsor setting out the reasons for its decision. The sponsor will be given 20 working days to make representations against the revocation decision.

## Compliance Track 1 and Track 2 process

### Track 1



## Track 2



## Action plans

- 4.13 An action plan gives a sponsor who has committed a breach, short of a serious breach, an opportunity to improve its processes in order to avoid any further breaches, and to ensure that it does not become necessary for UKVI to revoke its licence.
- 4.14 For the avoidance of doubt, an amber RAG rating is not by itself considered a breach, nor a serious breach, of sponsorship duties. However, it may indicate that a sponsor has deficiencies in their recruitment practices that constitute a

breach of their sponsorship duties, specifically the duty for the sponsor to do all they can to ensure that their prospective students are genuine students who can comply with the Immigration Rules, that they enrol, comply with their conditions of leave, and see their course through to completion. Where recruitment deficiencies, constituting a breach of sponsorship duties, are identified (including where the sponsor is amber rated) an action plan will be issued giving the sponsor an opportunity to address this breach of their duties and bolster responsible recruitment practices.

- 4.15 An action plan sets out specific actions that a sponsor must take by a given review date. Depending on the circumstances, UKVI may or may not discuss the content of the action plan, or the given review date, with the sponsor before it is finalised.
- 4.16 A sponsor must pay a fee to receive an action plan. If it does not pay the fee, or fails to take the required action on the SMS, its licence will be revoked. Fee levels can be found on GOV.UK here: <https://www.gov.uk/government/publications/visa-regulations-revised-table>
- 4.17 Until the action plan is lifted, UKVI may apply any limitations to a sponsor's licence it considers appropriate. For example, limiting the number of CAS the sponsor can issue (including to zero). The sponsor's status on the Register of Student Sponsors will be listed as 'subject to an action plan'. UKVI expects a sponsor to keep its students informed of how the action plan may affect them. UKVI will carry out a review of the sponsor's compliance on or before the review date.
- 4.18 If the required actions have been taken and no other issues with the sponsor's compliance are identified, UKVI will lift the action plan and decide on the sponsor's CAS allocation. This may be lower than the allocation held before the action plan was imposed. If some concerns remain, UKVI may decide to extend or vary the action plan as well as any licence restrictions, depending on the nature of the remaining concerns.
- 4.19 If a sponsor has failed to take the actions required, or is otherwise non-compliant, or other breaches are identified in the course of the review process, UKVI will move to Track 2.

## 5. Sanctions

This section gives information on:

- Licence revocation
- Other sanctions

### Licence revocation

- 5.1 If UKVI decides to revoke a licence, the sponsor will be given the opportunity to respond to the findings in writing within 20 working days. UKVI will consider any reasonable request from the sponsor to extend this period, but extensions will only be given in exceptional circumstances.
- 5.2 UKVI will consider any representations the sponsor makes but, unless these demonstrate that no serious breach has occurred, the sponsor's licence is highly unlikely to be reinstated. After 20 working days, or a longer period if this is needed in order for UKVI to consider representations made by the sponsor, the revocation will be confirmed. There is no right of appeal against this decision.
- 5.3 For the avoidance of doubt, representations with proposals to change processes in order to improve compliance in the future will be considered. However, because of the importance placed on the ability to trust sponsors, and the imperative to operate a sponsorship system which encourages all sponsors to take their responsibilities seriously, such representations are unlikely to affect the decision except in exceptional circumstances.
- 5.4 Where a sponsor's licence is revoked, the institution will be banned from the Register of Student Sponsors. If it is owned by a parent company or companies, that company or those companies will also be banned from the Register of Student Sponsors. The presumption is that this ban will last for two years, unless there are exceptional circumstances. UKVI will inform the sponsor if a shorter ban is applied.
- 5.5 The commencement date for the ban will be the date UKVI notified the sponsor in writing of the intention to revoke their licence and removed them from the Register of Student Sponsors.
- 5.6 A ban of up to two years may also apply to a sponsor's key personnel and, depending on the seriousness of the non-compliance, others depending on their role in the matter.
- 5.7 In considering the length of a ban, UKVI will consider, among other matters, the nature and gravity of the breach(es) identified and the sponsor's history.
- 5.8 Where a sponsor's Student sponsor licence is revoked, and the licence is a joint licence covering other categories, the revocation will also apply in relation to those categories.
- 5.9 If a sponsor chooses to surrender its licence at any point during a compliance investigation or compliance action, it will be treated as a revocation.

## Other sanctions

- 5.10 If a person with ownership or control of a Student sponsor is charged with a relevant offence, the sponsor will be removed from the Register of Student Sponsors pending the outcome of criminal proceedings. UKVI may not

respond to any representations made by the sponsor until the outcome of such proceedings. Please see 'Sponsor is removed from the Register of Student Sponsors pending an investigation' below for information on how this will affect current students.

- 5.11 Sponsors who employ workers illegally will be treated in exactly the same way as any other employer. Sponsors can protect themselves against possible action by following our guide for employers on Right to Work checks. This guide, and further information on the penalties for employing illegal workers, is available on the GOV.UK website using the following link:  
[www.gov.uk/penalties-for-employing-illegal-workers](http://www.gov.uk/penalties-for-employing-illegal-workers).

## 6. How some sanctions affect a sponsor's Students and Child Students

This section gives information on:

- Sponsor is removed from the Register of Student Sponsors pending investigation
- Sponsor's licence is revoked

### Sponsor is removed from the Register of Student Sponsors pending investigation

- 6.1 If a sponsor is removed from the Register of Student Sponsors whilst it is under investigation, the sponsor's current students will not be affected while they continue to have valid permission.
- 6.2 If a student has applied for entry clearance, their application will be held and will not be granted until the investigation has been concluded. Further checks may be made on the student's application while it is pending, and UKVI may ask the student to submit further documentation or attend an interview. Their application may still be refused where it otherwise falls for refusal under Appendix Student. If a student applies for an extension of stay with a valid CAS that the sponsor assigned before it was removed from the Register of Student Sponsors, UKVI will consider on a case-by-case basis whether to proceed with granting their application before a final decision is taken on the sponsor's licence. In some circumstances, the application will be held pending the decision in relation to the sponsor's licence. Further checks may be made on the student's application while it is pending, and UKVI may ask the student to submit further documentation or attend an interview. Their application may be refused where it otherwise falls to be refused under Appendix Student.
- 6.3 If a student has been already granted entry clearance on the Student or Child Student routes, but is outside the UK and seeks to travel, they do so at their own risk (outlined in paragraphs 6.5, 6.8 and 6.10), should the licence be subsequently revoked.

### Sponsor's licence is revoked

- 6.4 The following action will be taken where the period given for representations against a revocation decision has ended, and the revocation is confirmed.

#### Students with extant leave and no outstanding application

- 6.5 If UKVI believes a student has not been a bona fide student at the institution, or that they have participated in the practices that contributed to the licence being revoked, it may immediately cancel the student's permission. The student will have to leave the UK or face enforced removal.

6.6 In all other cases, UKVI will consider whether to allow some or all of the sponsor's students to continue to be taught by the sponsor for a limited period. It will take into account the following factors, and any other matter it considers relevant:

- The sponsor's previous history and compliance record.
- Whether the reason for revoking the sponsor's licence relates to concerns about its ability to manage its Students or Child Students, or acting dishonestly.
- Whether there are any concerns about the sponsor's educational quality standards (for example, following an assessment by an Educational Oversight body).
- The number of students being taught by the sponsor.
- How soon the students' module or course of study will finish.
- Whether the sponsor will remain solvent after its Student sponsor licence is revoked.
- Whether the revocation will have an impact on the sponsor's teaching quality.

6.7 The maximum period a sponsor can continue to teach students after their licence is revoked is six months or the end of the student's current academic year, whichever is the longest. Where a common academic year end does not apply to all students, each case will be considered on an individual student basis.

6.8 Where UKVI does not consider that any of the sponsor's Students and/or Child Students should be permitted to continue studying, UKVI will write to each student, curtailing their leave to 60 calendar days from the date of the letter. Students may find a new sponsor and apply for further permission to stay during this period. If their permission expires they will have to leave the UK or face enforced removal.

### **Students with an outstanding application**

6.9 If a student has made an application for permission to remain prior to the expiry of their last grant of leave (or within 14 days of such date and has provided evidence of a good reason beyond the control of the applicant, or their representative, preventing the application from being made in time) and before the sponsor's licence was revoked, and their application is still under consideration, their CAS will become invalid and UKVI will take one of the following actions:

- If the only ground for refusing the application is that the student's CAS has become invalid following the revocation of the licence, the refusal of their application will be delayed to give them 60 days to regularise their stay or to leave the UK. UKVI will write to the student informing them of the date by which they should provide a new CAS if they intend

to do so. If they fail to provide a new CAS within the specified period, their application will be refused.

- If there are other grounds for refusing the application (including where a student has not been a bona fide student at their institution or they have participated in the practices that may have contributed to your licence being revoked), UKVI will refuse it. If the applicant has extant permission, the case will also be referred to the curtailment team to consider curtailing the leave.

### **Students with a valid visa who have not yet travelled to the UK**

- 6.10 If a student has already been issued a visa and they have not yet travelled to the UK, the visa will be cancelled. If they then travel to the UK, they will be refused entry.