Home Office

Student Sponsor Guidance

Document 1: Applying for a Student sponsor licence

Version 10/2026 This guidance is to be used from 8 October 2026

This guidance covers:

- Introduction to Sponsorship under the Student and Child Student routes
- Applying for a Student sponsor licence
- Student sponsor licence application assessments
- Gaining student sponsor status

Please also see the other Student Sponsor Guidance documents: Document 2 – 'Sponsorship Duties', Document 3 – 'Student Sponsor Compliance' and Document 4 – 'Higher Education regulatory reform'.

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Glossary

Phrase	Meaning
Academy	An institution defined by, and established under, the Academies Act 2010, as amended. This includes academy schools, 16-19 academies and alternative provision academies.
Alternative provider	Any provider of higher education courses which: • does not directly receive annual funding from the Office for Students or its equivalent bodies in the devolved administrations, and • does not receive direct annual public funding, and • is not a further education college.
Annual Provider Review (APR)	The method which DfE in Northern Ireland use to assess the quality of education providers which they fund.
Care arrangements	Suitable arrangements for any children for their travel to the UK, reception at port and living arrangements while in the UK.
CAS	A Confirmation of Acceptance for Studies – a virtual document issued by a sponsor to a student to allow them to apply for a student visa under the Student or Child Student routes.
CEFR	Common European Framework of Reference for Languages.
Child Student	Has the same meaning as defined in paragraph 6 of the Immigration Rules.
Course start date	The date of enrolment in person, or induction on the course, whichever is the earlier.

Course end date	The date by which the prospective student is expected to have completed all academic elements of the course – taught sessions, examinations including meetings with examination boards, assessments, including oral assessments and other formal assessments, and writing and submitting dissertations or theses. In the case of PhD students, academic elements include writing and correcting theses and oral (viva) examinations, provided the sponsor is satisfied that they can continue to carry out their sponsor duties for the student.
Degree level	A course is considered to be at degree level if it is at: • Level 6 of the Regulated Qualifications Framework • Level 9 of the Scottish Credit and Qualifications Framework.
EEA student	A student who is a national of a European Economic Area (EEA) State. For the purposes of this guidance, EEA State means any member of the European Union (other than the UK) and Iceland, Norway, Liechtenstein or Switzerland.
Educational Oversight inspection	A full assessment by an Educational Oversight body. The Educational Oversight body may call this an inspection, assessment, audit or review.
English language course	A course where a student is studying English as a foreign language.
Face-to-face delivery	Timetabled learning that takes place in-person and on the premises of the student sponsor or a partner institution.
Foundation course	A course which prepares a student for undergraduate study and entry to a Higher Education Institution. It includes undergraduate foundation programmes, university foundation courses, international foundation year courses, and international year one courses (and equivalents). It does not include pre-A-levels foundation courses, A-levels, or the International Baccalaureate (or equivalents).

Foundation degree	A programme of study which leads to a qualification awarded by an English higher education institution with degree awarding powers which is at a minimum of level 5 on the revised National Qualifications Framework, or awarded on a directly equivalent basis in the devolved administrations. In Scotland, a Higher National Diploma at level 8 on the Scottish Credit and Qualifications Framework, awarded by the Scottish Qualifications Authority is equivalent to a foundation degree.
Higher Education Institution (HEI)	A recognised body (a higher learning institution that can award degrees), or a body that receives public funding as a higher education institution from the Department for the Economy in Northern Ireland (DfE), the Office for Students (OfS), the Commission for Tertiary Education and Research (Medr) www.medr.cymru/en/ or the Scottish Funding Council (https://www.sfc.ac.uk/). We also accept Richmond, the American International University in London, as an HEI because it is recognised in statute in the Education (Recognised Awards) (Richmond The American International University in London) Order 2006. A list of recognised bodies is available on the GOV.UK website, using the following link: https://www.gov.uk/recognised-ukdegrees#recognised-bodies
Higher education provider (HEP)	Has the same meaning as defined in paragraph 6 of the Immigration Rules. We are aware that some HEPs in the Devolved Administrations are not captured in the rules definition and will ensure that any such HEPs are not disadvantaged and will qualify for full privileges as Student sponsors.

Independent school	For schools in England and Wales, this means any school at which full time education is provided for five or more pupils of compulsory school age (whether or not such education is also provided at it for pupils under or over that age) and which is not a) a school maintained by a local education authority, or b) a special school not so maintained. For schools in Scotland, a school at which full-time education is provided for pupils of school age (whether or not such education is also provided for pupils under or over that age), not being a public school or a grant-aided school. For schools in Northern Ireland, this means a school that has been registered with the Department of Education. A school is not an independent school if it is an academy.
Integrated programme	A study programme comprising study at more than one RQF level, such as a four-year programme comprising a foundation year and degree course. A programme is only considered an integrated programme where progression from one stage to another is guaranteed (subject to meeting academic requirements) and only one qualification is awarded.
International student	For the purposes of this guidance, an international student is a migrant who wishes to apply for or has been granted permission under the Student or Child Student routes (including Students granted under Tier 4). The requirements for a grant of permission under the Student and Child Student routes are outlined in Appendix Student and Appendix Child Student of the immigration rules.
Joint venture	An entity formed by a joint venture agreement between two or more parties.

Office holder	If an individual holds an office under one of the following types of appointment, it is likely that they are an 'office holder': a. a statutory appointment (e.g. registered company directors or secretaries, board members of statutory bodies, judges or tribunal members, or crown appointments, for example, the police); b. an appointment under the internal constitution of an organisation (e.g. club treasurers or trade union secretaries); c. an appointment under a trust deed (e.g. trustees); or d. an ecclesiastical appointment (e.g. members of the clergy). An office holder is not an employee or a worker. But holding an office does not prevent someone from becoming a worker or an employee or vice versa. They can be an office holder and an employee if their working arrangements are a contractual relationship and satisfy the test for employee status. You can find more information on our pages on the GOV.UK website using the following link: https://www.gov.uk/employment-status
Overseas Higher Education Institution (HEI)	An institution which holds overseas accreditation confirmed by the Qualification and Language Service (QLS) as offering degree programmes which are equivalent to UK degree level qualifications, and which teaches no more than half of a degree programme in the UK as a study abroad programme.
Ownership and control	Private providers are linked by common ownership or control if: a. one entity controls the composition of the other entity's board; b. one entity is in a position to cast, or control the casting of, more than half the maximum number of votes that might be cast at a general meeting of the other entity; c. one entity holds more than half the issued share capital of the other entity (excluding any part of that issued share capital that carries no right to participate in a distribution of either profits or capital beyond a specified amount); d. both entities have a common parent entity or individual that, itself or himself, or through other entities, meets one of the requirements in a, b or c (as set out above) in relation to both entities; or e. the entities have shared management and/ or compliance systems.

Parent or legal guardian	The child's parent(s) or legal guardian, or just one parent who has the sole legal responsibility for the child.
Partnership	A collaborative arrangement between a Student sponsor and another organisation. Teaching partnerships allow students of Student sponsor licence holders to undertake study of a specified type at a partner's site.
Pathway course	A course which prepares a student for progression to another course at a specific Higher Education Institution. It does not include a pre-sessional course.
Permission, permission to enter and permission to stay	Have the same meaning as defined in paragraph 6 of the Immigration Rules.
Publicly funded college	Colleges that are listed by the Association of Colleges on their website on the basis that they are Further Education Colleges, Further Education Corporations (FECs) or Sixth Form Colleges. In: • England, these were those formed under sections 18 and 19 of the Further and Higher Education Act 1992 and are therefore exempt charities, or they are Special Designated Colleges which are registered charities in their own right. New colleges may only be formed with the permission of the Secretary of State. • Scotland, these were formed under the Further and Higher Education (Scotland) Act 1992 and are exempt charities and listed in Schedule 2 of that Act (2005). • Wales, these were formed under the Further and Higher Education Act 1992 and are exempt charities. • Northern Ireland, the colleges were incorporated under the Further Education (NI) order 1998 and are exempt charities.
Pre-sessional course	A course that prepares a student for, and directly precedes, their intended full-time course of study in the UK and enables them to acquire the ancillary skills or knowledge necessary to adjust to study in the UK. This will usually be supplementary English Language training or some instruction in the British education system. Courses such as foundation degrees which are designed to give a student fundamental training in the subject area of the main course, and courses which form an integral part of the main course of study or replace part of it, are not considered pre-sessional courses.

Private provider	A private education institution which: (a) maintains satisfactory records of enrolment and attendance of students, and supplies these to the Home Office when requested; and (b) provides courses which involve a minimum of 15 hours' organised daytime study per week; and (c) ensures a suitably qualified tutor is present during the hours of study to offer teaching and instruction to the students; and (d) offers courses leading to qualifications recognised by the appropriate accreditation bodies; and (e) employs suitably qualified staff to provide teaching, guidance and support to the students; and (f) provides adequate accommodation, facilities, staffing levels and equipment to support the numbers of students enrolled at the institution; and (g) if it offers tuition support to external students at degree level, ensures that such students are registered with the UK degree awarding body.
Probationary Sponsor	A Student sponsor is given Probationary Sponsor status when it is first granted a sponsor licence. A Probationary Sponsor must demonstrate that it can fulfil its sponsorship duties, will continue to do so, and can be trusted to hold Student Sponsor status, by passing its first Basic Compliance Assessment. When a Probationary Sponsor applies for, and passes, its first annual Basic Compliance Assessment, it will be given Student Sponsor status. Probationary Sponsors are subject to some restrictions on the types of courses they can offer, and on their students' ability to undertake certain activities. For example, a Probationary Sponsor's students may not undertake work placements if their course of study is below degree level.
Register of Student sponsors	The register of education providers which have been issued and currently hold a Student sponsor licence.
Remote delivery	Timetabled delivery of learning where there is no need for the student to attend the premises of the student sponsor or partner institution which would otherwise take place live in-person at the sponsor or partner institution site.

Representative	A representative is: a. a person who is qualified to provide immigration advice or services in accordance with section 84 of the Immigration and Asylum Act 1999 by being: i) regulated by the Office of the Immigration Services Commissioner (OISC); ii) exempt by ministerial order from the requirement to be regulated; or iii) otherwise comply with section 84. a regulated member of a designated professional body, or is working under the supervision of such a person. The bodies listed in the 1999 Act are the Law Society; Law Society of Scotland; Law Society of Northern Ireland; Institute of Legal Executives; General Council of the Bar; General Council of the Bar of Northern Ireland; and Faculty of Advocates.
Research institute	A research institute which is either: • listed as in receipt of UK Research and Innovation and its Councils grant funding, or • listed as a research institute with which the Research Councils have established a long-term involvement as a major funder and which is eligible to receive research funding.
RQF	Regulated Qualifications Framework.
School maintained by a local authority	An institution defined within the School Standards and Framework Act 1998 or the Education Act 1996, both as amended. This includes community schools, foundation schools, voluntary aided schools, voluntary controlled schools, community special schools, foundation special schools, pupil referral units, and maintained nursery schools.
SCQF	The Scottish Credit and Qualifications Framework.
Settled Worker	Has the same meaning as the definition of a 'settled worker' in paragraph 6 of the Immigration Rules.
Site	A location at which Students or Child Students may be taught.
SMS	The Sponsor Management System.

Student	Has the same meaning as defined in paragraph 6 of the Immigration Rules.
Student sponsor	A sponsor which has been granted a licence by UKVI to sponsor international students under the Student route, the Child Student route, or both. A sponsor is initially granted a Student sponsor licence with Probationary Sponsor status. Once it has passed its first annual Basic Compliance Assessment it will be given full Student Sponsor status. The status of a Student sponsor, and the routes under which it can sponsor students, is shown on the Register of Student sponsors.
Teaching hospital	Any hospital used by an HEP to teach sponsored students.
Track record of compliance	Has the same meaning as defined in paragraph 6 of the Immigration Rules. A Student sponsor with a track record of compliance will be shown on the Register of Student sponsors with the status 'Student Sponsor – Track Record'
UKVI	UK Visas and Immigration, an operational command of the Home Office.
UQS	Unsatisfactory Quality Scheme. DfE in Northern Ireland may require a detailed inspection of a higher education provider under the UQS where concerns have been raised about the integrity of degree standards, or the quality of the student academic experience. The investigation is undertaken by the Quality Assurance Agency for Higher Education (QAA).
You or Your	The sponsor organisation or prospective sponsor organisation, including any owner, director, authorising officer, key contact, Level 1 User and anyone involved in your day-to-day running.
We/us/our	Home Office.
Working Days	Any day other than Saturday or Sunday, a day which is a bank holiday under the Banking and Financial Dealings Act 1971 in the part of the United Kingdom to which the notice is sent, Christmas Day or Good Friday.

Changes since last publication

Current paragraph number	Previous paragraph number	Changes made
Glossary	Glossary	Updated the Overseas HEI section to now require accreditation confirmed by the Qualification and Language Service (QLS)
2.4, 3.7, 3.10	2.4, 3.7, 3.10	Wording updated to reflect that state-funded schools and academies can hold a Student sponsor licence for the purpose of sponsoring Students for courses that are part of the Erasmus+ programme
3.10	3.10	England table updated to change sponsor type from “HEP” to “HEI” reflecting that a “HEP” is not a sponsor type designated by the Home Office and to align the England table with that of the other 3 nations of the UK
3.21	3.21	Replaced Education Scotland with His Majesty's Inspectorate of Education (HMIE) as an Educational Oversight body along with its relevant ratings. Additional changes made to ISI’s outcome ratings
4.36	4.36	Replaced reference to Ecctis with the Qualification and Language Service (QLS)
5.1-5.39	5.1-5.37	Section updated to reflect that level 2 users are being phased out
5.11	New Paragraph	Added paragraph to reflect that correct and up to date contact and personal information is kept for key contacts to ensure they can use Multi-Factor Authentication
5.30	5.30	Removed reference to Tier 5 (International Agreement) sponsorship and replaced with the update immigration route, Temporary Work – International Agreement
5.40-5.53	New Paragraphs	New section added to provide guidance on Multi-Factor Authentication that has been implemented
6.10	6.10	References to “HEP” replaced with “HEI” to reflect that “HEP” is not sponsor type designated by the Home Office and replaced reference to UK NARIC with Qualifications and Language Service (QLS)

9.10	9.10	Licence ban wording amended to reflect that not all bans imposed are 2 years in length and that the sponsor may reapply after their ban period has passed (irrespective of length)
9.14	9.14	Amended content regarding activities that Probationary Sponsors are not permitted to do so that guidance now includes exceptions for Students who will be studying a course as part of the Erasmus+ programme
9.18	9.18	Removed reference to extending a sponsor licence to cover Tier 2 visa sponsorship, and replaced to reference extending a sponsor licence to cover various sponsored work categories
Throughout	Throughout	Minor grammatical and formatting changes

1. Introduction

1.1 This is Document 1 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 come to the UK under the Student or Child Student routes[1]. 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.

[1] Separate guidance exists for UK employers who wish to sponsor migrants to come to the UK to work. This can be found on the GOV.UK website using the following link: https://www.gov.uk/government/collections/sponsorship-information-for-employers-and-educators

2. Sponsorship under the Student and Child Student routes

This section gives information on:

- Overview
- Student sponsor licences
- Abuse of sponsorship arrangements

Overview

2.1 The Student and Child Student routes are the primary immigration routes for international students who wish to study full-time, or part-time in some limited circumstances, in the UK. These students must be sponsored by an education provider that holds a Student sponsor licence. The education provider is known as a sponsor.

2.2 The Student sponsorship regime is based on two basic principles. They are that:

a. sponsorship is a privilege and not a right so those who benefit most directly from student migration (education providers) must help to prevent the system from being abused; and

b. those applying to come to the UK to study must be eligible to do so, and must have a reputable education provider who genuinely wishes to teach them.

2.3 When an education provider is granted a Student sponsor licence, significant trust is placed in them. With this trust comes a responsibility to act in accordance with the Immigration Rules and all parts of the Student Sponsor Guidance. UKVI has a duty to ensure that all sponsors discharge these responsibilities, and will take compliance action when it considers that a sponsor has failed to do so, or otherwise poses a risk to immigration control. For more information on the duties sponsors must fulfil, please see Document 2 of this Student Sponsor Guidance.

2.4 State-funded schools and academies, including those with sixth forms, are permitted to hold a Student sponsor licence for the specific purpose of sponsoring participants of the Erasmus+ programme as students under the Student route. Such educational establishments are not permitted to sponsor Students or Child Students in any other circumstances. Should such an educational establishment attempt to sponsor a Student who is not an Erasmus+ participant or a Child Student, we will take action against it, up to and including revoking its licence. If we receive an application for a Student sponsor licence from such an educational establishment, for a purpose other

than sponsoring Erasmus+ participants, we will reject it and refund the fee. For information on the duties existing Student sponsors must fulfil if they become an academy or a state-funded school, please see Document 2 of this Student Sponsor Guidance.

2.5 The Visitor and Short-term Study (English language) routes are available for students to come to the UK for short periods of study. You can find out more about these routes on our pages on the GOV.UK website using the link below: www.gov.uk/browse/visas-immigration/short-visit-visas

Student sponsor licence

2.6 An education provider can apply for a licence in two categories:

a. Student. This route is for migrants aged 16 or over who come to the UK for their post-16 education.

b. Child Student. This route is for students aged 4-17 who come to the UK for their education. Child Students may only be educated at independent schools

2.7 A Student sponsor licence is valid from the date it is granted, unless it is revoked or surrendered.

2.8 A sponsor is given Probationary Sponsor status when it is first granted a licence. A Probationary Sponsor must demonstrate that it can fulfil its sponsorship duties, will continue to do so, and can be trusted to hold Student Sponsor status. When a Probationary Sponsor applies for, and passes, its first annual Basic Compliance Assessment, it will be given Student Sponsor status.

2.9 All sponsors, including Probationary Sponsors, must comply with the Student sponsorship duties including the duty to apply for and pass an annual Basic Compliance Assessment. Please see the sponsor guidance document 'Student sponsor compliance' for further information.

Abuse of sponsorship arrangements

2.10 We treat any allegation of abuse of student sponsorship in the strictest confidence. Anyone with information can report it at: https://www.gov.uk/report-immigration-crime.

2.11 UKVI will consider information about abuse of the sponsorship arrangements and investigate and, if appropriate, tell the relevant authorities.

2.12 Illegal immigrants and other immigration offenders can also be reported. The following page on the GOV.UK website at: https://www.gov.uk/report-immigration-crime has information on how to do this.

3. Requirements for a Student sponsor licence

This section gives information on:

- Guiding principles
- Educational Oversight requirement
- Eligibility and suitability for a Student sponsor licence

Guiding principles

3.1 To be issued a Student sponsor licence, an education provider must be:

- a genuine education provider that has acceptable educational quality standards, and is operating lawfully in the UK, complying with all appropriate rules and regulations;
- considered eligible and suitable to hold a Student sponsor licence; and
- capable of carrying out its duties as a sponsor.

An education provider must meet these criteria in order to be granted a Student sponsor licence, and continue to meet them in order to retain its licence.

3.2 In order to establish whether or not an education provider meets these criteria, UKVI will consider a number of factors, including (but not limited to) its history and background, the Key Personnel named on its application and anyone involved in the day-to-day running of the organisation.

3.3 UKVI views any history of dishonest conduct or immigration crime, either by the relevant organisation as a corporate entity, or by individuals in the organisation, seriously and may refuse an application solely on the basis that such activities have taken place.

3.4 UKVI will also look at an education provider's policies and processes, including how student attendance is monitored, to ensure it will be able to fulfil its sponsorship duties.

3.5 UKVI may visit an education provider before making a decision on its application for a Student sponsor licence. If UKVI has significant doubts about the ability of an education provider to fulfil its sponsorship duties after visiting it, it may refuse its application.

Educational Oversight requirement

Guiding principles

3.6 An education provider wishing to be a sponsor must demonstrate that all of its sites meet acceptable educational quality standards. An Educational Oversight body will make this assessment. Sponsors are required to maintain their Educational Oversight for all their sites throughout the duration of their Student sponsor licence

3.7 HEPs which are HEIs[2], publicly funded colleges, state-funded schools and academies and independent schools are already subject to statutory education inspections. If they achieve the required rating in these inspections, they will in most cases meet the Student sponsor licence Educational Oversight requirement (see the section below titled 'Statutory education inspections'). Other educational quality inspections cannot be relied upon for Student purposes.

3.8 Overseas HEIs and private providers must apply to the appropriate designated Educational Oversight body for a Student Educational Oversight inspection and pass it before they apply to UKVI for a Student sponsor licence. They will also be assessed at appropriate intervals throughout the period they hold a Student sponsor licence, and if their circumstances change (for example, if they apply to add a site to their Student sponsorship licence). Educational Oversight bodies will be able to advise on the timing of when they will accept applications.

3.9 Where an education provider has had its Student sponsor licence revoked (including Tier 4 licenses) and it re-applies for a Student sponsor licence, it cannot rely on a Student Educational Oversight inspection that either predates the revocation of its licence or was undertaken during the ban period.

Educational Oversight bodies

3.10 The following tables set out the designated Educational Oversight bodies for the different categories of education providers that can hold a Student sponsor licence in each nation of the UK[3], and the type of inspection that providers must pass.

[2] English HEIs are now regulated by the Office for Students

[3] The designated Educational Oversight bodies for HEPs in the Devolved Governments will continue to depend on whether they are a HEI, publicly funded college or private provider. All English HEPs are regulated by the Office for Students.

England

Provider type	Educational Oversight body	Inspection type
HEI	Office for Students	Registration with the Office for Students
Overseas HEI[4]	QAA will confirm whether it is able to assess provision. Where it cannot do so, the Educational Oversight requirement will not be met, and the overseas HEI will not be eligible to apply for a Student sponsor licence.	Student Educational Oversight inspection[6] Educational Oversight Review[7]
Publicly funded college	**Further education provision** Ofsted	Statutory education inspection
Private provider – Steiner and Montessori further education institution	Mainland Education Ltd	Student Educational Oversight inspection
Private provider – faith based further education institution	Mainland Education Ltd	Student Educational Oversight inspection

[4] Accredited US institutions listed on the US Department of Education website and associate members (or third party providers) of the Association of American Study Abroad Programmes UK (AASAP/UK) which offer complete US degrees are also able to apply to the QAA.

[6] Overseas HEIs offering only short-term study abroad programmes are exempt from the Educational Oversight requirements. Their students must enrol in their home country, study in the UK for no more than 50 per cent of the total length of their course, and return home to finish their degree course (which must be equivalent to a UK degree).

[7] QAA introduced the Educational Oversight Review in August 2024. Providers that were previously assessed by QAA under their previous methods for educational oversight will need to transfer to this new method at their next full review, and until that point continue to comply with the monitoring arrangements QAA has in place.

Private provider – other provision, including English language	Independent Schools Inspectorate (ISI)	Student Educational Oversight inspection
Private provider – publicly funded provision (where applicable)	Ofsted	Statutory education inspection
Independent school	Ofsted (Non-association) ISI (Association)	Statutory education inspection
State-funded school or academy	Ofsted	Statutory education inspection

Scotland

Provider type	Educational Oversight body	Inspection type
HEI	QAA	Statutory education inspection
Overseas HEI[5]	QAA will confirm whether it is able to assess provision. Where it cannot do so, the Educational Oversight requirement will not be met, and the overseas HEI will not be eligible to apply for a Student sponsor licence.	Student Educational Oversight inspection[8] Educational Oversight Review

[5] Accredited US institutions listed on the US Department of Education website and associate members (or third party providers) of the Association of American Study Abroad Programmes UK (AASAP/UK) which offer complete US degrees are also able to apply to the QAA.

[8] Overseas HEIs offering only short-term study abroad programmes are exempt from the Educational Oversight requirements. Their students must enrol in their home country, study in the UK for no more than 50 per cent of the total length of their course, and return home to finish their degree course (which must be equivalent to a UK degree).

Private provider – publicly funded provision (where applicable)	His Majesty's Inspectorate of Education (HMIE)	Statutory education inspection
Independent school	His Majesty's Inspectorate of Education (HMIE)	Statutory education inspection
Publicly funded college	QAA	Statutory education inspection: Tertiary Quality Enhancement Review
Private provider (alternative provider) – higher education provision or predominantly higher education provision	His Majesty's Inspectorate of Education (HMIE)	Student Educational Oversight inspection
Private provider – Steiner and Montessori further or higher education institution	Mainland Education Ltd	Student Educational Oversight inspection
Private provider – faith based further or higher education institution	Mainland Education Ltd	Student Educational Oversight inspection
Private provider – other provision, including English language	His Majesty's Inspectorate of Education (HMIE)	Student Educational Oversight inspection
State-funded school or academy	His Majesty's Inspectorate of Education (HMIE)	Statutory education inspection

Wales

Provider type	Educational Oversight body	Inspection type

HEI	Medr[9]	Statutory education inspection
Overseas HEI[6]	QAA will confirm whether it is able to assess provision. Where it cannot do so, the Educational Oversight requirement will not be met, and the overseas HEI will not be eligible to apply for a Student sponsor licence.	Student Educational Oversight inspection[11]
Publicly funded college	**Further education provision** Estyn **Higher education provision** QAA	Statutory education inspection

[9] The Welsh Government has the power to specifically designate courses to enable Welsh domiciled students to access student support but has delegated some administrative functions in relation to Specific Designation to Medr. Medr is the educational oversight body for both regulated universities in Wales and higher education providers in Wales with specifically designated courses that are not subject to educational oversight by Estyn. Medr has established a Quality Assessment Framework for Higher Education in Wales ((www.medr.cymru/en/)through which it assures itself that the quality of education, or a course of education, provided by or on behalf of regulated institutions meets the needs of those receiving it. One element of the Quality Assessment Framework is External Quality Assurance review which must be held every six years. Medr specifies that the review must be carried out by a body on the European Quality Assurance Register for Higher Education (EQAR), but does not prescribe which body must be used.. Universities in Wales have opted to obtain this review from the QAA. Student Educational Oversight requirements are met by achieving the required rating in such inspections.

Private provider (alternative provider) – higher education provision or predominantly higher education provision	QAA	Student Educational Oversight inspection: “Educational Oversight Review”
Private provider – Steiner and Montessori further or higher education institution	Mainland Education Ltd	Student Educational Oversight inspection
Private provider – faith based further or higher education institution	Mainland Education Ltd	Student Educational Oversight inspection
Private provider – other provision, including English language	Independent Schools Inspectorate (ISI)	Student Educational Oversight inspection
Private provider – publicly funded provision (where applicable)	Estyn	Statutory education inspection
Independent school	Estyn	Statutory education inspection
State-funded school or academy	Estyn	Statutory education inspection

Northern Ireland

Provider type	Educational Oversight body	Inspection type
HEI	Department for the Economy in Northern Ireland (DfE)	Statutory education inspection

Overseas HEI[7]	QAA will confirm whether it is able to assess provision. Where it cannot do so, the Educational Oversight requirement will not be met, and the overseas HEI will not be eligible to apply for a Student sponsor licence.	Student Educational Oversight inspection[8]: "Educational Oversight Review"
Publicly funded college	**Further education provision** Education and Training Inspectorate **Higher education provision** DfE (Northern Ireland)	Statutory education inspection
Private provider (alternative provider) – higher education provision or predominantly higher education provision	QAA	Student Educational Oversight inspection: "Educational Oversight Review"
Private provider – Steiner and Montessori further or higher education institution	Mainland Education Ltd	Student Educational Oversight inspection
Private provider – faith based further or higher education institution	Mainland Education Ltd	Student Educational Oversight inspection
Private provider – other provision, including English language	Education and Training Inspectorate	Student Educational Oversight inspection

[7] Accredited US institutions listed on the US Department of Education website and associate members (or third party providers) of the Association of American Study Abroad Programmes UK (AASAP/UK) which offer complete US degrees are also able to apply to the QAA.

[8] Overseas HEIs offering only short-term study abroad programmes are exempt from the Educational Oversight requirements. Their students must enrol in their home country, study in the UK for no more than 50 per cent of the total length of their course, and return home to finish their degree course (which must be equivalent to a UK degree).

Private provider – publicly funded provision (where applicable)	Education and Training Inspectorate	Statutory education inspection
Independent school	Education and Training Inspectorate	Statutory education inspection
State-funded school or academy	Education and Training Inspectorate	Statutory education inspection

Statutory education inspections

3.11 In Scotland, Wales and Northern Ireland, where an education provider is subject to a statutory education inspection, there will be a planned schedule of reviews, within which the Educational Oversight body may decide that additional scrutiny is necessary, in accordance with its statutory obligations.

3.12 In most cases, a statutory education inspection is sufficient to meet the Student sponsor license requirement to have Educational Oversight. However, where an education provider wishes to offer courses to Students or Child Students that have not been considered as part of a statutory education inspection, UKVI may require it to apply for an Educational Oversight inspection from another body, as if it was a private provider.

3.13 If an independent school wishes to sponsor students under the Child Student route, it must have been inspected on the basis that it teaches children under the age of 18.

Private providers offering different levels of education at different sites

3.14 If a private provider provides different levels of education at different sites, those sites may require Educational Oversight from different Educational Oversight bodies.

3.15 For example, a private provider in England may have some sites that offer higher education courses and, as such, receive Educational Oversight from the QAA, and other sites that offer English language courses and, as such, receive Educational Oversight from the ISI.

3.16 An Educational Oversight inspection will only affect the sites covered by that Educational Oversight body.

3.17 UKVI will require evidence of Educational Oversight in relation to each site for which a private provider seeks a Student sponsor licence. A site must have Educational Oversight before it is listed on a Student sponsor licence.

Student Educational Oversight inspections

3.18 A private provider applying for an Educational Oversight inspection must have been continuously teaching a course of study that meets Student requirements to UK or EEA students for the two years prior to its application.

3.19 All Educational Oversight inspections will cover the following core requirements, but Educational Oversight bodies may choose to add further requirements to their Educational Oversight inspection if they consider it appropriate to do so:

Requirement	Objective	Key elements that will be considered
Quality assurance, including academic governance	Give international students reasonable confidence in arrangements for maintaining the academic standards and quality of the courses that their education provider offers.	The setting and/or maintenance of academic standards by the provider. The provision of learning opportunities by the provider. The enhancement of the quality of students' learning opportunities by the provider. The provision of information to students by the provider. The suitability of teaching staff, taking into account whether pre-appointment checks have been carried out on staff where they will be teaching students under the age of eighteen or any vulnerable adults. The suitability of the premises for teaching, having regard to the number, age and needs (including any special needs) of students.

Financial sustainability, management and governance	Give international students reasonable confidence that they should not be at risk of being unable to complete their course as a result of the financial failure of their education provider.	Details of the provider's organisation, trading names and addresses, key individuals (directors, trustees and shareholders), limited company number (where there is one) and relationships with other corporate entities. The provider's corporate governance arrangements. If the provider has a complex structure, then arrangements relating to ownership and control at both a local and high level will need to be evidenced in a clear format. The provider's financial performance. This includes audited accounts, that have been filed at Companies House[6] and cover the two years immediately prior to the application in the case of new providers, and three years for other providers, as well as details of debt or service charges where interest or charges are payable to directors, trustees or related companies. The provider's financial sustainability over the next four years[7]. This includes an assessment of their business model and their projected ratio of international students to UK students over the next four years; their funding plans and the cost of face-to-face teaching provision for the projected number of international students; and contingency arrangements to safeguard international students' interests in the event of a sudden decline in international student numbers or institutional failure. (Note: assessments made by Educational Oversight bodies on an institution's financial sustainability will be made on the basis of information provided to them, and are not to be relied upon by any body other than UKVI.)

3.20 Educational Oversight bodies will decide how to conduct their inspections. They will have discretion to fail a private provider where they have reasonable

grounds to believe that the provider is not a credible educational institution and/or they have reasonable doubts about the evidence the provider has submitted.

Gaining Educational Oversight

3.21 To gain and maintain Educational Oversight, a provider must achieve and maintain the rating set out in the following table when inspected or reviewed by its Student Educational Oversight body. The Educational Oversight body for each type of provider is specified in the table in paragraph 3.10.

[6] Providers who are not required to file full financial statements for statutory purposes will need to provide externally audited accounts. These may take account of the accounting exemptions available for small and medium sized companies. The accounts must be audited each year by an independent, registered auditor and this must not be the same firm and/or individual that prepared the accounts. When monitoring starts, small companies will exceptionally be able to submit two sets of accounts that have been approved by the directors but not audited, although they must obtain audit certification for the last balance sheet that has been prepared.

[7] Educational Oversight bodies will stipulate the format in which financial forecasts must be supplied by providers.

Educational Oversight body	Rating that must be achieved
His Majesty's Inspectorate of Education (HMIE)	Excellent, “very good, “good” or “satisfactory”
Education and Training Inspectorate	‘Outstanding’, ‘Very Good’ or ‘Good’
Estyn	‘Good’ or ‘Excellent’

The Office for Students	**For providers funded by HEFCE or the OfS in 2017-18 or 2018-19:** The outcome of the Annual Provider Review (APR) must be 'Meets requirements', 'Meets requirements with an action plan' or 'Pending'. If, following an APR, the provider is subject to a further investigation, the outcome of the investigation must be 'No issues found' or 'Minor issues found'. **For providers registered with the OfS from April 2018 onwards:** Providers must meet the initial and ongoing conditions of OfS registration. For information about the requirement to register with the Office for Students, see Document 4 of this guidance.
DfE in Northern Ireland	The outcome of the Annual Provider Review (APR) must be 'Meets requirements', 'Meets requirements with an action plan' or 'Pending'. If, following an APR, the provider is subject to a further inspection under the Unsatisfactory Quality Scheme (UQS), the outcome of the investigation under the UQS must be 'No issues found' or 'Minor issues found'.
Medr	Medr approves the provider's Fee and Access Plan.
ISI	'All requirements are met'' (for private providers) 'Met' (for independent schools)
Ofsted	• Exceptional • Strong standard • Expected Standard
QAA	**Tertiary Quality Enhancement Review:** The institution is **effective** in managing academic standards, enhancing the quality of the learning experience and enabling student success.

	Where an institution receives an outcome that the institution is **partially effective** in managing academic standards, enhancing the quality of the learning experience and enabling student success then UKVI will use its judgement having considered the report from the QAA and the follow-up activity that is planned from the review as set out in QAA's method guidance, to determine whether or not the failings constitute a loss of EO under Student Sponsor Guidance **Educational Oversight Review:** "The provider **meets** the Home Office's quality assurance requirements for educational oversight" *or* "The provider is **fully aligned** with the Sector-Agreed Principles of the UK Quality Code for Higher Education" Where a provider receives an outcome of "The provider **requires action** to meet the Home Office's quality assurance requirements for educational oversight", this will constitute a loss of EO until such a time as the action required has been satisfactorily completed and QAA confirm that the provider now meets the Home Office's quality assurance requirements for educational oversight *or* "the provider **requires action** to be fully aligned with the Sector-Agreed Principles of the UK Quality Code for Higher Education." then UKVI will use its judgement having considered the report from the QAA and the follow-up activity that is planned from the review as set out in QAA's method guidance, , to determine whether or not the failings constitute a loss of EO under Student Sponsor Guidance
Mainland Education Ltd	'Meets expectations'

3.22 If an education provider is assessed by more than one Educational Oversight body, then the provider must achieve the ratings required in both inspections. For instance, in England, some publicly funded colleges receive a statutory inspection of their further education provision from Ofsted, and assessment by the Office for Students. In Scotland, Wales and Northern Ireland, providers receive a statutory inspection from the relevant body in the Devolved Government for further education provision and a statutory inspection of their higher education provision by the QAA. In these circumstances, the provider must achieve the requisite ratings in both inspections.

3.23 A new independent school will not have a rating, and must provide evidence of formal registration by the relevant authority (set out below) instead:

a) England – school number, issued by the Department for Education (DfE).

b) Wales - confirmation of registration letter, sent by the Welsh Assembly Government School Governance Team, which will include your unique school reference number.

c) Scotland – your Scottish Executive Education Department (SEED) code.

d) Northern Ireland – confirmation of registration letter sent by the Department of Education Northern Ireland School Governance Team.

Failing Educational Oversight

3.24 The following table sets out the consequences of not achieving a required rating in a statutory education inspection or a Student Educational Oversight inspection.

Status of education provider	Consequence of not achieving a required rating
New applicant	Provider cannot apply for a Student sponsor licence. If it is an overseas HEI or a private provider, it cannot apply for a Student Educational Oversight inspection for two years.

Probationary Sponsor	Provider's licence will be revoked. If it is an overseas HEI or a private provider, it cannot apply for a Student Educational Oversight inspection for two years. If it is an HEP, publicly funded college or independent school, it must achieve a required rating in a new statutory education inspection before reapplying for a Student sponsor licence.
Student Sponsor	Any Student sponsor with Student Sponsor status which fails to achieve the required rating will be allocated zero CAS until it achieves a required rating in a new Educational Oversight or statutory education inspection, as applicable. A provider which fails a statutory education inspection may be: • Subject to a partial reinspection or progress monitoring review by its statutory inspection body • For English providers, required by the Department for Education to produce an action plan If the provider has Student Sponsor status, it will be considered to have regained Educational Oversight for Student purposes if: • The partial reinspection or progress monitoring review confirms that all the issues which led to the loss of Educational Oversight have now been satisfactorily addressed, no new issues were identified and, if the provider is an independent school, it now meets the National Minimum Standards and independent school standards which were assessed. • For English providers, the Department for Education approves the action plan and decides to return the school to its regular inspection cycle. In cases where the provider is required to both undergo a partial reinspection or progress monitoring review, and produce an action plan, both the above requirements must be met before the school will be considered to have regained Educational Oversight.

	If an HEP is required to develop and implement an action plan because it has failed to achieve the required rating specified in paragraph 3.22 under the UQS, it must obtain confirmation that the action plan has been completed to the satisfaction of the Office for Students in England / DfE in Northern Ireland before it can apply for a new CAS allocation.

3.25 Educational Oversight bodies will notify UKVI of the outcome of an inspection as soon as possible, so UKVI can take the necessary action.

3.26 Sponsors must notify UKVI within 20 working days if the required rating for meeting the Educational Oversight requirement has not been achieved or maintained in an inspection. Not doing so is classified as a breach of sponsorship duties. Please see the section titled 'Maintaining your Educational Oversight' in the 'Sponsorship Duties' guidance.

Eligibility and suitability for a Student sponsor licence

3.27 UKVI will consider whether an education provider is eligible and suitable to hold a Student sponsor licence.

3.28 It will take into account any relevant factors, including (but not limited to) whether or not:

- the provider and all of its sites meet the Student Educational Oversight requirement;
- the provider has complied with any time restriction for an application for a Student sponsor licence;
- the provider and all of its sites have complied with the Immigration Rules and sponsor guidance in the past (including consideration of whether a Student sponsor licence or previous Tier 4 license has been revoked);
- the provider is a genuine institution that is operating lawfully in the UK, including registering for VAT with HM Revenue and Customs where required to do so; holding a written record of a fire risk assessment conducted by a competent person; and holding the appropriate planning permission or local planning authority consent to operate the relevant type or class of organisation at its trading address;
- Key Personnel, and individuals involved in the day-to-day running of the organisation or any of its sites, have complied with the Immigration Rules and sponsor guidance in the past (including whether any of its

Key Personnel have held a role in an institution that has had its Student sponsor licence or previous Tier 4 licence revoked, or surrendered a

Student sponsor licence or Tier 4 licence);

- Key Personnel, or any individuals involved in the day-to-day running of the organisation or any of its sites, have:

    - an unspent criminal conviction for a relevant offence (please see the Annex to this document for a list of offences that will be taken into account);
    - received a civil penalty for immigration offences;
    - previously come to the notice of the Home Office for potential investigation; or
    - been named as Key Personnel at any institution which was refused Specific Course Designation, or had Specific Course Designation removed, during their time at the institution;

- the provider has systems, policies and processes in place that enable it to meet its sponsor duties (under the Immigration Rules and/or the sponsor guidance); and
- the provider has at any time misrepresented its Student (or Tier 4) sponsorship status on its website or marketing material (for example, by claiming it was a licensed sponsor while its licence was revoked).

3.29 If an individual named as Key Personnel, or any individuals involved in the day-to-day running of the organisation or any of its sites, has a prosecution for a relevant offence pending (please see the table in the section titled 'When we will refuse a Student sponsor licence application' for what constitutes a relevant offence), their application will be put on hold pending the outcome of criminal proceedings and any appeals.

3.30 If an education provider has not included with its application all the required documents, as set out in Application documents, UKVI will consider it ineligible, reject the application and refund the fee paid.

3.31 If UKVI considers that an education provider is not suitable to hold a Student sponsor licence, it will refuse the application.

3.32 If a sponsor ceases to be suitable to retain its Student sponsor licence, compliance action will be taken against it.

4. Applying for a Student sponsor licence

This section gives information on:

- Overview
- Fees
- Making an application
- Using a representative to make an application
- Application documents

Overview

4.1 We treat all applications in confidence. We may, however, pass on the information that you provide to us, either when you apply for a licence or at any time throughout the period of your licence in accordance with the Home Office Personal Information Charter. In certain circumstances, details may be passed to other government departments and agencies (including Educational Oversight bodies), local authorities and fraud prevention agencies for immigration purposes, the prevention of fraud and criminality and/or to help them carry out their functions. These bodies may also provide the Home Office with information about you and your employees. Further details explaining when information may be passed to other bodies, and how that information may be used, can be found on GOV.UK.

4.2 You must apply for a Student sponsor licence using the online form and supply the specified documents to prove that you are eligible, suitable and able to fulfil your sponsorship duties. These documents are listed in Application documents.

4.3 When you apply for a Student sponsor licence, you must:

- appoint Key Personnel and provide contact details for them (please read the section on Key Personnel and others involved with your organisation);
- decide which sites you would like to use to teach sponsored students (please read the section on Sites and teaching partnerships); and
- set out the number of Confirmations of Acceptance for Studies (CAS) you would like to be allocated in your first 12 months as a Probationary

Sponsor (please read the section on Confirmations of Acceptance for Studies (CAS) allocations).

4.4 To become a sponsor and be listed on the Register of Student Sponsors, you must meet all of the requirements set out in this guidance. You must:

- complete and submit the online application (this includes a declaration from you that you agree to meet all of the duties associated with being a licensed sponsor - for more information on sponsor duties, please see the guidance document titled 'Sponsorship Duties');
- pay the correct fee (for more information please see the section titled 'Fees');
- provide proof that you are based in the UK and provide original or certified copies of the documents listed in Application_documents, unless we say otherwise, to establish that you are genuine and operating or trading lawfully in the UK, and with the appropriate planning permission or local planning authority consent to operate the type or class of business at your trading address (for more information on supporting documents, please see the section titled 'Document checks');
- meet the eligibility and suitability requirements. For more information, please see the section titled 'Eligibility and suitability for a Student sponsor licence'; and
- show there are no reasons to believe that you are a threat to immigration control; and
- provide the details of any agent or third party, in the UK or another country, which you have used or intend to use in the recruitment of a sponsored student. The details required are those set out in the agents section of SMS Guide 4A – Creating a CAS – guide for Student sponsors.

4.5 When you complete the online Student sponsor licence application, you must specify which categories you wish to be licensed under (Student or Child Student). You can choose both provided you are eligible for them. If your

application is successful these will be the categories under which you can sponsor a student.

4.6 Licence applications may be rejected, refused or granted with Probationary Sponsor status. For more information about the decision we may make on your application, please see the section titled 'Student sponsor licence application decisions'.

Fees

4.7 Education providers must pay a fee for the following:

- To apply for a Student sponsor licence.
- To apply for Student Sponsor status, or to renew it.
- An action plan (if you are set one).
- To extend your existing licence by adding other categories.
- To assign a CAS.

4.8 Full information is located on our pages on the GOV.UK website using the following link: https://www.gov.uk/government/publications/visa-regulations-revised-table

4.9 If you do not pay the correct fee, or pay only part of it, we will reject your application and return it to you together with the portion of the fee you have paid. If you overpay for the categories you have applied for, we will consider your application and return the excess payment.

Making an application

4.10 Applications for a Student sponsor licence must be made using the online form located on the GOV.UK website using the following link:

https://www.points.homeoffice.gov.uk/gui-sponsor-jsf/SponsorHome.faces

4.11 You must read all of the Student Sponsor Guidance before applying for a licence, particularly this document.

4.12 Application documents sets out the documentary evidence required to validate your application. We may ask for other documents at any time.

4.13 If you gather all the necessary information before starting, the application should take about 30 minutes to complete. If you want to keep a copy of it for your records, you must make a note of what you have included in your application as you complete it because we cannot provide copies of Student sponsor licence applications.

4.14 You must make the application yourself. A representative can help you to complete your application, but must not send it on your behalf.

4.15 The Student sponsor licence application process is set out below:

1) An education provider registers online with their name and email address: https://www.gov.uk/guidance/apply-for-a-student-sponsor-licence

2) The provider completes the application form, pays the fee online and submits the application.

3) The provider is then taken to a submission sheet page. It must print this, complete it and send it to UKVI with supporting documentation. The following must be sent to validate an application:

   i. the original submission sheet (not a certified copy), signed and dated by the authorising officer (all pages must be sent); and

   ii. all of the mandatory documents listed on the submission sheet (originals or certified copies).

   These must all be sent together within five working days of the submission of the application or the application will be rejected and the fee refunded.

4) UKVI processes the application, making any checks that are necessary.

5) UKVI notifies the provider of its decision.

6) If a Student sponsor licence is granted, the education provider's name and status will be published on the Register of Student Sponsors.

4.16 If any documents specified in Application_documents (other than mandatory documents) are missing from your application, or if we require any more documents or information, we will contact you by email. We will give you five

working days from the date of the email to send the documents or information we ask for. If you are sending in anything by post in response to our email request, you must email us by the deadline to let us know that you have posted the information and include any postal reference or tracking numbers.

4.17 We always email the person named as your key contact if we need any further information or documents. We may also email your authorising officer. It is important that your authorising officer and key contact are available to deal with any requests we may need to make. If you have not contacted us by the deadline date specified, we will refuse your application and your fee will not be refunded.

Application..	**UKVI will reject your application and refund your fee**	**UKVI will refuse your application and not refund your fee**
.. has been sent by a representative		✓
.. has mandatory documents that are incorrect or missing	✓	
.. requires further documentation or information but you do not respond by the given deadline		✓

4.18 If you are including more than one site, or an exceptional arrangement or partnership in your application for a Student sponsor licence you must submit all the evidence specified in Application documents for each site and institution involved. In addition, you must include documentation which demonstrates that the sites, exceptional arrangements and/or partnerships meet all of the relevant requirements of the 'Sites and teaching partnerships' section of Document 1 of this guidance.

4.19 If you are a private provider applying to hold your own licence as an embedded college offering pathway courses (in accordance with Table 2 of the 'Sites and teaching partnerships' section), you must include evidence that the HEI involved supports the application.

4.20 You must send the original documents or certified copies. A certified copy is one that includes a signed statement, either by the issuing authority or by a practising barrister, solicitor or notary. The certifier must confirm that it is an accurate copy of the original document. Each certified document must clearly detail the certifier's name, signature and the organisation they represent. If we cannot check a certifier's details we will reject the document. Sometimes, when a document has more than one page, the certifier does not certify each page individually. We will accept the certified copy of the document if the pages are all attached together (such as by stapling) and the top page is certified to confirm that all the pages are accurate copies of the originals. The certification must also state clearly how many pages have been certified.

4.21 We know you often receive original documents by email as a PDF attachment. You must have printouts of PDF files certified and the person who certifies the document must have seen the original email containing the PDF file.

4.22 If you provide documents that are not in English or Welsh you must also send us a certified translation. You must provide the translator's credentials, along with their official confirmation that the translation is accurate.

4.23 If you provide certified copies of documents and/or certified translations, we may ask for the original documents.

4.24 We will make more checks if we doubt that you can meet the requirements for the category in which you have applied. We may ask for more documents.

4.25 We will return all your documents by recorded delivery to the address on your application. If you want us to return the documents by special delivery, you must enclose a prepaid special delivery envelope.

Using a representative to make an application

4.26 You can use the services of a representative to help you complete the online application for a Student sponsor licence, but they cannot submit the application on your behalf.

4.27 To act on your behalf, a representative must meet our definition (please refer to the Glossary) and be based in the UK.

4.28 If they act on your behalf without being 'qualified' under the Immigration and Asylum Act 1999, they may be committing a criminal offence.

4.29 Anyone compliant with Section 84 through exemption by ministerial order still has to comply with the OISC code of standards.

4.30 If you are unsure of your representative's status you should contact the Immigration Advice Authority, which has a list of organisations and advisers it has authorised. It also has links to websites for solicitors, advocates, barristers and legal executives and the Community Legal Service.

You can contact them here for general enquiries and here for complaints

4.31 If after receiving a licence you wish to use the services of a representative you must formally appoint one using the Sponsorship Management System (SMS). For more information on the SMS please see the section titled 'What is the SMS' in the 'Sponsorship Duties' guidance.

4.32 We will not deal with any communications from a representative acting on your behalf unless they have been appointed by you. You can tell us that a representative has helped you fill in your licence application at the application stage. However, you can only appoint them at the licence application stage if you also appoint them as a key contact and/or Level 1 User.

Contact point for queries about the application process

4.33 If you have any queries about the application process, please contact us by email at: studentsponsorassessmentunit@homeoffice.gov.uk.

Application documents

4.34 You must provide all the following documentation with your sponsor licence application:

a. proof that you are based in the UK

b. proof that you are operating and trading lawfully in the UK

c. proof that you have registered for VAT with HM Revenue and Customs where required to do so

d. a written record of a fire risk assessment conducted by a competent person

e. evidence to show that you have appropriate planning permission or local planning authority consent to operate the relevant type or class of organisation at your trading address

f. any documentation which is required to demonstrate that your sites, exceptional arrangements and/or partnerships, where applicable, meet all of the relevant requirements of the ‘Sites and teaching partnerships’ section of this document.

Please note that we may ask for other documents at any time.

4.35 If you are a new independent school, you must send evidence that you have been formally registered by the relevant Government Department in your country as follows:

- England: your School Number, issued by the Department for Education
- Scotland: your Scottish Executive Education Department code
- Northern Ireland: your confirmation of registration letter from the Department of Education Northern Ireland, School Governance Team
- Wales: your confirmation of registration letter from the Welsh Assembly Government, School Governance Team, which will include your unique school reference number

4.36 If you are an overseas HEI offering short-term ‘study abroad’ programmes in your own premises in the UK to students who are enrolled in their home country, you must provide all of the following:

- England: your School Number, issued by the Department for Education
- Scotland: your Scottish Executive Education Department code
- Northern Ireland: your confirmation of registration letter from the

  Department of Education Northern Ireland, School Governance Team
- Wales: your confirmation of registration letter from the Welsh Assembly Government, School Governance Team, which will include your unique school reference number
- overseas accreditation, which can be confirmed by Qualification and Language Service (QLS), that your programmes are UK Higher Education equivalents; this overseas accreditation must be from a nationally recognised accrediting body clearly stating their name and be accompanied by a certified copy of the appropriate web page for the institution showing that accreditation
- proof that you only teach part of your programmes in the UK - the information you provide should verify that students are studying in the UK for no more than 50% of the total length of the course and must include either of the following:
- original letter from the home campus confirming the above

- original brochure/leaflet/catalogue confirming the above
- certified copy of appropriate information from the institutional web site confirming the above
- proof that you have full legal control of the premises you use – such as original or certified copy of licence, lease, or proof of ownership

If you offer study abroad programmes on a franchise basis via a third party in the UK, you will need to ensure that the private provider you are linked with meets our educational oversight requirements and send evidence of the contractual agreement.

5. Key Personnel and others involved with your organisation

This section gives information on:

- Key Personnel

Key Personnel

5.1 The online sponsor application form requires you to give certain responsibilities to members of your staff, some or all of whom will have access to the Sponsorship Management System (SMS) after a licence is granted. For more information on the SMS, please see the section titled 'The Sponsorship Management System (SMS) and Confirmation of Acceptance for Studies(CAS)' in the 'Sponsorship Duties' guidance. We call these people 'Key Personnel' and there are three roles:

a. authorising officer - a senior person within your organisation who has overall responsibility for your activity as a licensed sponsor
b. key contact - your main point of contact with UKVI
c. Level 1 User - a person within your organisation who is responsible for your day-to-day activity as a licensed sponsor, including CAS and reporting changes to student circumstances or changes to your organisation;

5.2 There is a further optional Key Personnel role, known as the Level 2 User. A Level 2 User is similar to a Level 1 User but has fewer permissions and can only be appointed by a Level 1 User after the organisation's licence has been granted. From 9 September 2026, you can no longer appoint any new Level 2 Users. Any existing Level 2 Users must be converted to Level 1 Users (where eligible) by 8 March 2027 or you must deactivate their account. See the 'Level 2 Users' section for further information.

5.3 Only Level 1 (and, where relevant, Level 2) Users will have access to the SMS. If the authorising officer or key contact wishes to have access, they must also be set up as a Level 1 User. You can do this when you apply for your licence or after it has been granted.

5.4 Each of your Key Personnel:

a. must be permanently based in the UK for the duration of the period that they fill the role you have appointed them to;

b. must not have an unspent conviction for a relevant offence, as set out in the section titled, 'Student sponsor licence application assessments';

c. must be a paid member of your staff or engaged by you as an office holder. The only exceptions are:

- An additional Level 1 User or, if they were appointed before 9 September 2026, provided they are converted to a Level 1 User (if eligible) or have their account deactivated by 8 March 2027, a Level 2 SMS User can be an employee of a third party organisation who you have contracted some or all of your HR function to. New sponsors must have at least one Level 1 User who is an employee. This is also best practice for existing sponsors. We will reject applications where the sponsor does not have a Level 1 User who is their employee.
- A Level 2 SMS User can be a member of staff supplied to you, but employed by an employment agency. They cannot fill any other Key Personnel role. From 9 September 2026, you cannot appoint any further workers as Key Personnel if they are supplied to you by an employment business. You must deactivate the account of any such staff by 8 March 2027.
- An insolvency professional who has been appointed because you have gone into administration can fill any Key Personnel role.
- A UK-based representative can fill the following Key Personnel roles:
  - Key Contact
  - an additional Level 1 User
- A UK-based representative cannot fill the role of authorising officer. They can fill the role of a Level 2 User, if they were appointed before 9 September 2026, provided they are converted to a Level 1 User (if eligible) or have their account deactivated by 8 March 2027.

d. must, in the case of SMS Users, access their account regularly and keep their details up to date

5.4 Your Key Personnel cannot be:

a. a representative who is not based in the UK;

b. a contractor or consultant who is contracted for a specific project;

c. subject to a Bankruptcy Restriction Order;

d. subject to a Bankruptcy Restriction Undertaking;

e. subject to a Debt Relief Restriction Order;

f. subject to a Debt Relief Undertaking; or

g. legally prohibited from being a company director. (The only exception to this rule is for the key contact who can be legally prohibited from being a

company director but only if that is solely due to them being an undischarged bankrupt or subject to a Debt Relief Order).

5.5 You must name your authorising officer, key contact and Level 1 User on the application form. These roles can be filled by the same person, or a combination of different people, but you can:

a. only have one authorising officer and one key contact;

add more Level 1 Users once you have a sponsor licence

5.6 If you want a representative to assign CAS, you must add their relevant employees to the SMS as an additional Level 1 User. It is your responsibility to make sure they meet the requirements to be a Level 1 User.

5.7 You are responsible for anything done by anyone you set up as a user of the SMS, including representatives. We treat anything a representative does on your behalf as if you had done it yourself so you should only employ representatives who are reputable, honest and competent. You should check the identity of any representative you employ and make sure they meet their responsibilities. If you do not comply with your responsibilities, we will take action against you.

Contact details for Key Personnel

5.8 You must give us the contact details of your Key Personnel when you:

a. apply for a licence; and

b. change or add Key Personnel following the grant of a licence.

5.9 The contact address for all Key Personnel must be your main address or the address of any branch or head office you include in your licence. If you appoint a representative as key contact or Level 1 User, their address must be the same as the representative's main business address. If you have a Level 2 User employed by a third party organisation engaged by you to deliver all or part of your HR function, their address must be the main business address of that organisation.

5.10 All email addresses you provide for each of your Key Personnel must be secure, personal to, and only accessible by, the named individual. When you give us an email address for a person, suitable care must be taken to ensure the security of emails sent to that address.

5.11 You must ensure we have a current email address for your SMS Users, as well as a current mobile phone number and correct date of birth for your Level

1 Users. This is to ensure they can use multi-factor authentication when they access the SMS

Checks we make on Key Personnel

5.12 We will check your authorising officer, key contact and Level 1 User against our records, and the Police National Computer or its equivalent in Northern Ireland. We may also check your owner(s), director(s) and anyone involved in your day-to-day running or the day-to-day running of any of your sites.

5.13 We may make checks:

a. while we consider your application for a sponsor licence;

b. at any time while you have a sponsor licence; and

c. when new people take up Key Personnel roles while you have a sponsor licence.

5.14 If any of these people have unspent criminal convictions or has been issued with a civil penalty by the Home Office in the past 12 months, we may:

a. refuse your application for a sponsor licence;

b. if you already have a licence, refuse to accept a person you later nominate for a Key Personnel role; or

c. revoke your licence.

Authorising officer

5.15 When applying for a licence you must appoint an authorising officer. The person you nominate to this role must be your most senior person responsible for the recruitment of students and ensuring that all of your sponsor duties are met. If there is more than one person who could fill this role, you must decide who to nominate. You are responsible for the actions of your authorising officer so we advise that you ensure you are confident that they fully understand the importance of this role.

5.16 The authorising officer is also responsible for deciding how many of your staff need to have access to the SMS and what level of permission they can have. They are responsible for the activities of all SMS users and must comply with our requirements for using the system. If they fail to do this, we will take action against you.

5.17 The authorising officer does not have automatic access to the SMS. If they require access to the system, they will need to be set up as a Level 1 User. This can be done by naming them as the Level 1 User on your application,

or adding them as an additional Level 1 User after your licence has been granted (you can no longer appoint them as a Level 2 User from 9 September 2026).

5.18 You must have an eligible authorising officer in place throughout the life of your licence. The nominated person must always meet the requirements set out in this guidance. If you fail to have an authorising officer in place who meets our requirements, or fail to tell us of a change in authorising officer, we will take action against you.

5.19 The authorising officer must be a paid staff member or office holder within your organisation.

5.20 They must not be:

a. a representative;

b. a contractor or consultant who is contracted solely for a specific project or projects;

c. a temporary staff member supplied by an agency; or

d. an undischarged bankrupt.

Key contact

5.21 You must nominate an eligible Key Contact in your application. The key contact can be the authorising officer, or another person in your organisation, provided they are suitable and eligible.

5.22 The key contact will be the main point of contact between you and us. We will contact them if we have any queries about your application, the documents you sent or the fee. A key contact must be a paid staff member or office holder within your organisation. They can also be a UK-based representative.

5.23 They must not be:

a. a contractor;

b. a consultant who is contracted solely for a specific project or projects;

c. an employee of a third party organisation you have engaged to deliver all or part of your HR function; or

d. a temporary staff member supplied by an agency.

5.23 The key contact does not have automatic access to the SMS. If they need access to the system, they must be set up as a Level 1 User of it (you can no longer appoint them as a Level 2 User from 9 September 2026).

Level 1 User

5.24 The Level 1 User can be the authorising officer or another person, or persons, in your organisation, provided (in all cases) they are suitable and eligible.

5.25 The Level 1 User must carry out your day-to-day sponsorship activities using the SMS.

5.26 When you first apply for a sponsor licence, you can only nominate one Level 1 User and they must be an employee. Once you have a licence you can use the SMS to nominate more Level 1 Users. We will check new Level 1 Users before we give them access to the SMS.

5.27 You must always have at least one Level 1 User in place. This is because it is impossible for you to meet all of your sponsor duties without one. If we find you do not have any Level 1 Users in place, we will take action against you, up to and including revoking your licence. You can decide how many additional Level 1 Users you need. The authorising officer is responsible for them, so we recommend that you do not have more Level 1 Users than you really need. You should make sure that you have at least enough to be able to cover periods of leave or sickness.

5.28 The Level 1 User must be:

a. a paid staff member or office holder within your organisation; or

b. an employee of a third party organisation engaged by you to deliver all or part of your HR function; or

c. a UK-based representative.

5.29 They must not be:

a. a contractor;

b. a consultant who is contracted for a specific project;

c. a temporary staff member supplied to you by an employment agency; or

d. an undischarged bankrupt.

5.30 You must always have a minimum of one Level 1 User who is both an employee and a Settled Worker. The only exception to this rule is if you are a

diplomatic mission or international organisation licensed under Temporary Work - International Agreement route of the Points Based System.

Level 2 User

5.31 From 9 September 2026, you can no longer appoint Level 2 Users to your licence. If you have any existing Level 2 Users, your Level 1 User must either:

- convert them to Level 1 Users if they meet the requirements for Level 1 Users and you still wish them to have SMS access to your licence
- deactivate their account.

5.32 You must take this action by no later than 8 March 2027. After that date, we will deactivate the accounts of any Level 2 Users you still have.

5.33 Staff members supplied by an employment business (and not employed by you) are not eligible to be converted into Level 1 Users. We will deactivate the accounts of any such Level 2 Users after 8 March 2027 if you have not already done so.

5.34 Level 2 Users have fewer permissions than Level 1 Users. They can only assign CAS to students and report student activity to us.

5.35 You can decide how many Level 2 Users you need until 9 September 2026, from when you can no longer appoint Level 2 Users to your licence. The authorising officer is responsible for them, so we recommend that you do not have more Level 2 Users than you really need.

5.36 A Level 2 User must be:

a paid staff member or office holder within your organisation; or

a. an employee of a third party organisation engaged by you to deliver all or part of your HR function; or
b. a temporary staff member supplied to you by an employment agency; or
c. a UK-based representative.

5.37 They must not be:

a. a contractor;
b. a consultant who is contracted for a specific project; or
c. an undischarged bankrupt.

5.38 Please see the table below titled Level 1 and Level 2 User functions for details on the different actions Level 1 and Level 2 Users can perform in the SMS.

Level 1 and Level 2 User functions table

Function	Level 1 User	Level 2 User
Request more Level 1 Users and (before 9 September 2026) add Level 2 Users to the SMS or remove them	✓	✗
Assign CAS to students	✓	✓
Request an increase in the number of CAS you can assign (your limit)	✓	✗
Tell us about changes to your details or the details of any active Level 2 Users	✓	✗
Notify us of change of your organisation's details or circumstances on the SMS	✓	✗
Report student activity to us (for example, inform us if a student goes missing or does not attend their course)	✓	✓
Withdraw CAS	✓	✗
Inform us of changes to study or work placement addresses	✓	✗
Use the bulk data transfer feature	✓	✗
Change user details including deactivating (removing) SMS Users, for example when they have left your organisation or ceased to be suitable or eligible	✓	✗
View information about your licence and key personnel	✓	✗
Access key messages that we post from time to time	✓	✗

Apply for Student Sponsor status and track the progress of your application	✓	✗

5.39 SMS Users must not assign a CAS to themselves or assign a CAS to anyone who is their:

- spouse or civil partner;
- unmarried partner;
- parent;
- daughter, step-daughter, son or step-son; or
- sibling or half-sibling.

Multi-factor authentication for SMS Users

5.40 We are introducing mandatory multi-factor authentication (MFA) for all SMS Users. MFA adds an extra layer of security by requiring users to use more than one verification factor to access their account. This protects sponsor accounts from unauthorised access, even if a password is compromised.

5.41 We have been trialling the use of MFA on a voluntary basis with a limited number of sponsors since November 2025. We will introduce mandatory MFA on a phased basis, beginning on 3 September 2026, and expect this to be in place for all sponsors by November 2026. Mandatory MFA will be enabled for any organisation granted a sponsor licence on or after 17 September 2026.

5.42 MFA requires the user to enter a one-time passcode, in addition to their username and password, each time they wish to access their SMS account. The one-time passcode will be sent to the user's registered:

- mobile phone (via text message) if they are a Level 1 User with a valid mobile phone number
- email address if they are a Level 1 User without a valid mobile phone number or a Level 2 User

5.43 For Level 1 Users, a valid date of birth will be required when they attempt to log into an MFA-enabled account for the first time using a mobile phone, or if they subsequently change their phone number or email address when logging into SMS. You must therefore ensure that the correct date of birth, phone number and email address have been recorded for each Level 1 User on your licence.

5.44 Level 2 Users (and Level 1 Users without a mobile phone number) will need a valid email address to use MFA. You must therefore ensure that we hold the

correct email address for these users.

5.45 We will contact you with instructions when MFA is due to be enabled on your SMS account. For detailed guidance on using MFA, see SMS User Manual 13.

Inactive SMS User accounts

5.46 A user account is considered to be inactive if the user hasn't accessed it for 12 months or more. We will deactivate any such accounts unless you take the action described in the paragraphs below. Your licence may be at risk if you do not take this action.

5.47 If we identify any inactive SMS Users on your licence, we will contact your authorising officer and any inactive Level 1 User with instructions on what to do.

5.48 To continue to have access to the SMS, your Level 1 Users must log into their account and check their details (and update them if necessary). They must do this within 3 months of the date we contact them.

5.49 We will not contact inactive Level 2 Users directly. It is your responsibility to identify any inactive Level 2 Users and, if you wish them to continue to have access (before the Level 2 role is abolished in March 2027), you must ask them to log into their account and check their details. If their details need updating or correcting, a Level 1 User must do this for them.

5.50 If you identify any Level 1 or Level 2 Users you no longer wish to have access, a Level 1 User must deactivate the accounts of those users.

If you fail to take action

5.51 If you do not take the necessary action within 3 months of the date we contact you, we will deactivate the accounts of any inactive user on your licence and they will no longer have access to the SMS.

5.52 If, as a result of this process, you no longer have any active Level 1 Users, we will suspend your licence and give you 28 days from the date of suspension to nominate at least one eligible Level 1 User. If you fail to do this, we will normally revoke your licence.

5.53 If your licence is revoked and you subsequently decide you wish to sponsor any students, you will need to apply for a new licence and pay the application fee. You must fully meet the requirements in force at the time you apply for your new licence.

6. Sites and teaching partnerships

This section gives information on:

- Guiding principles
- Requirements
- Before applying to add a site, exceptional arrangement or a teaching partnership to a Student sponsor licence
- Applying to add a site, exceptional arrangement or a teaching partnership to a Student sponsor licence

Guiding principles

6.1 The Student sponsorship system is based on a direct relationship between a sponsor and the student that they are sponsoring to study in the UK. This allows a sponsor to fulfil its sponsorship duties effectively.

6.2 Education providers have a wide range of corporate structures and collaborative arrangements for delivering education in partnership with others. These are permitted under the Student sponsorship system but they must not distort or dilute the relationship between a sponsor and a student that underpins the effective functioning of the Student sponsorship system.

6.3 In order to ensure that the Student sponsorship system works effectively where there are collaborative arrangements, the relationship between institutions must be open and transparent so that the sponsorship of students and child students can be monitored effectively. This will also ensure that students receive the appropriate conditions of stay, as laid out in the Immigration Rules.

6.4 We apply the following general principles to all arrangements to ensure that sponsors take their responsibilities seriously, and can fulfil their duties:

- an institution which teaches Students or Child Students must take responsibility for sponsoring them; and
- an institution or an umbrella organisation may not hold more than one Student sponsor licence.

6.5 The requirements set out in the next section give effect to these principles. Special provisions have been made for some specific exceptional

arrangements where an embedded college or joint venture is an autonomous institution with close links to a single HEI.

6.6 Student sponsors who are planning a new site, arrangement, or partnership that is not covered in the section below, should consult UKVI on the next steps to take. Arrangements or partnerships that circumvent the Immigration Rules or this guidance will be considered to be abuse of the Student sponsorship system, and compliance action may be taken against the Student sponsor and/or its partners in such circumstances.

Requirements

6.7 The following tables set out the ways in which sponsors may list sites and partnerships on their Student sponsor licence, and sponsor students and child students.

6.8 Table 1 sets out the main categories of sponsors under the Student and Child Student routes. All sponsors must fall within a category in Table 1, unless UKVI has agreed that they fall within Table 2. No sponsor can fall within more than one of the categories in Table 1. Table 2 sets out exceptional arrangements. Table 3 sets out teaching partnerships under which an institution may only assign CAS if they are teaching the majority of a course on their site, unless the partnership is with a research institute.

6.9 All institutions teaching Students or Child Students must fall under one of the categories in Tables 1 or 2. This category will be recorded on the Register of Student Sponsors. If an institution has doubts as to whether they fall under one of those categories, it must contact UKVI immediately, as it may be operating in breach of this guidance.

Table 1 - Student sponsor types and licences

6.10 Other than institutions with the exceptional arrangements set out in Table 2, all institutions sponsoring students or child students must fall under one of the following categories. These sponsors should hold a single licence listing all of the sites that they wish to use to teach students or child students and cannot hold multiple Student sponsor licences unless the exemption for independent schools applies.

Sponsor type	Sponsor site description and specific conditions
HEI	An HEI should list on its Student sponsor licence all sites which are part of the HEI and that it will use to teach students, including any teaching hospitals. With the exception of teaching hospitals, these sites must be fully integrated with broadly the same policies, procedures and regulations applying across the HEI in relation to Students. There should be processes in place to ensure that this is delivered in practice in all sites. The HEI must have central oversight of marketing and of the recruitment and the admission of Students across all of its sites. The HEI must have the same processes in place to quality assure course delivery and to conduct student assessments across all of its sites. Exceptional arrangements in Table 2 must also be listed on an HEI's Student sponsor licence.
Publicly funded college	A publicly funded college should list all sites that it will use to teach Students on its Student sponsor licence. A publicly funded college must have effective policies and procedures in place at a local level across all sites in order to comply with its sponsorship duties, such as day-to-day Student contact and attendance management.

Sponsor type	Sponsor site description and specific conditions
Private provider	A private provider should list all sites that it will use to teach Students on its Student sponsor licence. An institution which does not fall into one of the other categories in either Table 1 or 2 is considered to be a private provider. Private providers linked to one another by common ownership or control must be grouped under a single Student sponsor licence, including where they are part of a franchise. A private provider may only hold more than one licence if: • it owns or controls one or more independent schools which hold separate Student sponsor licences (see below); or • UKVI agrees that one or more of the private provider's sites is an embedded college offering pathway courses and the embedded college holds a separate Student sponsor licence (see Table 2). Where a private provider has more than one type of education institution on its licence, the institutions may have Educational Oversight from different Educational Oversight bodies – see the section called 'Educational Oversight requirement' for further information. Grouping sites under a single licence should not prevent a private provider from putting effective policies and procedures in place at a local level across all sites in order to comply with its sponsorship duties, such as day-to-day student contact and attendance management.
Independent school	An independent school should list on its Student sponsor licence all sites that it will use to teach Students or Child Students.

	An independent school that is linked by common ownership or control to a private provider or one or more independent schools may be grouped with them under a single Student sponsor licence as a private provider. Alternatively, an independent school may hold a separate Student sponsor licence.
Overseas HEI	An overseas HEI which offers short-term study abroad programmes should list on its Student sponsor licence all sites in the UK that it will use to teach students. To be recognised as an overseas HEI, the institution's students must: • enrol in their home country; • study in the UK for no more than 50 per cent of the total length of their course; and • return home to finish their degree course (which must be equivalent to a UK degree). The overseas HEI must provide evidence that: • it has overseas accreditation which can be confirmed by Qualification and Language Service (QLS) as offering degree programmes resulting in qualifications which are equivalent to UK degree-level or above; • it intends to teach only part of its programmes in the UK. For example, its students enrol on full time degree programmes at a site outside the UK and study only part of their overall degree programme in the UK, before returning overseas to finish their studies; • if it runs its study abroad programmes on its own site in the UK, it has full legal control of that site, including holding the appropriate planning permission or local planning authority consent to operate the type or class of business, and it owns or has a lease agreement for that site; and • if it rents or uses classroom space in the UK that is provided by a third party for its study abroad programmes, the space must be within an institution which also has a Student sponsor licence. It must provide evidence of the facilities it is renting or using, and that it has full legal control of the site it uses. If the third party's own Student sponsor licence is revoked it must find classroom space with another Student sponsor within six months of that licence being revoked.

Table 2 - Exceptional arrangements

6.11 Table 2 sets out certain exceptional arrangements which may be used to teach students. These exceptional arrangements will not be regarded as compliant with this guidance until UKVI has considered and granted them either as part of an application for a Student sponsor licence or an application for the arrangements to be added on a Student sponsor licence. The application must be supported by the relevant partner HEI and include supporting documentation showing that the exceptional arrangement meets the specific conditions set out below. Please see the section called 'Educational Oversight requirement' for information. All embedded colleges operating under approved exceptional arrangements require their own Educational Oversight[9] which is separate from that of the relevant partner HEI.

6.12 Where a provider chooses not to apply to be recognised as an exceptional arrangement, it will be considered a private provider.

Exceptional arrangement	**Description**	**Specific conditions**
Embedded college offering pathway courses	A private provider, usually part of a network, operating within or near to the main premises of an HEI, delivering pathway courses which prepare students for entry to higher education programmes at that HEI. This does not include pre-sessional courses.	The college may apply for its own Student sponsor licence as an embedded college offering pathway courses. Where it does so, the embedded college must not be listed on the private provider's Student sponsor licence and any students wishing to study pathway courses at the embedded college must be sponsored by it on its own licence. Alternatively, the college can be listed as a site on the private provider's Student sponsor licence (and will not be regarded as an embedded college). If an embedded college offering pathway courses wishes to deliver both pathway courses and integrated programmes to Students, students on integrated programmes must be sponsored by the relevant HEI. Students sponsored by the HEI must not be in the same class as those

[9] For more information about the Educational Oversight of embedded colleges which is provided by the Office for Students, see Document 4: Higher Education regulatory reform

		sponsored by the private provider or embedded college.

Exceptional arrangement	Description	Specific conditions
Embedded college offering integrated programmes	A private provider, usually part of a network, operating within or near to the main premises of an HEI, delivering integrated higher education programmes which students complete at that HEI. This does not include pre-sessional courses.	The embedded college must be listed as an exceptional arrangement on the relevant HEI's Student sponsor licence. Any student wishing to study integrated programmes at the embedded college must be sponsored by the relevant HEI.

Embedded college set up as a joint venture	An entity created by a joint venture agreement between a single HEI and a private provider, usually as part of a network, delivering pathway courses which prepare students for entry to higher education programmes at that HEI. This does not include pre-sessional courses. The joint venture entity must have an expected minimum contractual duration of 10 years. Robust shared governance and shared processes with the HEI must be set out clearly in the joint venture agreement.	The embedded college must be listed as an exceptional arrangement on the relevant HEI's Student sponsor licence. Any students wishing to study at the embedded college must be sponsored by the relevant HEI.
Short term joint venture arrangement	There may be circumstances where UKVI accepts that it is necessary to treat a joint venture entity delivering higher education courses as an exceptional arrangement for a time-limited period only. The HEI must justify why it is necessary to set up a joint venture entity, rather than setting up either a new site or any of the other teaching arrangements in this guidance, in order to deliver their higher education courses. Further, the	The entity must be listed as an exceptional arrangement on the relevant HEI's Student sponsor licence. Any students wishing to study at the entity must be sponsored by the relevant HEI.
	HEI must confirm that the majority of its students being taught at the joint venture entity are or will be from the UK. If UKVI agrees to add the entity to the HEI's Student sponsor licence as a short-term joint venture entity rather than a site, the HEI will be allocated a small number of additional CAS for this joint venture entity for a time-limited period only.	

Table 3 - Teaching partnerships

6.13 A sponsor must list all the teaching partnerships it wishes to use to teach Students and Child Students on its sponsor licence. Where both partners are Student sponsors, the partnership must be listed on both licences regardless of which sponsor is issuing CAS under the partnership.

Student sponsor type	Partnership description	Specific conditions
HEP with a track record of compliance	**Partnership to deliver a pre-sessional course** A partner provider delivers short pre-sessional courses to an HEP's Students.	The partner provider may or may not hold its own Student sponsor licence. It must hold its own Student sponsor licence where it is required to assign a separate CAS for the pre-sessional course, as set out below. The HEP may assign a CAS which covers both a pre-sessional course at the partner institution and the main degree course at the HEP, but only where it has made an unconditional offer for the degree course; the pre-sessional course is no more than three months long; and the pre-sessional course ends no more than one month before the main degree course.

		Where the pre-sessional course is an English language course, and progression to the main degree course is conditional on the student reaching B2 level English on completion of the pre-sessional course, the student must also have demonstrated their ability to speak English at B1 level by providing a SELT meeting the requirements of Appendix English Language of the Immigration Rules and this guidance. In all other circumstances, the partner institution must assign a separate CAS for the pre-sessional course.
HEP	**Partnership with another HEP or an overseas HEI to deliver a course** An HEP has entered into a partnership with another HEP or an overseas HEI to teach a course to Students.	Both parties must hold a Student sponsor licence with Student Sponsor status. The HEP teaching the majority of the course (i.e. over half its duration) at one of its sites must sponsor the student. If teaching is shared equally, the HEPs must decide which of them will sponsor all of the students being taught that course under the partnership. Where the partnership is with an overseas HEI, the HEP and overseas HEI may decide which of them will sponsor all of the students being taught that course under the partnership.
HEP	**Partnership with a publicly funded college or private provider to deliver a course** An HEP has entered into a partnership with a publicly funded college or a private provider to teach a course to Students.	Both the HEP and the partner institution must hold a Student sponsor licence with Student Sponsor status. Where a Student is taught by the HEP at one of its sites for over half

		the duration of the course, the HEP must sponsor the Student. In all other circumstances, the publicly funded college or private provider must sponsor the student.
HEP	**Partnership with a nondepartmental public body to deliver a course** An HEI has entered into a partnership with a nondepartmental public body to teach a course to Students.	The HEP must hold a Student sponsor licence with Student Sponsor status. The nondepartmental public body may or may not hold its own Student sponsor licence. The Student must be taught by the HEP at one of its sites for over half the duration of the course, and the HEP must sponsor the student.

HEP	**Partnership with research institute to deliver a course** An HEI has entered into a partnership with a research institute to teach courses to Master's and/or PhD Students.	The HEP must hold a Student sponsor licence with Student Sponsor status. The research institute may or may not hold its own Student sponsor licence. The research institute must either be: • listed as in receipt of UK Research and Innovation and its Councils grant funding, or • listed as a research institute with which the Research Councils have established a long-term involvement as a major funder and which is eligible to receive research funding. The HEP must sponsor the student. The course of study must lead to the award of a Master's degree or a doctoral-level qualification (for example, a PhD or other RQF Level 8 doctoral award). If a Student will be based at a research institute for more than half the duration of their course, the HEP must give this as the Student's main study address when assigning a CAS for them. The HEP remains responsible for monitoring the Student's attendance.

Publicly funded college	**Partnership with another publicly-funded college to deliver a course** A publicly-funded college has entered into a partnership with another publicly-funded college to teach a course to Students.	Both publicly-funded colleges must hold Student sponsor licences with Student Sponsor status. The publicly-funded college teaching the majority of the course (i.e. over half its duration) at one of its sites must sponsor the student. If teaching is shared equally, the publicly-funded colleges must decide which of them will sponsor all of the students being taught that course under the partnership.
Publicly funded college	**Partnership with a private provider to deliver a course** A publicly funded college has entered into a partnership with private provider to teach a course.	Both the publicly funded college and the private provider must hold a Student sponsor licence with Student Sponsor status. Where a Student is taught by the publicly funded college at one of its sites for over half the course duration, the publicly funded college must sponsor the student. In all other circumstances, the private provider must sponsor the student.
Private provider	**Partnership with another private provider to deliver a course** A private provider has entered into a partnership with another private provider to teach a course to Students.	Both private providers must hold Student sponsor licences with Student Sponsor status. The private provider teaching the majority of the course (i.e. over half the duration of the course) at one of its sites must sponsor the student. If teaching is shared equally, the private providers must decide which of them will sponsor all of the students being taught that course under the partnership.

Independent school	**Partnership to deliver a presessional course** A partner provider delivers short pre-sessional courses to an independent school's Child Students.	The partner provider may or may not hold its own Student sponsor licence. It must hold its own Student sponsor licence where it is required to assign a separate CAS for the pre-sessional course, as set out below. The independent school may assign a CAS to a Child Student to study a pre-sessional course at the partner institution where: (i) an unconditional offer has been made to a Child Student for a main course of study at the independent school; and (ii) the total length of the presessional course plus the main course of study is not more than the maximum time for which the applicant may stay in the UK as a Child Student. In all other circumstances the partner institution must assign a separate CAS for the pre-sessional course.
Independent school	**Partnership with another independent school to deliver a course**	Both independent schools must hold Student sponsor licences with Student Sponsor status. The independent school teaching the majority of the course (i.e. over half the duration of the course) at one of its sites must sponsor the child student. If teaching is shared equally, the independent schools can decide which of them will sponsor all of the child students being taught that course under the partnership.

Before applying to add a site, exceptional arrangement or a teaching partnership to a Student sponsor licence

6.14 A sponsor wishing to add a site (specified in Table 1), exceptional arrangement (specified in Table 2) or a teaching partnership (specified in Table 3) to its Student sponsor licence must meet the following conditions before making an application to UKVI to do so:

- There must be a contractual agreement to teach students in the manner specified, if more than one institution is involved. The agreement must include: the course(s) being delivered, the location of delivery, the qualification awarded upon completion, the education provider delivering the teaching, and the length of the agreement. UKVI may also require further information about the agreement as necessary.
- There must be a sufficient level of planning permission for any site involved (whether this is under Table 1, 2 or 3), and the sponsor must be able to provide evidence (for example, a business plan) of how they intend to use the site.
- The sponsor must notify its Educational Oversight body of its plans to begin teaching at a new site (whether this is under Table 1, 2 or 3), take any steps required by the body to maintain its Educational Oversight and provide evidence of this if required by UKVI. The sponsor must ensure that any teaching partner, exceptional arrangement or site it wishes to add to its Student sponsor licence meets the Educational Oversight requirements set out in this guidance.
- The sponsor must have systems in place to ensure it can meet its sponsorship duties in respect of students it would like to teach at the site, at the exceptional arrangement or under the teaching partnership.

6.15 This is in addition to the specific conditions set out in the relevant Table (Table 1, 2 or 3 in this section).

Table 4 - Establishing a new embedded college

6.16 Table 4 sets out the procedure a private provider should follow when establishing a new site which it wishes eventually to apply to be recognised as an exceptional arrangement.

Exceptional arrangement	Procedure

Embedded college offering	The private provider must notify the relevant Educational Oversight body and request for the college to be reviewed in its own right at the first available opportunity.
Pathway courses	The private provider may then apply to UKVI to add the new college to its Student sponsor licence as a site. If the application is approved the private provider may begin sponsoring students to study at the college. If the private provider has Student Sponsor status, then it will be permitted to sponsor students at the college on courses at RQF level 3 (and equivalent). If the college meets the required rating following an Educational Oversight review, then it may apply for its own Student sponsor licence as an embedded college offering pathway courses. If the Student sponsor licence application is approved, the Register of Student Sponsors will be updated to show the college has been recognised as an embedded college. The embedded college may gain Student Sponsor status once it has been operating for a year.
Embedded college offering integrated programmes and Embedded college set up as a joint venture	The private provider must notify the relevant Educational Oversight body and request for the college to be reviewed in its own right at the first available opportunity. An application may then be made for the college to be added to the relevant HEI's Student sponsor licence as an exceptional arrangement. The HEI is not permitted to assign any CAS for students to study there whilst the application is being considered by UKVI. If the application is approved, the HEI may begin sponsoring students to study at the college and the Register of Student Sponsors will be updated to show it has been recognised as an embedded college. If the college fails to meet the required rating following an Educational Oversight review, the HEI will not be permitted to sponsor any new students to study at the college. This will remain the case until the required rating has been obtained.

Applying to add a site, exceptional arrangement or teaching partnership to a Student sponsor licence

6.17 A sponsor wishing to add a site, exceptional arrangement or teaching partnership to its Student sponsor licence must apply to do so using the Sponsor Management System (SMS), in accordance with Document 2 of this guidance.

6.18 UKVI will verify the application and the documents provided with it, and may undertake further checks. For example, UKVI may visit the sponsor and/or the new site or partner and carry out compliance checks as part of the pre-

assessment process. UKVI may also request further documents. To avoid unnecessary delays, it is recommended that the sponsor engages with UKVI at the earliest opportunity to ensure that the application is considered well in advance of the anticipated start date of the arrangement.

6.19 Applications will be considered on a case-by-case basis. UKVI may refuse the application if:

- the sponsor fails to provide the information required to reach a decision within 10 working days of UKVI's written request;
- the application does not meet the criteria set out above; or
- the sponsor, or any of the sites or institutions involved in the teaching partnership or exceptional arrangement, has failed to comply with the Immigration Rules or sponsor guidance in the past.

6.20 Until the application has been granted, the sponsor may not:

- assign CAS to students to be taught at the new site;
- teach any students at the new site; or
- allow any of its students to study at the partner institution's site.

6.21 If the application is granted, the sponsor must notify its Educational Oversight body, and comply with the Educational Oversight body's directions on any further action that may be necessary in order for it to maintain its Educational Oversight. Failure to do this, or to update UKVI on steps being taken to comply with any direction by the Educational Oversight body, will lead to the site (whether this falls under Table 1, 2 or 3) being removed from the Student sponsor's licence.

6.22 For the avoidance of doubt, non-compliance with the Immigration Rules or sponsor guidance on any site will result in action against the sponsor and may affect the whole Student sponsor licence, including all sites, exceptional arrangements and teaching partnerships listed on it.

7. Confirmations of Acceptance for Studies (CAS) allocations

This section gives information on:

- Applying for a CAS allocation for the first time

Applying for a CAS allocation for the first time

7.1 When you apply for a Student sponsor licence, you must give us an estimate of the number of CAS you would like to assign in each category in the first year of your Student sponsor licence.

7.2 You may request a CAS allocation of up to 50 per cent of your current student body. If you are a new independent school, we will consider any reasonable request, taking account of your projected student body and any recommendation by your statutory education inspection body.

7.3 You must provide evidence to support your request, including the business plan that you submitted to your Educational Oversight body. We will use information from your Educational Oversight report and our compliance visit to reach a decision on your CAS allocation.

7.4 We may ask you for further information before we take a decision.

7.5 We will also take a number of factors into account, including:

- any agents that you will use to recruit international students, and whether they have been linked to immigration abuse in the past;
- the number, type and level of courses provided by your organisation;
- the student-teacher ratio in classes for the courses you provide;
- the number of students currently studying at your organisation;
- the number of academic (teaching) staff your organisation employs on a full-time basis;
- the total student capacity of your premises and any capacity restriction written in to your D1 planning permission;
- the length of time that you have been operating; and

- your history of compliance with the Immigration Rules and sponsor guidance (if you have one).

7.6 If we grant fewer CAS than you requested this may be because:

- you have a history of non-compliance;
- you cannot justify the number you requested; or
- we do not consider your request to be credible based on your current circumstances.

7.7 We will add your CAS allocation to your SMS account, and give you 12 months from the beginning of your licence to assign the CAS. After that time, any unassigned CAS will expire. You may not apply for additional CAS during this period.

8. Student sponsor licence application assessments

This section gives information on:

- Document checks
- Compliance checks
- Process following the checks

Document checks

8.1 We will check your documents and other aspects of your application, especially if we have reasonable doubts about them. We may check that documents are correct and genuine by contacting:

a. other government departments (in the UK and overseas);
b. banks;
c. universities; and
d. professional bodies.

8.2 We aim to make checks as quickly as possible, but allow up to 15 working days for answers to our enquiries. We use a standard format to record the results of enquiries, to ensure we record feedback consistently.

8.3 There are three possible outcomes of these checks:

a. Document confirmed as genuine. We will consider your application as normal.
b. Document confirmed as false. We will refuse your application, whether or not the document is essential to your application.
c. Check inconclusive. If we cannot verify that a document is either genuine or false, we will not use the document as evidence to support your application. We may instead ask for more supporting documents.

Compliance checks

8.4 UKVI compliance officers are trained to refer cases for civil penalties or prosecutions if they find evidence of wrongdoing or criminal activity. If you use deception to obtain a licence you may be committing a criminal offence. The compliance officer will consider information about abuse of the sponsorship arrangements and investigate and, if appropriate, inform the police and/or any relevant authority.

8.5 We will visit you before we decide your Student sponsor licence application and we will check your current monitoring arrangements. We

will make further checks after we have granted your licence to ensure that your monitoring arrangements are being implemented and closely adhered to. This is to also ensure the information you provided on your application form is accurate and that you are able or continuing to do what is required of a licensed sponsor.

8.6 We will check that you meet all the eligibility and suitability criteria. In submitting your application online, you consent to cooperating fully with these checks when you submit your online sponsor application.

8.7 UKVI compliance officers carry out the checks. Our visit may be announced or unannounced. If we make an unannounced visit, it does not necessarily mean that we have any concerns about you.

8.8 The compliance officer will gather material to support the information you gave on your Student sponsor license application and may take photographs of relevant (or potentially relevant) material held at any site from which you are operating. This is to enable us to ascertain whether or not the information you gave was full and accurate, and whether or not you are meeting (or will be able to meet) your duties and responsibilities as a licensed Student sponsor. Compliance officers may wish to speak to people involved in recruiting or enrolling students, to other staff, and to sponsored students. They will not discuss the outcome of the assessment during the visit.

8.9 In certain cases we may make follow-up checks either by telephone, email or by letter. We will ask for evidence to support any information you gave on your application.

8.10 The compliance officer, or any third party working on our behalf, will have official Home Office identification. If you doubt that an official is genuine, you should telephone us on 0300 123 4699.

Process following the checks

8.11 If we have carried out a check before making a decision on your application, we will base our decision on all of the information that you gave us and that we gathered during the checks. We will not usually

discuss the outcome of a visit or the result of checks we carry out with you until we have reached a decision.

8.12 We will write to you to give you the outcome of the checks. Many checks will reveal no problems.

8.13 If there are differences between what you told us and what we find during a check and we discover this before we make a decision on your application, we may request further information from you prior to making the decision.

9. Student sponsor licence application decisions

This section gives information on:

- When we may refuse a Student sponsor licence application
- When we will refuse a Student sponsor licence application
- Refusing a Student sponsor licence application
- Granting a Student sponsor licence application
- Access to the Sponsorship Management System (SMS)
- Adding more categories to your sponsor licence

When we may refuse a Student sponsor licence application

9.1 The table below sets out the circumstances in which we will consider refusing your application.

a.	You have a previous record of non-compliance or poor compliance with the duties of sponsorship, or with the work permit arrangements.
b.	You have previously been asked to provide evidence to allow us to decide whether an organisation was complying with the sponsorship or work permit arrangements and that information was not provided.
c.	You have previously had a sponsor licence revoked by us. In these cases, you will have to show that you have put right any issues which led to the revocation of that licence, before we will consider granting a new one.
d.	You, or any organisation that you have been involved with in a similar role, have their authorisation removed by the Office of the Immigration Services Commissioner (OISC). (This applies to people or organisations that provide immigration advice or services).
e.	You have, or a sponsor organisation that you have been involved with in a similar role within the last five years, has been issued with a penalty for failure to pay VAT or duty.
f.	You have any unspent convictions for offences listed in the Annex to this guidance which we believe to be of relevance to you discharging your sponsor duties.
g.	Any of your Key Personnel has been named as Key Personnel at any institution whose Student sponsor licence or Tier 4 license has been revoked within the last two years.

h.	An owner, director or the authorising officer has been issued with a civil penalty in the 5 year period immediately prior to your application for authorising occupation of premises under a residential tenancy agreement by an adult who is disqualified because of their immigration status.

9.2 We reserve the right to undertake checks on persons associated with sponsors who do not fall under the general definition of ‘you’ or ‘your’. Such persons may include, for example, employees in positions of responsibility who are not directors or Key Personnel and financiers involved in the running of your institution. We may ask you for information on such individuals as part of the application process. The conduct of such persons, where relevant, may also be taken into account in deciding what action we take.

9.3 The action we take will depend on:

a. The seriousness of any past conduct (including conduct that led to revocation of a Student sponsor license or Tier 4 licence, removal from the register of education or training providers, or removal of OISC authorisation).

b. How long it is since the conduct took place and any mitigating circumstances.

c. The nature and seriousness of the issues which led us to revoke your previous licence, and what you have done to improve the situation.

d. Any concerns we may have about any of your associated persons or employees, and the role they have within your organisation, in particular where they have been employed or associated with an organisation (or associated organisation) that has been removed from the sponsor register for abuse or non-compliance within the last five years.

e. The nature and seriousness of your previous criminal conduct and whether we consider that this has a bearing on your suitability to be a Student sponsor.

9.4 Having taken these factors into account, we may either refuse your licence application or grant you a licence with limitations. Such limitations may include restricting your CAS allocation, or asking you to nominate alternative Key Personnel where appropriate. We will inform you of our decision in writing.

When we will refuse a Student sponsor licence application

9.5 An application for a Student sponsor licence will be refused if the provider does not meet any of the eligibility or suitability criteria. In particular, an application will be refused or rejected in the circumstances set out in the table below.

a	You submit any false document with your application. If this happens, and we believe that a criminal offence has been committed, we will also refer your case for prosecution.
b.	You do not meet the requirements specified in this guidance or the Immigration Rules the Student or Child Student routes or the category under which you are applying. If you meet the requirements for some of the categories, but not others, we will only licence you for the categories under which you qualify.
c.	You have, been issued with a civil penalty under Section 15 of the Immigration, Asylum and Nationality Act 2006 or the Accession of Croatia (Immigration and Worker Authorisation) Regulations 2013 for employing illegal workers and you are still liable once your objection and appeal rights have been exhausted, and the fine: • for at least one of those workers was set at the maximum amount. If the fine was paid within the given time limit, your application will be refused if it is made within six months of the date the fine became payable; or • for at least one of those workers was set at the maximum amount. If the fine was not paid within the given time limit, but was paid at a later date, your application will be refused if it is made within 12 months of the date the fine became payable; or • was for a first offence and was set below the maximum amount. If the fine was not paid within the given time limit, but was paid at a later date, your application will be refused if it is made within six months of the date the fine became payable; or • was for a repeat offence and was set below the maximum amount. If the fine was paid within the given time limit, your application will be refused if it is made within six months of the date the fine became payable; or • was for a repeat offence and was set below the maximum amount. If the fine was not paid within the given time limit but was paid at a later date, your application will be refused if it is made within 12 months of the date the fine became payable. The date a fine becomes payable is the date on which all of your objection and appeal rights have been exhausted.

d.	An owner, director or the authorising officer has been issued with **more than one** civil penalty under Section 21 of the Immigration Act 2014 for authorising occupation of premises under a residential tenancy agreement by an adult who is disqualified because of their immigration status and you were or are still liable once your objection and appeal rights have been exhausted, your application will be refused if it is made within 12 months of the date the penalty was fully paid, or the date the penalty was issued if no penalty was imposed.
e.	If you have not paid an outstanding civil penalty issued for employing an illegal migrant worker, and you are still liable once your objection and appeal rights have been exhausted.
f.	An owner, director or the authorising officer has not paid an outstanding civil penalty issued for authorising occupation of premises under a residential tenancy agreement by an adult who is disqualified because of their immigration status, for which they are still liable having exhausted their objection and appeal rights have been exhausted.
g.	If you have been issued with a civil penalty in the five year period immediately prior to your application for a 'charge or penalty' in Appendix C of the guidance for sponsors, apart from: • employing an illegal migrant worker • authorising occupation of premises under a residential tenancy agreement by an adult who is disqualified because of their immigration status

h.	If you have an unspent criminal conviction for a relevant offence. Relevant offences are: • any offence under: ○ the Immigration Act 1971 ○ the Immigration Act 1988 ○ the Asylum and Immigration Appeals Act 1993 ○ the Immigration and Asylum Act 1999 ○ the Nationality, Immigration and Asylum Act 2002 ○ the Immigration, Asylum and Nationality Act 2006 ○ The UK Borders Act 2007 • trafficking for exploitation • any offence listed in Appendix B (which is separate to this guidance); and • any offences of: ○ espionage/terrorism ○ dishonesty (theft, corruption, deception and fraud) ○ tax or excise duty avoidance ○ bribery ○ proceeds of crime ○ money laundering ○ abuse and neglect of children; or • any unspent convictions for any class A Homicide and related grave offences (as defined by the Crown Prosecution Service).
i.	If you are legally prohibited from becoming a company director (unless this is due to being an un-discharged bankrupt). Please note that the authorising officer must not be an un-discharged bankrupt.
j.	If you have previously held a sponsor licence (either under Tiers 2, 4 or 5 of the points-based system or as a Student sponsor license) and that licence was revoked, or surrendered during a compliance investigation or compliance action that resulted in a ban from the Register of Sponsors. You will be able to apply for a new licence from the day after your ban expires. The ban will be considered to have commenced from the date UKVI removed you from the Register of Sponsors and notified you by letter of the intention to revoke your licence.
k.	If you have had an application for a Student sponsor licence (including Tier 4) refused within the last six months.

9.6 When referring to a civil penalty and a fine being paid 'within the given time limit' we mean that you have either paid the fine in full within that time limit, or you have entered into a repayment plan which is still in force and all of your payments are up-to-date. If you have defaulted on a repayment plan, we will not accept this as payments having been made within the given time limit.

Refusing a Student sponsor licence application

9.7 We will write to you giving you the reason(s) for the decision.

9.8 You have no right of appeal if we refuse your application. You may reapply six months from the date of your refusal notice (subject to our Educational Oversight requirement), paying the application fee and providing the required documentation. However, you must ensure that the reasons for refusal no longer apply. If you cannot do this, we are likely to refuse your application again. We may visit you if you have previously been refused a licence to ensure that you can meet your duties as a sponsor.

9.9 If we refused your application because you have previously been issued with a civil penalty, you should only reapply either six or 12 months after the date the fine became payable, depending on the circumstances. Please see the section titled 'When we will refuse a Student sponsor licence application'.

9.10 If we refused your application because you are subject to a sponsor licence ban due to your previous sponsor licence being revoked, you should not reapply until after the date the ban has concluded. For more information on the duration of sponsor licence bans please see the section titled licence revocation in the published Student sponsor compliance guidance.

9.11 If we refused your application by mistake, you must still complete a new application but you will not have to pay a fee.

Granting a Student sponsor licence application

9.12 We will write to you to tell you:

a. we have granted you a Student sponsor licence;

b. your Sponsor Licence Number, which you must quote in all communication with us;

c. your CAS allocation for a 12 month period; and

d. the user name for your Level 1 User to access the SMS.

9.13 Probationary Sponsors are not permitted to do certain things that sponsors with Student Sponsor status may do. This is because it is a transitional status for new sponsors, to enable them to build up an established record of compliance with the Immigration Rules and the sponsor guidance.

9.14 Probationary Sponsors cannot:

a. offer courses at Regulated Qualifications Framework (RQF) level 3 (and equivalent) unless:

- they are a Child Student Probationary Sponsor and are sponsoring a Child Student at this level; or
- the Student they are sponsoring is under the age of 18 and studying at RQF level 3; or
- the Student they are sponsoring is participating in the Erasmus+ programme and the Probationary Sponsor is offering courses at RQF level 2 or 3 (and equivalent) to Students who are participants in the Erasmus+ programme

b. offer courses below degree level that include work placements, unless they are participating in the Erasmus+ programme and wish to offer courses at RQF level 2 or 3 (and equivalent) to Students who are participants in the Erasmus+ programme;

c. allow a student to re-sit an examination more than twice; or

d. allow a student to start studying until UKVI has granted their application for leave to remain to study the course.

9.15 In addition, holders of Student Sponsor status who have not yet obtained a track record of compliance, and holders of Probationary Status are not permitted to do the following:

- self-assess the English language ability of their students who are studying at degree level or above
- offer any courses incorporating remote delivery to sponsored students unless required to prevent discrimination against the student on the basis of their protected characteristics under the Equality Act 2010, or where continuity of education provision would otherwise be interrupted by unforeseen circumstances (such as industrial action, extreme weather, periods of travel restriction)

The requirements for obtaining a track record of compliance, and therefore gaining the full privileges of the Student route, are set out in the Student Sponsor Guidance Document 4: Higher Education regulatory reform

Access to the Sponsorship Management System (SMS)

9.16 Once you have a Student sponsor licence, you will have access to the online SMS. We will:

a. send the user name for the Level 1 User you nominated to the authorising officer by email unless the Level 1 User is also the authorising officer and in which case we will send it by post; and

b. send the password directly to the Level 1 User by email.

9.17 For more information about the SMS and who can use it, please see the section titled 'What is the SMS?' in the 'Sponsorship Duties' guidance.

Adding more categories to your sponsor licence

9.18 Once we have granted your Student sponsor licence, you can add more categories and subcategories to it. For example, if you are registered to sponsor students, but then you want to bring employees to the UK to work you can apply to extend your licence to cover that category, (e.g. Skilled Worker).

9.19 To do this, you must go through the application process again, quoting your Sponsor Licence Number where asked, and select the categories and subcategories you wish to add. You must send in any extra mandatory documents we require along with any extra fee.

9.20 If you apply to add an extra category to your existing licence, all the details you give on your further application must be the same as those we already have for you, particularly for your authorising officer and key contact. A sponsor licence can only have one authorising officer and one key contact. If you want different people to be the authorising officer and key contact for the category you want to add, you cannot amend your existing licence. You must apply for another separate licence and pay the appropriate fee.

9.21 If the Level 1 User you name on the application is different to the ones on your existing licence you must say on the application whether you intend to replace an existing Level 1 User or add a new one. If you do not give this information, we will contact you to ask. If you do not reply within five working days, we will reject your application.

10. Gaining Student Sponsor status

This section gives information on:

- Applying for a Basic Compliance Assessment

Applying for a Basic Compliance Assessment

10.1 A Probationary Sponsor must apply for a Basic Compliance Assessment a year after being issued with a Probationary Sponsor licence. The application must be made using the SMS no earlier than 11 months and no later than 12 months after the date the Probationary Sponsor licence was issued and the relevant fee must be paid.

10.2 Please see Document 3 of the Student Guidance for Sponsors ('Student Compliance') for details of how UKVI carries out a Basic Compliance Assessment.

10.3 If the Probationary Sponsor passes the Basic Compliance Assessment, it will be given Student Sponsor status. The Register of Student Sponsors will be updated and it may:

a. offer courses at RQF level 3 (and equivalent);
b. offer courses below degree level that include work placements;
c. allow a student to re-sit an examination more than twice; and
d. allow a student to start studying where UKVI is still considering their application for permission to stay to study the course.

Annex - List of relevant offences

The following are listed relevant offences that we will take into account:

1. Manslaughter.
2. An offence under section 4 of the Offences against the Person Act 1861 (soliciting murder).

3. An offence under section 18 of that Act (wounding with intent to cause grievous bodily harm).

4. An offence under section 16 of the Firearms Act 1968 (possession of a firearm with intent to endanger life).

5. An offence under section 17(1) of that Act (use of a firearm to resist arrest).

6. An offence under section 18 of that Act (carrying a firearm with criminal intent).

7. An offence of robbery under section 8 of the Theft Act 1968 where, at some time during the commission of the offence, the offender had in his possession a firearm or an imitation firearm within the meaning of the Firearms Act 1968.

8. An offence under section 1 of the Protection of Children Act 1978 (indecent images of children).

9. An offence under section 56 of the Terrorism Act 2000 (directing terrorist organisation).

10. An offence under section 57 of that Act (possession of article for terrorist purposes).

11. An offence under section 59 of that Act (inciting terrorism overseas).

12. An offence under section 47 of the Anti-terrorism, Crime and Security Act 2001 (use etc. of nuclear weapons).

13. An offence under section 50 of that Act (assisting or inducing certain weapons related acts overseas).

14. An offence under section 113 of that Act (use of noxious substance or thing to cause harm or intimidate).

15. An offence under section 1 of the Sexual Offences Act 2003 (rape).

16. An offence under section 2 of that Act (assault by penetration).

17. An offence under section 4 of that Act (causing a person to engage in sexual activity without consent).

18. An offence under section 5 of that Act (rape of a child under 13).

19. An offence under section 6 of that Act (assault of a child under 13 by penetration).

20. An offence under section 7 of that Act (sexual assault of a child under 13).

21. An offence under section 8 of that Act (causing or inciting a child under 13 to engage in sexual activity).

22. An offence under section 9 of that Act (sexual activity with a child).

23. An offence under section 10 of that Act (causing or inciting a child to engage in sexual activity).

24. An offence under section 11 of that Act (engaging in sexual activity in the presence of a child).

25. An offence under section 12 of that Act (causing a child to watch a sexual act).

26. An offence under section 14 of that Act (arranging or facilitating commission of a child sex offence).

27. An offence under section 15 of that Act (meeting a child following sexual grooming etc.).

28. An offence under section 25 of that Act (sexual activity with a child family member) if the offender is aged 18 or over at the time of the offence.

29. An offence under section 26 of that Act (inciting a child family member to engage in sexual activity) if the offender is aged 18 or over at the time of the offence.

30. An offence under section 30 of that Act (sexual activity with a person with a mental disorder impeding choice).

31. An offence under section 31 of that Act (causing or inciting a person with a mental disorder to engage in sexual activity).

32. An offence under section 34 of that Act (inducement, threat or deception to procure sexual activity with a person with a mental disorder).

33. An offence under section 35 of that Act (causing a person with a mental disorder to engage in or agree to engage in sexual activity by inducement etc.).

34. An offence under section 47 of that Act (paying for sexual services of a child) against a person aged under 16.

35. An offence under section 48 of that Act (causing or inciting child prostitution or pornography).

36. An offence under section 49 of that Act (controlling a child prostitute or a child involved in pornography).

37. An offence under section 50 of that Act (arranging or facilitating child prostitution or pornography).

38. An offence under section 62 of that Act (committing an offence with intent to commit a sexual offence).

39. An offence under section 5 of the Domestic Violence, Crime and Victims Act 2004 (causing or allowing the death of a child or vulnerable adult).

40. An offence under section 5 of the Terrorism Act 2006 (preparation of terrorist acts).

41. An offence under section 9 of that Act (making or possession of radioactive device or materials).

42. An offence under section 10 of that Act (misuse of radioactive devices or material and misuse and damage of facilities).

43. An offence under section 11 of that Act (terrorist threats relating to radioactive devices, materials or facilities).

44. An attempt to commit an offence specified in the following list:

    a) Conspiracy to commit a listed offence or murder.

    b) Incitement to commit a listed offence or murder.

    c) An offence under Part 2 of the Serious Crime Act 2007 in relation to which a listed offence or murder is the offence (or one of the offences) which the person intended or believed would be committed.

    d) Aiding, abetting, counselling or procuring the commission of a listed offence.