Home Office

Lead sponsor applications - casework guidance

Version 1.0

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About this guidance

This guidance tells caseworkers how to assess applications to become lead sponsors from charities and community interest companies (CICs) for the named community sponsorship and refugee study routes. It will be updated to include the refugee work route ahead of that route opening.

This guidance explains how to assess whether an organisation meets the validity, suitability and eligibility requirements for accreditation as a lead sponsor. It also provides instructions on assessing the organisation's capacity and capability to fulfil the lead sponsor role, and making a decision on the application.

This guidance must be read alongside:

- Policy guidance: refugee sponsorship routes, which explains the policy and delivery framework for the routes
- Lead sponsor guidance: named community sponsorship and refugee study routes, which sets out the roles and responsibilities of lead sponsors and the requirements for sponsors and sponsorship arrangements

Contacts

If you have any questions about the guidance and your line manager or senior caseworker cannot help you, or you think that the guidance has factual errors, then email the Resettlement Policy Team.

If you notice any formatting errors in this guidance (broken links, spelling mistakes and so on) or have any comments about the layout or navigability of the guidance then you can email the Guidance, Rules and Forms team.

Publication

Below is information on when this version of the guidance was published:

- version **1.0**
- published for Home Office staff on **23 November 2026**

Related content
Contents
Policy guidance: refugee sponsorship routes
Lead sponsor guidance: named community sponsorship and refugee study routes

Introduction

Background

In the Restoring Order and Control policy statement, published in November 2025, the Government announced plans to reform refugee resettlement by introducing three new refugee sponsorship routes. These routes enable community groups, universities and employers to play a direct role in supporting refugees in need of international protection to come to the UK.

The routes operate through a lead sponsorship model. Lead sponsors are voluntary and community sector (VCS) organisations accredited by the Home Office to oversee sponsorship activity, support sponsors and provide assurance that route requirements are being met.

The routes are:

- named community sponsorship, which enables community groups to identify refugees they wish to sponsor
- refugee study, which enables universities to sponsor refugees to study in the UK, working with specialist VCS organisations to identify suitable students
- refugee work, which enables employers to sponsor and offer jobs to refugees, working with specialist VCS organisations to identify suitable refugees

The refugee sponsorship routes build on existing UK resettlement and sponsorship schemes. However, these routes introduce a new framework enabling community groups, universities and employers to identify a specific refugee that they wish to sponsor and support to come to the UK.

Applications from organisations seeking accreditation as a lead sponsor for the named community sponsorship and refugee study routes opened on 29 October 2026.

For further information, see Policy guidance: refugee sponsorship routes.

What does a lead sponsor do?

Lead sponsors play a key role in helping sponsorship arrangements succeed. They work with sponsors throughout the sponsorship period, helping them understand their responsibilities, providing ongoing support and oversight and acting as the main link between sponsors and the Home Office. Lead sponsors assess sponsorship arrangements to ensure they are safe, sustainable and capable of meeting refugees' needs, while maintaining consistent standards across the routes and identifying and addressing any concerns at an early stage.

For further information, see Lead sponsor guidance: named community sponsorship and refugee study routes.

What does a sponsor do?

Sponsors are community groups, universities or employers that provide direct support to refugees arriving through the sponsorship routes. They work closely with lead sponsors throughout the sponsorship arrangement.

Sponsors will refer a refugee for consideration and play a vital role in helping refugees integrate into their local communities and contribute to life in the UK. They provide the practical support needed to help refugees resettle into their local communities, access opportunities and progress towards independence. Depending on the route, this may include providing accommodation, financial support, pastoral support, access to education or employment, and assistance to access local services and build local connections.

Who can apply?

Charities and community interest companies (CICs) are able to apply to become lead sponsors.

To be accredited as a lead sponsor, organisations must demonstrate that they:

- are a registered UK charity or CIC, registered for a minimum of one year
- have the capability, resources and networks required to fulfil the lead sponsor role
- are able to support multiple sponsorship arrangements
- have a governance board where more than 50% of members are British or Irish citizens
- have required policies and procedures in place

For further information, see Lead sponsor guidance: named community sponsorship and refugee study routes.

Related content
Contents
Restoring Order and Control: A statement on the government's asylum and returns policy
Policy guidance: refugee sponsorship routes
Lead sponsor guidance: named community sponsorship and refugee study routes

Write out process

This section tells you when to request further information or provide an organisation with an opportunity to correct omissions in its application and the process to follow when doing so.

You must provide organisations with an opportunity to submit further information, clarification, evidence or corrections where this could address a concern or omission and could result in the application being granted.

Information on when a write out is required is set out in the relevant validity, suitability and eligibility sections of this guidance.

How to write out

When requesting further information or providing an organisation with the opportunity to correct omissions in its application, you must email the key contact listed on the application form.

You must give the organisation 10 working days to provide the information requested or correct the omission. If the organisation does not do so within that period, you must send a second email and provide a final 10 working days to provide the information.

If the organisation does not provide the information or correct the omission before the end of the second period, you must make a decision on the application based on the information available.

Related content
Contents

Validity

This section tells you how to determine whether an application for accreditation as a lead sponsor meets the validity requirements. You must complete the validity assessment before considering suitability or eligibility.

Application form

All applications must be made on the correct application form, 'Apply to be a lead sponsor for refugees', which is available on the GOV.UK website. If an attempt is made to make an application in another way (such as by telephone or email), you must reject the attempted application as invalid without consideration.

Previous applications

You must check whether the organisation has previously applied to become a lead sponsor, and, if so, whether a cooling-off period applies.

If a previous application was refused, the organisation cannot reapply for a period of 3 months from the date of the refusal decision (the "cooling-off period"). You must reject the application as invalid without consideration and inform the organisation when the cooling-off period ends, after which the organisation can reapply.

Where a previous application was refused because of serious issues or compliance failings, a 2-year cooling-off period applies from the date of the refusal decision. You must reject the application as invalid without consideration and inform the organisation when the cooling-off period ends, after which the organisation can reapply.

A further application submitted during a cooling-off period does not restart or extend that period where it is rejected solely because it was submitted too early.

Once the applicable cooling-off period has ended, you must assess any new application against the validity, suitability and eligibility requirements, including considering whether the issues that led to the previous refusal have been addressed.

UK charity or community interest company (CIC)

For an application to be valid, the organisation making the application must be a UK-registered charity or CIC and must have been registered for at least one year on the date of application.

You must use the charity or company registration number provided on the application form to check the organisation on the relevant register.

For charities, you must check the applicable regulatory body website, dependent on where the charity is located.

- for charities in England or Wales, you must check the Charity Commission website. Charities must have the status of 'active'
- for charities in Scotland, you must check the Office of the Scottish Charity Regulator (OSCR) website. Charities must have the status of 'registered'
- for charities in Northern Ireland, you must check the Northern Ireland Charity Commission website. Charities must not have a status of 'removed'

For CICs, you must check the Companies House website. The CIC must have a status of 'active'.

You must confirm that the organisation is UK registered and that it has been registered for at least one year on the date of application. If the organisation does not meet these requirements, you must reject the application as invalid.

Mandatory information and documents

For an application to be valid, the organisation must have completed all mandatory sections of the application form and provided all required information and documents.

Organisations are required to provide the following information as part of their application form:

- details of the organisation, including its name, UK address and charity or company registration number
- details of the organisation's governance board members, including the name, date of birth, nationality and the passport number of each board member
- details of individuals within the organisation who will act as key personnel (key contact, authorising officer and safeguarding lead), including their name, date of birth, nationality, contact information and a copy of their valid passport or driving licence as photographic identification
- a statement of capability outlining how the organisation will deliver the lead sponsor role

Where a board member does not hold a passport, you must request alternative documentation to verify their identity and nationality.

If a member of key personnel cannot provide a passport or driving licence, you must request an alternative form of photographic identification to verify their identity.

You must assess alternative documentation in line with the guidance How to prove and verify someone's identity.

Where any other mandatory information or documents are missing or incomplete, you must follow the write out process.

You do not need to follow the write out process where the information provided is clearly meaningless, irrelevant or substantially incomplete, such that there is insufficient information to meaningfully assess the application against the

requirements. In these circumstances, you may reject the application as invalid without seeking further information. You must not reject the application on this basis where there is any indication that information or documents may be missing because of a technical issue. In these circumstances, you must follow the write out process.

Conclusion

You must reject the application as invalid where any of the validity requirements are not met following any required write out or request for alternative documentation.

If all validity requirements are met, you must proceed to assess the application against the suitability requirements.

Related content
Contents
Apply to be a lead sponsor for refugees
Policy guidance: refugee sponsorship routes
Lead sponsor guidance: named community sponsorship and refugee study routes
Charity Commission | Search the register of charities
Companies House
How to prove and verify someone's identity

External content
Office of the Scottish Charity Regulator | Search
Charity Commission Northern Ireland | Charity search

Suitability

This section tells you how to assess whether an organisation meets the suitability requirements to be accredited as a lead sponsor and the checks that you must undertake.

You must undertake checks on the organisation and its key personnel to determine whether there are any issues that may affect the suitability of the organisation to fulfil the lead sponsor role.

Checks to undertake

You must undertake checks on the organisation, its key personnel, or both, as set out below.

For the organisation, you must assess:

- the organisation's sponsorship history, including any current or previous sponsor licences held under the points-based immigration system and evidence of any associated compliance concerns
- the organisation's financial position, including any evidence of insolvency or financial instability

For key personnel, you must assess:

- identity
- immigration history
- criminality
- insolvency and bankruptcy restrictions

For both the organisation and key personnel, you must assess:

- any potential links to extremism
- any activity that may present a legal or security risk
- any other conduct or activity that may raise concerns about their suitability, including evidence of discrimination, malpractice or other serious misconduct

Information on how to undertake each check is set out below.

Organisation checks

Details of the checks to be undertaken on the organisation are set out below.

Sponsorship history

Metastorm contains details of organisations and any sponsor licences they currently hold or have previously held. You must check Metastorm to determine whether the organisation currently holds or has previously held a sponsor licence. Where the

organisation holds or has held a licence, you must assess whether there is any adverse sponsorship history that may affect its suitability to act as a lead sponsor.

You must check for evidence of compliance concerns, including:

- civil penalties issued to the organisation
- special interest markers
- a sponsor licence that has previously been revoked or suspended, or an application for a sponsor licence that has been refused or rejected

Where the organisation has previously held a sponsor licence, you must establish how and why the licence ended. If the licence was surrendered, you must consider the reason for surrender. A licence surrendered because it was no longer required should not, by itself, be treated as an adverse factor.

If a sponsor licence has been revoked or suspended, you must review the reasons and consider whether the circumstances raise concerns about the organisation's suitability to fulfil the lead sponsor role. You must follow the write out process to request an explanation and evidence of the steps the organisation has taken to address the reason for revocation or suspension.

You must consider the organisation's response before referring the case to a senior caseworker. The senior caseworker must consider the nature, severity and relevance of the issues identified when determining whether this should be a reason for refusal.

Financial stability

You must assess whether the organisation has sufficient financial stability to fulfil the lead sponsor role. To do this, you must:

- review the organisation's published accounts for the two most recent financial reporting periods and
- run a report against Home Office systems to obtain information relevant to the organisation's financial standing

The accounts for the organisation can be found on the relevant regulator's website:

- for charities based in England or Wales, the Charity Commission website
- for charities based in Scotland, the Office of the Scottish Charity Regulator website
- for charities based in Northern Ireland, the Charity Commission Northern Ireland website
- for CICs, the Companies House website

When reviewing the accounts for the two most recent financial reporting periods, you must consider whether:

- the organisation has been insolvent

- the organisation's expenditure has substantially exceeded its income
- the organisation is able to continue operating for the foreseeable future

Within their annual accounts, charities are required to confirm whether they are able to continue operating for the foreseeable future. You must check the most recent published accounts to confirm whether the charity has identified any concerns about its ability to continue operating.

When considering whether expenditure has substantially exceeded income, you must consider the scale of any deficit and whether it occurred in one or both of the two most recent financial reporting periods. A deficit in a single reporting period does not, by itself, mean that the organisation is unsuitable to act as a lead sponsor.

You must refer all cases to the Home Office finance team for review. You must provide the finance team with the information obtained from your review of the organisation's accounts and the report obtained from Home Office systems. The finance team must review this information and provide an assessment of the organisation's financial stability.

Where the available information raises concerns about the organisation's financial stability and further information is required to determine whether the requirement is met, you must follow the write out process and request further information from the organisation.

You must consider any further information provided and, where relevant, refer it to the Home Office finance team for further advice.

You must consider the finance team's assessment alongside all other relevant information when determining whether the organisation has sufficient financial stability to fulfil the lead sponsor role.

If you are satisfied that the organisation has sufficient financial stability, you must continue to consider the application. If you are not satisfied, following consideration of the available evidence and the finance team's assessment, you must discuss the case with a senior caseworker before determining whether this should be a reason for refusal.

Key personnel

You must undertake checks on the key personnel listed on the organisation's application form:

- key contact
- authorising officer
- safeguarding lead

The checks that you must undertake on key personnel are outlined in this section.

Identity checks

A copy of a valid passport or driving licence must be provided as photographic identification for each member of key personnel.

If a member of key personnel cannot provide a copy of a valid passport or driving licence, you must follow the write out process to request an alternative form of photographic identification. For information on the types of documentation that can be used to verify identity, see How to prove and verify someone's identity.

You must verify the identity of each member of key personnel by arranging an initial video call with them, followed by a check of the physical identity documents during the in-person visit.

During the video call, the individual must show the identity document provided with the application. You must confirm that the individual attending the call matches the photographic identification provided and check the document for any obvious discrepancies or concerns. You must also check that the identity document submitted in the application is for the individual who attends the video call. You must record the details of the identity document checked in accordance with the relevant standard operating procedure.

During the in-person visit, the individual must present the physical identity document. You must check the physical document and cross-reference it against the document details recorded during the video check. You must record that the physical document has been seen and the date on which the in-person identity check was completed.

You must be satisfied that the physical document relates to the individual and is consistent with the document checked at the video stage. If there are any discrepancies between the physical document, the information recorded during the video check, or the individual presenting the document, you must resolve these before the individual's identity can be treated as verified.

Where you cannot verify an individual's identity or have concerns about the authenticity of the documentation provided, you must discuss the case with your senior caseworker.

Where, following consideration with a senior caseworker, the individual's identity cannot be verified, the individual must not be accepted as key personnel. You must follow the write out process to allow the organisation to nominate an alternative individual and then complete all required checks on that alternative individual.

Immigration and criminality checks

You must undertake immigration and criminality checks on all key personnel listed on the organisation's application form to identify any adverse immigration history, criminality or other relevant information.

Official sensitive – start of section

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Official sensitive – end of section

Insolvency checks

You must undertake checks to determine whether any member of key personnel:

- is subject to an undischarged bankruptcy
- is subject to a Bankruptcy Restrictions Order
- is subject to a Debt Relief Restrictions Order
- has entered into a Bankruptcy Restrictions Undertaking

Any individual who is subject to an applicable bankruptcy or debt-relief restriction cannot act as key personnel.

You must check the named key personnel on the English and Welsh, Scottish and Northern Irish insolvency registers, regardless of where the person is currently based.

You must search the relevant insolvency registers using the person's full name and any other information required to distinguish between people with the same or similar names.

If a member of key personnel is subject to an applicable restriction, you must follow the write out process to allow the organisation to nominate an alternative individual and then complete all required checks on that alternative individual.

Organisation and key personnel checks

Extremism, security and conduct checks

You must undertake the checks set out below to identify any information relevant to the suitability of the organisation or its key personnel:

Official sensitive – start of section

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Official sensitive – end of section

Conclusion

You must refuse the application where:

- following consideration of any concerns identified, you determine that the organisation does not meet the suitability requirements
- any nominated key personnel do not meet the suitability requirements and the organisation does not nominate a suitable replacement

If the suitability requirements are met, you must proceed to assess whether the organisation meets the eligibility requirements.

Related content
Contents
Charity Commission | Search the register of charities
How to prove and verify someone's identity
Get information about a company
Search the bankruptcy and insolvency register

External content
Office of the Scottish Charity Regulator | Search
Charity Commission Northern Ireland | Charity search
AiB - Register of Insolvencies - Privacy Policy & Content Disclaimer
Individual Voluntary Arrangement Register | Department for the Economy

Eligibility

This section tells you how to assess whether an organisation meets the eligibility requirements to be accredited as a lead sponsor.

Eligibility requirements

To meet the eligibility requirements to be accredited as a lead sponsor, organisations must demonstrate that they:

- have a governance board where more than 50% of its members are British or Irish citizens
- have the capability, resources and networks required to fulfil the lead sponsor role
- are able to support multiple sponsorship arrangements
- have required policies and procedures in place

You must assess the governance board requirement as set out below.

You must assess the remaining eligibility requirements through the statement of capability assessment and a visit to the lead sponsor.

Governance board requirement

You must assess whether more than 50% of the organisation's governance board members are British or Irish citizens.

Organisations will provide the following information for each governance board member:

- full name
- date of birth
- nationality
- valid passport number, where they hold a passport

You must check that the governance board members named in the application match those recorded for the organisation on the relevant charity or CIC register. If there are discrepancies, you must follow the write out process to seek clarification.

Using the information provided in the application, you must calculate whether more than 50% of the governance board members are stated as British or Irish citizens.

If more than 50% are stated to be British or Irish citizens, you must verify the nationality of the relevant board members. To verify the nationality of a board member stated to be British, you must undertake the relevant passport checks with HMPO to verify the information provided.

If the information provided shows that 50% or less of the governance board members are British or Irish citizens, you must refuse the application.

Where you are unable to verify that more than 50% of the governance board members are British or Irish citizens, you must follow the write out process and request further information or clarification. If, following consideration of all available evidence, you are not satisfied that the requirement is met, you must refuse the application.

If the requirement is met, you must continue to assess the remaining eligibility requirements through the statement of capability assessment.

Related content
Contents

Statement of capability

This section tells you how to assess whether an organisation meets the eligibility requirements that are assessed through the statement of capability.

The statement of capability is used to assess whether the organisation:

- has the capability, resources and networks required to fulfil the lead sponsor role
- is able to support multiple sponsorship arrangements
- has required policies and procedures in place

You must assess the statement of capability against four mandatory areas:

- experience and expertise
- networks and resources
- policies and procedures
- monitoring and assurance

Where an organisation is applying as part of a consortium, you must also assess the consortium arrangements.

Where an organisation is applying to become a study route lead sponsor, you must also assess the refugee study route requirements.

Statement of capability scoring assessment

To be accredited as a lead sponsor, an organisation must provide sufficient evidence that it is capable of delivering the lead sponsor role.

You must assess each section of the statement of capability against the scoring framework below. You should consider all relevant evidence provided when determining the score for each section.

For the statement of capability requirement to be met, the organisation must score three in each mandatory section. Where additional consortium or refugee study route requirements apply, these must also be met.

Requirement not met (fail) – score one

The organisation has provided no or only minimal evidence that is meaningful, relevant or assessable against the assessment criteria.

Further information required – score two

The organisation has provided some relevant evidence, but the evidence is incomplete, unclear, insufficiently supported or lacks credibility. The evidence

indicates that the requirement may be met if further information, clarification or supporting evidence is provided.

Requirement met (pass) – score three

The organisation has provided sufficient evidence to demonstrate that it meets the assessment criteria.

Statement of capability sections

Experience and expertise

You must assess whether the organisation has demonstrated sufficient relevant experience and expertise to fulfil the lead sponsor role. Previous experience of refugee resettlement or community sponsorship is not required where the organisation can demonstrate relevant transferable experience and expertise.

You must consider whether the statement of capability:

- demonstrates relevant experience of supporting refugees, vulnerable people, community groups or delivering comparable programmes including evidence of integration outcomes
- provides examples of previous activities, including evidence of their scale and outcomes
- demonstrates how the organisation's experience, expertise and skills are relevant to the lead sponsor role, including how it will address any gaps in knowledge or capability
- demonstrates that it has, or can put in place, the partnerships, safeguards and delivery arrangements needed to fulfil the lead sponsor role
- demonstrates that it has the capacity and capability to support and oversee multiple sponsorship arrangements at the same time

Where the organisation intends to work with particular sponsors or refugee groups, such as groups supporting specific diasporas or LGBTQIA+ refugees, you should consider any evidence of the organisation's experience and understanding of those groups as part of the experience and expertise assessment.

Evidence of relevant experience may include:

- the number of refugees supported to resettle in the UK
- integration outcomes achieved, such as employment, English language progression, education outcomes or sustained accommodation
- case studies demonstrating the support provided to refugees, including plans put in place to address identified needs and support successful integration
- formal or informal training undertaken

You should not treat the absence of previous refugee resettlement or community sponsorship experience as evidence that the requirement is not met. Where an organisation has limited or no previous experience in these areas, you must assess

whether it has demonstrated relevant transferable knowledge and skills and a credible approach to developing any additional capability required.

Relevant transferable experience may include:

- volunteer management
- support for vulnerable people
- experience of education or housing
- community development

You should also consider whether the organisation has explained:

- how its transferable experience and expertise are relevant to the lead sponsor role
- how any gaps in knowledge or capability will be addressed
- how it will access experienced partners or specialist expertise where needed
- how the required capability will be developed, maintained and reviewed

For organisations applying to become study route lead sponsors, you must also consider relevant or transferable experience, expertise, partnerships and delivery arrangements relating to refugee access to higher education.

Networks and resources

You must assess whether the organisation has sufficient staffing, financial resources, partnerships and organisational capacity, or credible plans to put these in place, to deliver the lead sponsor role and support multiple sponsorship arrangements at the same time.

You must consider whether the statement of capability:

- demonstrates sufficient staffing to support the organisation's proposed scale of activity, or provides a credible plan for recruiting additional staff
- clearly explains the roles, responsibilities and capacity of staff, volunteers and delivery partners
- explains its delivery and oversight arrangements, including the resources and partnerships that will support delivery of the lead sponsor role
- sets out the proposed scale of sponsorship activity and explains how its staffing, resources and delivery arrangements would support that scale
- demonstrates how its resources and delivery arrangements could be maintained as activity develops or increases
- demonstrates the financial resources the organisation has available to deliver the lead sponsor role or provides a clear and credible plan for securing funding where resources are not yet in place

When assessing whether staffing and resources are sufficient, you should consider them in the context of the organisation's proposed delivery model and scale of activity. There is no requirement for every organisation to have the same staffing

model or level of resources. You must be satisfied that the arrangements described are credible and capable of supporting the level of activity proposed.
You should also consider relevant partnerships and networks that the organisation has said it intends to use to support delivery. These may include relationships with community groups, charities, local authorities, Strategic Migration Partnerships and organisations involved in integration support.

For study route lead sponsors, you must also consider whether the organisation has evidenced:

- access to appropriate overseas academic partners, networks or expertise to support the identification and assessment of prospective refugee students
- appropriate networks and relationships with UK universities to support the matching of prospective students with an appropriate university

Policies and procedures

You must assess whether the organisation has demonstrated that it has appropriate policies and procedures in place to support effective delivery of the lead sponsor role.

The organisation must provide sufficient information in its statement of capability to explain the relevant policies and procedures it has in place and how these will operate in practice.

Organisations are not required to provide copies of their policies or procedures as part of the statement of capability. However, copies must be provided on request. You may ask the organisation to provide copies of any policies or procedures where this is necessary to support your assessment.

You must consider whether the organisation has appropriate arrangements covering:

- safeguarding
- complaints handling
- data protection
- fraud prevention
- indemnity and liability insurance
- identifying, declaring and managing conflicts of interest

You must consider whether the statement of capability:

- demonstrates that its policies and procedures are appropriate to the nature, scale and complexity of its proposed activity
- explains how its policies and procedures will be implemented and applied in practice to support sponsors, safeguard refugees and provide effective oversight
- explains how responsibility for implementing and overseeing relevant policies and procedures will be managed

- demonstrates that its policies and procedures form part of the organisation's operational arrangements and will be appropriately reviewed and maintained

You should not assess this requirement solely on whether the organisation states that a particular policy exists. You must be satisfied that the information provided demonstrates how the relevant policy or procedure will support the organisation to fulfil its lead sponsor responsibilities in practice.

Where a required policy or procedure exists but there is insufficient information to assess how it would support delivery of the lead sponsor role, you must score the evidence in accordance with the statement of capability scoring framework and follow the write out process where appropriate.

Monitoring and assurance

You must assess whether the organisation has demonstrated that it has, or has credible plans to put in place, appropriate arrangements for monitoring sponsorship arrangements and providing ongoing assurance that sponsors are meeting their responsibilities.

You must consider whether the statement of capability:

- explains the monitoring, assurance and oversight arrangements that are in place or will be established
- explains how sponsorship arrangements and compliance with route requirements will be monitored and assured
- describes the information that will be collected, reviewed and used to improve delivery and address concerns
- explains how risks will be identified, managed and escalated
- explains how sponsor performance, refugee welfare, safeguarding and route compliance will be monitored and assured
- explains what action the organisation would take where monitoring identifies concerns, non-compliance or performance issues

You must assess whether the proposed arrangements provide a credible means of identifying issues and giving the organisation appropriate oversight of the sponsorship arrangements for which it is responsible.

The level and nature of monitoring may vary according to the organisation's proposed delivery model and scale of activity. You should therefore assess whether the arrangements described are proportionate to the number and nature of sponsorship arrangements the organisation proposes to oversee, rather than expecting a particular monitoring model.

Consortium arrangements

Where an organisation is applying as part of a consortium, you must assess whether the proposed consortium arrangements demonstrate that the organisation applying to become the lead sponsor will remain able to fulfil its responsibilities effectively.

The statement of capability must demonstrate how the consortium will work together to deliver the lead sponsor role, including how the combined skills, experience, networks and resources of consortium members will support delivery and how responsibilities will be clearly defined and appropriately managed.

You must consider whether the statement of capability:

- explains the role, responsibilities and contribution of each consortium member
- demonstrates how members will work together to deliver the lead sponsor role
- provides clarity on governance, decision-making, accountability and oversight arrangements and explains how these will operate in practice
- demonstrates how the combined skills, experience, resources, networks and expertise of the consortium members strengthen delivery capability
- explains how risks, performance and delivery will be managed across the consortium
- clearly identifies where responsibility and accountability for the delivery of particular functions will sit
- demonstrates that the designated lead sponsor will retain sufficient oversight of the consortium arrangements to fulfil its responsibilities and ensure compliance with route requirements
- provides confidence that the designated lead sponsor can oversee delivery and ensure compliance with route requirements

You must be satisfied that the proposed arrangements clearly allocate responsibilities between consortium members and do not create gaps or ambiguity about who is accountable for delivery of the lead sponsor role.

Refugee study route requirements

Where an organisation is applying to become a lead sponsor for the refugee study route, you must assess whether it has demonstrated that it can deliver the education-specific aspects of the lead sponsor role.

Previous experience of refugee student resettlement is not required where the organisation can demonstrate relevant transferable experience, partnerships and credible delivery arrangements.

You must consider whether the statement of capability sets out:

- whether the organisation has an overseas academic network in place to assess qualifications and the suitability of refugees to access tertiary education
- how the organisation will use overseas academic networks or partners to identify and assess suitable refugee students
- how the organisation will work with university sponsors to match beneficiaries to suitable courses
- how the organisation will assess qualification equivalency and English language proficiency to align beneficiary skills and qualifications with courses

- how the organisation will support beneficiaries with university, student finance and other required applications (such as ATAS applications)
- how the organisation will meet funding gaps in student funding (such as those typically faced by master's students) through philanthropic partners or scholarships from university sponsors
- how the organisation will maintain oversight of the support provided by university sponsors to refugees, such as integration support and appropriate guidance on securing housing outside of student accommodation
- the organisation's ability to support refugees through study and postgraduate employment
- the organisation's ability to integrate beneficiaries into UK society
- previous experience of working in and/or delivering refugee education and/or refugee education sponsorship

You must consider whether the statement of capability:

- demonstrates previous expertise, experience or partnerships in refugee support, education or higher education
- explains how suitable refugee students will be identified, assessed and supported to access appropriate higher education opportunities
- demonstrates credible arrangements for assessing academic suitability, qualifications and English language proficiency
- demonstrates appropriate arrangements to ensure that refugees are able to access accommodation, welfare and integration support to help them achieve positive education outcomes
- explains how refugees will be supported throughout their studies and, where appropriate, into further study or employment

Where the organisation has limited or no previous experience of supporting refugee students, you must consider whether it has provided a credible plan for accessing specialist expertise, working with experienced partners and developing the capability required to deliver the study route lead sponsor role.

You should assess whether those arrangements, considered together, provide sufficient evidence that the organisation could support refugees from identification and assessment through to accessing and undertaking appropriate higher education.

Conclusion

You must complete the assessment of all applicable sections of the statement of capability before progressing the application to a lead sponsor visit.

Where the organisation has scored three in each applicable section, you can conclude that the statement of capability meets the required standard and progress the application to a lead sponsor visit.

Where one or more sections are scored two, you must follow the write out process and reassess the relevant sections once any further information has been received.

You should not progress the application to a lead sponsor visit until the statement of capability meets the required standard.

Where the statement has received scores of one, you should normally reach a decision on the evidence provided without seeking further information. However, there may be circumstances where it is appropriate to write out. For example, where one or more sections score two or three, but one or more other sections score one, you must consider whether further information, clarification or evidence could reasonably enable the organisation to demonstrate that the remaining requirements are met. Where it could, you must follow the write out process before reaching a decision.

Where, following any required write out, you are not satisfied that the organisation meets the required eligibility requirements, you must proceed in line with the Deciding an application section.

Related content
Contents

Lead sponsor visit

This section tells you how to undertake a visit to a prospective lead sponsor organisation.

A visit must be undertaken for each organisation that has met the requirements assessed through the statement of capability.

Purpose of the visit

The purpose of the visit is to test whether the organisation can substantiate the evidence and arrangements described in its statement of capability and demonstrate that they are capable of operating effectively in practice. You must also use the visit to verify the physical identity documents of all members of key personnel.

The visit does not replace the statement of capability assessment. Evidence obtained during the visit must be considered alongside the statement of capability when determining whether the relevant eligibility requirements are met.

Preparation for the visit

Before the visit, you must review the statement of capability and identify the areas of the organisation's arrangements that should be tested during the visit.

You must contact the key contact listed on the application form to arrange the visit, including confirming that all members of key personnel are required to attend the visit and that physical identity documents for key personnel will be checked, as part of the identity verification process, on the day.

You must prepare appropriate probing and scenario-based questions tailored to the organisation's statement of capability and the areas identified for testing. The questions should test the organisation's understanding of its responsibilities and whether the arrangements described in its statement of capability are capable of being delivered in practice.

Scenario-based questions could, for example, include asking the organisation to explain how it would respond if:

- a sponsor group was no longer able to provide the support it had committed to
- a safeguarding concern was raised about a sponsorship arrangement
- a sponsor repeatedly failed to meet its responsibilities
- several sponsor groups required additional support at the same time
- a significant concern arose that may need to be escalated to the Home Office

During the visit

During the visit, you must use probing and scenario-based questions to test whether the organisation can substantiate the systems, processes, governance

arrangements and delivery model described in its statement of capability and whether those arrangements are capable of operating effectively in practice.

Depending on the evidence provided in the statement of capability, this may include testing the organisation's staffing, resources and governance arrangements, its ability to support and oversee multiple sponsor groups, how its policies and procedures would operate in practice, and how it would manage risks, respond to concerns and monitor sponsorship arrangements.

When considering the organisation's responses, you must assess whether the organisation can clearly and coherently explain its proposed approach, respond to questions about how its arrangements would work in practice and demonstrate that the arrangements described in its statement of capability are credible and capable of being delivered.

The visit may also include interviews with relevant staff, volunteers or trustees to test understanding of their roles, responsibilities and escalation routes.

You must record the identity checks and areas tested during the visit, the evidence considered and any concerns or further information requirements identified.

Conclusion

You must consider the findings from the visit alongside the statement of capability when reaching your final assessment of whether the organisation meets the relevant eligibility requirements.

Where the visit substantiates the material evidence and arrangements described in the statement of capability and no further concerns are identified, you can conclude that the relevant eligibility requirements are met.

Where evidence obtained during the visit does not substantiate, or is inconsistent with, material information provided in the statement of capability, you must consider the effect of this on your assessment of the relevant eligibility requirements.

Where further information or clarification could resolve a concern identified during the visit, you must follow the write out process before reaching a decision.

Once you have completed your assessment, you must proceed to make a proposed decision on whether the application should be approved in principle or refused, following the process set out in the 'Deciding an application' section.

Related content
Contents

Deciding an application

This section tells you about the process for approving or refusing an application.

An application to become a lead sponsor must only be approved or refused with the agreement of a senior caseworker. The senior caseworker may convene a panel of relevant officials with expertise to support effective and consistent decision-making.

An application to become a lead sponsor will either be approved "in principle" initially or refused. Approval in principle means that the organisation has met the requirements for accreditation as a lead sponsor. It is not final approval and does not allow the organisation to begin operating as a lead sponsor.

Organisations that receive an approval in principle decision must enter into a lead sponsor contract with the Home Office. Final approval is subject to the contract being agreed and signed by both parties. The organisation must not begin operating as a lead sponsor unless and until it has received written confirmation of final approval.

Approval in principle

If the application is valid and the organisation meets all the eligibility and suitability requirements, you must approve the application in principle, subject to senior caseworker approval.

You must use the ‘approval in principle’ decision template to confirm that the application has been approved in principle, subject to the lead sponsor contract being agreed and signed by both parties.

If the senior caseworker agrees with your decision, you must email the key contact for the organisation to confirm the decision. The decision notification must include the ‘approval in principle’ letter and must clearly set out the period within which the lead sponsor contract must be signed.

Final approval

Once the lead sponsor contract has been agreed and signed by the Home Office and the organisation, the organisation will receive final written approval as a lead sponsor.

You must issue the signed contract to the organisation’s key contact as confirmation of the final approval. The contract must confirm the date from which the organisation is approved to begin operating as a lead sponsor.

The organisation must not exercise any lead sponsor functions before the start date specified in the final approval notification.

Refusal

You must only make a refusal decision once:

- all relevant checks and assessments have been completed
- the write out process has been completed where further information was required
- any additional information provided by the organisation has been considered
- the findings from the lead sponsor visit have been considered

If the organisation does not meet all the eligibility and suitability requirements, you must set out all the reasons for refusal in a refusal decision notification. You must refer every proposed refusal decision to your senior caseworker before confirming the decision to the organisation's key contact.

The senior caseworker must be satisfied that:

- the reasons for refusal are supported by the available evidence
- all relevant information has been considered
- the write out process has been followed where required
- the reasons for refusal are clearly and accurately explained
- the decision notification does not disclose sensitive information that cannot appropriately be shared with the organisation

If the senior caseworker agrees with the refusal decision, you must confirm the decision in writing to the organisation's key contact.

The refusal notification must clearly set out:

- the reasons for refusal, including the relevant information and evidence considered in reaching the decision
- where appropriate, any actions the organisation may take to address the issues identified
- the applicable cooling-off period
- the date on which the organisation may submit a new application

You must record the refusal decision, the reasons for refusal and the applicable cooling-off period on the case record.

Related content
Contents

Lead sponsor contract

This section tells you what happens after an organisation has been approved in principle.

Once an application has been approved in principle, a lead sponsor contract must be agreed and signed by the organisation and the Home Office before final approval can be given and the organisation can begin operating as a lead sponsor.

The lead sponsor contract will set out:

- the start date from which the organisation is approved to begin operating as a lead sponsor
- the terms of the agreement
- the roles and responsibilities of the lead sponsor and the Home Office
- escalation routes and interventions
- data-sharing principles
- circumstances in which the contract may be terminated
- the period of accreditation and date on which the accreditation will be reviewed

Once an organisation has been notified that its application has been approved in principle, you must refer the case to the Head of Sponsorship to agree and progress the lead sponsor contract with the organisation.

Signing the lead sponsor contract

The lead sponsor contract must be reviewed and agreed by the Home Office and the organisation before it is signed.

The contract must be signed by an appropriately authorised person on behalf of each party. The Authorising Officer should sign the contract on behalf of the lead sponsor because they have overall responsibility for overseeing the organisation's lead sponsor activities. The Head of Sponsorship should sign the contract on behalf of the Home Office.

Once the contract has been signed by both parties, you must follow the final approval process set out in Deciding an application.

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