



WESTBOURNE SCHOOL

STUDENT SPONSOR LICENCE PROCEDURE (UKVI)

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“One of the most consistently high-achieving independent schools in Britain” Sunday Times Schools Guide

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1. Key Dates

Licence renewal date: 06/04/2034

BCA renewal date: 24th February 2027

CAS allocation expiry: 12th May 2027

2. Student Sponsor Licence Application

2.1 As of the 6th April 2024, the Home Office announced that the requirement to renew Sponsor Licence has been removed and our licence was automatically renewed to expire in 10 years' time.

2.2 The School remains subject to all sponsor duties and must maintain compliance throughout the 10-year license period. Any failure may result in suspension or revocation.

3. Student Sponsor Key Personnel and The Sponsorship Management System (SMS) Users

3.1 Student Sponsor Key Personnel at Westbourne School:

- Authorising officer: Marie de Tito Mount, Global Chief Executive Officer
- Key contact: Marie de Tito Mount, Global Chief Executive Officer
- Level 1 users: Marie de Tito Mount, Eliz Gurler

3.2 Key Personnel requirements:

- Must be permanently based in the UK.
- Must not have an unspent conviction for a relevant offence.
- Must be a paid member of staff.
- Can be a UK-based representative.

3.3 Only permanent members of Westbourne School staff will be selected to be a Level 1 or 2 User

3.4 All staff at Westbourne School are required to undergo an enhanced DBS check as part of their pre-employment checks.

3.5 Any requests to add further Level 1 or 2 Users must be authorised by the Authorising Officer.

3.6 Personal details of any proposed new Level 1 or 2 Users must be submitted to UKVI for consideration.

4. Student Sponsor Sites and Teaching Partnerships

4.1 Sites:

- SENIOR SCHOOL & SIXTH FORM, 4 Hickman Road, Penarth, Vale of Glamorgan, CF64 2AJ
- PREP SCHOOL, 14 Victoria Road, Penarth, Vale of Glamorgan, CF64 3EF
- INNOVATION HUB/DRAKE HOUSE, 1 Plymouth Road, Penarth CF64 3TP

4.2 Any additional site must be notified to UKVI within 20 working days via SMS and accompanied by relevant due diligence documentation.



5. Basic Compliance Application (BCA) Process

5.1 A sponsor must apply for a Basic Compliance Assessment every 12 months.

5.2 The Student Sponsor status start date is the 13th May 2026 and the end date is the 12th May 2027. The Basic Compliance Assessment renewal opening date is the 25th January 2027.

5.3 The core requirements are that the sponsor must have:

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

Our 2026 Assessment Results:

- Refusal Rate: 0%
- Enrolment Rate: 100%
- Course Completion Rate: 94.74%

5.4 The Authorising officer monitors all three core requirements on an ongoing basis.

5.5 Visa refusal rate is monitored daily, while the enrolment and course completion rates are assessed on a monthly basis.

5.6 There are linked policies and procedures which address any risk of the core metrics being breached:

[Admissions Procedure](#)

[Attendance Policy](#)

[Missing Persons Policy](#)

[Overseas Students Travel Risk Assessment](#)

[Right to Study Policy](#)

[Safeguarding and Child Protection Policy](#)

[Student Travel Arrangements Process \(UKVI\)](#)

[Visa Procedure](#)

[Visa Monitoring Process](#)

6. The Sponsorship Management System (SMS)

6.1 UKVI's Sponsor Management System is the online platform which is used to maintain the Student Sponsor Licence.

6.2 The SMS is the means by which a student specific Confirmation of Acceptance for Study (CAS) is generated.

6.3 A CAS is an electronic code number which is used within the Student Visa application process so the drafting and issuing of CAS can only be completed by authorised members of staff.

6.4 Each Student Sponsor is required to establish Level 1 (full system access) and Level 2 (read only system access) users of the SMS system.

6.5 The Authorising officer checks the SMS regularly to ensure that Level 1 and 2 User details are up to date and remain appropriate.



6.6 The Authorising officer will remove any Level 1 or 2 Users from the SMS where they cease to be employed by Westbourne School.

6.7 Level 1 and 2 Users must never share their username and / or passwords with anyone.

6.8 All SMS changes, including CAS assignment, student reports, personnel/site changes, are logged and reviewed termly by the Compliance Manager to ensure accuracy.

7. Confirmation of Acceptance for Studies (CAS)

7.1 Confirmation of Acceptance for Studies (CAS) are digital codes which are used in the Student visa application process.

7.2 There are two routes you can use to sponsor a student. These are the Student and Child Student routes. The Child Student route is for students aged 4-17. Child Students may only be educated at independent schools. The Student route is for students aged 18 or over.

7.3 Before assigning a CAS to a student, authorised members of staff must consider whether:

They are assigning a CAS under the appropriate Student or Child Student route

- They are complying with the law and have legitimate intent to study at Westbourne School.
- The academic requirements are met or correct exemption applied
- The level of study
- The student intends and is able to follow the course of study concerned
- The student will successfully complete their course on the date specified on the CAS
- The course the student intends to follow will lead to an approved qualification
- The student is aware of their responsibility to abide by the conditions of their Student or Child Student visa, including their obligation to study at their sponsor institution (unless studying at a partner institution or undertaking supplementary study), their working restrictions and that they will leave the UK when their visa expires unless they have obtained further permission to stay
- The CAS you are assigning is for a course that represents academic progression if the student is continuing their studies and is applying from within the UK

We are currently allocated 35 Child Student CAS and 3 Student CAS. The School applies annually to UKVI for CAS allocation renewal based on projected student numbers and must maintain evidence to justify this allocation.

8. UKVI Audit Procedure

8.1 In the event of a Student Sponsor audit, the authorising officer must be contacted directly to arrange a suitable date. The authorising officer is required to be present. On the day of inspection, the UKVI inspector(s) must be asked for their identification documents and provided with a Visitors Identity Badge before they access any UKVI registered school site. No documentation, or student records are to be discussed until identity has been established. UKVI will require access to student files to assess retention of 'Appendix D' documentation as well as other documents used for record keeping as well as care arrangements.

These documents include:

- Current passport / national identity doc (EEA students)



- UK visa(s) and e-Visa
- Check and note entry date to the UK for example entry stamp, e-ticket, boarding pass
- History of the student's contact details (address, phone number) - regularly updated
- Evidence of student's attendance and absence records
- Copies of all evidence used when assigning the CAS
- Evidence of care arrangements for students under 18 for example Parental Consent letter and accompanying proof of relationship with parents i.e. birth certificate

8.2 In addition, UKVI will require access to Westbourne School's policies and procedures and marketing materials linked to student sponsorship and compliance.

8.3 The following colleagues will be involved should Westbourne School be audited by UKVI:

- Marie de Tito Mount: Authorising Officer
- Marie de Tito Mount: Key Contact, Level 1 User
- Eliz Gurler: Level 1 user
- Clare Leach: Office Manager / Examinations Officer
- Eliz Gurler: Compliance Manager

8.4 Student attendance and absence records are retained within iSAMS.

8.5 Appendix D documents are retained as paper copies and uploaded to iSAMS for each student.

8.6 All additional non-student documents are saved centrally within Westbourne Schools UKVI shared files.

8.7 A pre-audit checklist is maintained and reviewed termly to ensure readiness for inspection.

9. Sponsorship Reporting Duties

All reports must be submitted via the SMS within the prescribed UKVI deadlines. Evidence of reports and decision making is logged and retained for audit.

9.1 Reporting Changes of Circumstances (Sponsored Students)

a. If a student withdraws from their course before they travel to the UK

We must:

- Report the activity to UKVI within 10 working days. Evidence of follow up contact must be retained before reporting.
- Tell UKVI if the student is joining another institution and the name and address of that institution if known.

b. If a student's start date is delayed before they enter the UK but after they have been granted entry clearance. The Compliance Manager must record the decision rationale and supporting evidence for continued sponsorship.

We must:

- Agree with the student whether they can still complete the course within the dates given on their visa. If they can, we need not report anything.



If they can't, we must:

- Assign a new CAS
 - Advise the student to apply to vary their leave to include a later finish date.
- c. If a student does not enrol within the enrollment period.

We must:

- Report it to UKVI within 10 working days of the enrolment period ending, including the reasons for non-enrolment, for example;

- a) they missed their flight;
- b) they decided not to come to the UK;
- c) they delayed their enrolment;
- d) they are doing a course with a different sponsor; or
- e) UKVI have refused them permission to come to, or stay in, the UK.

If UKVI has refused a student permission to come to, or stay in, the UK, we do not need to report the non-enrolment as soon as we become aware of the refusal. The time-limit is still 10 working days from the date the enrolment period ends.

- d. If a student misses 10 consecutive expected contact points.

We can either:

- Report a tenth missed contact, or the date the student has stopped academically engaging whenever it occurs during the year; or
 - Set two checkpoints during any rolling 12-month period. We must report any students who have stopped academically engaging or missed 10 consecutive expected contacts, without us reasonably giving them permission leading up to that checkpoint, and we are withdrawing sponsorship of the student.
- e. If a student defers their studies after they have arrived in the UK and is no longer actively studying

We may continue to sponsor a student who has deferred their studies for up to a maximum of 60 days providing we can continue to carry out our sponsorship duties and the student will be able to complete their course within their existing period of permission. If we think the student will not resume their studies after 60 days, we must withdraw sponsorship.

In exceptional circumstances, such as serious illness or injury, we may continue to sponsor a student for longer than 60 days, providing the student can still complete their course within their existing period of permission when they resume their studies.

We must decide whether we are prepared to continue sponsoring a student during a deferral and, if necessary, provide evidence to verify this decision to UKVI compliance officers.

We must report that the student has deferred their studies within 10 working days of agreeing to the deferral. If we withdraw sponsorship, the student's permission to stay is no longer valid and we must advise them to leave the UK.

Once the student is ready to resume their studies, **we must** assign a new CAS and the student must reapply for a new visa.

f. If we are withdrawing a student from their course.

We must:

- Tell the UKVI within 10 working days of knowing about the issue
- Explain, for example;

a) The student has not met our requirements

b) The awarding body stops running the course or stops trading.

If a student to whom we have issued a CAS intends to request administrative review of a decision to refuse their visa application, and we will continue to sponsor them if the refusal is overturned, we must not withdraw sponsorship until the review has been concluded. Report such students as non-enrolments in accordance with c. above, unless we are withdrawing sponsorship for other reasons.

g. If we stop sponsoring a student because they:

- commence a study abroad programme overseas and do not plan to return to the UK or we do not want to continue to be responsible for them while they are out of the UK
- move into a different immigration category with a different sponsor;
- move into an immigration category that does not need a sponsor; or
- complete the course sooner than expected.

We must:

- Tell UKVI about it within 10 working days of knowing about the issue.

h. If there is a significant change in a student's circumstances

These include:

- a change in where they study or do their work placement;
- a change of course; or
- anything that suggests that they are breaking the conditions of their permission to stay in the UK, such as working in breach of their conditions.

We must:



Report the change to UKVI within 10 working days of knowing about it.

i. If we suspect that a student is not a genuine student.

We must:

Report this by e-mail to the Home Office as soon as possible.

9.2 Information we do not have to report

We do not need to tell UKVI if:

- a. We have given a Student permission to miss a contact or expected academic engagement event.
- b. We have decided not to withdraw sponsorship even though a Student has missed 10 consecutive contacts. This should be very rare and we must keep evidence of our decision and the reasoning behind it as UKVI compliance officers will monitor these exceptions.

9.3 Reporting Changes of Circumstances (Institution)

a. Changes to key personnel

If we replace our authorising officer and/or key contact; or

We need to amend the details of our existing authorising officer and/or key contact; or

We replace our existing Level 1 user; or

We want to add another Level 1 user; or

We need to amend the details of our existing Level 1 user.

We must:

- Updated DBS certificates must be on file for any new Key Personnel before SMS submission. Use the SMS to notify the UKVI as soon as possible
- Give all the details of the new Key Personnel

UKVI will conduct checks on all people nominated to these roles and will not accept a nominated person who does not meet their requirements.

Changes to the address of our authorising officer, key contact or a level 1 user may take effect automatically, if their new address matches our main or head office address, or the address of our representative for a key contact or level 1 user.

UKVI will write to us if they are enabled to make these or any other changes automatically.

b. If we change our address and/or change our name

We must:



- Use the SMS to notify UKVI as soon as possible
- Give UKVI the details
- Explain why

c. Changes to sites

Adding a site, exceptional arrangement or teaching partnership

We must use the SMS to:

- Give UKVI the full details of the site, exceptional arrangement or teaching partnership we wish to add to our sponsor licence. Due diligence evidence and safeguarding assurances must be submitted within the details.
- Provide UKVI with any additional information that they ask for to help them reach a decision on our application within 10 working days of their written request for information.
- Notify our approved Educational Oversight body that we would like to make this addition to our sponsor licence (and provide UKVI with confirmation of this) and take any steps required by that body to maintain your Educational Oversight. We must ensure that any teaching partner, exceptional arrangement, or site we wish to add to our licence meets the Educational Oversight requirements set out by UKVI.

Removing a site, exceptional arrangement or teaching partnership

We must use the SMS to notify:

- Give UKVI the full details of the site, exceptional arrangement or teaching partnership we wish to remove from our sponsor licence.
- We must notify UKVI within 20 working days of ceasing to use the site, or ending the exceptional arrangement or teaching partnership.
- We must provide details of any students that we are sponsoring at the site, under the exceptional arrangement or under the teaching partnership and whether those students will be ceasing their studies or transferring to another site or course.

Reporting material changes to a site, exceptional arrangement or teaching partnership

We must use the SMS to:

- Give the full details of material change to the site, exceptional arrangement or teaching partnership.
- We must notify UKVI within 20 working days of the material change to the site, exceptional arrangement or teaching partnership.

d. If we appoint a new principal or change owners



We must:

- Use the SMS to give UKVI their names within 20 working days of the change.

If we do not, UKVI will revoke our licence.

e. If we have a criminal prosecution pending, or we are convicted of a relevant offence

We must:

- Use the SMS to give UKVI the details of the pending prosecution or the conviction as soon as we know about it.

f. If there is a change in status of any registration by a governing body that we are required to hold including changes to our Educational Oversight

We must:

- Use the SMS to inform UKVI and give full details of the change, within 20 working days of the change.

g. Changes to the business

If we have sold all or part of our business;

or

We are involved in a merger or takeover.

We must:

- Use the SMS to inform UKVI within 20 working days of the change.

h. Insolvency

If we become insolvent and

- go into administration (including special administration) or administrative receivership (receivership in Scotland);
- enter into a Company Voluntary Arrangement (CVA) or Debt Arrangement Scheme (DAS);
- go into liquidation or sequestration is awarded; or
- become bankrupt

We must:

- Use the SMS to notify UKVI within 20 working days of:
- 1. going into administration or receivership



- 2. the CVA or DAS being agreed
 - 3. ceasing trading
 - 4. entering an Individual Voluntary Arrangement (IVA) or DAS
 - 5. being issued a bankruptcy order
 - tell the administrator/receiver that you are a licensed sponsor
 - tell UKVI who has been appointed as the administrator within 20 working days of them being appointed.
 - nominate the insolvency professional appointed as administrator or receiver as our authorising officer
 - tell UKVI if the CVA, IVA or DAS has resulted in a change of ownership
- i. If we want to appoint, remove or change a representative

We must:

- Use the SMS to give the details of the representative we want to appoint/remove/add.

j. If we want to, or are required to, surrender the whole or part of your licence

We must:

- Use the SMS to notify UKVI as soon as possible

k. If we are subject to a civil penalty

We must:

- Use the 'Request any other changes to your licence details' part of the SMS to give the details of the civil penalty as soon as we know about it.

l. If we become an academy or a school maintained by a local authority

We must:

- Use the SMS to notify us as soon as possible and provide UKVI with details of the conversion

At the point we become an academy or school maintained by a local authority, our CAS allocation will be set to zero and we will not be allowed to sponsor any new students. Any CAS assigned prior to the conversion may still be used to support a visa application. UKVI will also process any visa application supported by a CAS that we have assigned, which has been made but not yet been decided at the point we become an academy or school maintained by a local authority.

Students or Child Students (including Tier 4) already studying with us at the time of the conversion may complete their current course of study but may not commence a new course with us.



We must continue to fulfil our sponsor duties, including reporting on our students and applying for a Basic Compliance Assessment, until you have taught our existing Students or Child Students, after which we must surrender our licence.

