



UNIVERSITY_{OF}
WINCHESTER

VISA SPONSORSHIP POLICY 2025/26

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<p>Indicate whether the document is for public access or internal access only</p> <p>Indicate whether the document applies to collaborative provision?</p> <p><i>(Strikethrough text, as appropriate)</i></p>	<p>Public Access</p> <p>Internal Access</p> <p>Only</p> <p>Applies to Collaborative Provision</p>
<p>Summary:</p> <p>This document defines the policy for compliance with the Home Office regulations relating to Student Route visa students, sponsored by the University.</p> <p>The Policy is specific to the University of Winchester and does not cover all immigration and sponsor requirements. It is reviewed annually but may be amended sooner in response to UKVI Policy changes.</p>	

STUDENT VISA COMPLIANCE POLICY

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Equality Impact Assessment	
Summary of process undertaken to determine equality impacts:	<p>Assurance of access, equity and inclusivity and that no process or required procedure places an unfair advantage or disadvantage for any person possessing, associated with or perceived to be possessing any of the protected characteristics as defined in the Equalities Act 2010.</p> <p>To also ensure that UKVI regulations and sponsor guidance and followed for Student Route Visa holders and those on other visa sponsorship (where appropriate).</p>
University Committee (name/ date) where equality impacts discussed (may be Committee of approval, or another):	Academic Regulations Policies and Procedures Committee and Senate
Identified equality impact(s) on colleagues and students (i.e. any specific impacts related to this policy that may cause disadvantage for people due to one or more particular protective characteristic)	
Protected Characteristic	Impact(s) identified and any action(s)/mitigation(s) to address these impact(s), as necessary.
Age	Where applicable, this policy is subject to the rules and regulations of the UK Visa & Immigration Directorate of the Home Office (UKVI).
Disability	Where applicable, this policy is subject to the rules and regulations of the UK Visa & Immigration Directorate of the Home Office (UKVI).
Gender Identity	Where applicable, this policy is subject to the rules and regulations of the UK Visa & Immigration Directorate of the Home Office (UKVI).
Marriage/Civil Partnership	Where applicable, this policy is subject to the rules and regulations of the UK Visa & Immigration Directorate of the Home Office (UKVI).
Pregnancy and Maternity	Where applicable, this policy is subject to the rules and regulations of the UK Visa & Immigration Directorate of the Home Office (UKVI).
Race (incl. nationality)	Where applicable, this policy is subject to the rules and regulations of the UK Visa & Immigration Directorate of the Home Office (UKVI).
Religion and Belief	Where applicable, this policy is subject to the rules and regulations of the UK Visa & Immigration Directorate of the Home Office (UKVI).
Sex	Where applicable, this policy is subject to the rules and regulations of the UK Visa & Immigration Directorate of the Home Office (UKVI).
Sexual Orientation	Where applicable, this policy is subject to the rules and regulations of the UK Visa & Immigration Directorate of the Home Office (UKVI).

1. Policy Introduction

The UK Visa & Immigration Directorate of the Home Office (UKVI) requires Higher Education Institutions to undertake a range of duties and responsibilities as Sponsors of students entering the UK with the Student Route Visa. The Student Route Visa requires the issuing of the Confirmation of Acceptance for Studies (CAS), accurate record keeping and reporting duties as per UKVI rules and regulations.

The Pro-vice Chancellor (Engagement) is the Authorising Officer and has overall responsibility for the Sponsor Licence.

The Head of International Student Success is the key contact and is responsible for ensuring that the University complies with the UKVI Student Sponsor Guidance.

2. Scope

- 2.1 This policy applies to applicants and students of programmes delivered on University of Winchester premises who require a Student Route Visa to study in the UK.
- 2.2 This policy does not apply to employees of the university (except where the employee is also a student of the university). This policy also does not apply to collaborative provision.

3. Key Requirements of UKVI Policy Guidance

The University's Policy reflects the requirements set out in UKVI's Student Sponsor Guidance and Immigration Rules. They are as follows:

- 3.1 The University shall allow access to UKVI staff; apply their guidance; supply ad hoc data; use the UKVI on-line Student Management System (SMS) and strive to ensure that the University's sponsored students arrive, enrol and complete their studies.
- 3.2 The University shall issue a CAS for students that meet the relevant UKVI and university requirements. The CAS contains essential information on the student's programme, background, fees and English Language Requirements (where required) and Agent details (when required). The CAS is a document used by the student in support of a visa application.
- 3.3 The University will keep copies of an up-to-date passport (specific pages); Visa (Immigration Status/ Digital immigration Status); evidence of date of entry; contact details; attendance and engagement data and any relevant documents in support of their application and during their time of study.
- 3.4 The University will securely keep electronic copies of up-to-date passport (specific pages); visa (Immigration Status/ Digital immigration Status) as evidence of Right to Study for all unsponsored Overseas students.
- 3.5 The University will report students who do not enrol; cease engagement; change immigration category or have significant programme changes. The University will also report details of recruitment 'intermediaries' and students believed to be breaching or attempting to breach visa conditions or involved in terrorism or other criminal activity.
- 3.6 To retain sponsor status, the University must apply for a Basic Compliance Assessment (BCA) every 12 months. This consists of a Visa Refusal rate not exceeding 10%; a 90% enrolment rate of sponsored students and a course completion rate of at least 85% for sponsored students. It is anticipated these rates will be amended to the following within the next academic year: visa refusal

rate not exceeding 5%; 95% enrolment rate and a course completion rate of at least 90%.

- 3.7 Failure to comply with UKVI requirements may result in the loss or suspension of the University's licence to sponsor Overseas students.
- 3.8 Sponsored students can only enrol on programmes that meet certain requirements; these are that the programme must be at RQF 3 or above (except English language courses); the programme should be full-time (part-time students may be accepted at Postgraduate level) and must lead to an approved qualification. There are additional conditions about the place of study and mandatory work placements.
- 3.9 Full details of current UKVI requirements are available on the [UKVI website](#) and Student Support and Success pages of the intranet. The Head of International Student Success or the UKVI Compliance Officer can also provide clarification.

4. Specific Responsibilities at the University of Winchester

4.1 CAS Issuing

UKVI Requirement	Responsibility
Issue CAS to new students	Marketing, Communications & Engagement – Admissions Student Support and Success - International Student Success for Study Abroad students
Issue CAS to continuing students	Student Support and Success - International Student Success

4.2 Record Keeping

UKVI Requirement	Responsibility
Copies of relevant passport pages, visas (Immigration Status/ Digital immigration Status) and all relevant Appendix D documents	UKVI Compliance Officer
Contact details	UKVI Compliance Officer
Attendance and Engagement records	UKVI Compliance Officer
Evidence used for CAS issuing	Marketing, Communications & Engagement – Admissions for new students Student Support and Success - International Student Success for Study Abroad students

	Student Support and Success - International Student Success for continuing students
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4.3 Reporting Duties (see [Student sponsorship Guidance for detail](#))

UKVI Requirement	Responsibility
Student visa refusal	UKVI Compliance Officer
Student delayed	UKVI Compliance Officer
Student fails to enrol	UKVI Compliance Officer
Student Withdrawal/deferral	UKVI Compliance Officer
Student engagement/contact stops	UKVI Compliance Officer
Sponsorship withdrawal and any other reasons which require reporting (i.e. work placement, completion of early programme, change of immigration category, etc.)	UKVI Compliance Officer
Successful completion of course confirming eligibility for Graduate Route Visa	UKVI Compliance Officer

5. Recruitment and Admissions

- 5.1 Applications to study at the University are received via UCAS, Department for Education (DfE) Apply, via an international partner or using a University of Winchester Application Form.
- 5.2 Applications are considered according to the University's academic and English language entry requirements, as published on the University website.
- 5.3 All programmes at the University are taught and assessed in English. Applicants whose first language is not English and who require student visa sponsorship to study in the UK must normally hold a recognised English language qualification that assesses each of the four skills (listening, reading, speaking and writing) separately and has been achieved at the required level to meet UKVI requirements.
- 5.4 As a University with a track record of compliance, students may also demonstrate their English language suitability in other ways, for example, by having a degree-level academic qualification that was taught in English.
- 5.5 Entry requirements for certain programmes may include an audition or interview as part of the application process to determine an applicant's suitability.
- 5.6 Offers made do not guarantee a CAS will be issued to the student. The University reserves the right to refuse sponsorship under the Student Route to any applicant. Where such action is taken, the University will provide reasons for this refusal to the student.
- 5.7 Once a student has accepted an unconditional offer, they are required to provide further information about their UK Immigration history.
- 5.8 Students are normally required to pay a tuition fee deposit to demonstrate their commitment to University study before a CAS is issued.
- 5.9 Students may be required to provide financial evidence to demonstrate they have sufficient funds to study in the UK. Only where the University is satisfied that a student has sufficient funds, will a CAS be issued.
- 5.10 Students may be required to undertake a pre-CAS credibility interview. This will be used to assess the credibility of the student before CAS is assigned.
- 5.11 When a CAS is provided to a student, they will also be sent information about our expectations and the conditions of visa sponsorship, via email.
- 5.12 A CAS does not guarantee a successful visa application.
- 5.13 Any Agent or other intermediary will be appointed and managed by Marketing, Communications & Engagement - International Recruitment, in line with the University's Agent Policy.
- 5.14 The UKVI Compliance Officer will provide UKVI with the list of agents it works with. The list is submitted on an annual basis via UKVI's Educators Helpdesk.
- 5.15 When the functionality is launched, agent details will also be recorded on each individual CAS, where an agent has been involved in the recruitment process.

- 5.16 Visa refusals for new students will be reported to the UKVI by the UKVI Compliance Officer. Depending on the nature of the refusal, a new CAS may be issued to allow the student to submit a new visa application. This will be assessed on a case-by-case basis and will be at the discretion of the UKVI Compliance Officer.
- 5.17 In the event of visa refusal, a new CAS will not normally be issued where:
- The visa was refused on credibility grounds.
 - The visa was refused due to fraudulent documents or suspicion of fraudulent documents.

6 Right to Study checks and Enrolment

- 6.1 All students will complete a Right to Study visa check prior to formally enrolling at The University of Winchester. Students who are unable to evidence their Right to Study will not be permitted to enrol onto their course.
- 6.2 An in-person check will be carried out on arrival by staff enrolling students. All staff members enrolling students are required to complete mandatory enrolment training held by the Head of International Student Success.
- 6.3 Checks determine a) that the student has the valid and correct documentation and b) ensures The University of Winchester retains copies of documentation on the student record as per the [UKVI Appendix D](#) requirement.
- 6.4 All students must ensure they have the Right to Study for the duration of their course, whether on the sponsored route or non-sponsored route.
- 6.5 Non-sponsored students must provide evidence of Right to Study before being permitted to enrol. This does not need to cover the entirety of the course at point of enrolment; however, it is the student's responsibility to inform the UKVI Compliance Officer of any immigration changes throughout the duration of their studies.
- 6.6 Should this not be provided in a timely manner, the student will be contacted by the UKVI Compliance Officer and will be asked for evidence of their Right to Study. If the student is unable to provide further evidence of their Right to Study, they may be liable to be withdrawn from their studies at the University.
- 6.7 If the student requires a visa extension, they are required to contact International Student Support so that appropriate information, advice and guidance can be provided.
- 6.8 It is recommended that students live within a 60 mile/90-minute radius of the University to ensure they are able to meet their engagement requirements.

7 Engagement Monitoring

- 7.1 This section is based on the [Student Sponsor Guidance, Document 2: Sponsorship Duties](#) and should be read alongside the University of Winchester's Dashboard Procedures 2025-26. This document outlines the technical aspects of how the University's engagement dashboard works and the approach taken to support students to re-engage with their studies.
- 7.2 Sponsored students must academically engage with their course throughout the period of

leave for which the students are being sponsored. UKVI recognises that academic engagement is indicated by activities such as:

- Attending required and timetabled lectures, seminars or tutorials
- Undertaking required laboratory work
- Undertaking research or fieldwork
- Submitting essays, assignments and attending examinations

- 7.3 Faculties are responsible for recording the attendance and engagement of its sponsored students on taught programmes via the Academic Engagement Dashboard (AED), ensuring no falsifying of attendance is taking place.
- 7.4 Research Knowledge and Exchange (RKE) are responsible for recording PhD students by way of monitoring engagement with Supervisor meetings.
- 7.5 A record of these supervisory meetings are shared with the UKVI Compliance Officer.
- 7.6 Sponsored students whose intended award is below degree level are required to attend a minimum of 15 hours of daytime (08:00 to 18:00, Monday to Friday) classroom-based study per week.
- 7.7 Where the student has not reached 85% attendance of their classroom-based study in any given month, the Faculty/Department will review the reason for the student's absence and will keep a record with the reason for the non-attendance, including steps being taken to improve the student's attendance.
- 7.8 Where a student's attendance falls below 70% for three consecutive months, the UKVI Compliance Officer will be notified and will withdraw sponsorship as appropriate.
- 7.9 If applicable, exceptional and evidenced reasons for the non-attendance (e.g. illness) will be considered.
- 7.10 Students studying a Foundation year as part of their degree should be considered as 'degree level' and will be monitored by their Faculty.
- 7.11 The attendance and engagement of Sponsored students whose intended award is degree level or above (with the exception of students on work placements, Study Abroad programmes and Research programmes) will be monitored through AED as detailed in the Academic Engagement Dashboard Procedures 2025-26 document.
- 7.12 Attendance is monitored on a 7 calendar days rolling basis, from the first teaching week.
- 7.13 Relevant staff/ teams will follow the procedures outlined in the Academic Engagement Dashboard Procedures 2025-26 for any student non-attendance and/or non-engagement.
- 7.14 International Student Success will be automatically notified by AED when a sponsored student has not attended for a period of 14 days.
- 7.15 International Student Support will reach out to the student to provide them with support and remind them of their Student Route Visa responsibilities.
- 7.16 Should attendance not improve, International Student Support will be notified by AED when a 21-day period of absence is reached.
- 7.17 When the 21-day alert is triggered, the student will be contacted by the UKVI Compliance

Officer.

- 7.18 The UKVI Compliance Officer will email the student with an expected response date of 3 working days.
- 7.18.1 Should there be a response and disclosure of health/support related matters, the case will be assigned to International Student Support and appropriate measures will be followed, i.e. Support to Study.
- 7.18.2 Should there be no response after 3 working days, the UKVI Compliance Officer will telephone the student for a period of 3 consecutive working days. If the student has not responded and there is cause for concern, then the case will be raised with the Head of International Student Success who may choose to enact the Missing Student Policy.
- 7.19 Should there be no cause for concern and no response, the UKVI Compliance Officer will send a final email to the student asking for a response, informing them that their visa will be cancelled should they not respond within 3 working days.
- 7.20 If the student does not respond, the UKVI Compliance Officer will inform Registry and the Faculty regarding non-attendance and will withdraw sponsorship as appropriate.
- 7.21 There may be exceptional circumstances where the University will not seek to withdraw the student due to non-attendance. This must be agreed in writing with the Head of International Student Success and Director of Student Support and Success. Exceptional circumstances will normally be approved where:
- 7.21.1 Evidence demonstrates a clear risk to a Student's well-being based upon notification of withdrawal and;
- 7.21.2 The students can still complete their programme of study within the timeframe of their current visa.
- 7.22 The attendance and engagement of sponsored students on work placements or field research trips is recorded by faculty.
- 7.23 The attendance and engagement of sponsored students on a Study Abroad programme is monitored by International Student Success in conjunction with the Partner institution as detailed in the Student Global Mobility Procedures.
- 7.24 The Faculty Administrators are responsible for regularly informing the UKVI Compliance Officer with details of sponsored students that are due to start a placement in the UK or a study abroad placement.
- 7.25 In both instances, the UKVI Officer will report these students at the start of each placement period via a change in student circumstances report.
- 7.26 The Faculty Administrator is responsible for ensuring that the work placement provider is aware of the requirements relating to sponsored students in their workplace.
- 7.27 Placement providers are required to alert the University of any unauthorised absences by the student. The placement provider will inform them of any student failing to attend and/or engage with their placement, and appropriate measures will be taken.
- 7.28 Students may undertake a work placement if it is an integral and assessed part of the programme, but it must not normally be more than 50% of the total length of a programme.

- 7.29 The University remains responsible for the student during their work placement and shall continue to comply with all sponsor duties, including those relating to attendance monitoring and the maintenance of current contact details.
- 7.30 Faculties must keep a record of regular contact with Postgraduate and Research students in the writing-up phase of their course.
- 7.31 Postgraduate students in the write up phase of their dissertation are recorded as 'Current'. This period runs from the end of term two or term three (as appropriate) until the dissertation is submitted for marking.
- 7.32 The attendance and engagement of sponsored students who are undertaking official roles as Student Union sabbatical Officers is monitored by International Student Success in conjunction with Student's Union.
- 7.33 There is no requirement to monitor academic engagement for immigration purposes during university designated vacation periods or post study periods.

8 Review by the Office of the Independent Adjudicator

Students and former students who remain dissatisfied with the outcome of the University's internal procedures may refer the matter to the Office of the Independent Adjudicator (OIA) within 12 months of the date of issue of the Completion of Procedures Letter. Further information can be obtained from the Students Union Advice Centre or the [OIA website](#).

9 Re-sit and Repeating Students

- 9.1 These students may continue to be sponsored, provided their continued participation is required. If no participation or attendance is required for more than 60 days, sponsorship will be withdrawn, but the student may still continue to be enrolled at the University.
- 9.2 There is no automatic right to a visa extension. If a student is due to re-sit or repeat modules, or has already re-sat or retaken modules, and requires a new CAS for the purpose of a visa extension, this will normally be provided by the University, except where:
- No in-person attendance or participation is required.
 - The purpose of visa extension is to provide extra time to apply for a Graduate Route visa.
 - There are tuition fee debts.

10 Exceptional Circumstances

If a student requires a CAS for the purpose of a visa extension due to exceptional circumstances, this will be escalated to the Head of International Student Success and will be assessed on a case-by-case basis alongside the Director of Student Support and Success.

11 Interrupting/withdrawing Students

If a student requests to interrupt or withdraw from studies and this is confirmed by registry, sponsorship will be withdrawn where applicable. Please note requests for backdated Interruption/withdrawals will not be accepted if the requested date is more than 40 days prior to application.

12 Compliance Duties

- 12.1 The UKVI Compliance Officer will undertake several scheduled activities throughout the year to monitor the University's compliance. The key activities to be monitored include:
- Completeness of passport and visa records relating to sponsored and non-sponsored students
 - Completeness of student contact details on SITS.
 - Maintenance of attendance and engagement records
 - Changes to UKVI policies and regulations
 - Annual Licence activities such as annual CAS allocation application
 - Annual confirmations of third parties/ agents
 - Addition of new teaching sites
 - Renewing Student Sponsor Licence (when applicable)
- 12.2 The University of Winchester will continue to meet its Educational Oversight requirements by maintaining the required ratings during inspections.
- 12.3 Material changes will be reported if applicable as per the [Sponsorship Guidance document](#). Changes such as name or address of the University; new sites; changes in staff or student profile; mergers or significant financial changes.
- 12.4 Changes to sponsor details will be updated via the SMS as stated in the guidance document