UKVI Compliance Policy (Trust including EYFS)

Author / Role	Director of Admissions
Date Published	May 2026
Approving Body	Executive
Regulatory References	UK Visas and Immigration
Date of Review	April 2027

Equity, Diversity, Inclusivity and Belonging Check for new Policy completed by (committee/date): Executive, April 2026

Documentation Distribution

Please delete as applicable

All staff / volunteers	**Y**
Board of Governors	**N**
Parents on request	**Y**
Published on School website	**N**
ISI requirement to be available on request	**N**
ISI requirement to be on School website	**N**
Parent Portal	**Y**
Staff Hub	**Y**
ISI Portal	**N**
Limited Internal Use Only (state recipients)	

This policy is considered a 'live' document and will be updated as statutory guidance is released

St Bede's School Trust Sussex (registered in England with liability by guarantee No. 1386499) Registered Office: Bede's, Upper Dicker, East Sussex BN27 3QH Registered Charity No. 278950

In policies St Bede's School Trust Sussex may be referred to as Bede's/the School/the Trust.

Bede's is committed to safeguarding and promoting the welfare of children and young people, and expects all staff and volunteers to share this commitment.

Vision, Mission and Values

Our Vision
Where every child finds joy in their pursuit of brilliance

Our Mission
We continue to craft a more joyful education.

- Cultivating a vibrant learning experience, motivating us to pursue our individual best.
- Providing a festival of opportunity, enabling us to discover new passions and develop new talents.
- Building a kind-hearted community, inspiring us to enhance the lives of others.

Our Values
Be Compassionate
Because a caring community fosters belonging.
We expect our community to show kindness to people of all ages, genders and ethnicities, maintaining campuses where every person feels joyful and energised. **Be Courageous**
Because fortune favours the brave.
We challenge our community to stand up for what is right, providing them with a safe environment where they can take bold action in pursuit of brilliance.
Be Curious
Because wisdom can be found off the beaten track.
We encourage our community to discover unlikely passions and hidden niches, releasing them into a wealth of opportunities inside and outside the classroom.
Be Conscientious
Because dedication is a spearhead of success.
We ask our community to throw themselves wholeheartedly into every endeavour, taking responsibility for their journey and inspiring others to do the same.

Policy Principles/Aims:

This is a policy to explain the Trust's policies and procedures in regards to UKVI Compliance.

Statutory Guidance:

Not statutory.

Associated Trust Policies:
Admissions Policy (Trust including EYFS) Educational Guardianship Policy (Trust including EYFS)

1. Summary

What is this document about?

This policy document outlines Bede's UKVI compliance with the requirements of the Home Office UK Visas and Immigration (UKVI) for the admittance of Non-UK/Irish pupils, under the Points Based Immigration Child Student and Student Route. This policy highlights the best practice and safeguarding of Bede's sponsor licence and will be subject to regular change in line with Government legislation or whenever the guidance is subject to change.

2. Who is this policy for?

This policy will be of interest to all boarding staff and the Senior Management Team as well as all pupil's sponsored under this route. It will also be of interest to UK Visas and Immigration (UKVI), the Home Office, and the Independent Schools Inspectorate (ISI).

3. Amendments to this policy

This policy has been written on the basis of the current UKVI Child Student and Student Route policy published to date by the Home Office UK Visas and Immigration. This policy will be subject to regular change based on Government policy changes.

4. Introduction

4.1. On 18 February 2009, St Bede's School Trust (which covers Bede's Prep School based in Eastbourne and Bede's Senior School based in Upper Dicker), obtained approval as a UKVI sponsor to facilitate recruitment of overseas pupils and staff (migrants outside of the EEA and Switzerland who required study visas). Our sponsor reference is QWJENV346.The pupils were sponsored on the Points Based System in categories of Tier 4 (Child) and Tier 4 (General).

4.2. On 5th October 2020 Tier 4 was superseded by the UKVI Student Route and encompasses the changes due to Brexit and the need to sponsor all non-UK and non-Irish pupils. As before, there are two routes that Bede's can use to sponsor pupils; "Child Student" which replaces Tier 4 (Child) and "Student" which replaces Tier 4 (General). The Sponsor Licence allows Bede's to issue Confirmation of Acceptance to Study (CAS) to all non-UK/Irish pupils who require a study visa to join courses at Regulated Qualification Framework (RQF) level 2 and 3.

4.3. In order to retain its licence, St Bede's School Trust has to fulfil certain criteria relating to the recruitment, arrival, monitoring and reporting of pupils sponsored on this route.

This policy outlines the school's intent to comply with UKVI requirements and to minimise the risk in respect of the status of all non-UK/Irish pupils. For more detailed information please see the Government's Student Sponsor Guidance: https://www.gov.uk/government/publications/student-sponsor-guidance

4.4. Responsibility for the monitoring of the School's continued compliance with the scope of its licence rests with the Visa & Immigration Compliance Manager and the Director of Admissions.

4.5. The School's operational guidance specifies the actions required by the Visa & Immigration Compliance Manager to ensure that Bede's is fulfilling its sponsorship duties and safeguarding the School's UKVI sponsor licence.

5. Responsibilities and Training

5.1. The Headmaster/CEO is the Authorising Officer on the sponsor licence. This role has overall responsibility for the School's sponsor licence, including oversight of the actions of staff who use the Home Office Sponsor Management System (SMS). All applications to renew the Schools licences under the Points Based System, regardless of the route, are made under the Authorising Officer's name.

5.2. The Director of Admissions is the Key Contact listed on the sponsor licence. The key contact is the main point of contact for the Home Office UK Visas and Immigration (UKVI). The role is responsible for overall authorisation of users required to access the Home Office's Sponsor Management System (SMS).

5.3. St Bede's School Trust, Sussex has a single licence, which allows Bede's Prep School and Bede's Senior School to sponsor pupils.

5.4. The Visa & Immigration Compliance Manager is responsible for monitoring the Child Student and Student Route regulations at a national level and proposing changes in internal policy and procedures to ensure that the School's status as a Student Sponsor remains secure.

5.5. The Visa & Immigration Compliance Manager and the Director of Admissions have responsibility for ensuring that the relevant staff across the School comply with operational procedures and are supported in doing so. The Visa & Immigration Compliance Manager will prepare staff for Home Office audits and will ensure sponsor licence responsibilities are upheld.

5.6. The Visa & Immigration Compliance Manager will manage the annual sponsor licence service, including the annual Basic Compliance (BCA), annual CAS allocation and ten-year licence renewal process, in collaboration with relevant staff across the both schools.

5.7. The Director of Admissions will co-ordinate relevant local and sector level training for staff who require it across both school sites.

6. Parental Responsibility

6.1. The parent is responsible for meeting the requirements of their UKVI Child Student and Student visa, in accordance with current Home office UKVI Student Route sponsorship policy and guidance. The Visa & Immigration Compliance Manager will provide information, advice and guidance to pupils on the UKVI Student Route, throughout their pupil journey, to ensure they are aware of their responsibility to abide by the conditions of their UKVI Student Route leave. Any pupil in breach of the sponsorship conditions will be withdrawn from the school.

7. Use of Agents

7.1. The UKVI states that where overseas agents are used to help recruit overseas pupils, that we maintain a close relationship with those agents, and monitor the retention pattern of pupils coming into the country through an agency link. It is also a requirement to regularly inform the Home Office of names and contact details of agencies used at Bede's. The Visa & Immigration Compliance Manager will keep records through a spreadsheet and update as necessary, informing the UKVI of becoming aware of any changes within twenty working days. Agent details are also required to be added to the Confirmation of Acceptance to Study (CAS).

7.2 The School commits to adhering to the key principles of the Agent Quality Framework (AQF)

About the UK Agent Quality Framework (AQF) | British Council

8. Confirmation of Acceptance to Study (CAS)

8.1. Confirmation of Acceptance to Study (CAS) is issued to pupils in the support of them obtaining a visa for courses. They are actioned by the Visa & Immigration Compliance Manager through the Sponsor Management System (SMS) which is the UKVI online system.

8.2. Only nominated staff are authorised to use the SMS. There are two levels, Level 1 (authoriser) and Level 2 (Data Entry). There are strict criteria, which must be met in order to issue the CAS, which is a virtual document. The pupil will be assessed by the Admissions Team and offered a place. A CAS will not be issued until all Admissions documents, security deposit, Parental Consent letter, completed Educational Guardian form and Guardian Letter of Undertaking has been received and parents' credentials, and ID has been verified in order to protect the School against potential trafficking and ensure safeguarding. Due diligence checks may be required, as per the UKVI Guidance, to be carried out by a third party, prior to the CAS being issued. The cost for this check will be re-charged to the parents and in some cases, the fee will be required to be paid before a place is offered. The Visa & Immigration Compliance Manager will then issue the CAS.

8.3. ACAS will be issued at the School's discretion and in line with the UKVI criteria.

8.4. UKVI constantly monitors the level of CAS issued against the levels of CAS requested by Bede's annually. UKVI also monitor statistics assessed at the Basic Compliance assessment (BCA) annually which are as follows:

BCA applied for before 01 June 2026:-

Visa refusal rate of less than 10% (where a pupil has a visa refused)
Enrolment rate of at least 90%
Course Completion rate of at least 85%

BCA applied for after 01 June 2026:-

Visa refusal rate of less than 5% (where a pupil has a visa refused)
Enrolment rate of at least 95%
Course Completion rate of at least 85%

BCA applied for on or after 01 June 2027:-

Visa refusal rate of less than 5% (where a pupil has a visa refused)
Enrolment rate of at least 95%
Course Completion rate of at least 90%

Failure to meet these targets can impact heavily on the School's sponsor licence and therefore this data is closely monitored by the Visa & Immigration Compliance Manager.

5.5. A CAS is valid for 6 months and the applicant applying for entry clearance can apply for their visa 6 months before the start of their course. If a CAS is not used within the 6 months then the CAS will expire and a new CAS will need to be issued in line with the school's CAS issuance policy.

9. Visa Extension (Leave to Remain)

9.1. Where a pupil is in the UK and is starting a new course with Bede's and they have shown academic progression, a CAS can be issued for extension of a new visa. The CAS issuance policy should be followed and all criteria will need to be met in line with issuing a CAS. The pupil must still have valid entry clearance at the time of application, and should the application for extension be refused and there is no scope for Administrative Review then the pupil will need to leave the UK and return to their home country and reapply.

https://www.gov.uk/child-study-visa
https://www.gov.uk/student-visa

10. Standard Visitor Route

10.1. All pupils attending St Bede's School Trust Summer School who are visa nationals will need to apply for a Standard Visitor visa. Bede's Summer School will be responsible for issuing confirmation of attendance letters to enable them to apply for the visitor visa. Non-visa nationals should now apply for an Electronic Travel Authorisation (ETA) for short stay visits.

https://www.gov.uk/eta/apply

10.2. If a pupil is attending a course for less than 6 months, such as one-term pupils at the Prep or Senior school, they may also apply for a Standard Visitor visa or an ETA, as long as they are genuinely seeking a short period at the school. Where Bede's suspects that they are only applying for this route in order to negate the need to apply for a Child Student visa from the outset in order to give them time to apply for a visa at a later stage, we will not issue the documentation to attain this visa.

https://www.gov.uk/standard-visitor/apply-standard-visitor-visa

10.3. Where a pupil arrives at School to start a course and they have the incorrect visa they will not be allowed to commence the course and will be asked to return to their Country of residence to apply for the correct visa.

11. Passports

A valid passport is required for a pupil to obtain their Child Student Visa. In order for the pupil to travel - whether to return home or participate in a school trip overseas - a valid passport is required which must be at least 6 months before the expiry date. Parents are responsible for ensuring that a pupil's passport is in date and has the recommended validity period remaining prior to any school trips or return home. Parents are responsible for letting the School know of all updated passport details or new issues.

12. Registration

12.1. Pupils are expected to arrive by the start date stated on their CAS, which is their course start date. The pupils' parents will advise Bede's should there be any unavoidable changes to their arrival date and the circumstances surrounding this.

12.2. All pupils will be required to supply their original identity documents to the school before they commence their course. This will be in accordance with current Home Office Student and Child Student Guidance.

Student and Child Student Guidance

12.3. All non-UK/Irish pupils will have to supply evidence of their right to study in the UK and provide this to Bede's before the start of their course. Upon arrival at the school on the start date of their course, all pupils will be required to provide original documents for these to be retained, copied and certified before being returned to boarding houses for safe keeping until requested or required for travel.

12.4. No pupil will be permitted to commence studies without the correct permissions to study being produced.

12.5. Returning non-UK/Irish pupils and pupils who have transferred to Bede's from another UK establishment will be required to show proof of a previous leave to enter/remain. They will also need to provide proof that a valid application has been submitted to the Home Office under St Bede's School Trust Licence.

12.6. Where at any time within a pupil's period of leave the leave is curtailed, cancelled or revoked then the pupil will not be able to register and if they are a current pupil then they will have to cease studying and return to their country of Residence.

13. Reporting Duties

13.1. In order to comply with Home Office rules Bede's has a duty to report on the SMS certain occurrences concerning the reporting on pupils. Changes to personal circumstances, failure to enrol or join their course after a holiday, pupil being delayed in returning, suspension, early course completion, withdrawal, course changes and a pupil contravening their Child Student/Student sponsor responsibilities and changes in immigration status, must be reported to the School and the UKVI.

13.2. Most circumstances should be reported within 10 working days of the occurrence.

14. Attendance Monitoring

14.1. It is a sponsor's responsibility to regularly check on pupils' attendance. Attendance will be checked at the beginning of each term to ensure all pupils have returned and weekly thereafter.

14.2. Pupils must ensure that their attendance levels and engagement with academic studies is satisfactory or risk their Child Student Visa being withdrawn.

14.3. Pupils who are ill and at home will continue to be monitored and reasons recoded. Bede's will have regular contact with parents and If they are approaching 60 days the required reporting time they will be advised that unless there are extreme extenuating circumstances then sponsorship will be withdrawn.

15. Guardians

15.1 The safety and wellbeing of pupils when they spend time away from school is of the highest level of importance. As a sponsor recruiting children, it is the responsibility of the Trust to ensure that suitable care arrangements are in place for pupils whilst they are in the UK and away from school, including arrangements for travel, reception on arrival in the UK and care during school holidays and other periods away from school and the School will actively monitor these arrangements. The specific requirements for guardians are detailed in the Guardian Policy.

15.2 It is the Parent's responsibility to ensure that suitable care arrangements are in place for all Child Student Visa pupils during personal days out and holiday periods where the pupil remains in the UK or returns home. Parents/Guardians are required to inform the School of the details of these arrangements that include the following:

I. The address(s) where the pupil will be residing
II. Confirmation of the dates the pupil will be in their care
III. Name of individual responsible for the pupil's care
IV. Contact details of the individual responsible for the pupil's care
V. Details of travel from and return to the School (driver details and flights).

Note: If the pupil is taking part in an official school trip, this will form part of the school day and would not need to be recorded as above.

16. Change of Circumstance

16.1 Keeping contact details up to date with the School. Parents/Guardians should inform the school and the UKVI of any changes to their personal details that may affect the pupil's visa and/or immigration status. These changes may include name, address, nationality, gender etc. Bede's is required to report any significant changes in a Child Student Visa pupil's course to the UKVI. If any of the following are applicable to the pupil during their study at the School, it is important that Parents/Guardians let the School know straight away, if there is a change of course, change to length of study or change in care arrangements.