



Student Route Sponsorship Risk Management Guidance

Scope

All applicants requiring Student Route sponsorship; All courses for which the University holds Student Route sponsor approval; All staff involved in admissions, visa compliance, recruitment, or CAS issuance.

This Guidance applies irrespective of academic merit where immigration compliance risk thresholds are not met.

Date approved/re-approved

June 2026

Date for review

To be reviewed annually, or sooner where there are substantive changes to Immigration Rules; Sponsor Guidance; A significant Study Risk Brief is issued; Sponsor compliance metrics indicate material risk.

Definitions

For the purposes of this Guidance:

- **Academic Engagement:** Active and ongoing participation in scheduled learning as defined by the University (e.g., attendance, submission of assessments, supervised study, tutorials, labs).
- **Adverse Sponsor Withdrawal:** Any sponsor-initiated withdrawal of CAS sponsorship (e.g., non-enrolment, non-attendance, withdrawal, failure to progress) reported via SMS.
- **Basic Compliance Assessment (BCA):** a formal assessment conducted by the Home Office to determine whether a licensed student sponsor (such as a university

or college) is complying with its sponsorship duties and continues to meet the requirements to hold a Student Sponsor licence.

- **Confirmation of Acceptance for Studies (CAS):** a reference number issued by a UK university or college to international students, confirming that a CAS has been assigned to support their Student Route visa application
- **Credibility Interview:** a structured, recorded interview assessing an applicant's intention, ability, academic rationale, and financial credibility.
- **Genuine Student:** an applicant who credibly demonstrates they intend and are able to study the proposed course, meet academic and English language requirements, have access to sufficient funds for the tuition fees and living costs, and comply with immigration conditions (aligned with Home Office definitions).
- **High Risk:** as defined in paragraph 6 below, a designation based on objective indicators of increased immigration compliance risk.
- **Home Office Risk Information:** collective term used in this Guidance to refer to communications and guidance issued by the UK Home Office to licensed Student Route sponsors that provide information relevant to immigration compliance risk and sponsor responsibilities. This includes, but is not limited to:
 - *Study Sector Briefs:* Periodic Home Office briefings providing analysis of trends in visa applications, refusals, fraud indicators, asylum claims, and sponsorship withdrawals.
 - *Study Risk Communications:* Targeted communications highlighting emerging or elevated immigration compliance risks associated with specific countries, applicant profiles, courses, or recruitment channels.
 - *Sponsor Notes:* Operational updates or instructions issued by the Home Office to licensed sponsors via official channels such as the Sponsor Management System.
 - *Formal Guidance Updates:* Updates to the Immigration Rules, Home Office Student Sponsor Guidance, or other official Home Office policy documents relevant to Student Route sponsorship.
- **Immigration Rules:** the legal rules and procedures that govern entry to, stay in, and settlement in the United Kingdom for people who are subject to immigration control.
- **Sponsor Management System (SMS):** the Home Office's online system that licensed sponsors use to carry out their sponsorship duties, including assigning Certificates of Sponsorship (CoS), reporting changes, and managing their sponsor licence.
- **Student Route under Points Based System:** visa category for international students (aged 16+) to study in the UK at a licensed sponsor institution.

Student Route Sponsorship Risk Management Guidance

1 Introduction

Most international students who do not hold UK immigration status permitting study are required to obtain permission under the UK Student Route before commencing their programme. To support such applications, the University must issue a Confirmation of Acceptance for Studies (CAS) in its capacity as a licensed Student Route sponsor.

As a licensed sponsor, City St George's, University of London is required to comply fully with the Immigration Rules and the Home Office Student Sponsor Guidance. These requirements impose strict duties relating to the recruitment of genuine students, enrolment, attendance monitoring, academic progression, and reporting via the Sponsor Management System (SMS).

Failure to meet sponsor duties may result in compliance action by the Home Office, including suspension or revocation of the University's sponsor licence. Loss of the sponsor licence would prevent the University from sponsoring international students under the Student Route.

CAS issuance is a regulatory decision and is entirely separate from academic admission. The University must therefore assess immigration compliance risk when determining whether to issue a CAS and reserves the right to decline sponsorship where this is necessary to protect its sponsor licence, ensure regulatory compliance, or mitigate identified risk.

This Guidance sets out the framework under which such risk is assessed and managed.

2. Purpose and Scope

2.1 This Guidance sets out how City St George's, University of London ("the University") identifies, assesses, and manages immigration compliance risk in the recruitment, admission, and sponsorship of students under the UK Student Route.

2.2 The Guidance ensures the University complies with its sponsor duties under UK immigration law and in line with the Home Office Student Sponsor Guidance, including obligations relating to genuine students, enrolment, academic engagement, attendance monitoring, academic progression, and reporting via SMS.

2.3 This Guidance forms part of the University's wider regulatory compliance and risk management framework, and should be read alongside:

- [Admissions Policy and Academic Regulations](#)
- International Recruitment and Agent Management Procedures
- Attendance and Academic Engagement Policy
- Data Protection Policy and Records Retention Schedule

2.4 This Guidance applies to all applicants and students requiring Student Route sponsorship and to all staff (including agents and pathway providers) involved in recruitment, admissions, visa compliance, and related decision making. It ensures that all decisions are made through a fair, consistent, and transparent process.

3. Regulatory Context and Principles

3.1 As a licensed sponsor, the University must:

- Sponsor only genuine students;
- Ensure and monitor academic engagement and attendance;
- Report non-enrolment, non-attendance, withdrawals, and other relevant events via SMS to the Home Office within required timeframe;
- Maintain Basic Compliance Assessment (BCA) thresholds as defined by the Home Office.

3.2 Failure to meet sponsor duties may result in:

- Sponsor action plans;
- Suspension or revocation of the sponsor licence;
- Loss of ability to sponsor international students.

3.3 The decision to issue a CAS is a regulatory sponsorship decision, separate from - and not guaranteed by - academic admission.

4. University Rights and Discretion

4.1 The University, acting reasonably, proportionately, and in accordance with its duties as a licensed Student Sponsor under UK immigration legislation and Home Office Student Sponsor Guidance, may take additional measures where it identifies a material immigration compliance risk, fraud risk, credibility concern, or other factor that may affect its ability to meet sponsor obligations. Such measures may include:

- Declining to make an offer to an applicant requiring immigration sponsorship where the University reasonably considers that it cannot meet its sponsor duties or where there is a significant risk that the applicant will not meet immigration requirements;
- Making an offer conditional upon the completion of enhanced credibility, compliance, or document verification checks;
- Declining to issue a CAS, notwithstanding that an academic offer has been made, where the University is not satisfied that sponsorship is appropriate or compliant with its sponsor obligations;
- Requiring additional checks or evidence before CAS issuance, including interviews, document authentication, independent financial verification, increased tuition fee deposits, or third-party verification;
- Restricting, suspending, or reviewing recruitment activity in relation to particular courses, regions, recruitment channels, or applicant profiles where risk indicators suggest an elevated threat to sponsor compliance;
- Withdrawing a CAS prior to a visa decision where credible new information or evidence arises which calls into question the appropriateness of sponsorship or the accuracy of information previously provided.

4.2 Any such decision will be based on relevant evidence, risk indicators, and the University's sponsor compliance obligations and will be taken in accordance with applicable

equality and discrimination legislation. Nothing in this guidance limits the University's ability to take action necessary to comply with UK immigration law, Home Office requirements, or its duties as a licensed Student Sponsor.

4.3 Meeting academic entry criteria does not create an entitlement to an offer, a CAS, or sponsorship under the Student Route.

4.4 The University reserves the right to refuse to issue, or to withdraw, a CAS where it reasonably considers that such action is necessary to comply with its duties as a licensed Student Sponsor, to maintain regulatory compliance, or to manage identified immigration compliance risks.

4.5 The University will not normally be responsible for losses arising solely from a decision taken in accordance with this guidance and its sponsor obligations, provided that such decision has been made reasonably and in good faith. Nothing in this guidance excludes or limits any liability which cannot lawfully be excluded or limited.

5. Risk Identification and Inputs

5.1 The University identifies immigration compliance risk using both external and internal sources, including but not limited to:

- Home Office Study Sector Briefs, Study Risk communications, Sponsor Notes, and formal guidance updates;
- Visa refusal data and decision trends (including interview outcomes);
- CAS usage and withdrawal rates;
- Enrolment, non-enrolment, and late enrolment patterns;
- Attendance and academic engagement data;
- Financial compliance (fees/deposit/payment default);
- Academic progression and completion outcomes;
- Internal fraud detection, document verification results, and agent performance.

5.2 Where the Home Office or internal data indicate heightened risk related to specific nationalities, regions, visa application centres (VACs), course types, qualification levels, recruitment channels/agents, or applicant profiles, the University may introduce enhanced due diligence and mitigation measures.

6. High Risk

6.1 For the purposes of this Guidance, “High Risk” refers to a classification used by the University for internal compliance risk management purposes where there is objective evidence of increased immigration compliance risk associated with an applicant cohort, nationality, region, course type, qualification level, or other relevant characteristic and is subject to periodic review.

6.2 Such designation will be informed by a combination of internal and external data sources, including but not limited to:

- Home Office Risk Information, including Study Sector Briefs, Study Risk communications, Sponsor Notes, and formal guidance updates;
- Trends identified by the Home Office relating to:
 - Visa refusal rates;
 - Findings of non-genuine students following credibility interviews;
 - Document fraud and verification outcomes;
 - Asylum claims made following entry under the Student Route;
 - Patterns of non-enrolment, non-attendance, or failure to progress;
- The University's own data and monitoring, including:
 - CAS issuance and visa refusal rates;
 - Enrolment and non-enrolment rates;
 - Adverse sponsor withdrawals;
 - Attendance and academic engagement data;
 - Financial compliance (including unpaid fees or debt);
- Any other information indicating an increased risk to the University's ability to meet its Student Route sponsor duties or maintain BCA thresholds.

6.3 The identification of "High Risk" is based on immigration compliance considerations and does not constitute a judgment about individuals or any protected characteristic.

7. Non-Exhaustive CAS Decision Criteria

7.1 The University may refuse or withdraw sponsorship (including refusal to issue a CAS) where any of the following apply:

7.1.1 Credibility & Intent

- Material inconsistencies between application, interview, and documentation;
- Unexplained or inadequately explained study gaps;
- Weak, incoherent, or non-credible academic progression rationale, including where the proposed course does not represent a logical progression from previous study or is inconsistent with the applicant's stated academic or career objectives;
- History of visa refusals without credible new evidence.

7.1.2 Financial Standing

- Failure to evidence maintenance/fees in line with requirements;
- Inability or refusal to supply independent financial verification when requested;
- Evidence of third party documentation that cannot be authenticated.

7.1.3 Compliance Indicators

- Links to high-risk channels, agents, or VACs without additional assurance;
- Prior non-enrolment, non-attendance, or academic failure without credible remediation;
- Evidence of previous non-compliance with UK immigration conditions, including (where information is available) overstaying or breach of visa conditions;
- Patterns or indicators of increased risk identified through Home Office Risk Information or internal compliance data.

7.1.4 Process Issues

- Failure to attend or engage with a credibility interview when required;
- Failure to meet conditional requirements by deadlines;
- Discovery of fraud, misrepresentation, or non-genuine documentation.

7.2 Any other circumstances which, in the University's reasonable judgment, indicate that issuing or maintaining sponsorship would be inconsistent with its duties as a licensed Student Sponsor, applicable immigration requirements, or regulatory obligations.

8. Enhanced Due Diligence Measures

8.1 Where heightened risk is identified, one or more of the following may apply (individually or combined):

- Mandatory pre-CAS credibility interviews;
- Document authentication (e.g., education verification, bank/financial checks, English language certification checks);
- Independent financial evidence checks or additional bank statements;
- Increased tuition fee deposit requirements;
- Additional scrutiny of progression claims (mapping to prior study/experience);
- Agent performance review, conditional operation, or suspension;
- Temporary caps or suspension of recruitment in specified segments.

8.2 Measures will be applied proportionately, based on assessed risk.

9. Decision Making, Governance, and Documentation

9.1 Guidance oversight: International Student Advice and Visa Compliance Manager.

9.2 The International Student Advice and Visa Compliance Manager may

- Withhold or decline the issuance of a CAS;
- Designate applicant categories, recruitment channels, regions, courses, qualification levels, or other factors as presenting elevated immigration compliance risk, where supported by Home Office Risk Information, University data, or other relevant evidence;

- Require enhanced due diligence, credibility assessments or additional verification measures;
- Implement temporary recruitment restrictions or other risk mitigation measures where necessary to protect the University's sponsor licence and ensure compliance with sponsor obligations.

9.3 The International Student Advice and Visa Compliance Manager may delegate operational activities under this Guidance to appropriately trained members of staff but retains overall accountability for decisions made under it.

9.4 Where urgent action is required to protect sponsor compliance, decisions may be taken by the International Student Advice and Visa Compliance Manager or a nominated deputy. The rationale for such decisions shall be documented and reported through appropriate governance channels.

9.5 The Recruitment and Admissions Operations Group shall receive updates on the operation of this Guidance, emerging compliance risks and any significant changes to associated processes. The Group's role is advisory and oversight-focused and does not extend to decision-making in individual sponsorship or CAS cases.

9.6 Record keeping (audit trail):

- All CAS decisions (approve/refuse/withdraw) must be documented with a clear rationale and evidence in the applicant record;
- Records must show who decided, what was decided, when, and why (including risk indicators and documents considered);
- Interview notes and verification outcomes must be retained in line with the Records Retention Schedule.

9.7 Separation of functions: Sponsorship decisions remain distinct from academic admission decisions.

10. Monitoring and In-Year Controls

10.1 The University will monitor:

- Visa refusal and interview outcomes;
- CAS usage and withdrawal rates;
- Enrolment, non-enrolment, late enrolment;
- Attendance and academic engagement;
- Academic progression, completion, and withdrawal;
- Financial compliance (deposits, fee payment, defaults);
- Internal fraud trends and agent performance;
- Home Office communications affecting risk.

10.2 This also applies to applicants undertaking programmes delivered by pathway providers where such provision is delivered under, or forms part of, the University's Student Route sponsor licence.

10.3 Where metrics indicate potential detriment to BCA or sponsor compliance, the University may introduce immediate mitigation (e.g., enhanced checks, recruitment caps, increased deposit, agent suspension, or targeted audits).

10.4 The University may suspend or restrict recruitment in year where necessary to protect its sponsor licence.

11. Applicant Communication and Reconsideration

11.1 Transparency: Applicants may be informed where decisions relate to sponsor compliance.

11.2 Reconsideration: CAS decisions are regulatory and do not carry a right of appeal. A request for reconsideration may be accepted only where the applicant provides new, material evidence not previously available. Reconsideration outcomes will be documented and are final.

11.3 This does not constitute an appeal process and does not create a continuing right of review.

12. Equality, Diversity and Inclusion

12.1 City St George's, University of London works to advance equality, diversity and inclusion in its activities, processes, and culture, for the whole University community, including staff, students and visitors.

12.2 Decisions under this Guidance are based on objective risk data, are proportionate, and are applied consistently with Home Office guidance and equality legislation.

12.3 High risk designations and enhanced measures must not be applied in a way that discriminates on the basis of protected characteristics.

12.4 The University will meet its obligations under the Equality Act 2010 in its policies and seek to eliminate discrimination on the basis of age, disability, neurodiversity, sex, gender reassignment, gender identity, marital status, pregnancy, caring responsibilities, sexual orientation, race, nationality, ethnic origin, religion and belief and socio-economic background.

13. Freedom of Speech and Academic Freedom

13.1 City St George's, University of London, regards freedom of speech and academic freedom to be fundamental to delivering its mission as the University of business, practice and the professions. Its values in this respect are set out in a code of practice on freedom of speech and academic freedom, which explains how the University will uphold, secure, and promote freedom of speech within the law:

<https://www.citystgeorges.ac.uk/about/governance/policies/code-of-practice-on-freedom-of-speech>.

13.2 Nothing in this guidance should be interpreted in any way that would be inconsistent with the code of practice and – in the event of any inconsistency – the provisions of the code will

prevail.

14. Confidentiality

14.1 Study Sector Briefs and related Home Office communications may be confidential and not for external distribution.

14.2 The University will handle such communications in accordance with Home Office instructions and data protection legislation.

14. Review and Change Control

14.1 This Guidance will be reviewed annually or sooner in response to substantive changes to the Immigration Rules, Home Office Student Sponsor Guidance, or significant Home Office risk notifications.

14.2 Interim updates may be issued by the International Student Advice and Visa Compliance Manager with notification to the Recruitment and Admissions Operations Group.