

1. Introduction

Brooke House College takes its responsibility as a UKVI Sponsor licence holder very seriously and recognises that it has a reporting duty and must ensure that the Sponsor Management System (SMS) is kept up to date at all times. The College will undertake to apply for a Basic Compliance Assessment (BCA) every 12 months via the (SMS). The College's authorised Officer and Level 1 user will be responsible for the application and will ensure the appropriate fee is paid through the Chief Operating Officer (COO).

2. Guiding Principles

The College understands that sponsorship is a privilege and not a right and will be expected to play its part in ensuring that the system is not abused. The College will therefore fulfil certain duties, in order to ensure that immigration control is maintained.

The College will show that it can fulfil, and are fulfilling, its sponsor duties in order to gain and retain a Student sponsor licence.

The College understands one of its key duties as laid out in UKVI Document 2 is its reporting responsibilities. This policy outlines what these reporting duties are.

3. Reporting duties

The College will keep abreast of UKVI updates and reviews/changes to Document 2, but the following list, which is not exhaustive, outlines some of the reasons we would be reporting to the UKVI.

- A student withdraws from their course before they travel to the UK;
- A student's start date is delayed before they enter the UK but after they have been granted entry clearance;
- A student does not enrol within the enrolment period;
- You are a sponsor with Probationary Sponsor status and a student misses 10 consecutive expected contact points;
- You are a sponsor with Student Sponsor status and a student misses 10 consecutive expected contact points;
- A student defers their studies after they have arrived in the UK and is no longer actively studying;
- You are withdrawing a student from their course;
- You stop sponsoring a student because they:
 - commence a study abroad programme overseas and do not plan to return to the UK or you 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; or
 - exceed the amount of remote delivery permitted on their course of study.

- 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;
 - if they are a Child Student, they are not in a permitted living arrangement; 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; and
- You suspect that a student is not a genuine student.
- The College fails to meet standards during an Educational oversight inspection;
- Should there be key material changes to the college such as:
 - a change of address;
 - the acquisition of a new building;
 - an extension of premises with an increase in capacity by 25 per cent or more;
 - a change of legal or trading name;
 - a change of principal and/or proprietor or equivalent;
 - a change of 20 per cent or more of permanent teaching staff;
 - a change of 30 per cent or more on the type of provision/courses offered, including changes or awarding body/organisation;
 - a change in the age range of students (from 18+ to under 18s) for the first time; or
 - a change in accommodation arrangements for students (from not directly owning and managing to directly owning and managing accommodation).

Other changes in circumstance that require reporting include:

- You replace your authorising officer and/or key contact; or
- You need to amend the details of your existing authorising officer and/or key contact; or
- You replace your existing Level 1 user; or
- You want to add another Level 1 user; or
- You need to amend the details of your existing Level 1 user.
- You change your address and/or change your name.
- You would like to add or remove a site, exceptional arrangement or teaching partnership to your sponsor licence. You must also report any material changes to such a site, exceptional arrangement or teaching partnership.
- You change owners
- You have a criminal prosecution pending, or you are convicted of a relevant offence.
- There is a change in status of any registration by a governing body that you are required to hold including changes to your Educational Oversight
- You have sold all or part of your business; or
- You are involved in a merger or takeover
- You 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

- You want to appoint, remove or change a representative;
- You want to, or are required to, surrender the whole or part of your licence.
- You are subject to a civil penalty.
- You become an academy or a school maintained by a local authority.

4. Internal processes

In addition to section 3 duties outlined above, the College will also operate a robust whole-college operation which addresses other aspects related to the College responsibilities for reporting to the UKVI. This include areas such as:-

- Monitoring systems: A clear system for monitoring student attendance and academic engagement, such as using daily class registers using the school management system iSAMS.
- Designated staff: Roles and responsibilities of key personnel (e.g., Authorising Officer and Level
 1 User) who are trained on reporting procedures and have access to the SMS will receive
 training updates to ensure future compliance.
- Internal record-keeping: Procedures for securely storing all required student documents, both paper and electronic will be used in compliance of the Data protection Act 2018, including GDPR. Storage of pupil data will be via iSAMS.
- **Non-compliance procedures:** Actions to take if a student fails to meet visa requirements, including initial outreach, warnings, and the process for withdrawing sponsorship if necessary.
- **Safeguarding:** Confirmation that the school has a policy for the safeguarding and protection of students under 18, including vetting and monitoring guardianship arrangements.

Authorised by	resolution of the Board of Directors	
Signed		
Q. Ilia C.		
On behalf of the Board of Directors		
Date	August 2025	

Schedule of Updates

Date document updated	Document updated by	Summary update/comments	Location of saved file
29 th Oct 23	MT/ML		MS Teams – Policies – Master files
10 th May 24	SD/ML	Reviewed	MS Teams – Policies – Master files
21 March 2025	ML	Reviewed	MS Teams – Policies – Master files

Schedule of Review

Date of document review	Reviewed by	Scheduled date of next review
May 2024	ML	July 2025
July 2025	MCO/IMS	August 2025