



KING'S BRUTON

UKVI COMPLIANCE POLICY

This is a combined policy that applies to King's School, Bruton and Hazlegrove Prep School.

The Student Sponsor Licence is vital to the school. Without it we would be very limited in our ability to recruit international students. Holding the licence is a privilege and not a right. With it comes a number of responsibilities in record keeping, reporting and procedures. Our aim is to comply fully with the requirements of the UKVI.

See Flow Charts detailing the processes across the Foundation.

RECORD KEEPING

We are required to keep the following records for our sponsored international pupils.

- Copy of current passports and e-visas. These are collected at the beginning of the Christmas term or on the arrival of the student and stored in the Houseparents' offices. A copy of the passport and travel documents are taken and given to the Admissions Office (Hazlegrove & King's) to prove when the student arrived in the UK and to keep a record of expiry dates of their passport.
- Evidence used to make an offer to the pupil. This is stored in the pupil's file in the Head's office.
- A copy of the parental consent letter from the student's parents or legal guardian, that gives consent to the arrangements for the student's application and care arrangements in the UK this includes new parental consent letters where there is a change in care arrangements.
- Details of passports and visas. These are stored on the International Visa Details spreadsheet.
- Permission from the parents to apply for a visa, travel and reception in the UK and care while in the UK. This is in the pupil's main file (Hazlegrove) or in the Registrar's folder (King's).
- Attendance records. These are on the ISAMS School Register and the signing in/out book (HZG).
- Details of any historical addresses on Isams. NB ISAMS overwrites new addresses, so a new address is created and the current address flagged as active.

- Whereabouts while in the UK if not in school. This is maintained by the Head of Admissions, the Receptionist and the Houseparents (HZG)/Registrar (King's) and recorded via the Overseas Travel Exeats_Half Term_End of Term spreadsheet.
- Names and addresses of guardians. These are on ISAMS and a record is kept on the International Visa Details spreadsheet.

USE OF AGENTS

The School uses agents to assist in the recruitment of international students. The School takes seriously the need to check the agents that we use.

- Agents are recorded on the agent spreadsheet maintained by the Admissions teams and reported to the UKVI annually.
- Agents sign a contract with the School outlining their responsibilities. This is renewed every three years.
- Agents fall into one of three categories which determines the due diligence we do on them.
 - New agents - two references are to be collected from other schools who have dealings with and know the agent.
 - Agents who have been vetted by BSA, BBSN or other industry body - these are considered to have been vetted and so no further checking is necessary.
 - Agents with whom we have an established relationship over at least five years and who are regularly providing pupils to the School. If there have been no problems with the agent, their procedures or the pupils they have recommended, we consider them well known to the School.

Any use of new agents is reported to the UKVI.

PRE-SESSIONAL PROVIDERS

The schools do not use pre-sessional providers.

LICENCE RENEWALS, CAS ALLOCATIONS AND BASIC COMPLIANCE CHECKS

These are the responsibility of the Key Contact who will apply for CAS allocations and BCA annually. These dates are noted for backup. The Key Contact will also apply for licence renewals when they become due. These are all done via the SMS.

FINANCIAL BACKGROUND CHECKS

- Applicants to the School are checked against the UK Sanctions List by the Admissions Teams during the application process.
- Further details are in the Anti Money Laundering policy. Any causes for concern are checked against the gov.uk list of countries or individuals who are sanctioned.

RECORDING PUPIL WHEREABOUTS

- In term time. This is the responsibility of Houseparents who will use iSAMS, LiveRegister and roll calls to keep track of pupils. Should a pupil return to School late or leave School early, they will inform the Admissions Team who will inform UKVI via SMS.
- Out of term time. Parents are asked to complete a Travel Arrangements Form before each holiday, half-term and exeat to confirm the pupil's whereabouts during the time away from School. This information is recorded on the Overseas Travel Exeats_Half Term_End of Term spreadsheet.

GUARDIANS

It is the School's policy that all international students should have an educational guardian in the UK. These guardians are appointed by the parents and must meet criteria set by the Home Office and the School. The guardians are contacted annually by the Houseparents to ensure that they agree to undertake the responsibilities of guardianship and Houseparents make a record of having either met the guardians or had a Teams call. For the younger children at Hazlegrove, surveys are carried out after pupils have been to a homestay for safeguarding reasons.

CHILD STUDENT VISA HOLDERS WHO ARE NOT FULL BOARDERS

It is the responsibility of the Admissions Team to check that any child student visa holders who are not full boarders have appropriate accommodation in line with UKVI guidelines. These occur in the following circumstances:

- The pupil is residing with a parent who holds a Parent of a Child Student visa. A copy of this is kept on file with the pupil's passport record. A note should be made on the UKVI spreadsheet to record the date of expiry of the parents' right to be in the UK.
- The pupil lives with a foster family. If this is the case, the local authority should be notified via the DSL.
- The pupil is living independently (if over 16 years old). It is highly unlikely that the School will allow this for safeguarding reasons. In this case, written permission is required from parents.

- The pupil is living with a close relative who is a UK resident. The School must collect evidence of the relative's residence rights.

SPONSORSHIP MANAGEMENT SYSTEM

The school has four users of the SMS; the Authorising Officer is the Head of King's, the Key Contact is the Bursar and there are two second Level 1 users, the Head of Admissions at Hazlegrove and the Registrar at King's.

They keep their logins secure and do not allow any unauthorised person use of the SMS.

REPORTING TO UKVI

We will report to the UKVI any circumstances listed in the Duties of Sponsorship document. This will be done via SMS.

These include:

- Visa refusals.
- A student who withdraws before they come to the UK.
- A delayed start date before the pupil enters the UK but after they have been granted entry clearance.
- A pupil who does not enroll within the enrollment period.
- A student who defers for less than 60 days (above 60 days will require cancellation of sponsorship).
- We are withdrawing a student from their course.
- A student leaves the School.
- A student who works illegally.
- We suspect that the student is not genuine.
- Students who have left the School before the end of their course.
- Students who have missed 10 expected contacts. This is defined as being 10 morning registrations where permission has not been granted by the Head for their absence from School.
- Any mistakes that they have made in granting a visa.
- Circumstances which have to be reported are defined in Section 7 of Student Sponsor Guidance – Document 2 Sponsorship Guidance.

Houseparents should report any of the above to the Admissions Team who will make the required report.

RECORD RETENTION

Records need to be kept in accordance with the Storage and Retention of Records and Documents Policy.

OTHER SCHOOL RESPONSIBILITIES

The School has a responsibility to ensure that we are not inadvertently supporting illegal immigration by:

- Employing people who do not have the right to work in the UK. This is checked by HR for every employee and recorded on the Single Central Register. Right to work checks are carried out as a part of our standard recruitment policy.
- Enrolling pupils in the School who do not have a right to be in the UK. This is checked by the registry who require a copy of the passport of every applicant to the School. If the pupil is not a UK citizen, a copy of the right to reside/visa is collected. This is stored in the Head's office with the expiry dates being recorded on the UKVI spreadsheet.