



UKVI SPONSORSHIP & COMPLIANCE POLICY

1. Introduction

Jimmy Choo Academy (JCA) holds a UK Visas and Immigration (UKVI) sponsorship licence, which allows us to enrol international students, including those from the European Economic Area (EEA) and Switzerland who do not hold settled or pre-settled status under the EU Settlement Scheme.

This guide serves to provide staff with a clear understanding of the compliance obligations associated with student visas and also covers relevant aspects for EU and non-sponsored students too. Adhering to these regulations is crucial to ensuring that JCA maintains its sponsorship licence and upholds its UKVI responsibilities.

2. Maintaining JCA's Sponsorship Licence

JCA must renew its UKVI sponsorship licence every four years and meet an annual basic compliance assessment. This assessment evaluates key metrics, including:

- A visa refusal rate below 10%
- A minimum enrolment rate of at least 90%
- A course completion rate of at least 85%

All staff must work collaboratively to ensure accurate record-keeping and timely reporting of changes in student's course, attendance or enrolment status through the UKVI's Student Management System (SMS).

3. Role of the UKVI Compliance Team

The UKVI Compliance Team at JCA is responsible for:

- Overseeing adherence to sponsorship regulations and duties
 - Keeping accurate student records
 - Reporting student status changes via the UKVI SMS portal
 - Maintaining record relating to BCA (Basic Compliance Assessment)
 - Managing visa extension requests and approving/issuing CAS for it.
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- Addressing student attendance, engagement, and compliance concerns, which includes transfer requests, deferrals, authorised absence, non-attendance and withdraw sponsorship where required.

Compliance is a shared responsibility, and staff in academic and administrative roles must support these efforts to ensure regulatory adherence.

4. Responsibilities of JCA Staff

Compliance obligations extend across multiple functions and teams including:

- a) Admissions: Ensuring applicants meet credibility, academic, and English language requirements before issuing a Confirmation of Acceptance for Studies (CAS) and also ensuring appropriate records are kept in the system. Check if ATAS is provided and recorded for courses that require it for certain students.
- b) Registry and Student Records; Tracking of enrolment process with academic services, documenting original documents on basis of which CAS was issued, BRP/E-visa, entering date of arrival (stamp or boarding pass) and visa stamp/vignette, Student's contact details including UK address, phone number, ATAS certificate (if required), and in case of a Child Student, their foster carer's address and contact details and permission letter of parents or legal guardian confirming student's travel to UK and study while living in UK. Also ensure any changes to student status such as withdrawal, deferral, transfer etc. are actioned after speaking with compliance team.
- c) Student Services: Supporting international students, monitoring engagement, and assisting with visa queries. Bring up any concerns to compliance team.
- d) Academic Teams: Ensuring high levels of student attendance, engagement, and academic progression while reporting any concerns on a daily and weekly basis. Ensuring full enrolment of all students and checking and saving all the required documentation. Refer students to compliance team in case of issues affecting compliance such as early completion, retakes, attendance or engagement issues etc. Report any enrolment issues to compliance team.
- e) Finance: Overseeing tuition payments and liaising with compliance team on non-payment cases. Agree on payment plans where required and ensure they are being followed.
- f) HR & Payroll: Conducting right-to-work checks for students employed by JCA and monitoring working hours where allowed. Note that an international student of JCA must not engage in any work whatsoever.

5. JCA's Sponsorship Duties

5.1 Overall Responsibilities and Duties

As a licensed sponsor for student visas, Jimmy Choo Academy (JCA) holds key responsibilities from the moment a Confirmation of Acceptance for Studies (CAS) is assigned to a student until:

- JCA withdraws sponsorship from the student.
- The student departs the UK.
- The student secures permission to stay in the UK under a different sponsor or immigration category.

As a sponsor, JCA must:

- Act with integrity in all dealings with the Home Office, ensuring that accurate information is provided in applications and during compliance checks.
Take full responsibility for all sponsored students, ensuring they meet Immigration Rules, enrol on time, comply with visa conditions, and complete their course successfully.
- Address any integrity concerns related to students, including taking action in cases of deception.
Ensure full compliance with Immigration Rules and sponsor guidance, maintaining students' permission to study in UK throughout their course.
Fulfil Home Office requirements for any information they may request.

JCA reserves the right not to assign a CAS to any student where it considers that the student is not a credible and genuine student. It also reserves the right to withdraw a student from its course and to withdraw sponsorship if it has any concerns regarding a student's credibility, intention or ability to study.

5.2 Right to Study Verification

For sponsored students, JCA must confirm their UK entry date at enrolment to ensure they entered within the validity of their visa, without which they cannot study.

Students may enter through automated e-Passport gates if they hold valid digital status. If no entry stamp is present, alternative evidence such as travel tickets must be provided.

5.3 Document Verification at Enrolment

JCA's Compliance team ensures that all required immigration documents are scanned and stored on JCA's record system and that the documents provided are correct and contain no errors.

5.4 Record Keeping

JCA must retain the following documents, per [UKVI's Sponsor Guidance Appendix D](#):

A copy of each student's passport, including all pages with identity details, biometric data, vignettes and entry stamps.

Copies of BRP cards or electronic status confirmations (E-visas/digital status to be downloaded by obtaining share code from the student)

- Records of UK entry dates, documented through boarding passes or travel tickets/entry stamps.
- Attendance records and contact details, including updated UK residential addresses and phone numbers.
Any required Academic Technology Approval Scheme (ATAS) clearance certificates if required.
- Record of evidence including academic qualifications and references, assessed as part of process for making an offer to student.
- Records of student's visa refusal appeal documentation where applicable.

Any of the above documents requested by UKVI must be provided upon request, with certified translations if necessary.

5.5 Reporting students to UKVI

JCA's UKVI Compliance team must report to UKVI via the Sponsor Management System (SMS) within 10 working days if:

- A student withdraws before arriving in the UK.
- A student fails to enrol within the enrolment period.
- A student defers studies after arriving in the UK.
- A student ceases engagement with their studies and JCA are withdrawing sponsorship.
- JCA withdraws the student for whatever reason.
A student transfers to a different institution with another sponsor, or changes to an immigration category which doesn't need sponsorship, or completes the course sooner than expected.
- There is a significant change in circumstances such as a student's study location, work placement, or course.
- JCA suspects a student is violating visa conditions or is not a genuine student.

6. Tuition Fee Payments

Students must adhere to JCA's Tuition Fees Policy. If a student's payment status impacts their enrolment, JCA's UKVI Compliance Team must be consulted before action is taken.

7. Attendance and Engagement

JCA's Attendance and Engagement Policy and Procedure outlines how the Academy ensures full compliance with statutory and regulatory requirements around the management of attendance and engagement. This Policy both defines and describes timed actions around non-attendance and engagement.

8. Master's students' Dissertation/Projects

Masters' students undertaking their dissertation would be monitored and the supervisory sessions would be recorded. It is expected that these sessions will take place once a month in person. The supervisor should have a documented record of all supervisory meetings whether they are in person or online. During dissertations, Master's students are considered to be in term time even if it may be outside of JCA semesters.

9. Assessment Boards

The Assessment Boards should monitor student's academic progress, and the students could be withdrawn from their studies in case of failure or non-submissions of assessment. If the students are awarded earlier, or withdrawn, the UKVI compliance team should inform UKVI through SMS. UKVI compliance team should monitor the assessment reports.

JCA should review the achievements of all sponsored students following the Assessment Boards and ensure they have passed. If a student fails a module, they should be given appropriate academic advice and an appropriate student plan going forward. If they need more time to finish their studies, it should be reported to UKVI compliance team. If a student is required to resit a module, it should be discussed with student advice team and UKVI compliance team to ensure JCA doesn't breach its sponsorship duties.

10. Work Placements

Work placements must:

- Be recorded on the CAS and monitored by JCA.
- Be an integral and assessed part of the course.
- Comply with UKVI limits.

11. Visa Tracking and Monitoring

JCA is committed to ensuring that all students holding visas are tracked and monitored effectively. Visa tracking is to ensure that all students holding visas maintain compliance with immigration regulations and to support their academic journey. This tracking applies to all students enrolled at JCA who hold a student or other type of visa.

JCA is responsible for maintaining accurate records of student visa applications, tracking their status, and providing updates to students.

Students are responsible for submitting all required documentation in a timely manner and notifying the JCA of any changes in their visa status or personal information.

JCA uses electronic systems to track visa expiry dates. Regular reports will be generated to identify students with upcoming visas expiring and ensure timely follow-up. Students will be identified where their visa is expiring in 3 months, 2 months and 1 month and emails will be sent accordingly to remind students of their upcoming visa expiry and to ask what their plans are and whether any CAS extension is required.

At the point of visa expiry and if there has been no engagement from the student, steps will be taken to ensure the student is not permitted to continue their studies unless and until further updated right to study evidence is obtained.

JCA will thereby ensure full compliance with all relevant immigration regulations.

12. Visa Extensions

JCA's UKVI Compliance team should monitor visa expiry dates and advise eligible students on extensions. A CAS for extension will only be issued if a student meets academic and attendance requirements. Make sure to check the 5-year study rule for study at degree level. A student requiring a visa extension should complete the required form, and JCA reserves the right to not issue a CAS if a student is not engaged or if there is any other reason why JCA consider it is not appropriate to assign a CAS. .

13. Changes in Student Status

Course Changes: Only permitted if within the same subject area and visa duration allows, to be approved by UKVI compliance team after speaking with academic team.

- **Deferrals & Withdrawals:** Students must seek academic and immigration advice before making such decisions. Once advised, the deferral form should be filled and sent to UKVI compliance team for signature and UKVI notification.
- **Early Completion:** UKVI must be informed so visa durations can be adjusted, and visa curtailed as needed.
- **Visa Category Changes:** JCA must report changes to student's immigration visa category (e.g., changed to indefinite leave to remain) to UKVI.

14. Non-Sponsored Students

JCA must maintain visa records for all students, including EEA nationals with pre-settled or settled status or those with other permission.

15. Immigration Advice

Only JCA's authorised advisors may provide immigration advice, and should be trained in line with OISC rules. Staff must direct students with visa concerns to the Compliance or Student Advice team and should not give advice directly to any students.

16. UKVI Compliance Meetings

Regular compliance meetings ensure staff remain updated on sponsor duties and regulatory changes.

17. UKVI Compliance Team Responsibilities

JCA's Compliance team ensures:

- Prompt reporting of student visa activities and compliance with sponsorship duties.
- Regular audits and adherence to UKVI guidelines.
- Staff training on compliance-related matters.

Failure to comply with these duties may risk JCA's sponsorship license and ability to recruit international students. All staff must report relevant student status changes to the UKVI Compliance Team promptly and within the stated timescales of this Policy.

The Compliance Team reports weekly to the Principal, who has a standing item on the Executive Committee Agenda, attended by JCA's Chief Executive Officer (CEO).

Governance oversight is via the CEO's reporting of the ongoing status of JCA's UK Visas and Immigration (UKVI) sponsorship licence to JCA's Audit and Risk Committee.

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