



BUCKINGHAMSHIRE
NEW UNIVERSITY

EST. 1891



Right to Study Policy



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Purpose

- 1 Buckinghamshire New University (BNU or 'the University') is a licensed Student sponsor under the UK Visas and Immigration (UKVI) Student sponsorship scheme. As a sponsor, the University is legally required to verify that every student who is subject to immigration control has permission to study in the UK before they enrol, and to monitor that permission throughout the whole period of their studies.
- 2 This policy establishes the University's framework for meeting that obligation. It sets out who must be checked, what must be verified, when verification must take place, what must be recorded, and what happens when a student cannot demonstrate the right to study.
- 3 This policy sits alongside the International Student Policy, which governs the University's obligations towards students sponsored on a Student visa.
- 4 This policy extends right to study obligations to all students who are subject to immigration control, regardless of visa category or fee status.

Applicability and Scope

- 5 This policy applies to all applicants and enrolled students at Buckinghamshire New University, including students enrolled at partner institutions where BNU retains the UKVI sponsor obligation, and to all staff with a role in admissions, enrolment, or student records. It applies to all campuses, through all application and enrolment routes, and at all levels of study.
- 6 The right to study obligation applies to all students subject to immigration control, regardless of visa category, fee status, or mode of enrolment. Fee status assessment and right to study verification are legally distinct processes. The absence of a Student visa does not mean a student has an unrestricted right to study.
- 7 The University's right to study obligations arise from the following:
 - UKVI Sponsor Guidance: Document 2: Sponsorship Duties and Document 3: Student sponsor compliance: requires sponsors to ensure that every student subject to immigration control has permission to study in the UK throughout the whole period of their study.
 - Immigration Act 2014 and Immigration Act 2016: establish and strengthen obligations on higher education providers to verify that students have immigration permission before undertaking a course.
 - Immigration (Restrictions on Employment) Order 2007 (as amended): sets out acceptable evidence of immigration permission.
 - UK GDPR and Data Protection Act 2018: governs the collection, processing, storage, and retention of personal data held for right to study purposes.

Who This Policy Applies To

Students who require a right to study check

- 8 A right to study check must be carried out where it is necessary to confirm that a student holds valid immigration permission to undertake study in the UK.
- 9 This will normally apply to individuals who are subject to immigration control. In practice, this includes students who are not British or Irish citizens, or whose right to study is not otherwise clear from their circumstances.
- 10 Students may hold a range of immigration permissions which permit study, including (but not limited to):
 - EU Settlement Scheme status (settled or pre-settled)
 - Indefinite or Limited Leave to Remain
 - Refugee status or Humanitarian Protection
 - Student or Graduate visa
 - Dependent visa
 - Youth Mobility Scheme, BNO visa, Global Talent visa, or Skilled Worker visa
 - Any other immigration permission which permits study
- 11 This list is illustrative and not exhaustive. The key consideration is whether the individual holds valid immigration permission that allows them to study in the UK.

Students not typically required to complete a right to study check

- 12 Students who are British or Irish citizens are not normally required to undergo a formal right to study check; however, the University may require appropriate evidence to confirm nationality where this is necessary for enrolment, compliance, or record-keeping purposes.
- 13 Self-declaration alone is not sufficient. Where nationality is declared as British or Irish but cannot be confirmed by a valid passport or equivalent evidence, the case must be referred to the Compliance and Immigration Team before an offer is confirmed or enrolment is completed.
- 14 The University recognises that some students may be unable to produce a valid passport due to financial or personal circumstances. This is more likely to affect students from low-income backgrounds, care leavers, and students who are in the process of regularising their documentation. Where a student cannot produce a passport, the Compliance and Immigration Team will work with them to identify alternative evidence on a case-by-case basis. Acceptable alternatives may include a birth certificate, certificate of naturalisation, or driving licence, considered in combination with other supporting documentation.
- 15 No student will be refused enrolment solely on the basis that they do not hold a valid passport where alternative evidence of nationality can be established to the satisfaction of the Compliance and Immigration Team.

Guiding Principles

- 16 **Universality:** checks apply to all students subject to immigration control. Checks will be conducted in a consistent manner and will not be applied in a way that results in unlawful discrimination on the basis of protected characteristics.
- 17 **Consistency:** the same verification standards apply across all campuses, programmes, and enrolment routes. Distance learning and auto-enrolled students are not exempt, where checks are required.
- 18 **Auditability:** every check must generate a record. Enrolment will not normally be confirmed until the required verification record has been completed and retained.
- 19 **Timeliness:** checks are conducted at defined stages of the student lifecycle and, where necessary, updated to reflect changes in immigration status.
- 20 **Separation of duties:** fee status assessment and right to study verification are distinct. Completion of one does not satisfy the requirements of the other.

Verification: What Is Required and When

At offer stage

- 21 Where it is necessary to confirm a student's right to study, the University will inform applicants that they are required to provide documentation to verify their immigration status before enrolment can be completed. This requirement will be set out in the offer letter. Applicants must be informed that enrolment cannot be confirmed without this verification, and that where their immigration permission is time-limited, they must maintain valid permission for the duration of their studies and provide updated evidence where required.

Before enrolment is confirmed

- 22 Students who are subject to immigration control must have their right to study verified before enrolment is confirmed. A record of the verification must be created and retained in accordance with University procedures.
- 23 This requirement applies regardless of whether enrolment is conducted in person, online, or by auto-enrolment. Distance learning students are subject to the same verification requirements as all other students where a right to study check is necessary.

At enrolment

- 24 At enrolment, the following must take place for every non-UK or non-Irish national:
 - The student's identity must be verified using appropriate documentation (such as their passport or equivalent identity document).
 - The student's immigration permission must be verified by the appropriate method for their immigration category, as set out in Appendix A.

- The verifying member of staff must confirm that the permission covers the intended period of study. Where it does not, the case must be referred to the Compliance and Immigration Team before enrolment is confirmed.
- A record of the check must be completed before enrolment is marked as confirmed.

Identity verification at interview

- 25 For programmes that involve an admissions interview, the interviewing academic or panel must, at the start of the interview, ask the applicant to present their passport or equivalent identity document, to verify their identity. This identity verification does not constitute a right to study check.

Ongoing Monitoring

- 26 The right to study obligation does not end at enrolment. Where a student's immigration permission is time-limited, the University must monitor the expiry of that permission and seek evidence of renewal before or at the point of expiry. This applies to all time-limited permissions, including (but not limited to) pre-settled status, limited leave to remain, refugee status where a time-limited grant has been made, BNO visa, dependent visa, Youth Mobility Scheme, Graduate visa, and Skilled Worker visa.
- 27 In collaboration with the Student Records team, the Compliance and Immigration Team is responsible for maintaining a monitoring process to ensure that affected students are contacted in advance of expiry, that updated documentation is obtained where required, and that appropriate records are maintained. Where a student does not provide evidence of continued permission within a reasonable timeframe, the case must be escalated in accordance with Appendix B.
- 28 Where a student has made an in-time application to UKVI which remains pending, they may continue to study while that application is under consideration. The University must retain evidence of the pending application and, where the student's previous permission has lapsed, seek confirmation of the student's continuing right to study from UKVI directly.

Students Who Cannot Demonstrate the Right to Study

- 29 Where a student is unable to provide documentation within the required timeframe, the Compliance and Immigration Team must be notified and the student will be given a reasonable opportunity to provide the necessary evidence. Where documentation is not provided within that timeframe, enrolment must not be confirmed. Where the student is already enrolled, the University will consider appropriate action, which may include temporary suspension, in accordance with University procedures and applicable regulations.
- 30 Where a student fails to provide required documentation within the required timeframe, the University's obligations as a UKVI-licensed sponsor must be met and take precedence. However, the Compliance and Immigration Team should, where possible and without delay to required compliance action, make or prompt a referral to the appropriate student support service at the point of escalation. This does not override or defer any compliance or reporting obligation but

ensures that students who may be experiencing difficulty are directed to support, and that consideration of the student's welfare has been documented as part of the escalation record.

- 31 Where verification indicates that a student's permission does not permit them to study, the University will take appropriate action, which may include refusing or suspending enrolment. The student must be notified in writing and directed to seek advice from an external source such as UKCISA. The Compliance and Immigration Team will assess any UKVI reporting obligation that arises and take the appropriate action where required.
- 32 Escalation routes for specific situations are set out in Appendix B.

Recording Requirements

- 33 A record must be made of every right to study check. The record must capture:
- The student's name and ID Number
 - The date on which the check was conducted
 - The name and role of the member of staff who conducted the check
 - The type of document or immigration permission reviewed
 - The method by which the permission was verified
 - The outcome of the check
 - Where the permission is time-limited: the expiry date and confirmation that monitoring has been initiated
- 34 A copy of, or a record of verification of, the documentation reviewed must be retained with the student's record. Records must be held securely and in accordance with the University's data retention schedule.
- 35 The Registrar or nominee may review verification records at any time to assure themselves of compliance. The Compliance and Immigration Team will produce an annual compliance report for the Director of Collaborative Compliance confirming evidence of checks held and identifying any outstanding cases.

Data Protection

- 36 Documentation collected for right to study purposes is personal data and may constitute special category data under UK GDPR. The lawful basis for processing is compliance with a legal obligation (Article 6(1)(c)) and, where special category data is engaged, the performance of a task in the public interest (Article 9(2)(g)). Applicants and students must be provided with a clear privacy notice at the point of data collection. Access to documentation is restricted to staff with a direct operational need. The DPO must be consulted before any new system or tool for right to study verification is introduced.

Roles and Responsibilities

- 37 Roles and responsibilities are set out below.

Role / Team	Responsibilities
Compliance and Immigration Team	Policy ownership; staff training; complex case escalation and resolution; liaison with UKVI; oversight of the ongoing monitoring programme; annual policy review.
Admissions Teams (Partner, Home, International)	Operational implementation; ensuring right to study verification is embedded in admissions and enrolment workflows; quality assurance.
Staff conducting right to study checks	Conducting verification checks at the relevant stage of the admissions and enrolment process; ensuring records are completed accurately and promptly.
Registry / Student Records Team	Maintaining the integrity of student records; ensuring verification outcomes are recorded against the student record.
Data Protection Officer	Advising on lawful basis for processing; ensuring retention schedules are observed; reviewing data protection implications of any verification systems.

Staff Training

38 All staff who conduct right to study checks must complete training before doing so, covering the legal basis for checks, who is subject to checks, acceptable documents, verification methods, recording requirements, and escalation procedures. Training must be refreshed annually or when there is a material change to UKVI guidance. The Compliance and Immigration Team is responsible for designing, delivering, and recording training completion.

Consequences of Non-Compliance

Institutional

39 Failure to comply with right to study obligations may result in downgrading, suspension, or revocation of the University's UKVI sponsor licence; civil penalties under the Immigration, Asylum and Nationality Act 2006; criminal liability under the Immigration Act 2016; and OfS regulatory action. The consequences of licence revocation would be severe, including the loss of ability to sponsor international students and significant reputational and financial harm.

Individual students

40 A student found to be studying without the right to do so faces suspension or withdrawal of enrolment, potential immigration consequences, and the possible review of any qualifications awarded in breach of their immigration conditions. The University has reporting obligations to UKVI in such cases.

Staff

41 Staff who fail to follow this policy - including by failing to conduct required checks or to complete required records - may be subject to disciplinary proceedings. Wilful or reckless failure to comply may constitute gross misconduct.

Related Policies

42 The University's student related policies can be found on the [Policies and Strategies](#) webpage.

- Admissions Policy
- Data Protection Policy
- Disciplinary Policy
- International Student Policy
- Safeguarding Policy
- Student Code of Conduct

Review and Governance

43 This policy will be reviewed annually by the Compliance and Immigration Team, in consultation with Legal Services and the DPO, and whenever there is a material change to UKVI guidance or immigration law. It is approved by Senate and is the responsibility of the Director of Collaborative Compliance, who will report annually to Senate on the operation and effectiveness of the policy.

44 Queries about this policy should be directed to the Compliance and Immigration Team.

Table of Definitions

BNO Visa	A visa available to British National (Overseas) passport holders and their family members, allowing them to live, work, and study in the UK.
Biometric Residence Permit (BRP)	A physical card (now largely replaced by eVisa) that was previously issued as proof of immigration permission.
Civil Penalty	A financial penalty imposed by the Home Office on an institution or employer found to have enrolled or employed an individual without the right to study or work in the UK.
Compliance and Immigration Team	The University team responsible for policy oversight, complex case escalation, UKVI liaison, staff training, and ongoing monitoring of time-limited immigration permissions.
Dependent Visa	Immigration permission granted to the partner or child of a person holding a UK visa (e.g. Student, Skilled Worker), which may permit study subject to conditions.

Employer Checking Service (ECS) Positive Verification Notice	A document issued by UKVI confirming that an individual with a pending application has the right to work or study in the UK while their application is being considered.
EU Settlement Scheme (EUSS)	A scheme allowing EU, EEA, and Swiss citizens and their family members resident in the UK before 31 December 2020 to obtain settled or pre-settled status.
eVisa	An electronic record of a person's immigration status, replacing physical documents such as Biometric Residence Permits (BRPs). Verified using a share code.
Fee Status Assessment	A separate process to determine whether a student is liable for home or overseas tuition fees. It is legally distinct from right to study verification.
Graduate Visa	Post-study immigration permission allowing recent graduates to work or study in the UK for up to two years* (three years for PhD graduates). Holders cannot be sponsored under the Student route.
Immigration Permission	Any lawful basis under UK immigration law that permits an individual to remain in the UK, which may or may not permit study (e.g. visa, leave to remain, settlement status).
Indefinite Leave to Remain (ILR)	Immigration permission to remain in the UK permanently, with no time restrictions.
In-Time Application / 3C Leave	Where an individual has submitted an application to extend or vary their immigration permission before their current permission expires, their existing permission is extended by statute while the application is pending.
Limited Leave to Remain	Immigration permission to remain in the UK for a specified period, after which it must be renewed or replaced.
Ongoing Monitoring	The process of tracking students whose immigration permission is time-limited and ensuring they provide evidence of renewal before or at the point of expiry.
Pre-Settled Status	Limited Leave to Remain granted under the EU Settlement Scheme, valid for five years and subject to ongoing monitoring and renewal.
Refugee Status / Humanitarian Protection	Immigration permission granted to individuals who have been recognised as refugees or granted protection on humanitarian grounds. May be time-limited or indefinite.
Right to Study	The immigration permission required by individuals subject to immigration control to lawfully undertake a course of study in the UK.

Settled Status	Indefinite Leave to Remain granted under the EU Settlement Scheme, conferring permanent residence rights with no time limit.
Share Code	A unique code generated via the UKVI online service that allows an individual to prove their immigration status to a third party, such as an employer or university.
Skilled Worker Visa	A visa allowing individuals to work in the UK in an eligible occupation. Study is permitted as a secondary activity subject to conditions.
Student Sponsor	A licensed higher education provider authorised by UKVI to sponsor international students under the Student visa route.
Subject to Immigration Control	Individuals who are not British or Irish citizens and whose right to enter or remain in the UK is governed by immigration law.
UKCISA	UK Council for International Student Affairs, an independent advisory body providing guidance and support on immigration and related matters for international students.
UKVI	UK Visas and Immigration, the Home Office division responsible for administering the UK's visa and immigration system.
View and Prove Service	The online service used to verify an individual's immigration status via a share code.
Youth Mobility Scheme	A visa allowing young people from certain countries to live and work in the UK for up to two years, which also permits study.

*from January 2027, this duration will be reduced to 18 months for new applicants

Appendix A - Acceptable Documents and Verification Methods

The following table sets out the verification method required for each category of immigration permission. Where a member of staff is uncertain whether a document is acceptable or whether the permission allows study, the case must be referred to the Compliance and Immigration Team before enrolment is confirmed.

Immigration Permission	Verification Method
British or Irish passport (current)	Visual inspection of biometric page.
EU Settlement Scheme: settled status	UKVI share code verified via the UKVI View and Prove online service.
EU Settlement Scheme: pre-settled status	UKVI share code verified via the UKVI View and Prove online service. Expiry date must be recorded; permission subject to ongoing monitoring.
Indefinite Leave to Remain (ILR)	eVisa: UKVI share code verified online via the View and Prove service. Where a physical document is presented, this should be checked and, where possible, verified against UKVI online records.
Limited Leave to Remain (any category)	UKVI share code via the online service, or other acceptable evidence where an online check is not available. Expiry date must be recorded and monitored.
Refugee status / Humanitarian Protection	Passport plus Refugee Travel Document or evidence of grant. Where a time-limited grant exists, expiry date must be recorded and monitored.
Dependent visa (partner or child of Student / Skilled Worker)	Passport plus UKVI share code confirming dependent permission. Conditions must be checked to confirm that study is permitted.
Graduate visa	UKVI share code confirming Graduate visa status. Holders are permitted to study but are not eligible for sponsorship under the Student route. Cases involving further study should be referred to the Compliance and Immigration Team.
BNO (British National Overseas) visa	BNO passport plus UKVI share code verifying BNO visa. Expiry date recorded; subject to monitoring.
Youth Mobility Scheme (Tier 5)	UKVI share code or BRP. Expiry date recorded; subject to monitoring.
Skilled Worker visa (studying as dependent activity)	UKVI share code confirming permission and conditions. Study is permitted subject to the conditions of the visa. Cases of uncertainty should be referred to the Compliance and Immigration Team.
In-time pending application	Copy of UKVI application acknowledgement plus, where permission

(3C leave)	has lapsed, an Employer Checking Service (ECS) Positive Verification Notice. Case flagged for monitoring pending decision.
Any other immigration permission	Refer to the Compliance and Immigration Team before proceeding.

Documents that are not acceptable as sole evidence of the right to study include national identity cards (except for EUSS verification purposes), student cards, driving licenses, bank statements, utility bills, or self-declaration.

Birth certificates are not sufficient evidence of a right to study on their own, but may be considered in combination with other documentation where appropriate, and subject to approval by the Compliance and Immigration Team.

Where there is uncertainty about the acceptability of documentation, cases must be referred to the Compliance and Immigration Team.

Name and gender marker discrepancies

Where a student's documentation does not reflect their current name or gender marker - including students who have changed their name through marriage, deed poll, or cultural practice, and trans or non-binary students whose documents predate a change of name or gender - this must not be treated as a verification failure. Staff should note the discrepancy, handle the matter sensitively and confidentially, and refer the case to the Compliance and Immigration Team for guidance before any further action is taken. Supporting documentation such as a deed poll, statutory declaration, or gender recognition certificate may assist in these cases but students should not be required to disclose more than is necessary to satisfy the verification requirement.

Appendix B - Escalation Pathways

Situation	Action
Documentation cannot be verified by the Officer conducting the check	Refer to Compliance and Immigration Team within one working day. Do not confirm enrolment.
Student presents a Graduate visa as their basis for a new sponsored programme	Refer to Compliance and Immigration Team immediately. Student cannot commence a programme requiring Student visa sponsorship unless appropriate immigration permission is obtained.
Student's declared nationality cannot be confirmed by documentary evidence	Refer to Compliance and Immigration Team. Do not assume British or Irish citizenship without appropriate evidence.
Suspected identity fraud - person at interview appears to differ from application record	Refer to Compliance and Immigration Team and Fraud Prevention Officer within one working day. Do not confirm enrolment, pending investigation.
Student's permission does not permit study	Refer to Compliance and Immigration Team. Enrolment suspended or not confirmed. UKVI reporting obligations assessed. Student notified and directed to regulated immigration advice.
Time-limited permission expires during studies and student does not evidence renewal	Refer to Compliance and Immigration Team. Escalate to Director of Collaborative Compliance as appropriate. Enrolment suspension considered. UKVI reporting obligations assessed.
Student fails to respond to monitoring contact within the required timeframe	Refer to Compliance and Immigration Team. Escalate to Director of Collaborative Compliance as appropriate. Enrolment suspension considered.
Any case where the Officer is uncertain	Refer to Compliance and Immigration Team. Do not make independent judgements on complex immigration matters.

Appendix C - Equality Impact Assessment

As a university, we are committed to enhancing equality, diversity and inclusion (EDI). We have a legal (Equality Act 2010) and ethical obligation to ensure our policies, systems and processes are fair, inclusive and ensure every member of the BNU community can thrive.

Whilst we all have protected characteristics, we know there are certain characteristics and communities that are marginalised and underrepresented in Higher Education and the workplace. These are: different ethnicities (including Gypsy, Roma, Traveller, Showmen and Boaters, migrants, refugees and asylum seekers) Disabled individuals; neurodiverse individuals; pregnancy (including maternity and paternity impact); the LGBT+ community; carers; people of different faiths; people impacted by menopause and individuals from a range of backgrounds including: socio-economic disadvantage, homeless, alcohol and/or substance misuse, people experiencing domestic and/or sexual violence, ex-armed forces, looked after children and care leavers. We also know individuals have multiple intersectional experiences and different points in their lives and careers.

1. With reference to the above characteristics, in what ways does this policy enhance equality and the access of opportunity at BNU?

The Right to Study Policy enhances equality by establishing a consistent, transparent, and legally compliant framework for immigration verification that applies uniformly across all students subject to immigration control. By codifying the University's obligations clearly and separating right to study verification from fee status assessment, the policy reduces the scope for inconsistent or discriminatory application of checks.

The policy's guiding principle of universality - that checks apply to all students subject to immigration control and will not be applied in a way that results in unlawful discrimination on the basis of protected characteristics - is a direct equality safeguard. Without this principle explicitly stated, there is a risk that checks could be applied on the basis of perceived ethnicity, nationality, or religion rather than immigration status. The policy mitigates this risk by requiring a consistent standard across all campuses, programmes, and enrolment routes.

The policy provides explicit protection for students with complex or non-standard immigration statuses, including refugees and those with humanitarian protection, BNO visa holders, students on dependent visas, and those with a pending in-time application. By setting out clear verification pathways for each category rather than defaulting to the most straightforward cases, the policy ensures that students from migrant, refugee, and asylum-seeking backgrounds are not disproportionately excluded from enrolment through procedural uncertainty. The ability to continue studying during a pending application, with appropriate evidence requirements, is a significant protection for these students.

The requirement to provide a privacy notice at the point of data collection, and to restrict access to documentation to staff with a direct operational need, protects the dignity and

data rights of students whose immigration documentation may contain sensitive personal information. This is particularly relevant for students with refugee status or humanitarian protection, whose documentation may contain information about persecution or trauma.

The policy's escalation routes and referral pathways - including the requirement to direct students who cannot demonstrate a right to study to external regulated advice such as UKCISA - ensure that students are not left without support or guidance when their situation is complex. This is relevant for students from migrant and asylum-seeking communities who may have limited awareness of their options or access to legal advice.

For students from GTRSB communities, and others who may have non-standard documentation histories, the requirement to refer uncertain cases to the Compliance and Immigration Team rather than make independent judgements at officer level reduces the risk of a student being incorrectly refused enrolment due to a lack of familiarity with their circumstances.

2. In what ways does the policy adversely impact individuals from marginalised and underrepresented communities?

The primary risks of adverse impact arise not from the policy's intent but from the potential for inconsistent application, procedural barriers, and the cumulative effect of immigration compliance obligations on students who are already in precarious circumstances.

Disproportionate scrutiny and discrimination risk: Immigration verification policies carry an inherent risk of differential application based on perceived ethnicity, nationality, or religion rather than objective immigration status. Students from Black, Asian, and ethnic minority backgrounds, including students from Muslim-majority countries, may experience greater scrutiny than white British students. Without robust monitoring of how checks are applied across different groups, this risk cannot be adequately managed. The policy's guiding principle of universality mitigates but does not eliminate this risk, and monitoring data should be reviewed regularly to identify any disparity in outcomes.

Documentation barriers: The policy requires verification through specific methods including UKVI share codes and online verification services. Students from GTRSB communities, refugees, asylum seekers, and students from lower socio-economic backgrounds may face practical difficulties accessing or generating these documents. The requirement to verify British or Irish citizenship by passport where self-declaration is not sufficient may create a barrier for students who do not hold a valid passport, including those from low-income backgrounds and care leavers. Where a passport cannot be produced, the policy provides that the Compliance and Immigration Team

will work with the student to identify alternative evidence - such as a birth certificate, certificate of naturalisation, or driving licence - on a case-by-case basis, so that absence of a passport does not automatically prevent enrolment.

Anxiety and deterrence: For students from migrant, refugee, and asylum-seeking backgrounds, engagement with any formal institutional immigration process can cause acute anxiety, particularly where a student has experienced trauma in relation to their immigration history. The prospect of enrolment being conditional on immigration verification, or of a case being escalated to UKVI, may deter vulnerable students from proceeding with or completing enrolment. Staff training must equip those conducting checks to handle sensitive cases with care and to signpost students to appropriate welfare support.

Students with pending applications: The policy permits students with in-time pending applications to continue studying but requires an Employer Checking Service Positive Verification Notice where permission has lapsed. Obtaining this requires proactive action and familiarity with a process that is not straightforward. Students without legal advice, adequate English language proficiency, or support networks may be unable to navigate this without additional guidance. The Compliance and Immigration Team should provide proactive guidance to students in this position rather than relying on self-navigation.

Suspension at the point of non-response: Where a student does not provide required documentation within the required timeframe, the University's legal obligations under UKVI Sponsor Guidance are significant and may ultimately require suspension of enrolment. This cannot be avoided where the legal threshold is met. However, students experiencing mental health difficulties, domestic violence, homelessness, or other welfare crises may fail to respond not through unwillingness but through inability. The policy requires that, where possible and without delay to required compliance action, the Compliance and Immigration Team makes or prompts a welfare referral at the point of escalation. This does not override the compliance requirement but ensures that students in difficulty are directed to support and that welfare consideration is documented as part of the escalation record.

UKVI reporting obligations: Where a student cannot demonstrate a right to study, the University is required to assess and potentially action UKVI reporting obligations. For students from migrant and refugee backgrounds the downstream consequences can be severe, and awareness of this may deter self-disclosure of difficulties at an earlier stage when intervention would have been more straightforward. Staff should be trained to communicate these obligations clearly and sensitively, and to encourage early

engagement rather than avoidance.

Name and gender marker discrepancies: Trans and non-binary students, and students who have changed their name through marriage, deed poll, or cultural practice, may hold documentation that does not align with their current identity. Without explicit guidance this creates a risk of unnecessary friction or unjustified referral at the identity verification stage. The policy confirms that where a discrepancy exists it must be handled sensitively and referred to the Compliance and Immigration Team for guidance rather than treated as a verification failure, and that students should not be required to disclose more than is necessary to satisfy the verification requirement.

3. How does this proposal work towards achieving the BNU Equality Objectives as outlined in the [Equality Strategy 2023-2028](#)? Please signpost objectives and actions in the BNU Equality Strategy.

Priority One: Involve and Empower Our Community

Objective E: Completion of this assessment directly fulfils the strategy's requirement for equality impact assessments to be used as a mechanism for applying shared learning. The policy's referral to UKCISA for students who cannot demonstrate a right to study is consistent with the objective's emphasis on linking with external organisations to support the community.

Priority Two: Take Action to Tackle Inequalities

Objective B: The policy's requirement to refer non-standard documentation cases to the Compliance and Immigration Team, rather than making local judgements, reduces the risk of GTRSB students being incorrectly refused enrolment, consistent with BNU's GTRSB into HE Pledge.

Objective C: Consistent, well-governed application of this policy supports the Access and Participation Plan by ensuring students from widening participation backgrounds, including migrants and refugees, are not subject to disproportionate barriers at enrolment.

Objective D: The policy's anti-discrimination principle, if backed by monitoring data, supports BNU's Race Equality Charter commitments. Disparities in how checks are applied across ethnic groups should be scrutinised through the REC workstream.

Priority Three: Build a University Community Where People Can Be Themselves

Objective C: The policy contributes to a process that treats students with dignity in compliance-sensitive situations, supporting a culture of belonging for students from communities that may have historical reasons to be wary of institutional authority.

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