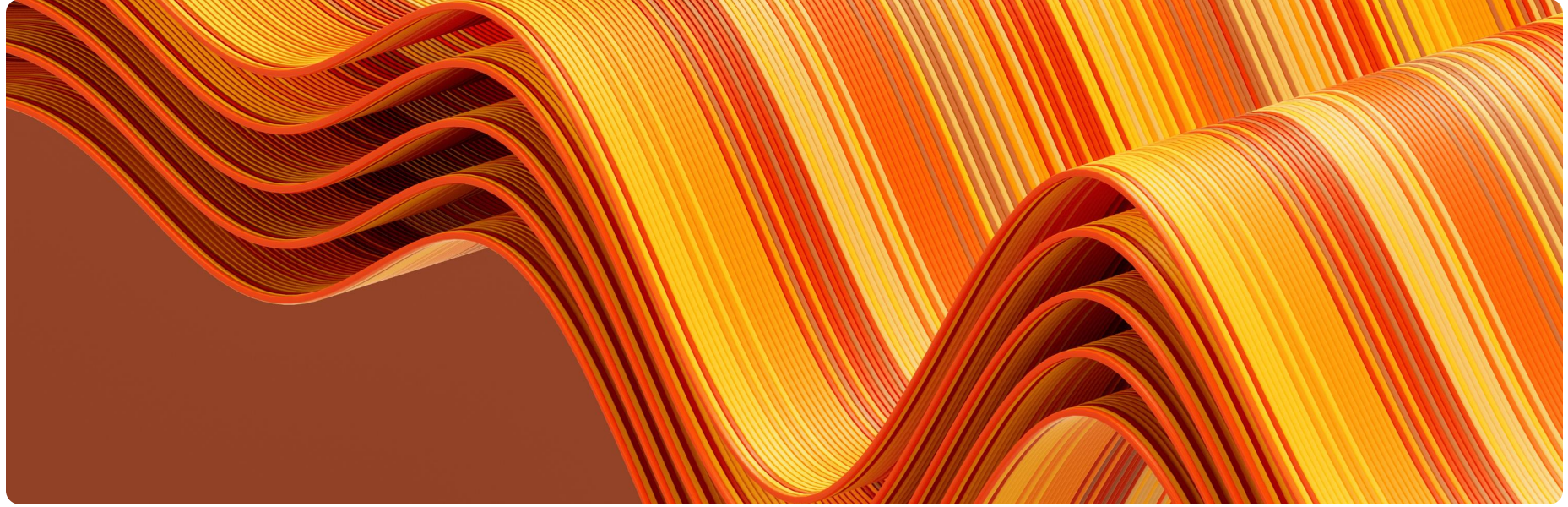




# The UK Government's Basic Compliance Assessment (BCA)

Key elements of the UKVI approach to international student recruitment compliance, and what UK universities need to do to stay compliant

# What is the Basic Compliance Assessment?

The Basic Compliance Assessment (BCA) is UK Visas and Immigration's (UKVI) annual review of every higher education provider holding a Student sponsor licence.

It measures how well a sponsor is managing the international students it recruits and issues Confirmation of Acceptance for Studies (CAS) to, and it is the primary mechanism UKVI uses to decide whether a university may continue to sponsor students under the Student and Child Student routes.

Holding a sponsor licence is treated as a privilege rather than a right.

A university must apply for a new BCA every 12 months, regardless of the outcome of its previous assessment, and a pass on one occasion does not prevent UKVI from later finding the same sponsor non-compliant.

# The three core compliance metrics

From 1 June 2026, the legacy BCA framework has been replaced by a public-facing Red-Amber-Green (RAG) rating system, set out in the Home Office's revised Student Sponsor Guidance. This followed the 2025 Immigration White Paper and represents a significant tightening of the threshold's UK universities must meet.

| Core metric            | Calculation method                                                                                                                                                                                                                                                                                                | Legacy BCA threshold (assessments before 1 June 2026) | New RAG threshold (assessments from 1 June 2026)                                  |
|------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------|-----------------------------------------------------------------------------------|
| Visa refusal rate      | <p>The proportion of used CAS (i.e. submitted in a decided visa application) that were refused.</p> <p><i>Applications with a live administrative review are excluded.</i></p>                                                                                                                                    | Less than 10%                                         | Less than 5%                                                                      |
| Enrolment rate         | <p>The proportion of students granted entry clearance or leave to remain who actually enrol on their course within the enrolment period.</p>                                                                                                                                                                      | At least 90%                                          | At least 95%                                                                      |
| Course completion rate | <p>The proportion of enrolled students whose course was due to end in the assessment period, who complete it, rather than dropping out.</p> <p><i>Students who defer and leave the UK, switch institution, switch immigration category, or leave the course and the UK are excluded from the calculation.</i></p> | At least 85%                                          | At least 85% (1 June 2026 – 31 May 2027), rising to at least 90% from 1 June 2027 |

Course completion does not form part of a sponsor's first RAG rating under the new framework, but the 85% threshold still applies and failing it will still trigger compliance action. The tougher 90% completion threshold takes effect for assessments made on or after 1 June 2027.

# The RAG rating system

Each BCA outcome from 1 June 2026 results in a single overall Red, Amber or Green rating, published on the Register of Student Sponsors. Ratings for each sponsor's first assessment under the new framework will not be published individually, they will be released simultaneously once every sponsor has been assessed.

## Green

**Refusal rate: <4%**  
**Enrolment rate: ≥96%**  
**Course completion rate: ≥92%**

## Amber

**Refusal rate: ≥4% - <5%**  
**Enrolment rate: ≥95% - <96%**  
**Course completion rate: ≥90% - <92%**

## Red

**Refusal rate: ≥5%**  
**Enrolment rate: <95%**  
**Course completion rate: <90%**

A sponsor's rating is determined by the lowest metric they hold, across the three categories of refusal, enrolment and course completion. For example, therefore, if one of those metrics is red, then their overall RAG outcome will be red, regardless of the performance in the other two metrics.

# UKVI Compliance action – post assessment

## Green

**All three core metrics meet the required thresholds.**

No compliance action is taken automatically, although green-rated sponsors can still be audited and sanctioned on a discretionary basis.

A green rating does not automatically increase a sponsor's CAS allocation.

## Amber

**At least one metric falls short.**

UKVI will not grant additional CAS above the sponsor's previous usage until a green rating is achieved.

The sponsor must attend a formal engagement meeting within 30 days, normally attended by the Vice-Chancellor, Chief Executive or equivalent, and may be placed on an action plan of up to 12 months.

## Red

**A serious shortfall against one or more metrics**

The sponsor's next CAS allocation is likely to be reduced, and privileges such as English-language self-assessment and remote delivery may be withdrawn. A 'final warning' is recorded that stays active for the next five BCAs.

A second red rating within that window, or two or more red-rated metrics in one assessment, will normally trigger licence revocation.

### Discretionary assessment

UKVI may apply a discretionary assessment instead of an automatic fail where a sponsor's numbers are small enough that a percentage-based metric could be misleading, broadly, where fewer than 50 CAS were used or fewer than 50 students were due to enrol or complete in the relevant period. UKVI considers factors such as the reasons for refusals or non-enrolment, the sponsor's wider compliance history, and whether it poses a threat to immigration control. A sponsor that would otherwise be rated amber can be moved to green through a discretionary assessment, but a sponsor cannot be moved to red as a result of one.

### Transitional operational discretion

For each sponsor's first RAG assessment under the new rules, and again for the first assessment once the 90% completion threshold applies, UKVI has said it will exercise 'operational discretion' when arriving at a rating, taking into account factors such as prior compliance history, changes to recruitment practice, and the period the underlying data relates to.

# Wider sponsorship duties universities must maintain

The BCA metrics sit alongside, not instead of, a sponsor's ongoing sponsorship duties. UKVI monitors compliance continuously, and breaches of these duties can trigger action even between BCA cycles.

Accurate record-keeping in the institution of processes and individual Students.

Right to work checks and compliance with illegal working requirements as an employer.

Child safeguarding duties, where the institution sponsors Child Students.

Prompt withdrawal of sponsorship from non-compliant students, and monitoring of student attendance and academic engagement.

Proper assessment of English language ability and academic suitability before assigning a CAS.

Timely reporting of changes in circumstances to the UKVI and to the relevant Educational Oversight body, including changes in a student's circumstances and changes such as a change of ownership.

Compliance with rules on remote delivery, course design must stay within the permitted proportions of remote teaching, and delivery above 20% generally requires prior UKVI approval.

Appropriate use of the Sponsor Management System, and cooperation with Home Office visits, whether announced or unannounced.

Maintaining eligibility and suitability, ensuring fit-for-purpose premises, valid planning permission, and Key Personnel who are not bankrupt, disqualified as directors, or convicted of a relevant offence.

Home Office guidance is explicit that a number of breaches which are minor in isolation can be treated cumulatively as a serious breach. Institutions should not assume that individually 'small' compliance gaps are safe simply because no single major breach has occurred.

# Applying for a BCA and challenging an outcome



1.

A sponsor must apply for a BCA every 12 months via the SMS, using its Level 1 user account, and pay the applicable fee. Applications can be made up to one month before they are due but must be submitted by the due date.

2.

It is the sponsor's responsibility to track its BCA due date on the SMS 'Licence summary' screen and keep contact details current, UKVI reminders are sent no more than a month in advance, but a missed deadline is treated as a serious breach and triggers revocation action regardless.

3.

If a sponsor disagrees with a BCA outcome, it has 20 working days to submit representations. These must show the decision was materially flawed based on the facts at the time it was made, UKVI will not reconsider individual visa decisions, and there is no further right of appeal once representations have been considered.



## Where UKVI suspects a breach of sponsorship duties, it follows one of two investigation tracks, depending on severity.

| Track   | When it applies                                                                                                                                                                                                                                                                                |
|---------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Track 1 | Used for suspected isolated or minor breaches. The sponsor continues to hold its licence and issue CAS during the investigation. If a breach short of a serious breach is confirmed, the sponsor is placed on a charged action plan with a review date and, if appropriate, CAS limits.        |
| Track 2 | Used for suspected serious breaches. The sponsor is normally removed from the Register of Student Sponsors and barred from issuing CAS while UKVI investigates. A confirmed serious breach leads to revocation action, with a ban of up to two years for the institution and/or key personnel. |

### Sanctions

- **Action plans:** a charged, time-limited plan setting out required actions and a review date; failure to comply, or to pay the associated fee, leads to revocation.
- **CAS restrictions:** including reduction to zero CAS while an action plan or red-rating restriction is in force.
- **Loss of privileges:** such as the ability to self-assess English language ability or to deliver courses remotely.
- **Licence revocation:** normally accompanied by a two-year ban from the Register of Student Sponsors for the institution, and potentially for parent companies and Key Personnel.

A revoked licence has direct consequences for currently sponsored students, who may be curtailed to 60 days' leave, permitted to complete their studies for a limited period (up to six months or the end of the academic year), or refused/cancelled entry depending on their individual circumstances.



# Practical checklist for universities

To stay compliant with the BCA and the wider sponsor duties regime, international offices, admissions, and compliance teams should:

Scrutinise recruitment channels and agents in higher refusal rate markets, since refusal rate is calculated on used CAS, not on offers made.

Track visa refusal, enrolment and completion rates continuously against the new 5% / 95% / 85–90% thresholds, not just in the run up to a BCA application.

Tighten pre-CAS assessment of genuine student intent, academic suitability and English language ability, particularly for routes and partners associated with higher refusal or non-enrolment rates.

Strengthen enrolment monitoring and early engagement with offer holders to reduce no-shows, and ensure SMS records (deferrals, withdrawals, switches) are updated promptly and accurately.

Build in a completion/attrition early-warning process, since a single missed report or delayed withdrawal can count against the completion metric.

Review remote delivery proportions on every course against the permitted thresholds before assigning CAS.

Keep key staff and senior leaders, upskilled and trained in understanding the process, the impact and significance of good compliance.

Recognise that effective compliance starts at the beginning of the recruitment process not just post admissions, ensure all staff operating at the early recruitment stages recognise their part in good compliance

Prepare governance for an amber or red outcome in advance, engagement meetings must be attended by the Vice-Chancellor, Chief Executive or equivalent, within 30 days, so escalation routes should be agreed before they are needed.

Treat minor, isolated compliance gaps seriously, since the UKVI may aggregate them into a finding of a serious breach.

# How can QS support your compliance journey?

## Compliance Review

Using experts from our Consulting team to review your whole student recruitment journey from pre-enquiry through to enrolment.

Ensuring you are in a strong position to support students through their route to compliance and to ensure your institutional compliance 'house' is in order, to support meeting the UKVI BCA metrics.

## Pre-CAS assessment and interviews

Working with our QS team to implement extended support to deliver pre-CAS assessment as part of your admissions process.

Deployment of QS staff to undertake pre-CAS interviews to support compliance.

## Post-outcome support

Once you have received your RAG rating, QS can support you in analysing what measures to put in place to support greater compliance.

Also ensuring you can continue to meet your international recruitment goals via the development of a revised international strategy.

# Explore QS student recruitment solutions

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