

## Equality Analysis: Template Form

This form supports you to undertake an equality analysis of the policy or change you are proposing to ensure meaningful consideration of the various impacts it may have on different groups within our diverse community. Please refer to the [Equality Analysis Guidance document](#) to support you to complete this exercise. Depending on the change you are considering, this form can be adapted to best fit the scale of your analysis.

*Throughout this guidance the term 'policy' is used to include a wide range of activities, for example processes, procedures, projects and initiatives.*

<b>Policy Title</b>	Student Visa Sponsorship Policy
<b>Purpose</b>	The purpose of this policy is to set out the Queen Mary University of London policy for sponsoring students to study at the Queen Mary University of London under the university's Sponsor Licence (Student Route) and set out the responsibilities of Queen Mary University of London regarding Sponsor Licence Compliance under rules as set out by the UK Visa & Immigration Directorate of the Home Office (UKVI).
<b>Equality Analysis Lead(s)</b>	Amy Simcock, Head of Student Immigration Compliance
<b>Policy Sponsor (if applicable)</b>	Jonathan Morgan, Chief Governance Officer and University Secretary
<b>Date of equality analysis</b>	12 May 2025
<b>School/Institute/Department</b>	Registry Services, Student Experience Directorate
<b>Is the policy new or existing?</b>	New

Has the policy previously been subject to equality analysis?	No
If so, what are the main changes since the last analysis?	N/A
Committee/group giving formal approval (if applicable)	TBC

**1. Consider your approach to undertaking equality analysis.**

This is an opportunity to consider how you will approach your equality analysis; who are your key stakeholders and who needs to be involved, how will you embed the equality analysis into the wider decision-making process, what scale of impact do you anticipate?

Key Stakeholders:

- Students, especially students who are subject to immigration control.
- Immigration Compliance colleagues.
- Advice and Counselling Service colleagues.
- Admissions and Recruitment colleagues.

This policy applies to applicants and students of programmes delivered on Queen Mary University of London UK premises who are subject to immigration control, but it does not apply to employees of the University except where they are also sponsored as a student. Therefore, the scope of the policy may include both Home and Overseas fee-paying students. It aims to align current various webpages and international guidance and processing documents to a singular framework to support the day-to-day management of the University's sponsor licence as well as provide clear guidelines and expectations on students who are within the scope of the policy.

**2. Supporting Queen Mary's Values and Strategy 2030**

- How does this policy demonstrate Queen Mary's [Values in action](#)?
- What opportunities are there for this policy to progress positive impact across protected characteristics and beyond?
- How does it support the aims of Queen Mary Strategy 2030, including our mission to be the most inclusive university of our kind

**How does this policy demonstrate Queen Mary's Values in action?**

**Inclusive:** Whilst the policy scope focuses on applicants/students subject to immigration control, all students are subject to 'Right to Study' checks which are detailed in this policy. The policy sets out the framework for decision-making where compliance duties intersect with the student experience and university administration to further support striving for equity and fairness.

**Proud:** This policy provides a framework to enable and empower staff not directly involved with compliance to feel proud of the decisions they have made within the remit of their own roles, to support the University in meeting sponsor compliance duties.

**Ambitious:** This policy provides a framework that outlines the University position on sponsor compliance duties and to uphold the basic principles of sponsor licence compliance in terms of acting honestly and with integrity. The policy pulls together the various processes and guidance to support the University recruitment strategy but also to ensure robust and informed decisions are made.

**Collegial:** The policy brings together the various threads of process and guidance that cover sponsor duties to provide collaborative working across both Professional Services and Faculties with a focus on resolving issues. The policy is designed to unify the University standpoint on maintain sponsor duties that span various departments across the University.

**Ethical:** Along with the Student Immigration Compliance Working Group, the policy sets out how the University demonstrate we are acting honestly and with integrity regarding our sponsor licence duties and it details the roles and responsibility regarding compliance to promote transparency in our internal processes.

**What opportunities are there for this policy to progress positive impact across protected characteristics and beyond?**

The Student Visa Sponsorship policy clearly outlines the University commitment to the responsibility of maintain sponsor licence compliance and ensuring compliance expectations are clearly defined for both the University and the student. The policy also aims to provide a clear framework for decision-making that is balanced in the approach and to ensure all circumstances are taken into consideration, for example, when visa sponsorship is not provided to a student.

**How does it support the aims of Queen Mary Strategy 2030, including our mission to be the most inclusive university of our kind+**

The Student Visa Sponsorship Policy will provide a clear framework regarding visa sponsorship which will support the recruitment strategy of the University. In turn, this will support the mission to promote inclusivity across the study body.

The policy will outline our commitment to ensuring sponsorship duties are met by the University and upholding UKVI basic principles of the Student Route immigration, allowing the University to retain the sponsor licence and continue to recruit international sponsored students from all background across the world.

### 3. Evidence and information

Consider what sources of information you will need to undertake your equality analysis. You should consider both quantitative and qualitative information and must consider the protected characteristics listed below as a minimum. You should consider what information is already available and whether any additional data is required.

The potential impacts you anticipate the policy may have should inform your approach.

Although all QMUL applicants/students are subject to 'Right to Study' checks which are detailed in this policy, the policy scope focuses on applicants/students subject to immigration control and so will have a more significant impact on this cohort of applicants/students. Within this group, students requiring Student visa sponsorship (sponsored students) will be further impacted than students who do not require Student visa sponsorship but who do not hold a British/Irish passport (unsponsored students).

Consultation with Well-being services (Advice and Counselling service), Recruitment and Admissions teams and the Students' Union.

Data (as of April 2025)

Enrolled sponsored students:

*Redacted*

Enrolled unsponsored students (non-British/Irish passport):

*Redacted*

### 4. Engagement and qualitative data

- What engagement exercises have taken place already?
- What do the findings show? How will these inform the proposed policy?
- Is any further engagement required to inform your assessment of potential impacts?

Consultation with the Student body has been facilitated via consultation with VP Liberation, International and Postgraduates (Hassam Naeem) and specific feedback has been received from International Student Advisors (Advice and Counselling) with a focus on how the policy might impact students and the international student experience.

Further consultation will take place after 1 year to measure the impact on students affected by the policy to determine whether any further amendments should be made to either support positive impact or reduce negative impact.

## 5. Assessment of potential impact on different groups

- The list below follows the legal framework of the Equality Act 2010 and the groups protected within it as well as additional groups whose needs should be considered. You can add any additional groups to this list where relevant.
- Consider both **negative** and **positive** impacts here
- Please consider intersectionality throughout your assessment

<b>Characteristic</b> <i>(Characteristics in bold reference those which are protected under the Equality Act 2010)</i>	<b>Impact identified</b> <ul style="list-style-type: none"> <li>- Negative</li> <li>- Positive</li> <li>- Neutral/non identified</li> </ul>	<b>Rationale</b> <ul style="list-style-type: none"> <li>- What data or information has informed your assessment of impact</li> </ul>
<b>Age</b>	Neutral/non identified	<p>The details in the policy are not specific to this characteristic with the exception that Postgraduate research students are more likely to be older than Undergraduate taught students due to the academic requirements of the course and therefore, are more likely to be affected by rules regarding withdrawing sponsorship where they wish to ‘write-up’ outside the UK. Conversely however, they are less likely to be negatively impacted by visa sponsorship withdrawal due to non-engagement since the attendance and engagement requirements are less stringent for research programmes than for taught programmes.</p> <p>Similarly, students under 18 are more likely to be enrolled onto foundation courses (RQF Level 3) that have stricter engagement requirements with specific reference to a minimum percentage attendance requirement, as imposed by UKVI, where unsponsored students would not be as affected.</p> <p><b>Review of data shows us:</b></p>

		<div>Redacted</div>
<b>Disability</b>	Neutral/non identified	The details in the policy are not specific to this characteristic.
<b>Marriage and Civil Partnerships</b>	Neutral/non identified	<p>The details in the policy are not specific to this characteristic.</p> <p>This data is not recorded in the Student Records database.</p>
<b>Race &amp; Ethnicity</b> <i>(including nationality and citizenship)</i>	Neutral/non identified	<p>Although the details in the policy are not specific to this characteristic, UKVI compliance rules are linked to nationality and citizenship and therefore there can be differing requirements and restrictions for different nationalities such as financial or ATAS requirements.</p> <p>Additionally, there are strict UKVI requirements on the minimum thresholds of non-engagement and where non-engagement will lead to visa sponsorship withdrawal, and although though as an institution, all students will be treated equitably as per the Student Learning Engagement Policy, it is important to note that this could disproportionately affects students subject to immigration control in that they are more likely to be de-registered than British/Irish students.</p> <p><b>Review of data shows us:</b></p> <div>Redacted</div>
<b>Religion or belief</b>	Neutral/non identified	<p>The details in the policy are not specific to this characteristic.</p> <p>This data is not recorded in the Student Records database.</p>

<b>Pregnancy and maternity</b>	Positive	The policy references the maternity policy to include that this can be considered an exception circumstance where visa sponsorship can be retained rather than withdrawn thereby, reducing the likelihood for pregnant students to be disproportionately impacted by visa sponsorship withdrawal.
<b>Sex</b> (The Equality Act 2010 defines 'sex' as relating to male and female)	Neutral/non identified	<p>The details in the policy are not specific to this characteristic however this data is recorded in the Student Records database.</p> <p><b>Review of data shows us:</b></p> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p><i>Redacted</i></p> </div>
<b>Sexual Orientation / LGBTQIA+</b>	Neutral/non identified	<p>The details in the policy are not specific to this characteristic.</p> <p>This data is not recorded in the Student Records database.</p>
<b>Trans and non-binary people</b> (The Equality Act 2010 uses the term 'Gender Reassignment')	Neutral/non identified	<p>The details in the policy are not specific to this characteristic.</p> <p>This data is not recorded in the Student Records database.</p>
Caring responsibilities	Neutral/non identified	<p>The details in the policy are not specific to this characteristic however, UKVI rules changed in 2023 to exclude most post-graduate courses from the ability to of sponsored students to bring dependants. Certain post-graduate research courses still permitted sponsored students to bring dependants, but the University does not have these programmes.</p> <p>Although data on caring responsibilities is not recorded in the Student Records database, it can be suggested that sponsored students with caring responsibilities are less likely to be able to access QMUL programmes based on the</p>

		inability to bring dependants, where an unsponsored student may indeed have that ability.
Socio-economic background or status	Neutral/non identified	<p>As this policy focuses on international fee-paying students who are predominantly ineligible for SLC/SFE, applicants/students impacted are more likely to be of a higher socio-economic background since they must pay tuition fees without the advantage of funding or loans. Additionally, as part of a visa application, must demonstrate they have enough funds to support living costs in London for up to 9 months of their course.</p> <p>This data is not recorded in the Student Records database.</p>
Menopause	Neutral/non identified	<p>The details in the policy are not specific to this characteristic.</p> <p>This data is not recorded in the Student Records database.</p>
<i>Additional:</i> Refugees/Asylum Seeker Status	Positive	<p>The policy clearly defines the expectations of a Refugee/Asylum seeker status with specific reference to Right to Study checks at the point of enrolment.</p> <p>Furthermore, the policy provides a clear framework for Right to Study checks and does not seek to exclude the evidence available to demonstrate Right to Study. Specifically, the policy highlights that whilst a student must have the correct immigration permission to study for the duration of their course, they are not required to demonstrate immigration permission that covers the <i>entire</i> programme of study at the <i>point of enrolment</i>, which particularly promotes inclusivity for Refugees/Asylum Seeker Status where the nature of their immigration status can be especially unpredictable and should not be a barrier to study.</p>



		<b>Review of data shows us:</b> <div style="border: 1px solid black; padding: 5px; margin-top: 5px;">Redacted</div>	
<b>6. Action plan to eliminate or reduce adverse impact.</b> <ul style="list-style-type: none"> <li>- The template below allows you to identify specific actions to address any negative impact that you have identified through your assessment.</li> <li>- Negative impact should be address before the policy is put into place.</li> <li>- This may include actions already undertaken since the beginning of this equality analysis exercise.</li> </ul>			
<b>Impact identified</b>	<b>Action planned</b>	<b>Timeframe</b>	
N/A	Share with Student Immigration Compliance Working Group	By August 2025	
Disparity in likelihood of visa sponsorship being withdrawn from different characteristics: <ul style="list-style-type: none"> <li>• &lt; 18s are more likely to have visa sponsorship withdrawn due to non-engagement due to the stricter attendance requirements.</li> </ul>	Introduction of wider communications to students at the point of enrolment regarding visa conditions and responsibilities and the expectations of both the student and the University.	September 2025	
<b>7. Decision</b>			
Is the policy ready for implementation:	<b>YES</b>	<b>NO</b>	
Equality analysis reviewed by (e.g., relevant governance group):	TBC		
If “No”, what action will be taken?			

## 8. Monitoring and Review

- How will you monitor the impact of your project once it has been implemented?
- Include date for review and person(s)/group/committee responsible

- September 2025 – review enrolment data to review impact on Student Visa Policy in relation to core Basic Compliance Metrics such as, enrolment rate and course completion rate.
- January 2026 & May 2026 – undertake quantitative review of visa sponsorship withdrawals and if necessary, make appropriate recommendations.

Date for review	July 2026
Person responsible	Amy Simcock
Relevant committee(s)/working group(s)	TBC

Please share your completed equality analysis with the EDI Team by sending this form to [hr-equality@qmul.ac.uk](mailto:hr-equality@qmul.ac.uk)

**Appendix 1: Space to record the data that has been used in this equality analysis exercise.**

*Redacted*