

Loughborough College

Attendance and Engagement Monitoring Policy (International Students)

1. Scope and Purpose

Process for monitoring and reporting the attendance of international students in accordance with Immigration Rules.

This document supports the Loughborough College *International Student Recruitment Policy*, specifically its policy statements relating to the attendance monitoring and reporting of international students holding a Student visa. This relates to those undertaking pre-degree, degree and postgraduate level programmes with Loughborough College.

The College has a responsibility to the Home Office, UKVI to ensure that all sponsored Student Visa holders meet the terms of their visas, in respect to study and attendance.

It is a legal requirement for all education institutions to help the Home Office prevent abuse of the Student Visa route. Institutions need to take proper steps to ensure that they only accept bona fide students, and take measures to monitor attendances (i.e. agreed and scheduled contact points) and report unauthorised absences to UKVI as outlined in the Student Sponsor Guidance.

Failure by Loughborough College to monitor attendances and absences, to maintain proper records, or to immediately report students who are in breach of the terms and conditions of their visa, may result in suspension or revocation of its Student Sponsor licence.

2. Policy Statement

The purpose of this document is to set out the protocols, criteria and processes that are used to monitor and record attendance and report unauthorised absence of international students, accepted to Loughborough College courses under the Student Sponsor licence.

Specifically, this document details the processes whereby the College meets its requirements to:

- Remain compliant in terms of the fulfilment of its duties and responsibilities as a Student Sponsor;
- Ensure that the College and its Student Route sponsored students, adhere to the policies and guidance provided by the UKVI;
- Monitor properly the attendance and engagement of its Student Route students, and thus ensure that students are not in breach of the terms and conditions of their visa;
- Ensure that Student Route students maintain a good level of attendance and engagement, and adhere to the terms and conditions of their Student Route visa;

- Ensure that students, who are potentially at risk of being withdrawn from their course due to lack of attendance / engagement, are identified early and supportive intervention measures are implemented;
- Identify Student Route students who may require pastoral, welfare or other support;
- Support, advise and guide Student Route students who may not be attending as required;
- Provide accurate and up to date information to UKVI as and when required for individual students and Student Route students as a whole.

3. Impact Assessments

- 3.1. This policy/procedure has been assessed for its impact on equal opportunities and will be informed by the aim to eliminate all forms of discrimination in all strands of the equal opportunities legislation.
- 3.2. This policy/procedure has been assessed for potential risk on data subjects due to the processing of personally identifiable information. All processing has been reviewed and is in line with all current Data protection laws and appropriate safeguards implemented to ensure that the policy has privacy by design as its underlying approach.

4. Policy/Procedure

This procedure applies to the attendance monitoring and reporting of all International Student Route students, regardless of the level or programme of study at the College.

The College is required to monitor all Student Route students to ensure engagement with their course and that they are meeting the requirements of their Student Route visa. All Student Route students are required to comply with the processes set out in this document. Failure to do so may result in their Sponsorship being removed (and being reported to the UKVI), subsequent withdrawal from their course following which the students will be required to return home.

Responsibilities

Responsibility for oversight of this procedure lies with the Senior International Officer, and the implementation is carried out in collaboration with Curriculum areas across College. The procedure is monitored and reviewed regularly by the College to reflect good practice, research and changes to relevant legislation.

- The Senior International Officer will ensure that the College is compliant in terms of its duties and responsibilities as a Student Route licence holder.
- The International team is responsible for withdrawing any students who are in breach of the terms and conditions of their visa and the Senior International Officer or, in their absence, the SMS Level 1 Users, are responsible for reporting to UKVI in a timely and accurate manner.

It is the responsibility of all Curriculum areas and the relevant Head(s) of Department – supported by the Senior International Officer – to ensure that students who are potentially in breach of the terms and conditions of their visa, are identified early and that the necessary preventative and/or interventionist

measures are taken to ensure the students regularise their attendance and are withdrawn from their course as the last resort.

It is the responsibility of all Loughborough College Student Route Students to:

- Ensure that they enrol on their course within the specified enrolment period;
- Attend timetabled activities in line with their programme of study. These include lectures, seminars, tutorials, workshops, examinations and any other required meetings with tutors, lecturers or course supervisors, and submit all assessments within the deadlines;
- Meet any “registration or check-in” requirements as per set schedule, using their Student ID card and/or other proof of identity where required, and attend the additional document checks as required;
- Notify immediately, if absent due to illness, the relevant Curriculum administrators and the International team;
- Inform the International team immediately of any change in circumstances, e.g. name change, change of address, change of immigration category etc.;
- Ensure they attend, if asked to meet with the International Officer, at any time to discuss immigration status, or to present documents;
- Request a meeting with the International Officer in good time, if their visa is due to expire before they complete their course.

The International team will be responsible for ensuring that students are aware of, and are acting in accordance with, these responsibilities.

Definitions

In the context of this procedure, an International student is defined as a student who registers on a Loughborough College course where they require a Student Route visa to study in the UK.

Record-keeping arrangements and compliance monitoring

Each Student Route student’s file must contain relevant documents, saved on the College’s system securely.

It is good practice for all correspondence with the student to be saved securely, with key information being saved on the College’s Prosolution Student Record System.

Details of compliance monitoring by the College, including audit checks and roles and responsibilities of key staff are specified in the International Student Sponsor compliance Policy.

Reporting duties

Reporting of students to the UKVI is carried out by the Senior International Officer and, in their absence, by the other SMS Level 1 Users.

Reporting must take place within 10 working days of the change to the student’s status or circumstance, and will take place via the SMS.

Students will be reported to the UKVI for the following reasons:

- When a student is withdrawn from the course for failing to maintain a good attendance in line with the Attendance and Engagement procedures;
- If Loughborough College no longer wishes to sponsor the student;

- If there is a change to the student's circumstances;
- If a student fails to enrol, defers their studies or withdraws before or after travelling to the UK;
- If a student's visa is refused;
- If the College suspects that the student is breaking the conditions of their immigration permission to stay in the UK.

Monitoring and reporting arrangements

Attendance and engagement

The *Attendance and Engagement Policy* applies to all Loughborough College students, regardless of place of study or mode of learning. This is supported by this procedure, which additionally applies to international students, in accordance with UKVI requirements.

Student Route Students, must come to the UK or must already be in the UK, with the main purpose of full-time study. The College is therefore responsible for monitoring the attendance and other key engagement aspects of study, and report to UKVI where sponsorship is withdrawn for any student who stops academically attending and/or engaging.

It is the student's responsibility to register their attendance via the student ILP portal and/or their absence telephone line.

Student Route students' attendance and engagement is monitored through a series of defined contact points that must be met. **Contact points** may include the following, but the list may be revised by the College from time to time:

- Enrolment on the student's course
- Attendance at lectures/seminars/tutorials/workshops
- Visits by academic staff to students studying off campus
- Marks awarded for assessments
- Attendance at main examinations
- Annual progress reports
- Submission of dissertation
- Course completion/award notification (at the end of the course)
- Additional visa and document check carried out twice per academic year with the International team, based on intake

Changes to personal circumstances

If a student's circumstances change, such as their name, address etc, they must inform the International team, who will update the central student record system.

The student must also inform UKVI of such changes by completing the appropriate forms. For name change, students should complete the migrant change of circumstances form available from the UKVI website and for address change, an online form is available from the UKVI website. The International Officer will remind the student of this requirement at their Induction.

Some wider changes to circumstances must be declared by the College on the UKVI SMS as part of the Student Route reporting duties: for example, a change in immigration status, course of study, where the student studies or undertakes their work placement.

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The College's Student Records System will maintain a record of all students' addresses and immigration status – previous addresses must not be deleted.

Students who do not enrol

If, after obtaining a CAS from Loughborough College and being issued with a Student Route visa, a student fails to enrol within the period stipulated by the College, this must be reported to the UKVI via SMS within 10 working days.

If, after obtaining a CAS from Loughborough College and the Student Route visa application is refused, the student must notify the International team immediately.

If a student fails to enrol after obtaining a Loughborough College CAS, but is yet to receive the visa, Loughborough College should either withdraw the CAS (if possible) or inform the UKVI that the student has missed the latest course start date.

Students who enrol late

The International team will usually agree a latest start date for each course within the College. This date is to allow students a grace period should their visa or travel plans be delayed, and normally will be two weeks after the stipulated main enrolment date. The later start date should not have a negative impact on the student's ability to successfully complete the course.

The latest start date will be stated on the CAS.

If a student requires a letter which confirms the latest start date, they can request one from the Senior International Officer.

If the student cannot enrol by the latest start date, they will be advised not to travel to the UK and their offer will be withdrawn. The UKVI will be informed via the SMS.

If a student has already arrived in the UK, the Senior International Officer will make an assessment – on an individual basis – to determine whether the student can be enrolled. If it is decided that the student cannot enrol, they will be considered as 'Failure to enrol' and the UKVI informed via the SMS.

Resits and repeating students

If a student is required to retake exams or re-submit work during their valid visa period, no reporting to the UKVI is required, save for the continuation of the College's general Student Route duties.

If a student is required to retake exams or re-submit work after their visa has expired, each student will be considered on a case by case basis in liaison with the Curriculum department with the following possible outcomes:

- A CAS may be issued for a visa extension;
- The student may be advised to return home and re-submit work from home. Should travel to the UK be required, this may be done under the Short-term study visa, if appropriate;
- The student may have a visa in another immigration category in the UK, in which case the UKVI will be informed via the SMS.

Students who wish to withdraw, or are no longer permitted to, able to or willing to study

If a student cannot study, the student is withdrawn, or if the student decides to cease studying with Loughborough College, a withdrawal form must be completed and processed by the Curriculum

Manager and forwarded to the International Team. They will review and take forward with the MIS department for processing

Once the withdrawal form has been received by the International team, the student may be invited to meet and discuss the implications and options available to them. The withdrawal form will then be processed, the Student Record System will be updated, and the student's withdrawal will be reported to the UKVI in line with UKVI requirements.

The International Team will request information on the student's next steps and record evidence to support this; this will include details of return tickets to their home country and / or a copy of their visa linked to a new Student Route sponsor.

In all cases where a student has decided to withdraw, the International Team will offer advice and guidance to ensure the student can make an informed decision.

5. Location and Access to the Policy/Procedure

SharePoint
College Website

6. Persons Responsible for the Policy/Procedure

Vice Principal – Learner Experience

7. Linked Policies and Procedures

Student Sponsor Compliance Policy
Attendance and Engagement Policy
Learner Disciplinary Policy & Procedure
International Student Recruitment Policy
Equality and Diversity
Data Protection Policy
Fees Policy

8. Change log

Date	Version	Details of change	Review / Revision by	
			Name	Title
26/06/2023	1.0	Final document submitted	David Robertson	Student Recruitment Manager