

Attendance Monitoring Policy for Tier 4 Sponsored Students

Date	Purpose of Issue/ Description of Change	Equality Impact Assessment Completed
25 th July, 2018	Initial Issue	
24 th October, 2018	Minor amendment	

Policy Officer	Senior Responsible Officer	Approved By	Date
Head of Governance and Compliance	University Secretary	UKVI Compliance Group	25 th July, 2018

This Policy will be reviewed in a year

Attendance Monitoring Policy for Tier 4 Sponsored Students

1. Introduction and Remit

Bangor University (BU) is committed to excellence in education, and to supporting progression and achievement of students. We therefore expect all our students to attend lectures and other teaching events.

Regular monitoring of student attendance allows BU to identify students who are in need of guidance or support and to direct them to the most appropriate department or service within BU. BU monitors Tier 4 Visa students' attendance and engagement in particular, in accordance with the requirements of the UK Visa & Immigration Authority, and this Procedure sets out how any concerns in relation to these matters will be followed up for those students.

This Policy outlines the processes in place for monitoring the attendance of Tier 4 students studying at Bangor. It aims to ensure compliance with UKVI regulations and to assist the University in meeting its responsibilities as a Tier 4 sponsor in relation to attendance. This Policy is in addition to the processes already in place to monitor the attendance of all students.

This policy also applies to students sponsored under Tier 4 by BU who currently study on the following programmes:

- Pre-Sessional English Study Programmes within ELCOS : Tier 4 students will be required to adhere to the attendance policy set and monitored by ELCOS;
- Foundation Year Programmes undertaken by Bangor University International College (BUIC): Tier 4 students will be required to adhere to the attendance policy set and monitored by BUIC.

Initial attendance monitoring for these students will be carried out by BUIC and ELCOS respectively, with attendance overseen by the Governance and Compliance Office.

2. Policy Statements

A. Undergraduate (UG) and Taught Postgraduate Tier 4 Students (PGT)

All UG and PGT Tier 4 students' attendance at lectures will be monitored at least once a week. A student who is in the final stage of a PGT programme will be monitored once a month. Attendance at a lecture, and contact with the student's tutor and /or supervisor will be seen as a contact point (see Section 4. below) per event. Students must present their Student ID card for checking when asked to do so at a monitored teaching event.

PGT students who have progressed to the final stage of the programme will need to maintain contact with their supervisors on a regular basis, and attendance and progression must be noted on MyBangor by the Supervisor.

Schools are responsible for monitoring attendance in smaller lectures and tutorials and these registers must be uploaded onto MyBangor at the earliest possible opportunity following the event, and in any event within a week. Schools are encouraged to monitor as many teaching events and tutorials as possible so that the Governance and Compliance Office have a full picture of a student's attendance.

All Tier 4 sponsored students are subject to this Attendance Policy until the end of their programme of study or the duration of their visa, whichever is the earlier of the two dates.

In order for Tier 4 sponsored students to fully comply with the Attendance Policy, the University expects students to live within a commutable distance from the University. The University defines 'commutable

distance from Bangor University' as a distance from the University that enables the student to attend the University during core working hours on a daily basis if they are required to do so. The location of where a Tier 4 sponsored student chooses to reside cannot, in any circumstance, be considered an adequate reason for non-compliance with this policy.

The Governance and Compliance Office will monitor the attendance records of all UG and PGT students holding student visas and will contact Schools where there are causes for concern, in accordance with the monitoring and escalation procedures below (see Section 3[a]).

B. Tier 4 Students on Work Placement / Study Abroad

It is a requirement that all Tier 4 sponsored students on placements must also be monitored for attendance. Absences from Bangor for academic purposes (e.g. fieldwork, conferences, placements, study abroad etc.) must be approved by the students' personal tutor/supervisor *before* submitting a Notice of Absence form via MyBangor.

The University requires the student to ensure that their contact details (e.g. term time address and contact telephone number) are kept up to date on My Bangor for the duration of the absence from Bangor, together with the dates of departure and return. Contact between the University and student during this time must occur at least once per calendar month by using Skype, email or telephone for all UG and PGT students. All PGR students must have contact every 2 weeks either by Skype, email or telephone.

C. Tier 4 sponsored students on Postgraduate Research Programmes (PGR)

Full-time PGR students are required to attend at least one formal supervision session each month. For UKVI compliance purposes, these sessions must take place once a month, every month, and the sessions must be recorded on MyBangor by the Supervisor.

All Tier 4 PGR students are subject to the Attendance Policy for Tier 4 Sponsored Students until the end of their programme of study or the duration of their visa, whichever is the earlier of the two dates.

The attendance monitoring process for Work Placement / Study Abroad / PGR students can be found in Section 3[b].

3. Monitoring and Escalation

[a] Tier 4 sponsored UG and PGT students

All UG and PGT Tier 4 students included in this Policy are required to attend **ALL** their lectures, tutorials or seminars and any other timetabled event within any given day of the academic year. For the purposes of Tier 4 attendance monitoring a Tier 4 student at BU triggers an intervention if they miss 3, 5, 8 or eventually 10 consecutive contact points (where one contact point is equal to one day where attendance / engagement has been noted) (see Section 4. below), or where there is demonstrable pattern of non-attendance sufficient to raise concerns.

The Governance and Compliance Office will monitor the attendance of all students and in particular, those who are holding Tier 4 visas and will implement the four stage Escalation Procedure attached as Appendix 1.

Stage 1 will be triggered following 3 consecutive missed expected contact points.

Stage 2 will be triggered following 5 consecutive missed expected contact points, or a demonstrable pattern of non-attendance causing concern.

Stage 3 will be triggered where a student has missed 8 consecutive expected contact points.

Stage 4 will be triggered if the student fails to improve attendance or engagement following Stage 3 and / or has missed 10 consecutive expected contact points.

Students will have 5 days to Appeal against the Stage 4 decision before their sponsorship is withdrawn by the Governance and Compliance Office.

[b] Tier 4 Work Placement / Study Abroad / PGR Students

Tier 4 students who are on work placement, study abroad or are a PGR student are included in this Policy, and are required to ensure they attend at least one formal supervision session each month, or have contact with their School at least once a month. It is the School's responsibility to ensure that these contacts are made, and that they are recorded on MyBangor.

For the purposes of Tier 4 attendance monitoring a student in this category triggers an intervention if they miss one expected contact point. The School should ensure that they contact the PGR student promptly to discuss any problems they may be experiencing. The School should also inform the Assistant Compliance Officer of the situation at the earliest convenience. Where there remains a demonstrable pattern of non-attendance sufficient to raise concerns the matter will be referred to the Head of Governance and Compliance who will follow Stage 4. of the Escalation Procedure.

Students will have 5 days to Appeal against the Stage 4 decision before their sponsorship is withdrawn by the Governance and Compliance Office.

4. Examples of expected contact points

BU will take the following examples as proof of expected contact points.

Attending formal academic or pastoral care activities including:

- A lesson, lecture, tutorial, seminar, practical class or field course;
- A test, examination or assessment board;
- A meeting with a supervisor or personal tutor;
- A research-method or research-panel meeting, writing-up seminars or doctoral workshops;
- An oral examination (viva);
- An appointment with a welfare adviser or international student adviser;
- Submitting
 - Assessed or unassessed coursework, or
 - An interim dissertation, coursework or report; and
 - Registration (for enrolment or matriculation).

5. Errors in Attendance

Where a student believes there has been an error in their attendance data, they can evidence their attendance at the timetabled sessions in question, and / or they have evidence of special circumstances which they need to report they should contact attendance@bangor.ac.uk as soon as possible to rectify the error.

6. Travelling outside the UK

All travel outside of the UK by a Tier 4 sponsored student *must* be approved by the student's personal tutor / supervisor before the student completes a Notice of Absence form in MyBangor. Students must include details of the destination, overseas contact details, dates of departure and return to the United Kingdom and

also upload travel details (e.g. flight information). Students may be asked to produce their passport by the Governance and Compliance Office on their return to Bangor, in order to gain confirmation of the date of return to the UK.

The University does not encourage absence from study. However, if an absence is unavoidable it remains the student's responsibility to keep up with coursework and meet all deadlines for assignments and tests.

7. Monitoring for Tier 4 Postgraduate Research Students

A research student must have regular contact with the supervisor to assess progress. The supervisor will decide how often to meet the student, taking into account the research topic/area and the needs of the student. Supervisors are required to meet with their students at least once every two weeks. Where a meeting cannot be arranged, an alternate contact methods must be used in its place. The meetings, and all other alternative contact points, must enable the Supervisor to confirm that the student is committed to his/her programme of study. Each meeting/contact point must be recorded.

8. Absences

All absences from study of 7 calendar days or more - whether pre-notified or post-notified - must be recorded in the Attendance Record section of MyBangor, by the student submitting a Notice of Absence.

All students must advise the University of ALL absences from study (i.e. 7 calendar days or more) by completing a Notice of Absence form in MyBangor. Where the absence is pre-planned approval must be obtained from personal tutor / supervisor before completing the Notice of Absence form in MyBangor. Students with a Tier 4 visa to study in Bangor may jeopardise their sponsorship if they fail to notify the University of any absences.

9. Guidance and Support

The University will make every effort to ensure that a student receives the necessary advice and guidance that they may need in order to comply with the Regulations and the University has an excellent student support system in place.

This Policy and any other processes relating to attendance monitoring are overseen by the UKVI Compliance Group, the composition and terms of reference are attached as Appendix 2.

APPENDIX 1

Escalation Procedure: Non-Engagement of Tier 4 Visa Students

Bangor University (BU) is committed to excellence in education, and to supporting progression and achievement of students. We therefore expect all our students to attend lectures and other teaching events.

Regular monitoring of student attendance allows BU to identify students who are in need of guidance or support and to direct them to the most appropriate department or service within BU. BU monitors Tier 4 Visa students' attendance and engagement in particular, in accordance with the requirements of the UK Visa & Immigration Authority, and this Procedure sets out how any concerns in relation to these matters will be followed up for those students.

1. COMMENCEMENT OF EACH ACADEMIC YEAR

At the start of each academic year the student monitoring procedure will normally commence in week 2 of the first semester. At this stage the Assistant Compliance Officer will undertake an initial assessment of Tier 4 visa students' engagement, and for those students who have already missed 3 contact points or more, will send an email reminding them of their responsibilities and their sources of support.

2. STAGE 1

STAGE 1 of this Procedure will apply from week 4 of the first semester, and will apply in the following circumstances:

- Grounds for concern with regard to a student's attendance and / or academic engagement have been identified. This will be through a variety of methods including concerns raised within the School with regard to academic progression and attendance data inputted into MyBangor.
- 3 contact points or more have been missed, including lectures / tutorials and / or other contact events for undergraduate and graduate taught students. Reports on a student's attendance / contacts / events will normally be run in week 2 of a semester and subsequently every week thereafter.
- With regard to postgraduate research (PGR) students 2 instances or more of lack of engagement within a calendar month would trigger a concern which will be followed up.

Where a student's lack of attendance and / or engagement is brought to BU's attention, the Assistant Compliance Officer will initially explore the reasons for this, and where there is no obvious cause for the issues an email will be sent inviting the student to view their attendance record to ensure it is up to date, and to check that absences or sickness have been reported (students can add a reason for absence directly on to the MyBangor system), this email will be copied to the Personal Tutor / Supervisor. They will also be told to make an appointment within five working days with their Personal Tutor / Supervisor to discuss their attendance and engagement.

Brief notes of any discussions with the student, including agreements on future attendance levels and engagement must be put into the Notes tab in MyBangor when a meeting with a Personal Tutor / Supervisor has been held. This is important, to ensure that should matters escalate further, the Governance and Compliance Office are able to view all the issues which have already been discussed.

3. STAGE 2

Reports will continue to be run by the Assistant Compliance Officer on a weekly cycle. A list of those students still giving cause for concern either in relation to attendance or engagement after the Stage 1 intervention, will be discussed with the Senior UKVI Compliance Officer.

Following review the list will also be shared with the relevant College Manager, Senior Tutor and the Head of International Student Services for their information.

Stage 2 will apply in the following situations:

- Where Stage 1 has been completed, and the student's lack of attendance and engagement (at the appropriate contact and percentage level) continues.
- The student will have missed 5 contact points or more.
- Where the situation is sufficiently concerning, that the matter is escalated immediately to Stage 2 (for example where a student's attendance or academic engagement has dropped markedly within a short period of time and therefore the situation warrants initial intervention at Stage 2).

Following the identification of a student who requires intervention at Stage 2 an email will be sent to the student by the Assistant Compliance Officer informing them they must attend a compulsory briefing on a pre-arranged date and time with the Senior UKVI Compliance Officer. The Senior UKVI Compliance Officer will explain in detail to the student the reasons why they should improve their attendance, and what the consequences of non-improvement are.

A copy of the Stage 2 email will be sent to the Head of International Student Services who will be asked to make contact with the student to offer further support. In addition the student's Personal Tutor / Supervisor, and the relevant College Manager will be informed, and the correspondence will be copied to the student's MyBangor account.

A note confirming whether the student attended/did not attend the meeting must be inserted into the notes section of the students' account in MyBangor. In addition the outcome of any meeting with the Head of International Student Services and / or the Personal Tutor / Supervisor, and any steps the student has agreed to take should also be noted in MyBangor.

At Stage 2, where it is appropriate to do so, the Head of International Student Services will also contact the student's sponsor and / or home country college / university to make them aware of the issues with non-attendance. The sponsor / college / university will be invited to assist BU in supporting the student to attain the required attendance / academic engagement level. The student is advised of this process during their on-line registration process.

4. STAGE 3

STAGE 3 applies if there has been no satisfactory improvement in attendance and / or engagement following the Stage 2 implementation, and the student has reached 8 missed contact points.

An email will be sent by the Assistant Compliance Officer to both the student's personal and BU email address. The student will be asked to attend a meeting with the Head of School or Senior Tutor within five working days of receiving the email. The email will be copied to the relevant Head of School, the School's Senior Tutor, the Head of Governance and Compliance, and the Head of International Student Services.

The email will make it clear that if the student does not attend the meeting with the Head of School / Senior Tutor, and there is no satisfactory improvement in attendance and / or engagement the matter will be referred to the **FINAL** stage 4 process.

5. STAGE 4

STAGE 4 will apply when all other attempts to engage with the student has failed, and the student has now missed 10 contact points. The matter will be referred, by the Assistant Compliance Officer, to the Head of Governance and Compliance who, having received a report from the Senior UKVI Compliance Officer detailing actions taken at Stages 1-3, will review the matter and will ensure that all appropriate steps have been followed, and advice and guidance have been offered to the student at all stages. In consultation with the Director of International Recruitment and Development they will come to a decision on the most appropriate course of action, this may include meeting the student, who will be allowed to bring a friend, a member of the Students' Union or a staff member with them.

- a. Where a decision is made to withdraw sponsorship due to lack of attendance or engagement the matter must be reported to the UK Visa and Immigration Authority, at which point the Confirmation of Acceptance of Study (used to gain an entry visa to the UK) and the student's Tier 4 visa will be withdrawn and the student will be required to return to their home country within a specified period of time (normally 60 days).

Withdrawal of a student's sponsorship will not, however, occur for 5 working days, during which time the student may appeal the decision as outlined in Section 5. below.

- b. Where a decision is made to continue to sponsor the student the Head of Governance and Compliance will inform the student of the decision in an email, and will outline in detail the requirements of being allowed to continue their studies (e.g. the level of attendance and engagement expected). The School's Senior Tutor, the Senior UKVI Compliance Officer and the Head of International Student Services, will also be informed of the decision.

In relation to both 4a. and 4b. above the student's sponsor and / or home college / university may also be informed, and where this is relevant, and they will be invited to work with the International Education Centre to support the student to achieve the requirements.

Should the student be unable to keep to the requirements as outlined within the timeframe given by the Head of Governance and Compliance the sponsorship will be withdrawn and the student notified with a copy to the School's Senior Tutor. This means that the Confirmation of Acceptance of Study (CAS) and the student's Tier 4 visa will be withdrawn and they will be required to return to their home country within a specified period of time (normally 60 days). The withdrawal of a student's sponsorship will not occur for 5 working days, during which time the student may appeal the decision as outlined in Section 5. below.

6. Appeals Process

At the conclusion of Stage 4, where a decision has been made to withdraw the student's sponsorship the student is entitled to submit an appeal to the University Secretary within five working days of being informed of the decision.

The University Secretary, having received a report from the Head of Governance and Compliance, will make a decision to either:

- a. Overturn the decision and allow the student to continue their studies at BU, where necessary detailing the conditions that the student must comply with.

Or

- b. Confirm the decision to withdraw sponsorship, in which case the matter will be reported to the UK Visa and Immigration Authority by the Head of Governance and Compliance.

The University Secretary's decision in this matter is final.

7. Record-keeping

The Senior UKVI Compliance Officer is responsible for ensuring that all relevant records are kept in relation to a student's attendance at the University, in accordance with the UKVI guidance *Appendix D: keeping documents guidance for sponsors* and the University's Records Retention Schedule.