

Student Visa Engagement Policy

This policy intends to outline the processes in place to review and monitor attendance of students with a Student visa sponsored by the University of Westminster (“the University”). This is to ensure that the University remains compliant with UKVI regulatory requirements for those students with a Student visa (“sponsored students”).

General Principles

- 1.1 The University of Westminster asserts that full engagement with all aspects of the course provides students with the best opportunity to academically excel and to gain the most benefit from the support available through membership of our community.
- 1.2 For international students studying in the UK with a Student visa, demonstrating genuine engagement with the course is also a requirement for retention of their visa.
- 1.3 The University, as sponsor of the Student visa, accepts the responsibility for ensuring that sponsored students are academically engaged throughout the period of leave for which the student is being sponsored
- 1.4 As a Higher Education Provider sponsoring students at RQF levels 6, 7 and 8 our Academic Engagement Policy is set within the criteria designated by the UKVI as “Band 2”.

Attendance Requirement

- 2.1 We expect sponsored students on a taught programme to attend every timetabled event. Students should consider attendance at all timetabled events to be compulsory.
- 2.2 There will be a record of attendance at all timetabled events. This record will be shared with the UKVI upon request.
- 2.3 All sponsored students will be required to engage with the attendance monitoring system, as described in the Student Engagement and Attendance Policy.
- 2.4 The UKVI Compliance team will carry out regular reviews of the attendance record for sponsored students. Students who fail to meet the minimum required attendance in each review period will be contacted to remind them of the attendance requirements, and to signpost them to support available. Persistent absences may result in the student being called to an Attendance Review Meeting (see 8.1) and subsequently, if not improvement is made, the cancellation of Student Visa sponsorship.

Online delivery

- 3.1 In-person delivery on campus will be the default means of course delivery for all taught courses offered to sponsored students.
- 3.2 While courses may include some online elements, these will form no more than 20% of the overall course.
- 3.3 Where a timetabled event is delivered on campus, sponsored students will be expected to attend in-person, even where supplementary online resources exist.

3.4 A report will be generated after each semester confirming the percentage of online teaching by taught module. The Head of College will be notified of any modules exceeding 20% online delivery and will be asked to assess with course leaders to ensure modules with over 20% online delivery do not lead to an individual student exceeding the maximum allowance.

Authorised Absence

4.1 While we encourage sponsored students to attend all timetabled sessions, we recognise that in some cases absence may be unavoidable. In such cases the University will act with compassion and offer flexibility where appropriate.

4.2 Grounds for an authorised absence include, ill health or medical treatment, mental health, bereavement, family or carer commitments and logistical issues (such as travel delays). Students will be asked to submit appropriate evidence to explain their absence, such as medical notes or confirmation of travel dates.

4.3 For short term absences (<1 week) students will be encouraged to report via SEA

4.4 For longer term absences (>1 week) students will be required to provide evidence explaining their absence in order for the absence to be authorised e.g. a doctor's note to confirm absence due to illness or flight details where the absence is due to a family emergency.

4.5 Long term absences (> 60 days) cannot be authorised in normal circumstances. Students with an absence of over 60 days (not inclusive of official vacation periods) will be advised to interrupt their studies or can be withdrawn from their course. A student may appeal this if they believe their exceptional grounds justifying their absence and these cases will be dealt with on a case-by-case basis.

Wellbeing and Academic Support

5.1 While the aim of this policy is to ensure the University and sponsored students remain compliant with UKVI requirements, this in no way invalidates our commitment to supporting the wellbeing of our student body. Sponsored students retain full rights to access all academic and pastoral support offered by the University.

5.2 Where adverse circumstances impact on a student's ability to comply with this policy the student will be advised on academic and pastoral support services available through the University in order to support them in returning to a pattern of engagement compliant with this policy.

Research

6.1 Research students are not within the scope of the standard engagement monitoring methods detailed in this document, recognising the unique and individual nature of their engagement with University services in support of their research.

6.2 Research students are outside the scope of the Remote Delivery requirements

6.3 Engagement for research students will be assessed on the basis of multiple recorded engagements with the University. These engagements include; supervisory meetings, attendance at academic and personal development workshops and tutorials and formal assessment stages in the progression of their research, such as submission and attendance for the viva.

6.4 Engagement records for research students will be collated at two checkpoints per academic year

6.5 Where a research student has not engaged with a minimum of 5 expected contact points between engagement checkpoints they will be contacted and asked to explain any gaps in engagement. The researcher will be counselled on their visa responsibilities and advised on how to resume in a manner compliant with their visa. Researchers may also submit any evidence they have to support a request for an authorised absence.

6.6 If a student has zero contacts during a checkpoint period the University can act to end sponsorship of their visa.

Work Placements and Study Abroad

7.1 Engagement will continue to be monitored for sponsored students studying a semester or full years abroad or undertaking a work placement

7.2 Responsibility for monitoring engagement for these cohorts will lie with the Go Abroad and Work Placement Teams respectively.

7.3 A minimum of ten engagements will be recorded per academic year

7.4 Engagements could include; registration, attendance at classes and workshops, submission of assessments, site visits and submission of timesheets.

7.5 Engagement records for students on a study abroad semester/year or undertaking a work placement will be collated at two checkpoints per academic year

7.6 Where a student has not engaged with a minimum of 5 expected contact points between engagement checkpoints they will be contacted and asked to explain any gaps in engagement. They may also submit any evidence they have to support a request for an authorised absence.

7.7 Where students fail to provide evidence of engagement or grounds for authorised absence sponsorship of their visa will cease and they student can be removed from the course.

Unsatisfactory Attendance

8.1 Attendance Review Meetings will be held where sponsored students have not met attendance requirements. Students will be invited to explain their circumstances and ask any questions they have regarding attendance. Where welfare or academic issues are raised the student will be signposted to the appropriate service for further advice.

8.2 Students who do not attend the Attendance Review Meeting when requested, or who fail to provide satisfactory grounds for their absence, may then have sponsorship of their Student Visa revoked. This will mean withdrawal from the course at Westminster and early cancellation of their Student Visa.

8.3 Any attempts to evade or, frustrate the attendance monitoring process or to otherwise falsify attendance will be taken very seriously. Any event marked as having been attended due to such actions will be reverted to show an unauthorised absence. Students in this position will be invited to an Attendance Review Meeting with staff from the UKVI Compliance team. Students will be required to explain any confusion or mitigating circumstances that led to the breach (with evidence, if applicable). The UKVI team will make a decision on the basis of this Attendance Review Meeting whether or not to end sponsorship of their Student Visa.

8.4 The University recognises that lack of engagement may be due to a wide range of personal, medical or mental health causes. Adverse personal circumstances will not, in themselves, exempt the student from the requirements described in this document, however the University will exercise its discretion where appropriate. Examples of where discretion may be offered include:

- Granting additional time to provide requested supporting documents (or translations of these)
- Re-arranging Attendance Review Meetings

8.5 Where a student demonstrates genuine grounds to explain their absence, but is not in a position to resume attendance they will be advised to formally interrupt their studies with the aim of resuming their studies at a later date.

Reporting

9.1 The University will report to the UKVI following the steps described above. The student will be informed of the University's action. Simultaneously, the student will be removed from their course and be marked as withdrawn.

Appeals

10.1 In the majority of cases there will be no appeal against a decision to report. Students will instead be given multiple opportunities to address their absences prior to the submission of any report to the UKVI

10.2 Appeals after a report will only be considered where the student can submit evidence explaining why they were not able to engage with the University prior to the report, in addition to evidence of their reason for absence.

10.3 Where genuine grounds for both the absence and the failure to engage have been provided the University may consider withdrawing a notification of cancellation, if there has been an absence of less than 60 days and where such evidence is provided prior to their visa cancellation. If these two criteria are not met, the University may consider sponsoring a new application to resume studies at a later date.

Appendix- Engagement Monitoring Process for Taught students

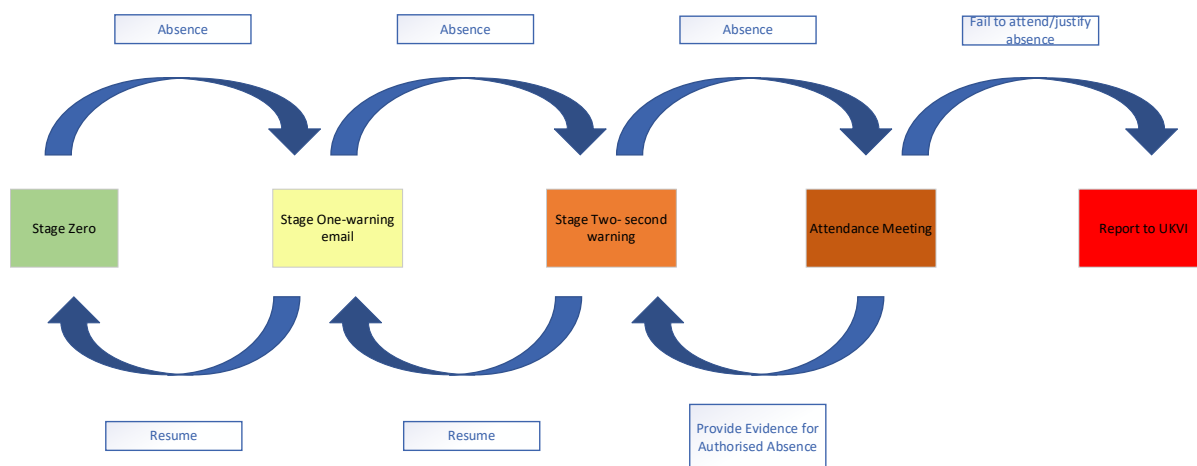
The University of Westminster deploys the SEAtS system (known internally as “SEA”) as our principle means on monitoring engagement and attendance.

SEA Workflow

The SEA system deploys a workflow (with both automated steps and manual interventions) which escalates interventions for students with consistent or repeated absences from their course of study.

Students’ timetables are imported into the SEA system, which records the time and location of each scheduled teaching event.

In order to record their attendance, students swipe their Student ID card on the reader inside the classroom. When a student swipes in in the time and location matching their timetable they are recorded as attended. If they do not attend, or do not swipe in they will be recorded as absent for that session.



Stage Zero

Stage Zero denotes a student who is currently meeting minimum attendance requirements. Students will fail the conditions for “Stage Zero” if they have 100% absence for the previous two weeks. Students who fail the conditions for Stage Zero will be automatically moved to Stage One and will receive the first automated intervention email.

Stage One

To pass the conditions for Stage One students must have recorded attendance in the 7 day period following their escalation to Stage One. If students pass the conditions for Stage One they will be automatically moved back down to Stage Zero. Students who fail the conditions for Stage One will be automatically moved to Stage Two and will receive the second automated intervention email.

Stage Two

To pass the conditions for Stage Two students must have recorded attendance in the 7 day period following their escalation to Stage Two. If students pass the conditions for Stage Two they will be automatically moved back down to Stage One. Students who fail the conditions for Stage Two will be automatically moved to Stage Three.

Stage Three- Manual intervention

Moving to Stage Three triggers a manual intervention. A member of the UKVI Compliance team will review the student's record on SEA. In addition, we will review any communications received from the student, such as responses to the automated intervention emails, requests for authorised absences or notifications classes that have been cancelled or changed. Where appropriate evidence has been provided for an authorised absence, or where amendments to the record are needed to confirm attendance, the UKVI Compliance team member can manually reset the student to a lower level. Where no evidence (or no suitable evidence) has been received students will be manually moved to Stage Four.

Stage Four- Attendance Review Meeting

At Stage Four students must attend an Attendance Review Meeting. These will ordinarily be held online, but can be arranged in person on request. Two staff members will attend the meeting (subject to staff availability)

Attendance Meeting Format

Step 1. Verifying ID

Step 2. Explain the attendance and engagement requirement for Student visa holders

Step 3. Explain the SEA system

Step 4. Offer the student the opportunity to explain their absence and provide supporting evidence

Step 5. Agree course of action to resume engagement

Step 6. Signpost student to welfare or support services (if appropriate)

Step 7. After the meeting, provide a summary of the issues discussed by email

*Students may be asked to provide additional evidence after the meeting such as:

- Medical Evidence
- Confirmation of attendance from Tutors
- Signed Attendance Agreement

Stage 5- Reporting

If the student fails to attend the Attendance Review meeting, or fails to provide a suitable justification and/or supporting evidence for their absence, then the University will end sponsorship of their Student Visa. Sponsorship will be ended via the Sponsor Management System. Students will be notified of our intention to end sponsorship.