

# UKVI MONITORING AND ENGAGEMENT POLICY



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**INTRODUCTION AND CONTEXT** Aston University monitors attendance and engagement to ensure students are progressing academically and to help ensure it is carrying out its duty of care to all students.

In addition, the University has particular obligations in respect of international students being sponsored under the Student Route (formerly Tier 4) This policy sets out the responsibilities

of all those who are involved in supporting international students, and the responsibilities of the students themselves.

The Policy sets out steps that must be taken if there is non-engagement of students. However, Aston University's approach is one of support for students and the emphasis is on removing any barriers that students might have to engagement to enable them to enjoy their studies and to achieve to their full potential.

This Policy should be read alongside the Immigration Law Compliance Policy and other policies, as referenced in this document.

## 1. SCOPE OF THIS POLICY

This policy addresses the engagement of all international students. Students are categorised by the Home Office as Band 1 or Band 2:

Band 1: Study at a Higher Education Provider at RQF Level 5 and below

Band 2: Study at a Higher Education Provider at RQF Levels 6,7 and 8

If a student is studying a course which spans more than one level the Band is determined by the most appropriate scheme relevant to their level of study as outlined in this document.

Aston University students will typically be in Band 2, apart from students studying some pre-sessional programmes.

This policy sets out:

- The responsibilities that Aston University staff and students have in complying with UKVI requirements and, therefore, complying with this policy
- The systems that are in place to monitor academic engagement
- What information is recorded to confirm that students are academically engaging
- What actions will be taken when a lack of academic engagement is identified
- The maximum period of non-engagement before intervention will take place
- The robust systems in place to identify students who are not engaging, with specific emphasis on the different groups of students to whom monitoring applies
- When non-engagement will lead to withdrawal of sponsorship

## 2. ACADEMIC ENGAGEMENT

As part of its obligations as a Home Office student sponsor, Aston University is required to ensure that all students on a Student Visa are actively engaging with their studies.

2.1 Engagement' means that the students are actively and consistently following their programme of study.

2.2 To demonstrate engagement, Band 1 students must attend a minimum of 15 hours of daytime (08:00 to 18:00, Monday to Friday) classroom-based study per week. If a student does not achieve 85% attendance in any calendar month Aston University will review the student's attendance and annotate the student's record with the reasons for non-attendance, and note the measures being taken to address this.

If a Band 1 student's attendance falls below 70% for three consecutive calendar months Aston University will withdraw sponsorship, unless there are extenuating circumstances, which will be considered on a case-by-case basis.

2.3 Band 2 students are required to engage with their studies, and this must include regular engagement with on-campus activities. Evidence of engagement, depending on the programme of study being undertaken, could include:

- Attending lectures, seminars or tutorials
- Undertaking required laboratory work
- Undertaking research or fieldwork
- Submitting essays, assignments and attending examinations
- Studying in the library
- Accessing Blackboard to listen to recorded lectures
- Attending Blackboard Collaborate sessions
- Attending scheduled meetings with university staff, such as a Personal Tutor

This is not an exhaustive list. There may be other programme-specific activities which could demonstrate engagement.

### **3. MONITORING ENGAGEMENT: UNDERGRADUATE AND POSTGRADUATE (TAUGHT) STUDENTS**

Aston University is keen to ensure that all students are progressing and are supported in their studies. It is also a Home Office requirement to monitor the engagement of sponsored international students. This section applies to undergraduate and postgraduate taught students only:

3.1 Engagement monitoring starts on the day that a student completes enrolment at Aston University, and ends on the day that the course officially ends. Engagement monitoring does not apply during university vacation periods for students on undergraduate and postgraduate programmes.

3.2 Vacation periods for undergraduate students are:

- Christmas/Winter vacation – the period between term one and term two
- Easter/Spring vacation – the period between term two and term three
- Summer vacation – the period between two academic years

Vacation periods for postgraduate (taught) students are:

- Christmas/Winter vacation – the period between term one and term two
- Easter/Spring vacation – the period between term two and term three

Postgraduate (taught) students do not have a vacation period during the summer months, because they are required to work on their dissertation.

Students who start their studies in January are not on vacation during the summer months.

Medical students, and students who are on placements, will not typically be on vacation during the summer months and might be required to work during all or part of the Christmas/Winter and Easter/Spring vacations. These students will receive separate notification of vacation periods.

- 3.3 When monitoring engagement the University will be mindful of the possibility that the student has become a victim of modern slavery. Possible signs of this are the student not being able to attend meetings alone, appearing to be under the control of others, being reluctant to engage in discussions and appearing frightened. If concerns are identified these should be discussed with the Associate Pro-Vice Chancellor (Students) in the first instance.

### **RESPONSIBILITIES OF THE VISA COMPLIANCE TEAM**

- 3.4 Engagement will be monitored by the Visa Compliance Team using feeds from a variety of sources, including Blackboard, Panopto and evidence of swiping into lecture rooms and engagement in the library (this is not an exhaustive list). Engagement will not be monitored when students are taking a university vacation.
- 3.5 If a student has not engaged with any activity on campus for 2 weeks, they will be sent an email reminding them of the importance of engagement.

If a student does not then engage on campus for 4 weeks, they will be contacted by the Visa Compliance Team who will request a face-to-face meeting with the student. The student's College Support Office will be informed and will be asked to make contact with the student.

If the student has not engaged on campus for 6 weeks the student will be informed that their sponsorship is at risk. They will be informed that, if they do not make contact with the Visa Compliance Team in the next 48 hours their sponsorship will be withdrawn and therefore they will be withdrawn from their programme of study. The Personal Tutor will be informed.

If a student has a sporadic attendance pattern (for example, not engaging for two weeks, then engaging and then stopping engagement again) the Visa Compliance Team will make contact with the student and request a face to face meeting.

- 3.6 If the student fails to meet the minimum engagement requirements the Visa Compliance Team will keep a record of any conversations or correspondence with the students, and any actions that are taken.
- 3.7 If a student fails to re-engage with their studies within 60 days of their last registered engagement sponsorship will be withdrawn, except in exceptional circumstances agreed by the University and in line with the University Exceptional Circumstances Policy. The Visa Compliance Team is responsible for informing UKVI. Please see the Tuition Fee Charging Policy to understand the impact on the payment of tuition fees.

### **RESPONSIBILITIES OF THE STUDENT**

- 3.8 The student is responsible for ensuring that they record their attendance at all lectures, seminars or tutorials by swiping their student card across the card reader on entry to the room.
- 3.9 The student is responsible for replying promptly to any communication about non-engagement.

- 3.10 If the student does not engage due to personal circumstances (e.g. sickness) the student will be required to provide evidence of this to the Visa Compliance Team if contacted to discuss their attendance.

#### RESPONSIBILITIES OF THE COLLEGE

- 3.11 College support staff should be alert to any issues arising with a student's engagement and consider whether additional support might be appropriate. They should ensure that they involve the Visa Compliance Team in any conversations relating to engagement with their studies and make sure the appropriate records are up to date in SITS (for example for short periods of absence as approved by the College)

## 4. POSTGRADUATE (TAUGHT) STUDENTS: DISSERTATION

Postgraduate students at Aston University typically have a number of months in which they are working on their dissertation.

The end date of a degree programme must not be set as more than 2 weeks after the last formal interaction from the student (e.g. handing in of the dissertation or the final lecture of a programme, attending an oral examination for MSc project, or the final lecture of a programme). If a student submits their dissertation earlier than 2 weeks before the end date of their degree programme then sponsorship of their visa will be withdrawn, and the student will no longer be eligible for the Graduate Immigration Route Visa.

#### **RESPONSIBILITIES OF THE STUDENT**

- 4.1 When working on their dissertation the student is responsible for engaging with their studies on campus, and providing evidence of this. This could be through meetings with their Dissertation Supervisor, study in the library, attending a timetabled session relating to the dissertation, working in the laboratories or workshops or other on-campus engagement.
- 4.2 After a meeting with their Dissertation Supervisor the student is responsible for recording the meeting on MAP. Once a meeting is recorded an automated email will go to the Dissertation Supervisor, with a copy of what has been recorded by the student.

#### **RESPONSIBILITIES OF THE DISSERTATION SUPERVISOR**

- 4.3 The Dissertation Supervisor is responsible for responding to an email that indicates that a student has recorded an interaction with them, and confirming (through an automated MAP process) that this interaction took place.
- 4.4 A student is not allowed to be absent during the dissertation period, unless this is for specific research at an approved location. A Dissertation Supervisor should confirm if it is necessary to do research at a specific location off campus.

#### **RESPONSIBILITIES OF THE VISA COMPLIANCE TEAM**

- 4.5 The Visa and Compliance Team will continue to monitor the engagement of dissertation students, in the same way as for the taught period (set out in Section 3 above). Non-engagement will be addressed in accordance with the timescales set out in 3.5.

## 5. PLACEMENT/STUDY ABROAD STUDENTS - UNDERGRADUATE

Aston University encourages students to participate in a placement or study abroad. Monitoring of engagement must continue during the placement period.

### **RESPONSIBILITIES OF THE STUDENT**

- 5.1 If a student is successful in obtaining a work placement they must inform Careers and Placements, and seek approval of the placement before they start work.
- 5.2 If the student is required to do a placement as a regulatory requirement which is part of their studies (e.g. Medicine) they will be informed of the process for placement approval by the relevant academic department.
- 5.3 Students who are on a work placement are required to meet with their Placement Line Manager at least once every 4 weeks, and to record the outcome of this meeting in MAP. An automated email will be sent to their Line Manager once this has occurred.
- 5.4 Students are also required to engage with their Placement Tutor/Supervisor (an academic member of staff). The Student should record any interaction with their Placement Tutor/Supervisor on MAP. An automated email will be sent to their Placement Tutor/Supervisor once this has occurred.
- 5.5 Students who are required to do a placement as a regulatory requirement (e.g. Medicine) will be informed of the process for recording their engagement with the placement, which will vary according to the placement provider.
- 5.6 If a student is studying abroad as part of their degree they will be informed by their host institution of the person who will monitor their attendance. The student is required to log a record of their attendance on MAP at least every 4 weeks.

### **RESPONSIBILITIES OF THE PLACEMENT LINE MANAGER/STUDY ABROAD SUPERVISOR**

- 5.7 The Placement Line Manager/Study Abroad Supervisor is expected to respond to the automated email generated by the student recording their engagement every 4 weeks, to confirm that the student is attending their placement/studies.
- 5.8 The confirmation of engagement by students who are attending a placement as part of the regulatory requirement of their course (e.g. Medicine) will be agreed with the placement provider. This will vary from provider to provider.

### **RESPONSIBILITIES OF THE PLACEMENT TUTOR/SUPERVISOR**

- 5.9 The Placement Tutor/Supervisor is required to respond to the automated email generated by the student recording engagement with their Tutor/Supervisor, to confirm that this engagement took place.

### **RESPONSIBILITIES OF THE CAREERS AND PLACEMENTS TEAM**

- 5.10 The Careers and Placements team are responsible for managing the placement records in SITS, ensuring all of the relevant paperwork is in place and checking that placements have been officially approved.

- 5.11 The team will be responsible for the liaison between the University and the placement provider in the event that a student is not engaging, or if the placement provider is not responding to the engagement MAP task.
- 5.12 In the event of any changes to the placement the student's record is to be updated without delay and reported to the Visa Compliance Team for reporting purposes.

### **RESPONSIBILITIES OF THE VISA COMPLIANCE TEAM**

- 5.13 The Visa and Compliance Team will check that the student is meeting the engagement requirements. If there is no engagement from a student who is on placement or study abroad in a 4 week period the Visa and Compliance Team will inform the Careers and Placement team who will then contact the employer/academic supervisor abroad to determine if the student is engaging.

## **6. PLACEMENT STUDENTS - POSTGRADUATE**

Aston University encourages students to participate in a placement during their postgraduate studies. Monitoring of engagement must continue during the placement period.

### **RESPONSIBILITIES OF THE STUDENT**

- 6.1 If a student is successful in obtaining a work placement they must inform the relevant department or school within their College (students will be advised of this process, according to their degree programme), and seek approval of the placement before they start work on the placement.
- 6.2 If the student is required to do a placement as a compulsory part of their degree they will be informed of the process for placement approval by the relevant academic department or school.
- 6.3 Students who are on a work placement are required to meet with their Placement Line Manager at least once every 4 weeks, and to record the outcome of this meeting in MAP. An automated email will be sent to their Line Manager once this has occurred.
- 6.4 Students are also required to engage with their Placement Supervisor/Tutor (an academic member of staff). The Student should record any interaction with their Placement Supervisor on MAP. An automated email will be sent to their Placement Supervisor/Tutor once this has occurred.

### **RESPONSIBILITIES OF THE PLACEMENT LINE MANAGER**

- 6.5 The Placement Line Manager is required to respond to the automated email generated by the student recording their engagement every 4 weeks, to confirm that the student is attending their placement/studies.

### **RESPONSIBILITIES OF THE PLACEMENT SUPERVISOR/TUTOR**

- 6.6 The Placement Supervisor/Tutor is required to respond to the automated email generated by the student recording engagement with their Supervisor/Tutor, to confirm that this engagement took place. In the event of any changes to the placement the student's record is to be updated without delay and reported to the Visa Compliance Team.



## **RESPONSIBILITIES OF THE VISA COMPLIANCE TEAM**

- 6.7 The Visa and Compliance Team will check that the student is meeting the engagement requirements. If there is no engagement from a student who is on placement or study abroad in a 4 week period the Visa and Compliance Team will inform the College team who will then contact the employer/academic supervisor abroad to determine if the student is engaging. If the student has stopped engaging consideration will be given to withdrawing them from the course and notifying the Home Office.

## **7. PHD STUDENTS**

Aston University must ensure the engagement of sponsored students who are completing a PhD.

### **RESPONSIBILITIES OF THE STUDENT**

- 7.1 The student is responsible for contacting their PhD Supervisor at least once every 2 weeks. In addition, there should be a structured interaction with the Supervisor once every 3 months. Unless the student has been given formal permission to study at a different location, and this has been reported to the UKVI, this contact should be face to face and on campus.
- 7.2 The student should record that all interactions with their PhD Supervisor on MAP. This will generate an automated email which will be sent to the PhD Supervisor.
- 7.3 The student is responsible for agreeing any vacation period with their supervisor.

### **RESPONSIBILITIES OF THE PHD SUPERVISOR**

- 7.4 The PhD Supervisor is required to respond to the automated email generated by the student recording engagement with their Supervisor, to confirm that this engagement took place.
- 7.5 The PhD Supervisor is responsible for approving any vacation request from their student, in accordance with the postgraduate research vacation policy. In the event of any substantive changes to the PhD the student's record is to be updated without delay and reported to the Visa Compliance Team.

## **8. PRE-SESSIONAL STUDENTS**

Pre-sessional students are classed as band 1, and therefore subject to more specific monitoring requirements.

### **RESPONSIBILITIES OF THE STUDENT**

- 8.1 The student must aim to attend every timetabled activity. The student must attend at least 85% of all timetabled activity each week, and in total.
- 8.2 The student must register at each timetabled activity they attend.
- 8.3 If the student is unable to attend a timetabled activity (for example, because of ill health) the student must contact the Course Tutor as soon as possible.

## **RESPONSIBILITIES OF THE VISA COMPLIANCE TEAM**

- 8.4 The Visa Compliance Team will contact a student if their attendance on a pre-session course drops below 85%. Reasons for the non-attendance will be recorded on the student's record on My Engagement.
- 8.5 If attendance drops below 70% for 3 consecutive calendar months the student will be withdrawn from the course and the Visa Compliance Team will inform UKVI.

## **9. STUDENT SABBATICAL OFFICERS**

A student sabbatical officer is a full-time, elected and salaried executive union position. A student may be a sabbatical officer for a maximum of two years during their course or in the academic year immediately after they graduate.

### **RESPONSIBILITIES OF THE STUDENT**

- 9.1 If a student wants to take up the role of Sabbatical Officer at the end of their course and their permission to stay is due to expire, they must apply again with a new CAS from Aston University which gives details of the post.
- 9.2 If the student is re-elected at the end of one year they must apply again with a new CAS from Aston University which gives details of the post. The student cannot apply again for a third year, unless the post is with a different institution or at a national level with the National Union of Students.

### **RESPONSIBILITIES OF THE VISA COMPLIANCE TEAM**

- 9.3 if a student takes up a Sabbatical Officer post the Visa Compliance Team must notify UKVI of the change of circumstances.

## **10. ONCAMPUS ASTON STUDENTS**

ONCAMPUS Aston is run by Cambridge Education Group (CEG). Some students studying in ONCAMPUS Aston are studying on an Integrated CAS, issued by Aston University. The monitoring of these students is carried out by CEG, but the students are the responsibility of Aston University.

### **RESPONSIBILITIES OF CEG**

- 10.1 CEG staff will take registers at the start of each timetabled event. These registers will be stored on a shared drive which is accessible by the Aston University Visa Compliance Team.
- 10.2 The Attendance and Compliance Officer for CEG will update the register and is responsible for raising any concerns about students with the Visa Compliance Team. This will include alerting Aston University to any student who has received a final warning about their attendance.

- 10.3 CEG is responsible for addressing the non-engagement of any student, and reporting the withdrawal of any student to the Visa Compliance Team of Aston University within 24 hours of the decision to withdraw being made.

### **RESPONSIBILITIES OF THE VISA COMPLIANCE TEAM**

- 10.4 If a student fails to re-engage with their studies within 60 days of the first contact about their non-engagement the sponsorship will be withdrawn, except in exceptional circumstances. The Visa Compliance Team is responsible for informing UKVI.

## **11. REFER/DEFER STUDENTS: UNDERGRADUATE**

Students might be required to retake an element of their course.

If an undergraduate student is required to complete an assessment in the summer resit period there are no monitoring requirements because they will be studying for the resit during a vacation period.

If an undergraduate student is required to repeat part of their degree with attendance:

- 11.1 If attendance is required in both Teaching Periods 1 and 2 attendance monitoring will be as set out in Section 3 above.
- 11.2 If attendance is required in Teaching Period 1 only they will attend for that period, and their attendance will be monitored as set out in Section 3 above. They will then be required to return home until the next academic year starts and their studies resume. Their sponsorship will be withdrawn when they return home and they would then be required to reapply for a new visa on their return.
- 11.3 If attendance is required in Teaching Period 2 only the student will be required to return home for Teaching Period 1, and their sponsorship will be withdrawn. They will then be required to reapply for a visa to return and study in Teaching Period 2, when their attendance will be monitored as set out in Section 3 above.

## **12. REFER/DEFER STUDENTS: POSTGRADUATE**

Students might be required to resit an element of their course.

If the resit is without attendance, and requires the student to continue their studies into an additional academic year, the student will be required to return home and sponsorship will be withdrawn. The student will lose eligibility for the Graduate Immigration Route visa.

If a postgraduate student is required to repeat part of their degree with attendance:

- 12.1 If attendance is required in both Teaching Periods 1 and 2 attendance monitoring will be as set out in Section 3 above.
- 12.2 If attendance is required in Teaching Period 1 only they will attend for that period, and their attendance will be monitored as set out in Section 3 above. They will then be required to return home. Their sponsorship will be withdrawn when they return home and they would then be required to reapply for a new visa on their return.

- 12.3 If attendance is required in Teaching Period 2 only the student will be required to return home for Teaching Period 1, and their sponsorship will be withdrawn. They will then be required to reapply for a visa to return and study in Teaching Period 2, when their attendance will be monitored as set out in Section 3 above.

## 13 AWAY FROM CAMPUS: NOT STUDYING

A student might request to spend a Leave of Absence to address personal circumstances which arise during their studies.

### **RESPONSIBILITIES OF THE STUDENT**

- 13.1 The student should make a request for a Leave of Absence using the relevant MAP task, at least two weeks before the leave is due to start.
- 13.2 The student is required to discuss their request with the Visa Compliance Team to discuss the implication of their request on their visa status.
- 13.3 When the student returns to the UK they will be required to apply for a new visa.
- 13.4 Absence from studies might mean that the student loses their eligibility for the Graduate Immigration Route visa.

### **RESPONSIBILITIES OF THE VISA COMPLIANCE TEAM**

- 13.5 The Visa Compliance Team should advise the student, copying the Programme Director in on correspondence which clarifies the student's situation.
- 13.6 The Visa Compliance Team must inform the UKVI that the student is taking a Leave of Absence, giving the length of absence that has been approved.

### **RESPONSIBILITIES OF THE PROGRAMME DIRECTOR**

- 13.7 The Programme Director is responsible for making a decision about a Leave of Absence request, following advice from the Visa Compliance Team.

## 13. DEFINITIONS

Abbreviations used in this document

CAS Confirmation of Acceptance for Studies

MAP My Aston Portal

UKVI UK Visas and Immigration

Aston University  
Birmingham  
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