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Summary of Changes since previous version

- Changed References of Student Services team to College Services
- Updated References Tier 4
- Updated requirements for Home Office Reporting
- Formatting Updates

Purpose and Scope

- 1.1.1 This document sets out ICP and Navitas UPE policy and procedure for record keeping, student monitoring and Home Office reporting. ICP has an obligation to ensure that it has accurate records of all students. This is critical to the management of the student experience, and compliance with the Home Office requirements under Appendix D of the relevant Sponsorship Guidance.
- 1.1.2 CPR QS3 – Admission requirements detail that before assigning a CAS to a prospective student – or issuing an unconditional offer – the Sponsor (College and/or University) is required to have assessed that the applicant is eligible for such. This is most applicable, but not exclusive, to applicants that are already in the UK.
- 1.1.3 In addition to these admission checks, it is also a requirement to monitor the continued eligibility for students to be enrolled. A Sponsor must take reasonable steps to ensure that every student studying has valid permission to be in the UK.
- 1.1.4 Additionally, the College has an obligation to the Home Office to report on, as required, changes of status in an individual student’s study pattern for those holding a Student Route visa. Changes to a student’s study pattern may affect the terms of the visa and/or Leave granted to the student. Thus, it is a requirement for the College to have a robust student and CAS monitoring strategy in place that covers the period of stay at the College.
- 1.1.5 Since ICP is an embedded College of the University of Portsmouth, the obligation to monitor and report, as outlined above, is devolved to the College by the Partner University. Operational responsibility for monitoring and reporting of the College’s students for compliance with the Home Office regulations rests with the College. The College then reports this on to the Partner University to be actioned.
- 1.1.6 Reporting of the status of each applicant and enrolled student, to the Home Office, is managed via the UKVI Sponsorship Management System (SMS). The SMS uses a unique Confirmation of Acceptance for Studies (CAS) reference number that is generated by the Sponsor and assigned to each applicant. This reference number then stays with a student throughout their course of studies in the UK, providing they remain on the same visa. The Student’s CAS document is retained within their respective e-file, as well as recorded within their profile on the internal student management system, Navigate.
- 1.1.7 Under the current Sponsor Guidance*, the Home Office requires Student Route Visa Licence holders to report students who:
 - 1.1.7a Fail to enrol – including those where an application for leave to remain/enter is refused;
 - 1.1.7b Stops contact – including 10 consecutive missed points of contact (see below);
 - 1.1.7c Are no longer under the sponsorship of the institution – including Withdrawal, Terminations and Deferral (this includes students who transfer institution); and/or

1.1.7d Indicate a significant change in circumstances – including a change in course of study, work placement change.

1.1.8 *Please note: Direct reference should always be made to the most recent Sponsor Guidance, Immigration Rules and Reporting Manual before carrying out any Home Office reporting. For the most up-to-date versions visit the GOV.UK website.

- When monitoring and reporting those students that ‘Stop contact’ the Sponsor needs to:
- Make at least two checkpoints (re-registrations) during any rolling 12 month period;
- Report on students who have missed 10 consecutive expected contacts without the Sponsor reasonably giving them permission and where the Sponsor is withdrawing sponsorship;
- Make these reports within 10 working days of the Sponsor completing the checkpoint process and determining to withdrawal of sponsorship; and
- Judge whether a student’s absence is authorised ensuring that this is documented for inspection by the Home Office’s Compliance Officers.

1.1.9 To ensure consistency of monitoring and compliance with the Home Office requirements, Navitas Academic Registry defines a contact point to be:

“Any day on which a student is required to attend a class of study, as timetabled on the College’s Student Management System”.

1.1.10 Therefore, if a student has three timetabled events in a day and they attend just one of those, the student is deemed to have successfully made that designated ‘Contact Point’. This does not preclude the student meeting the College requirements, as indicated below in section 2.

2 College Attendance Requirements and Policy

2.1 Our Expectations

ICP believes that students need to attend classes and participate in the learning process to obtain value for money and gain the education that will enable them to achieve their University of Portsmouth degree award. The monitoring of attendance and student engagement, by ICP is an important aspect of this philosophy particularly its ability to help retain and minimise a student’s risk of academic failure or withdrawal.

Furthermore, this policy helps to outline our approach in identifying students who may require additional support.

To ensure consistency and adherence with the regulatory bodies, the Navitas Academic Registry defines an engagement point (one that creates a positive attendance mark) to be:

“Any formal ‘scheduled engagement’ of which a student is required to attend, as timetabled on the student management system”.

Students are expected to maintain a minimum of an overall **90%** attendance record, failing which they will be monitored and encouraged to re-engage. Those that fail to re-engage with their studies and continue to fall beyond this threshold will be monitored through the Compass Programme guided by CPR QS7.

2.1.1 Students are expected to arrive punctually at the start of class and remain for the duration of the class/lecture. The lecturer and/or College reserves the right refuse entry to any student who arrives to class more than 10 minutes late or does not return from any designated break in a timely manner.

2.1.2 **A scheduled engagement** includes any interaction or event where attendance is deemed to be mandatory. These include events such as:

Orientation, class sessions, lectures, tutorials, workshops, supervised lab work, field trips, appraisal points, meetings or interviews, assessments and so forth.

All meetings, appraisal points and/or interviews that a student is informed as ‘required to attend’ by the College are classified as scheduled engagement points and must be attended.

2.1.3 In order that ICP complies with regulatory requirements (outlined in the Regulatory and Professional Body Responsibilities section), as well as to ensure the best student outcomes, the College will monitor its students in accordance with the latest Monitoring and Engagement Process in conjunction with the Compass Programme.

The practice of attendance and engagement is followed to help establish important learning routines, general time management skills and also guarantee that students have the opportunity to absorb and assimilate the information essential to understanding and comprehending a subject/module.

Furthermore, this policy helps to outline our approach in identifying students who may require additional support.

2.2 Student Responsibilities

As adult learners, students are expected to meet the attendance threshold and actively engage in their course. Students will be accountable for their participation with the expectation to arrive on time at the start of every scheduled engagement and remain for the duration of the scheduled engagement.

Further to this requirement, a student sponsored as a Student by the UKVI (a visa student), must attend their studies in line with their visa conditions.

Where a student is knowingly unable to attend, the College Services team must be informed prior to the scheduled engagement.

Absence will be defined when a student:

- Does not attend a scheduled engagement,
- Does not have their intended absence approved.

Authorised absence will only be granted if the circumstance is exceptional and evidence based (e.g., certified illness), and notified to the relevant team prior to the scheduled engagement. If a student fails to attend without approval the attendance mark for that scheduled engagement will be marked as 'none' (not present). Half-absence will also affect a student's overall attendance so attending scheduled sessions promptly and at the relevant times is imperative to maintain good attendance.

What you need to do as a student:

If you are unwell.	Call or email College Services before your class. You will be required to provide medical evidence if you are unwell for an extended period of time or if an assessment has been missed.
If you have an important appointment (such as a at the embassy).	Call or email College Services before your class to ask for permission. You will be asked to provide evidence of the appointment.
If you have a serious personal problem (such as a very unwell family member, or you will be attending a funeral).	Call or email College Services before your class to ask for permission. You may be asked to provide evidence.
Any other serious reason that you are unable to attend class.	Call or email College Services to discuss your situation.

2.3 Student Monitoring

- 2.3.1 In order that the College complies with the Home Office requirements, as detailed in the relevant Sponsor Guidance* and Immigration Rules* as well as to ensure the best student outcomes, the College will monitor its students in accordance with the Attendance Monitoring Process.
- 2.3.2 Any enrolled student on the College student monitoring system 'Navigate' who meet the following conditions will be placed, as per procedure, on the Compass Programme for closer monitoring. To be placed on the Compass programme, the student is enrolled with a status of 'Current' in Navigate, and whose attendance does not meet the expected 90% requirement and/or presents an inconsistent pattern across a set of modules. The Compass can be reviewed as part of the Operations Manual. Should a breach arise the student is formally contacted through Navigate, which retains all modes of contact information for the

student. Formal contact with the student in breach is made primarily by College Services . Where necessary (if permission has been given at enrolment, or prior to this through the admissions process), parents, guardians and/or agents may be contacted. Approved contacts should be entered into Navigate under the 'Relations' tab. Confirmation that data – including, but not limited to communications with the student – may be shared should be indicated alongside the respective individual by a 'Yes' in the 'Share Data' section. Initial contact by College Services must be clearly communicated in a formal capacity and explained to the student that as a result of the breach in the Student Contract, the student is to be automatically placed on the Compass Programme. Where such a student continues to not meet the expected 90% overall attendance requirement and has no CMT/CLTB approved extenuating circumstance, or approved leave of absence, then their situation is discussed further by the SMT. This breach should be considered in addition to any breach in the Home Office required 'missed 10 points of contact'.

2.3.3 Any student who has no approved extenuating circumstance, or approved leave of absence, and who habitually fails to respond to communication from the College and/or who fails to present at 10 consecutive scheduled contact points, as defined in 1.1.10 above, will be formally issued with 'Notification of Intention to Exclude'. The student is informed formally by College Services of this intent through Navigate, within 24 hours of this regulatory breach. Agents, parents and guardians should be informed at this stage of the situation (after confirming the student's privacy setting through Navigate) and the Home Office reporting requirements. Where such a student fails to appeal their Intention to Exclude, fail to attend their appeal meeting, or meet approved extenuating circumstances after a further five consecutive working days, they are formally issued with 'Notification of Termination – Exclusion' and where required the Home Office informed by report within the timeframes specified in the relevant Sponsor Guidance.

2.4 Intervention

2.4.1 Any student who meets the following conditions may be placed, as per procedure, on the Compass Programme for closer monitoring:

- i) A student whose attendance does not meet the expected 90% requirement and/or presents an inconsistent pattern of attendance across a set of modules.
- ii) A student requiring additional academic support as highlighted either by the student, our lecturers or the College Services Team.
- iii) A student is a minor or has personal or welfare circumstances/concerns which may impede his/her performance.

2.4.2 Should there be a fall below the expected attendance threshold the student will be formally contacted through the student management system by the Student/College Services staff. This initial contact will explain the importance of good attendance, the positive effects it can have on studies and highlight the consequences of continuing to breach the threshold.

- 2.4.3 Where a student does not meet the expected 90% overall attendance requirement and has no approved extenuating circumstance, or approved leave of absence, they will be placed on the College Compass Programme. At this point students will be communicated a warning outlining their requirements and any breaches in regulatory requirements (e.g., sponsorship requirements as a visa Student).
- 2.4.4 Where permissible, and deemed necessary, (if consent has been given at enrolment, or prior to this through the admissions process), parents and/or agents may be contacted to encourage re-engagement or participation.
- 2.4.5 Any student who has no approved extenuating circumstance, or approved leave of absence, and who habitually fails to respond to communication from the College and is deemed to have actively disengaged with their studies will be formally issued with an Intention to Exclude (ITE).
- 2.4.6 Where a student has been issued with an ITE they will have a period of appeal, of 5 working days, to justify their reasons for continuation on their course. If a student fails to respond, or their appeal is unsuccessful, the College will formally issue a 'Notification of Exclusion'. Upon reaching this point of non-engagement the University of Portsmouth will be notified and the student will no longer be eligible to study at the College.
- 2.4.7 For those students under Student sponsorship the University Partner will notify the UKVI within a designated timeframe confirming sponsorship has been withdrawn. For the student this will cancel the student visa and will give a short window to leave the UK or find an alternative sponsor.
- 2.5 Student Records
 - 2.5.1 The Home Office requires that all records, including attendance, be kept in accordance with Appendix D of the relevant Sponsor Guidance.
 - 2.5.2 The College has an obligation to ensure that it has accurate records for all students. This is critical to the management of the student experience, as well as regulatory requirements.
 - 2.5.3 The student management system will record student attendance and highlight student absence. Attendance warnings will be populated through the system, the frequency of which is determined in the Monitoring and Engagement Process. The system will also hold details of actions and activities taken to re-engage a student, records of meetings held and any engagement plans put forward where non-engagement is apparent.
- 2.6 Student Timetable and Attendance procedures
 - 2.6.1 Navitas UPE policy determines that a student must be timetabled for a minimum of 15 contact hours per week over a period of at least three days in each week of a semester. The exception to this Navitas UPE policy is where a student is repeating a module/s to complete a course/stage of study or where they are required to take up an approved core requisite

module. Details of the Home Office requirements surrounding hours of study and repeating modules are included in the Sponsor Guidance.

- 2.6.2 Attendance is recorded systematically by module by scheduled contact points in Navigate and through the College Student Portal (Axis) attendance reports system, including non-attendance due to extenuating circumstances or CLTB/CMT approved leave of absence.

Records are maintained by College Services and formally monitored each week, in accordance with the Attendance Monitoring Process. They are also recorded at the College Management Team on a regular basis. Regular feedback from academic teaching staff to the CLTB, along with on-going reviews of individual student assessment performance, must also be collated following assignment submissions, through the Compass programme for academic reasons. These are formally noted in the current semester's Student in Jeopardy log and acted upon to ensure that attendance is accompanied by active learning.

Attendance registers must be taken at each scheduled contact point via direct entry to the Student Portal (therein Navigate).

Entrance to the class will be at the discretion of the lecturer and/or the College. If a student has arrived more than 10 minutes late to a class, and is permitted to enter, they are normally recorded as a half absence. Students will also receive a half absence if they leave the class before the formal end of the session. Similarly, if any student arrives late or fails to attend after a scheduled break in a class, will be marked half absent/absent, unless there are any extenuating circumstances, which are subsequently approved by the CMT/CLTB. Students who regularly demonstrate this behaviour will also be placed on the Compass Programme.

2.7 Assessment Events and Attendance procedures

- 2.7.1 Attendance is mandatory at all scheduled assessment events throughout a semester. Only in CMT/CLTB approved extenuating circumstances may a student not be present at such an event. Non-attendance at a scheduled assessment event (approved or not) are reported for consideration at the Module Panel and Progression Board, for consideration (if required by the College or University Academic Regulations). Where a student has been approved as having met mitigating/extenuating circumstances by the Mitigating/Extenuating Circumstances Panel/CMT or a College Module Panel (for a final, end of semester, examination assessment), an approved absence should be noted and recorded with the Academic and Student Support Team. Re-sit assessment provision may be made for such approved students, as approved by the CLTB.

2.8 Other Required Engagement Events

All meetings, appraisal points and/or interviews that a student is informed as 'required to attend' by the CMT/CLTB or College Services Team, must be attended. Where a student is unable to attend then the College Services Team must be informed prior to the meeting and, where appropriate, the relevant member of the Academic Teaching Staff. A student may be granted a later appointment where approved extenuating circumstances have been met.

3 Home Office Reporting

3.1 Reporting under the University Sponsor Licence

3.1.1 As a licenced sponsor, under the Student Immigration Route, the University of Portsmouth and ICP have an obligation by law to monitor and report on sponsored students.

Under current Sponsor Guidance, the UKVI requires sponsor licence holders to report students on a programme of study who:

- i) Stop engaging – those that do not consistently partake in formal scheduled engagement as outlined in this document),
- ii) Are no longer under the sponsorship of the institution – including withdrawals, terminations, and deferral of studies (this includes students who transfer institutions),
- iii) Indicate a significant change in circumstances – including a change in course of study, work placement change, completing a course earlier than expected,
- iv) Are suspected not to be genuine.

Where the college has exhausted and evidenced all re-engagement opportunities, and withdrawal conditions are implemented (Notification of Exclusion), the college must:

- i) Make the University of Portsmouth aware that sponsorship is to be withdrawn; and,
- ii) Evidence a student has actively dis-engaged with their studies; and,
- iii) Cite all methods of re-engagement activity; and,
- iv) Report to the UKVI within 10 working days of the College/Sponsor confirming withdrawal.

3.2 Recording of Home Office reports

3.2.1 All Reports made to the UK Home Office should be recorded in their entirety in Navigate under the 'Student Document Details' tab by adding a UKVI report. Once complete the report linked to the relevant CAS. The report should also be documented within the shared reporting data sheet which is shared between the University of Portsmouth CFSO and DSAA teams, and ICP.

4 Right to Study Checks

Enrolment, Re-enrolment and monitoring of the right to study

4.1.1 Any student that is enrolled on any College/University programme and is subject to immigration controls is required under the Immigration Rules and Sponsor Guidance to have

valid permission to study in the UK. The Institution is obligated to request and retain evidence of the student's right to study in the form of verified copies of original documents.

- 4.1.2 The College must ensure that there is a robust process of enrolment, which includes the confirmation that all students who commence studying with the College/University are eligible to do so where the student has been issued with a Student route visa.
- 4.1.3. The College must ensure that they retain copies of original documents as per the requirements of Appendix D of the relevant Sponsor Guidance. These documents must be stored within the student's respective e-file, as well as stored within Navigate, under the appropriate document type within the Student Document Details section of each student profile. Once complete these documents, where applicable, should be linked with the respective CAS document.
- 4.1.4 The College must also ensure that there is a monitoring process in place, which is rigorous and allows for the determination of students' continued eligibility to remain enrolled of a programme of study.
- 4.1.5 Consideration and reasonable steps need to be demonstrated that Sponsors have assessed a student to have valid leave to study and these should be made at specific checkpoints and for particular scenarios, including, but not limited to:
 - i. The initial enrolment of every student;
 - ii. Any subsequent re-enrolment of every student; and
 - iii. Students where they are currently in the UK and are enrolling under a previous, but current visa – This requires on-going monitoring until the new application outcome has been established and this process and outcome is required to be evidenced.
- 4.1.6 In order to verify documents, it is suggested that the document "Full guide for employers on Prevention of illegal working in the UK" produced by the Home Office is used as a basis for decision making.

5 Variation of Programmes

ICP has a number of programmes and learning platforms that may require deviation from some of the principles outlined in this policy. Whilst the minimum threshold of attendance and our expectations do not change there are variations to consider set out for each academic capacity, as indicated below.

- 5.1 **Online Learning (where applicable):** For courses studied wholly or partly online, students must either attend all scheduled engagement, or where not physically possible and approved by CLTB, view the recordings/material issued for each class. Monitoring requirements will remain broadly similar to those outlined in this document however

engagement may be viewed and evidenced through the virtual learning environment logins and student portal access.

- 5.2 **Pre-Sessional Programmes:** As with all programmes the Pre-Sessional course requires maximum attendance to give the best possible chance of progression onto the main course of study. Due to the intensity of study on this programme, any student who has no approved extenuating circumstance, or approved leave of absence, and who habitually fails to respond to communication from the College and/or who fails to present at 5 consecutive scheduled contact points, as defined in 1.1.10 above, will be formally issued with ‘Notification of Intention to Exclude’.
- 5.3 **Integrated Students:** Where a course of study has an integrated element (part-taught by the University Partner) the University Partner will log attendance of the integrated element (class, module, etc). Students undertaking integrated elements will be subject to all monitoring requirements set out by ICP as above. The data may also be used in combination with attendance recorded by the College for college-based modules.

6 Student Records

- 6.1 The college has an obligation to ensure that it has accurate records for all students. This is critical to the management of the student experience, as well as regulatory requirements.
- 6.2 The student management system will record student attendance and highlight student absence. Attendance warnings will be populated through the system, the frequency of which is determined in the Monitoring and Engagement Process. The system will also hold details of actions and activities taken to re-engage a student, records of meetings held and any engagement plans put forward where non-engagement is apparent.

7 Regulatory and Professional Body Responsibilities

- 7.1 Some of our programmes carry a professional accreditation and/or are regulated by a national body. This can bring with it a specific minimum attendance requirements which differ from the level set out in this policy or from other courses provided by the College. Where such a requirement exists, students will be made aware of this via the appropriate course or unit handbook and will be expected to adhere to this localised rule.
- 7.2 For students sponsored under the Student Visa Route, ICP and the and University of Portsmouth have an obligation to the Home Office to report on, as required, changes of status in an individual student’s study pattern for those holding a Student route visa. Changes to a student’s study pattern may affect the terms of the visa and/or leave granted to the student.
- 7.3 The College will comply and follow all reporting requirements of the associated regulatory or accrediting body, and the University’s stated policies and processes.

- 8 Regulatory and Reporting Requirements for Sponsored Students
- 8.1 As a licenced sponsor, under the Student Immigration Route, the University Partner and College have an obligation by law to monitor and report on sponsored students.
- 8.2 Under current Sponsor Guidance, the UKVI requires sponsor licence holders to report students on a programme of study who:
- a) Stop engaging – those that do not consistently partake in formal scheduled engagement as outlined in this document),
 - b) Are no longer under the sponsorship of the institution – including withdrawals, terminations, and deferral of studies (this includes students who transfer institutions),
 - c) Indicate a significant change in circumstances – including a change in course of study, work placement change, completing a course earlier than expected,
 - d) Are suspected not to be genuine.
- 8.3 Where the college has exhausted and evidenced all re-engagement opportunities, and withdrawal conditions are implemented (Notification of Termination/Exclusion), the college must:
- a) Make the University Partner aware that sponsorship is to be withdrawn; and,
 - b) Evidence a student has actively dis-engaged with their studies; and,
 - c) Cite all methods of re-engagement activity; and,
 - d) Report to the UKVI within 10 working days of the College/Sponsor confirming withdrawal.