Imperial College London

Tier 4 Attendance Monitoring Guidance

Introduction

As a Tier 4 sponsor Imperial College London is responsible for ensuring that it meets United Kingdom Visa and Immigration (UKVI) attendance monitoring requirements for all students sponsored under the Tier 4 visa route. UKVI expects Tier 4 sponsors to monitor student engagement with the College at least 10 times per year and report to them via the Sponsor Management System (SMS) if a student is no longer in attendance. Failure to monitor Tier 4 student engagement is likely to result in sanctions against the College which could lead to the revocation of the Tier 4 sponsor licence.

Scope

This guidance applies to all students with a Tier 4 visa sponsored by Imperial College London. This includes students studying on full-time and part-time attendance modes. It applies to all time spent under Tier 4 including time spent writing up or away from College, on a placement or study abroad year and on external study leave for research purposes. This guidance outlines the basic monitoring requirements for Tier 4 students and does not replace Departmental or Faculty attendance procedures.

Procedures

It is acknowledged that the level, nature and timing of contacts between a student and the College will differ according to their discipline and programme type. It is the responsibility of each department to develop their own Tier 4 attendance monitoring plan and to ensure that this is followed. This process will be outlined in the *Departmental Tier 4 Attendance Monitoring Plan* which will be reviewed periodically by the Visa Compliance Team. Departments will be asked to provide a spreadsheet to the Visa Compliance Team twice a year showing how attendance has been monitored.

Attendance Period and Frequency

To show a student's engagement with their studies, the contact points must be spread across the academic year and include those which indicate the student's presence on campus. No more than 3 'electronic' engagement points (e.g. contact by email) can be used as evidence in one academic year and these should not be used consecutively.

Attendance Contact Points

Examples of expected contacts include:

- a lesson, lecture, tutorial or seminar;
- confirmation of a supervisory meeting
- a test, examination or assessment board;

- PhD progress review
- a meeting with a 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;
- an interim dissertation, coursework or report;
- registration with the College or Department

This is a non-exhaustive list and Departments should seek advice from the Visa Compliance Team about the suitability of other types of contact.

Part- Time students

UKVI introduced the part-time visa route in January 2018. Students who hold this type of visa are required to have 10 contact points per year. It is acknowledged that due to the nature of some of the part-time courses these contacts may be clustered around certain dates when students are expected to be in attendance at the College or that a number of them may be remote.

Enrolment

All Tier 4 students are required to enrol online each academic year and to register in person at the start of their programme. At in person registration Tier 4 students are required to present originals of evidence to confirm their visa status in the UK which will be logged and stored on the College's database in accordance with UKVI requirements. Students must complete all parts of enrolment with the College within two weeks of the start date of the programme. Failure to do so without first seeking authorisation from the Department (in conjunction with the Visa Compliance Team), could lead to withdrawal.

Recording Attendance Information

The College is subject to compliance auditing by UKVI and is required to keep evidence showing that Tier 4 student attendance monitoring has taken place and that any concerns about attendance have been investigated.

Departments are responsible for keeping a record of student attendance including details of contact points and where appropriate information about missed attendance points and what action was taken in order to confirm their status. This information should be clear and easily retrievable.

Records can be kept either on paper or electronically. They must be easily accessible in case of audit and should be available for Tier 4 students up to a year after they have completed their programme.

Year Abroad and Work Placements

The College will continue to monitor student's attendance while they are undertaking a work placement or a year abroad. Departments are required to put in place processes to monitor these students which may require confirmation of attendance from the host institution or remote contact with the student.

Study Away from the University

The College is required to fulfil its sponsor duties for Tier 4 visa holders when they are away from the College. This includes students that are undertaking study at a Partner Research Institution (PRI), undertaking a split PhD or on field work. Time away from the College should be authorised by the Department and a plan of how attendance will continue to be undertaken during the period away from College should be agreed.

Where Postgraduate Research students are undertaking field work the External Study Leave form should be completed and returned to Student Records. For any other types of study away from College should be reported directly to the Visa Compliance Team. Any changes to a student's status while away from College (i.e. student withdraws from the Study Abroad scheme) should be reported to the Visa Compliance Team immediately.

Writing Up

UKVI regulations allow the College to sponsor postgraduate students who are writing up a dissertation or thesis. If a student resides in the UK whilst writing up there must be regular contact with their supervisor and their contact details (including telephone numbers) must be kept up-to-date.

Where a student chooses to write up their thesis/ dissertation in their home country, the University will inform the student that their sponsorship will be withdrawn and a notification will be made to UKVI.

Vacation Periods

Students will not normally be allowed to be absent during designated teaching and examination periods. During the vacation periods, there is no requirement for undergraduate students to be present at Imperial. However Postgraduate taught students are expected to continue to engage with their studies over the summer as this is not a vacation period for them.

Postgraduate Research students do not have predetermined leave time and are entitled to 8 weeks annual leave throughout the year which Supervisors must authorise and keep a record of. Students taking agreed annual leave are not required to be engaged with the College.

Non-Attendance

Non-engagement and absences must be recorded and acted upon where applicable. The College is required to report to UKVI within 10 days any student that is no longer in attendance at the College.

Where a student has missed three expected contact points and there are no mitigating circumstances, or where there are other concerns regarding a student's absence this should be raised with the Visa Compliance Team.

Authorised Absence

In some exceptional circumstances where the well-being of a student may be adversely affected by a visa curtailment the College can permit an 'authorised absence' for up to 60 days. Absences of up to 14 days can be authorised by the Department. Any absence of 15 to 60 days must be authorised by the Department in conjunction with the Visa Compliance Team. Students will not be permitted more than a total of 60 days absence in an academic year. During an 'authorised absence' the student will not be placed on an interruption and they must be able to complete their programme within their existing period of leave. The College must remain in contact with the student during the period of authorised absence and be able to continue to meet its sponsor duties.

Reporting Students to UKVI

Reporting attendance concerns to Visa Compliance will not result in an automatic report to UKVI. The Visa Compliance Team will always seek agreement from the student's Department before taking any action to interrupt or withdraw a student from the College.

Further Information

For further support and advice on Tier 4 attendance monitoring requirements please contact the Visa Compliance team at visacompliance@imperial.ac.uk