

Student Sponsor Compliance

Policies and Associated Business Processes

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# Section 0 – Organisational Oversight and Review

0.1 London Metropolitan University is committed to working in accordance with the legislation and associated guidance issued by UK Visas and Immigration. This document sets out the policies and associated procedures that the University proposes to adopt in order to ensure that all Student sponsor duties are met. In particular, that all students sponsored under the Student visa route have valid leave to study in the UK and that London Met holds all documentation required to monitor, and where necessary, report, students in breach of visa conditions, and that the University has established that all other enrolled students subject to immigration control have valid leave to be in the UK.

0.2 The University will monitor its continued compliance through the establishment of a Sponsor Compliance Management Group that will meet regularly (at least once per semester). Membership of the group will normally consist of:

Deputy Vice Chancellor Academic (Authorising Officer)

International Support and Compliance Manager (Key Contact/ Level 1 User)

International Compliance Officer (Level 1 User)

Director of Admissions and Enrolment

Head of Admissions

Head of International Development

0.3 The Sponsor Compliance Management Group will be supported in its activities by the International Support and Compliance team.

0.4 International Support and Compliance Manager and International Compliance Officer are tasked with the responsibility of ensuring that all processes outlined in this document continue to be adhered to across the University. This will be done through a series of spot checks, regular internal audits and reviews. Any changes to these processes will be proposed to the Sponsor Compliance Management Group following discussions between the International Support and Compliance Manager and the senior manager responsible for that particular section.

0.5 The Sponsor Compliance Management Group will be responsible for:

* Receiving monthly reports from Sponsor Compliance in relation to the University’s CAS statistics which are the requirements for meeting the annual Basic Compliance Assessment (refusal rates, enrolment rates and course completion rates.) Refusal rates will be reported to the group on a month by month basis and enrolment and completion rates following the key dates in the academic cycle.
* Receiving reports as required on activities undertaken to ensure that all required documentation is stored in a retrievable form on the student records system;
* Receiving notification of any modules where attendance records are not being maintained and centrally recorded;
* Identifying any additional activities required to ensure that the University remains compliant with its responsibilities, and the person(s) responsible for implementing these, based on the reports received;
* Receiving an annual report on the operation and oversight of agents retained by the University as part of its arrangements for the admission of international students;
* Discussing and determining (when applicable) where business processes impact on, and may affect, the ability of the University to ensure full compliance with the current Student visa guidance and policy;
* Receiving any legislative or guidance changes issued by UKVI, from Sponsor Compliance, identifying any consequent changes to policies and procedures that may be required, reissuing as appropriate;
* Ensuring that timely requests are made to renew the Student sponsor licence (every four years) and the Basic Compliance Assessment (annually);
* Ensuring that the University’s Key Contact notifies UKVI of any changes to key personnel;
* Receiving and approving the list of Level 1 and Level 2 users within the Sponsor Management System;
* Commissioning internal auditing of London Met procedures and record keeping and those of collaborative partners;
* Keeping this document under review.

0.6 In addition to the Sponsor Compliance Management Group updates, the International Support and Compliance Manager will regularly update the Senior Leadership Team as to the University’s current compliance standing. This will be delivered on a monthly basis unless requested ad hoc. This update will include

* Information about the Basic Compliance Assessment for the current period to date
* Information about any visa refusals, student non-enrolment and student non completion or withdrawal figures
* Updates on any Student Sponsor guidance or Immigration Rules changes which may impact on internal processes or procedures.

0.7 The University seeks to work with UKVI in a transparent and constructive way and welcomes input from UKVI and other external agencies that can develop good practice and improve systems.

# Section 1 – Recruitment and Admissions Practices

**Senior Manager responsible for this process:** Director ofStudent Recruitment and Business Development & Director of Admissions and Enrolment

**Operational Responsibility:** Head of International Development & Head of Admissions

## 1.1 Introduction

1.1.1 The University values the contribution of its international students and its international partnerships to the globalisation, diversification and development of our educational character and mission.

1.1.2 In discharging this strategic mission, the University works within UKVI guidelines and ensures compliance with these through regular review of its strategies and operations in the light of UKVI policy and practice.

1.1.3 The University prides itself on the diversity of its student body, and its international development strategy is informed by the strategic desire to maintain diversity within the institution.

## 1.2 International Student Recruitment

1.2.1 The University operates a range of strategies and approaches to international marketing, promotion and recruitment, in line with the needs of different international markets.

1.2.2 For each key market, there is an annual plan reviewing market and competitor data, reviewing activities from the previous year(s), evaluating trends within admissions, conversion and enrolments. This plan informs the range of activities that will be undertaken in the coming year, on a country by country basis.

1.2.3 The University has regular contact with relevant Diplomatic Missions globally to ensure it is aware of any potential immigration risks.

1.2.4 The University participates in a series of events and activities around the world, maximising opportunities for potential students and offer holders to meet with University staff.. This enables the University to support the admissions process with direct contact with applicants, and helps the applicant to be sure that the course they have chosen is the best for them, given their long-term career aspirations.

1.2.5 The University works with a range of international partners, including; recruitment representatives and academic partners. In addition, we have two representatives in the USA and one in India, employed through partners whose staff work solely, and not on commission, for the University. Representatives are required to visit our London Campus twice per year for training purposes.

1.2.6 Overseas representatives enable the University to make direct contact with applicants, utilise detailed knowledge of the market, and allow opportunities to engage with prospective students directly.  Overseas representatives provide course-specific advice as well as guidance on life in the UK, excluding immigration advice, to applicants and enquirers and provide a high level of country-specific insight to the University and its staff.

1.2.7 International visits are coordinated by the International Development team, and many are undertaken by specialist staff within the International Development team, plus a selection of experienced academic staff.  This is to ensure that expertise is developed over time, so that those counselling and advising students are suitably knowledgeable and experienced, and contacts within the country have regular liaison and contact with the key individuals with whom they work.

### International Admissions standards

1.2.8 The Admissions department, in conjunction with UK ENIC and other relevant stakeholders, produces guidelines for admission decision makers which outlines the University’s general entry requirements on a country by country basis. This document is reviewed and updated annually and is governed by the overarching Academic Regulations

### International Recruitment Strategy and UKVI compliance

1.2.9 Within the Student Services, Sponsor Compliance will do the following: review all student visa refusals; any and all cases where students’ visas have been cancelled after joining the University; any issues of student non adherence to attendance requirements; keep a record of general issues relating to immigration risk, including information about representatives who have had contracts terminated for immigration related concerns; geographical areas of concern, feeder institutions and/or partners of those where there are immigration related concerns, including potential feeder institutions in the UK. This information will be communicated to the Head of International Development and used to inform the University’s recruitment strategy by feeding into the development of annual market plans.

## 1.3 Policy on Representatives

1.3.1 The University works with a number of recruitment representatives and educational recruitment consultancies around the world. The following summarises the policy aspects of our working relationships with representatives (often called ‘agents’) as relevant to Student compliance and the recruitment of genuine, suitably qualified international students.

### Appointing new representatives

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1.3.2 Requests to appoint new representatives are made only by the Deputy Head of International Development within the International Development Team, and decisions to appoint are based on the information provided in the New Agent Proposal Form, as well as due diligence checks (financial and references).  There are two levels of approval: first by the Director of Student Recruitment & Business Development, second by the Deputy Vice Chancellor.  Both signatures are required before contracts are issued for signature.

1.3.3 In all cases prior to appointment, the following are required;

* Clear information about the organisation, its staffing, its premises
* Summary of the organisation’s experience of international student recruitment
* Summary of which other institutions (UK and otherwise) the organisation works with
* Summary of how the organisation works, and how it wishes to work with London Metropolitan University
* Notes of visit to the organisation by London Metropolitan University staff where possible
* References including two reference forms from another UK University who works with the organisation or confirmation from Head of International Development or from the Deputy Head of International Development as to why this is not available or possible.

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### Contracts of representatives

1.3.4 All representatives who work with the University are contracted via a valid mutually signed contract.

1.3.5 Any promotional material relating to the University produced by the representative must be approved by the University in advance of its use.

1.3.6 No commission is paid to any organisation unless a valid, mutually signed contract is in place. Any commission owed to a representative is only paid once the student has formally enrolled at the University and at least 50% of the first year tuition fee has been received.

1.3.7 The University will provide UKVI with a list of all representatives who send applications to any course for which the University issues a CAS, this will be submitted annually.

### Training and Development of Agents

1.3.8 All agents appointed by the University are required to evidence that they have worked with other UK HEIs and that have a track record of referring quality applicants to UK HEIs.  Where this is not possible (eg new agency), approval will be given by the Deputy Vice Chancellor before proceeding.

1.3.9 Agents will have demonstrated by way of a UK HEI reference that the agency’s business model is able to provide appropriate advice to prospective students and successfully referred quality enrolments

1.3.10 University materials including admissions requirements and relevant updates are provided at the point of contractual engagement and periodically thereafter

1.3.11 On-going development and on-site training is provided, where possible, by visits to those agents whose volume of referrals and interaction merit face to face engagement with a member of University staff

### Review of the performance of recruitment representatives

1.3.12 The International Recruitment Team under the Head of International Development convenes an annual review of all recruitment representatives.

1.3.13 The University will usually terminate contracts of any recruitment representatives for whom no students have enrolled in the previous two years.

1.3.14 The annual review process will consider the total applications and enrolments by representative.  Apparent anomalies between application and enrolment numbers will be investigated.

1.3.15 The University will review the number of visa refusals for each representative in this annual review

1.3.16 Contracts with those agents with an unsatisfactory refusal rate, or about whom compliance concerns have been raised, will be discontinued

1.3.17 There will be at least one meeting every year between the Head of International Development or relevant International Recruitment Manager and the representative; if this is not possible in person, it will be by phone or video conference.

1.3.17 Representatives will receive regular training on the University’s courses, admissions requirements and procedures in place to ensure compliance with UK immigration regulations.

## 1.4 International Admissions – Application Processing

1.4.1 All applications to study at the University are received either through UCAS or directly via the University’s bespoke application portal. All applicants must complete a full application form including personal details, personal statement, along with a complete summary of their academic and professional background supported by the relevant qualification documents. Applicants are also required, where applicable, to provide details of their UK immigration history, specifically time spent studying in the UK.

1.4.2 The University will not make an unconditional offer to study on a course unless a full application has been received.

1.4.3 Applications received that contain no or very scant qualifications information and/or personal statement will generally be rejected. The University may request the information from an applicant in order to make an informed admissions decision.

1.4.4 Admissions decisions will be made in line with our agreed views of international qualifications and the specific entry requirements for particular courses, as codified variously in our Guide to International Qualifications, NARIC, the Admissions Database and guidance from faculties on the specific requirements for various courses.

1.4.5 Sponsor Compliance staff have the right to question admissions decisions before they are confirmed to the applicant, if they do not fit with the agreed guidelines.

1.4.6 The University will normally not offer admission to an international student who is already or has recently been in the UK, studying at a higher RQF level than the course to which they are applying.  Any such cases need to be signed off by the International Support and Compliance Manager or a member of the International Support and Compliance team in their absence.

1.4.7 Any applications from students who are applying to study a course at the same RQF level as a course that they have previously studied, must be reviewed by the appropriate faculty academic, who will provide further clarification on a clear and detailed rationale for this progression that meets the requirements laid down in the Student Sponsor Guidance. The application must then be signed off by Sponsorship Compliance, after seeing and approving the clear and detailed rationale for this progression.

1.4.8 Sponsor Compliance staff have the right to question or not process admissions decisions if the academic and English basis of offer is not clearly specified, or if in-UK progression is not clearly noted and confirmed on the application form by the admissions decision maker.

1.4.9 Where practical, non-standard or borderline applicants may be interviewed. Guidelines will be communicated to staff to enable them to identify non-standard scenarios.

1.4.10 At academic interview, applicants will be asked to show their original academic and English Language qualifications, and to prove their identity.  Interviews will follow a standard format, recorded on a proforma and interviewers will add their notes of to the applicant’s file.  Interviews will not provide the sole basis of offer but must be supported by relevant documents including academic qualifications, English language qualifications and references.

1.4.12 Any application that includes academic credit is to be signed-off by one of the key academic staff in the relevant School. This will normally be approved prior to assigning the CAS.

1.4.13 The University may appoint a third-party partner to support the admissions and compliance task, focussed on target markets chosen based on UKVI risk briefings and other market intelligence. This provider may carry out tasks such as application screening, document checking and conducting compliance interviews as part of the admissions process. Any third party engaged in admissions activities will be required to carry out training and regular updates with London Met staff.

## 1.5 Dealing with applications from representatives with which the University does not work

1.5.1 If the University receives applications from organisations with whom it does not hold a valid representative contract, the application will be dealt with in the usual way but with no reference to the ‘intending representative’.

1.5.2 If the University notices a number of applications coming from the same organisation, it will write to the organisation to question this.

## 1.6 Relationships with potential and actual feeder institutions

1.6.1 The University has a number of agreed progression/articulation agreements with feeder institutions in the UK and overseas, both for home and international students.

1.6.2 The Head of International Development and Deputy Head of International Development hold specific responsibility for liaison and relationships with UK-based feeder institutions for international students.

1.6.3 The University will enter into no articulation or other agreement with feeders of international students unless a member of staff with experience of international student matters has visited and met with the institution, and the potential agreement is well understood.

1.6.4 Any promotional material developed by the partner institution which includes reference to the University, should be approved in advance by the University.

1.6.5 Progression relationships will normally be of the form of academic progression from one RQF level to the next higher RQF level.

1.6.6 The University will generally not enter into articulation agreements with institutions unless it has confidence in that partner institution and how its name will be used.

# Section 2 – Assessing English Language ability

**Senior Manager responsible for this process:** Deputy Vice Chancellor Academic

**Operational Responsibility:** International Support and Compliance Manager

2.1 All international students are required to demonstrate a specific level of English language ability in order to meet the academic entry criteria specified by the University, as outlined on the English Language requirements webpage. The academic entry requirements for each course are available on the University website as are general admissions requirements which are listed on a country by country basis for our most common recruitment regions.

2.2 All international students who are not from majority English speaking countries, as specified by UKVI, are required to provide evidence of their level of English language ability to a specific level in order to meet UK immigration regulations. These may differ from academic requirements. The University can determine how to assess a student’s English language ability either through a recognised and authenticatable English Language test, a Secure English Language Test (SELT) or through a combination of other documented evidence which has been approved by the University as demonstrating language ability in accordance with the Student requirements.

2.3 The Head of International Development in collaboration with the International Compliance and Support Manager will identify cases for consideration where combinations of agreed qualifications plus satisfactory interview might be acceptable evidence of English language competency. Such cases will be determined by the University. Qualified staff will confirm the mapping of such qualification to CEFR B2 in terms of reading and writing. Trusted and qualified third party providers such as ECCTIS may be commissioned to review any qualifications being investigated and provide expert guidance on equivalences. Any interview will need to assess the applicant’s speaking and listening, and will need to be documented with the documentation retained on file. This process will be kept under review.

2.4 Admissions decision makers will document clearly how each student has been assessed in each of the four components and to what ability, where a SELT has not been used. This documentation will be scanned and stored on file.

2.5 Where applicable, the test result provided by the student as evidence of English language ability will be verified online i.e. IELTS and Pearson’s PTE. Confirmation that this has been done should be uploaded to the student’s file.

# Section 3 – Issuing a Confirmation of Acceptance for Studies (CAS)

**Senior Manager responsible for this process:**  Deputy Vice Chancellor Academic

**Operational Responsibility:** International Support and Compliance Manager

## 3.1 Issuing a CAS – New Applicants

3.1.1 CASs will only be issued to applicants when they have been offered unconditional admission onto a course, where the University has copies of all documents relevant to the CAS and where either the University has received proof of their deposit payment, or the University has agreed that they are a sponsored or scholarship student and that the deposit is therefore waived. In general, a deposit of a percentage of the tuition fee for the first year is required to confirm acceptance of the offer by the student and to secure their place on the course.

3.1.2 The University determines, on an annual basis, the scholarship agencies from whom evidence of funding on behalf of a student will be acceptable and therefore determining when the required deposit may be waived. This will usually only apply when the student is either fully sponsored by a recognised organisation or sponsoring body, or is in receipt of a University scholarship.

3.1.3 A CAS will only be issued when the University has received:

* a fully completed application, including a personal statement, by the student;
* an electronic copy of all academic and English language documents that relate to the basis of offer on the CAS statement;
* confirmation of any previous periods of study in the UK and the corresponding visa copy, if relevant; these will be used to confirm both that a student will not exceed the maximum periods of study and also to confirm that the course that the student is applying for represents ‘academic progression’ from any previous courses.
* documentation relating to any previous non-standard immigration history (refusals, appeals etc)
* interview notes, if relevant;
* a copy of the personal details page from the applicant’s current passport;
* copy of ATAS certificate, if applicable
* payment of required deposit, if applicable;
* if requested, copies of any documents that the applicant intends to submit as evidence that they meet the financial requirements of a Student visa application; and
* any other documents deemed relevant by the University, if necessary.

3.1.4 All CASs will include a clear start date, a latest start date, and an end date.

3.1.5 A single CAS for both pre-sessional study and a main course of study, will be issued only when the main course is at RQF level 6 or above; where the applicant holds B1 English demonstrated by a Secure English Language Test and/or holds a conditional offer for the main course where the only condition is that the student must reach B2 on successful completion of the pre-sessional course; where the pre-sessional programme is of three month’s duration or less, and where the ending of the pre-sessional programme and the start of the main programme is less than one month apart. Sponsorship of visa will be withdrawn if; at the end of the pre-sessional course the student holding B1 English has not reached B2 in all four assessed components.

3.1.6 Where a student holds an unconditional offer for the main degree and they will also take a pre-sessional English course where the length of the pre-sessional is no more than three months and it ends no more than one month before the start of the main degree, the University will determine the students English language ability to meet CEFR B2 as per Section 2 of this policy.

3.1.7 Before a CAS is issued to any applicant who has;

* previously been issued with a CAS from London Met which has led to a refusal, and/or
* studied in the UK at the same academic level as the course applied for, and/or
* not successfully completed the course for which their previous Tier 4 or Student leave was granted for

the CAS request must be approved by International Support and Compliance team staff trained and experienced in assessing and issuing CAS. Details explaining why a subsequent CAS is required should be retained on file (e.g. refusal notice relating to the Tier 4 or Student application based on the previous CAS).

3.1.8 Following CAS issuance, communications will be sent out, where applicable, to students who have been issued a CAS in relation to their forthcoming or pending immigration application, so that the University is aware of their status. Where the student is already in the UK, they will be advised that the immigration application must be submitted prior to enrolling at the University and referred to the International Student Advice Service for specialist immigration advice.

3.1.9 See Section 7 (Visa Expiry and Tracking Requests to Extend Visas) for information on application tracking.

## 3.2 Issuing a CAS – Students applying to extend a course of study

3.2.1 Each student will be advised to request a CAS by contacting the International Support and Compliance team and completing a CAS Request form, detailing the reasons that they require a visa extension and outlining their “intention and ability” to complete the course. Once this has been received the student will be considered for a new CAS. In order for a CAS to be assigned the following information must be considered:

* The expiry date of the student’s current visa;
* The total period of time that the student has studied in the UK as a Tier 4 (General) Student or Student towards qualifications below RQF level 6. This period must not exceed 2 years;
* The total period of time that the student has studied in the UK as a Student or Tier 4 Student at RQF level 6. Usually, this period must not exceed 5 years;
* Where the student has been assessed in terms of their continuing intention and ability to study*,* attendance and progression;
* Where the student has demonstrated their ability to meet the financial requirements of the Student visa route.

3.2.2 All students requesting a CAS to extend an existing visa are required to enter details summarising their educational history (including any periods at other institutions) enabling the issuing officer to ensure compliance with the criteria in 3.2.1. Any other supporting documentation not already held will be scanned and uploaded to the student record system where it is retrievable in case of future query or audit requirements.

3.2.3 Once the CAS request has been submitted and the International Support and Compliance team receive a completed CAS request form, final authorisation of the issuing of the CAS is actioned by the International Compliance Officer, thus enabling an additional check to ensure that the student’s circumstances and prior educational history will not lead to the extension being refused.

3.2.4 Students issued a CAS for an extension to their visa in order to continue studying will be required to provide evidence that an “in time” immigration application has been submitted to UKVI and to provide copies of all correspondence received from UKVI in relation to this immigration application. The International Support and Compliance team will ensure that the required documentation is obtained in a timely manner.

Acceptable documentation:

1. Scanned or forwarded copy of the UKVI confirmation of submission (email)
2. Screenshot of the successful online application page showing all necessary information
3. A copy of the application checklist
4. UKVI acknowledgement letter or email
5. Biometric enrolment appointment booking confirmation
6. Biometric enrolment attendance confirmation

3.2.5 When a student has provided acceptable evidence of an in-time application, the International Support and Compliance team sets a new visa details page within the student’s record in the SITS database, which is labelled “pending application”. The expiry date is used as a chase date for a pending application. The International Support and Compliance team will retrieve all the pending application students monthly and request updates on the application status. The chase date is then updated to the next month if required. Once the visa is granted the record is updated and no longer chased. If the application is refused, Sponsor Compliance are informed. If the application is outstanding for over four months, the Sponsor Compliance Team will chase via the UKVI Premium Account Manager.

3.2.6 The process described in 3.2.5 is also followed when checking visa expiry and new “in-time” applications made for students on non-Student visa routes.

## 3.3 Issuing a CAS – Collaborative Partnership Students

3.3.1 London Met will continue to teach ECA International partnership students sponsored until 1 October 2022.

3.3.2 London Met will work in accordance to the separate partnership agreement and Collaborate Partnership Operations Manual.

3.3.3 All CAS issued for students under the collaborative agreement for either an International Foundation Programme or a Pre-Masters Programme until 1 October 2022 will follow the procedures indicated above, and will be issued by a London Met member of staff following approval by the International Compliance Officer or the International Support and Compliance Manager.

## General

* + 1. In all cases where it is made known to one of the responsible offices that a student’s visa application has been refused/rejected, then the following must occur:
* A copy of the visa refusal/rejection letter must be uploaded to the student records system and the International Compliance Officer notified so that this can be reported via the SMS, if required.
* The International Compliance Officer will then advise the International Support and Compliance team as to the impact on the student’s status with the University and whether or not a new CAS can be issued, if applicable.
* The student will be referred to the International Student Advice Team for specific immigration advice.
	+ 1. All CAS issued will be generated via the SITS functionality and there should be a direct one to one relationship between a CAS and a VCR record. Where a new CAS needs to be issued then a new VCR screen will always be created.

# Section 4 – Enrolment and Re-Enrolment

**Senior Manager responsible for this process:** Director of Admissions and Enrolment

**Operational Responsibility:** Admissions and Enrolment Departments,Academic Quality and Student Administration, International Support and Compliance Manager

4.1 The processes for managing the enrolment of students (including UK domestic students, non-Student visa route students under immigration control as well as sponsored under the Student Licence) are managed by the Director of Admissions and Enrolment.

4.2 Students enrolling for the first time supply the majority of their personal data (including contact address, telephone number and any personal email used by the student) via a web-based process (known as *pre-enrolment*)and are then required to complete the enrolment process in person or online.

4.4 All students under immigration control will be required to present their identity and immigration status documents in person for these to be checked by trained members of staff. All academic qualifications used as a basis for offer are captured during the admissions process and held on file but will be checked in person where possible.

4.3 Students who make satisfactory progress and are continuing their studies at London Met within the period of their visa can complete reenrolment on-line.

4.4 Students are required to reconfirm contact details at the point of re-enrolment.

4.5 Guidance notes are reviewed and updated for each enrolment cycle and the enrolment process is reported and decided by the Director of Admissions and Enrolment and Head of Enrolmentand Graduation.

4.6 When a Student visa sponsored student attends enrolment the enrolling officer will check that all required documentation is held in electronic form and a student will only be recorded as fully enrolled if all original documents listed in the checklist have been checked. The checklist ensures that the University will have recorded, scanned and uploaded the following items:

* Passport – personal details page(s).
* Biometrics Residence Permit (front and back of BRP)
* Stamped 90 day Entry Clearance Vignette (where applicable)
* Grant of leave letter (for EU students with Digital Immigration Status)
* Where a student is a national of a country that allows entry via airport eGates, a stamped entry clearance vignette may not be available. In these cases, students should also provide a copy of their boarding pass or flight ticket indicating they entered the UK during the validity of their entry clearance vignette.
* All qualifications recorded as constituting the *Basis of Offer* (which is created at the point of making an offer to an applicant to study at the University; see Section 1). The student must present the original documents to the enrolling officer, who will confirm on SITS that these have been seen and verified. Where documents are already held on SITS then a check must be made to see if their status has been set to ‘verified’. If not then the originals must be seen.
* Copy of student’s ATAS Certificate where applicable.

4.7 A student with a Student visa will only be permitted to enrol if they have a current visa except where students have submitted an application for an extension or switch to a Student visa (e.g. those progressing from bachelors to masters study) who will only be enrolled if they have been issued with a CAS by the University and can provide evidence that an in time Student visa extension application has been submitted to UKVI.

4.8 In exceptional circumstances, such as delays with BRP printing and distribution, a student may be permitted to enrol on the basis of a valid Entry Clearance Vignette plus UKVI decision letter showing the full length of leave issued on the basis of sponsorship by London Met. This action must be authorised by the International Support and Compliance team. The student will be informed that they must provide the BRP within two weeks of the latest date of enrolment or they may be suspended if the original is not recorded by the International Support and Compliance team by the deadline. The International Support and Compliance team will contact the student on a weekly basis by email and telephone to chase the documentation until received.

4.9 In exceptional circumstances, and at the discretion of the International Support and Compliance Manager, a student may be able to enrol for ‘supplementary study’ as defined in the Student Sponsor Guidance documentation without holding a Student visa sponsored by the University, as is permitted by UKVI. To enrol, the student will be required to provide evidence of current enrolment from their current sponsor, unless that course has already completed and the student is in the period of leave granted following the course completion date. Evidence of the course completion will be required. Students following supplementary study will not be allowed to enrol if the course end date is beyond their current visa expiry date.

4.10 In addition, any student subject to immigration control (including EEA nationals from 1 January 2021 and those holding refugee status and Indefinite Leave to Remain) will only be recorded as fully enrolled when they have provided confirmation of their immigration status (passport or relevant government issued photo identification document where a passport is not held, BRP, immigration status document), and verified copies are held on SITS. In the instance of any doubt the enrolling officer must refer to the International Support and Compliance team. In the case of any pending non-Student immigration application; enrolment must be authorised by the International Support and Compliance team.

4.11 Students or prospective students who are unable to provide any of the evidence listed above, or who provide evidence of a visa category which prohibits study, will not be enrolled.

4.12 Any student permitted to enrol with a pending immigration application will be tracked by the International Support and Compliance team. This will ensure that the University can be confident that these students continue to have valid leave to study in the UK until the new visa is granted and a copy of this obtained.

4.13 Students who are attending short courses of less than six months, including short Study Abroad programmes, may be enrolled on a Visitor visa or, in the case of non-visa nationals who enter via the eGates, on the basis of a flight ticket or boarding pass to confirm entry to the UK. The arrival dates must allow for the full course of study to be completed within the permitted six month period.

4.14 Where a Student visa holding student is unable to supply proof of qualifications at enrolment (and where they have satisfied all other requirements) they will be given a further two weeks to complete this clearance check. If at the end of this period evidence has not been supplied the student will be withdrawn from their course and UKVI informed within ten working days.

4.15 Each year the University specifies the last date by which a new student may be permitted to enrol. A student may only be permitted to enrol after that date with the express permission of the Director of Admissions and Enrolment and for Student visa holders, the International Support and Compliance Manager, in coordination with key academic staff. Any changes to the last permitted date for enrolment will be reported to UKVI as required. A last date for completing re-enrolment for continuing is also specified on an annual basis.

4.16 A Student visa sponsored student who does not complete enrolment or re-enrolment within the specified period will be withdrawn from their course and UKVI informed within ten working days. The International Support and Compliance team will track non-re-enrolled continuing students as part of their routine activities and contact them to advise that immediate action is required by them in order to avoid being withdrawn and subsequently reported to UKVI.

4.17 A student who is unable to verify their identity will not be permitted to enrol.

# Section 5 – Monitoring of Attendance and Engagement

**Senior Manager responsible for this process:** Deputy Vice Chancellor Academic

**Operational Responsibility:** International Support and Compliance Manager.

## 5.1 General

5.1.1 This and the pre-masters and international foundation programme engagement policies have been developed in accordance with [UK Visas and Immigration Guidance for Sponsors (Sept 2021)](https://www.gov.uk/government/publications/student-sponsor-guidance), and the University [Student Regulations](https://student.londonmet.ac.uk/your-studies/student-administration/rules-and-regulations/) and Engagement Policy.

5.1.2 This policy will be reviewed regularly and is subject to change following guidance from the UK government or the wider University policies for maintaining safety on campus for staff and students.

5.1.3 All students attending the pathway programmes through ECA International will be subject to a separate Engagement Policy, Appendix B below, in line with this policy. This is due to the different nature of the programme and engagement expectations.

5.1.4 All teaching is expected to be on campus for all international visa students following the below procedures. Students will have access to online materials through Weblearn but this will not replace face to face teaching nor allow for any distance learning in accordance with UKVI Sponsor Guidance.

## 5.2 Engagement Methods

5.2.1 Students in the UK will be expected to return to on-campus teaching activity from the start of the academic year and the Autumn term, September 2022. All on campus activity will be monitored via access to Evision registration data taken on a weekly basis by academic staff.

5.2.2 Data from Weblearn for Tier 4/Student visa holders will be provided to the International Support team for review on a weekly basis.

5.2.3 Students who hold a Tier 4/Student visa in the UK will be expected to attend on campus activity unless there is good reason for them not to do so, such as illness or changes in personal risk factors where the Authorised Absence policy will come into force.

## 5.3 Monitoring

5.3.1 Any student on a Tier 4 or Student visa in the UK must be attending on campus teaching activity.

5.3.2 Attendance and engagement will be monitored on a weekly basis.

5.3.3 Students will be considered engaging where there is evidence that they are attending weekly lectures and seminars, recorded via Evision by the relevant academic member of staff.

5.3.4 Where a student is found to not be engaging, the International Support and Compliance team will reach out to students at the following points:

5.3.4.1 If a student has not engaged for two weeks without authorised absence or contact, we will provide a first formal warning, reminding students of their responsibilities and expect a response.

5.3.4.3 If a student has not engaged for three weeks without authorised absence or contact, we will provide a final warning and explain that at four weeks (30 days) we will be obliged to withdraw sponsorship

5.3.4.4 Once a student reaches four weeks of unauthorised absence or contact, the International Compliance Officer will initiate the withdrawal of the student's Student visa sponsorship.

5.3.5 Students following doctoral or post-graduate by research degrees will be expected to remain in contact with their supervisor as normal. They will be expected to engage directly with the University and their supervisor at least once every four weeks. This contact will be recorded on Evision by the relevant academic member of staff.

 5.3.5.1 Students following doctoral or post-graduate by research degrees will be contacted if there are two months (8 weeks) of missed engagement or contact points and reminded of their responsibilities.

5.3.6 Once a student reaches 60 days without contact or Authorised Absence, the International Support and Compliance Officer will inform the student their visa sponsorship will be withdrawn.

5.3.7 Students completing the dissertation element of a taught post-graduate degree will be expected to remain engaged with their supervisors on a regular basis, at least once per month.

 5.3.7.1 Students completing dissertations in the UK will be expected to attend on campus at least twice per month, for visiting the library, meeting with a supervisor or other related activity. This will be monitored with gate access to the University as well as Evision registers taken by academic staff.

5.3.8 Student completing work placement modules, in line with the work placement policy detailed in this document will also need to ensure they are engaging with the placement, whether this is in situ or remotely. Engagement will be monitored by

* completed weekly timesheets for all in situ placements
* written weekly confirmation from the employer for all external placements taking place remotely and where the manager or supervisor is unable to provide a timesheet
* written weekly confirmation from the supervisor for students completing client briefs

5.3.8.1 Students on work placement modules must ensure they contact the school Placement Officer and complete all aspects of the placement agreement before they start. Students will be informed that they may have sponsorship withdrawn if this information is not provided within 10 working days of starting the placement.

5.3.9 Students completing a period as Student Union Sabbatical Officers will be expected to remain in contact with their manager or supervisor in accordance to their role. The International Support and Compliance Team will request confirmation from the manager or supervisor that the Officer is engaging in activities as expected.

5.3.10 If a Tier 4 or Student visa holder is unwell or needs to self-isolate, they should follow London Met University processes and reach out to their Course Leader or School Office as well as visa.compliance@londonmet.ac.uk to inform the University they are unable to attend or engage in lessons. The standard Authorised Absence policy will apply permitting absence of a maximum of three weeks in one term.

## 5.4 Monitoring of Students on work placements

5.4.1 Guidance on work placements for Student/Tier 4 visa holders is detailed in the [Student sponsor guidance – Doc 2 para 6.4 to 6.23](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/939471/Student_Sponsor_Guidance_-_Doc_2_-_Sponsorship_Duties_2020-12.pdf).

5.4.2 Work placements are permitted provided they are an integral and assessed part of the course. For London Met, this will be determined by whether the placement is compulsory to allow to practice in the profession e.g. Social Work (UG and PG), PGCEs/Teaching, Dietetics, Sports Therapy, Early Childhood Studies and MSc Computer Networking and Cyber Security (with placement) and these will be considered reportable under UKVI Sponsor guidelines. Students completing any other core or optional work placement modules will be able to do so under standard work allowance regulation. Further detail can be found in Appendix A – Categorisation of Placements.

5.4.3 No placement can be more than 50% of the total length of the course (in time) unless there is a statutory requirement.

5.4.4 For Student/Tier 4 visa holders completing a core work placement module, the International Support and Compliance Team will work with the Work Based Learning (WBL) team to ensure all are captured on a shared report.

5.4.5 The relevant placement team (for each School) and International Support and Compliance Team must be informed of the approved placement/experience before it starts, to facilitate timely reporting and monitoring activities required by Student Sponsor regulations. For reports and tracking of placement students – see section 8

5.4.6 The International Support and Compliance Team will maintain the attendance record for that module on a separate document based on timesheets or confirmations received.

5.4.7 Students completing work placement modules will also need to ensure they are engaging with the placement, whether this is in situ or remotely. Engagement will be monitored by

* completed weekly timesheets for all in situ external placements
* written weekly confirmation from the employer for all external placements taking place remotely and where the manager or supervisor is unable to provide a timesheet
* written weekly confirmation from the supervisor for students completing client briefs

5.4.8 Where a timesheet is submitted that indicates that a student has been absent from their placement for a full week the International Support and Compliance team and/or WBL team will contact the student to seek explanation and to instigate the authorised absence procedures where appropriate, seeking evidence if necessary.

## 5.5 Absences

5.5.1 If a Student/Tier 4 visa holder is unwell or needs to self-isolate, they should follow London Met University processes and reach out to their Course Leader as well as visa.compliance@londonmet.ac.uk to inform the University they are unable to attend or engage in lessons.

5.5.2 The standard Authorised Absence policy will apply permitting absence of a maximum of three weeks in one term. Evidence may be requested to support the request. Satisfactory evidence could include but is not limited to:

* Doctor’s certificate or positive Covid-19 test
* Death certificate (as evidence of bereavement)
* Counsellor/Other health professional’s letter
* Hospital letter
* Police report

5.5.3 Where a student is unable to provide sufficient justification (which may include evidence as listed above) for an extended period of absence, this will be recorded and considered in regards to progressions and performance. If a student is found to have patterns of regular periods of unexplained absence, the International Support and Compliance team will review whether Student/Tier 4 visa sponsorship will be continued. (See section 8 Reporting).

# Section 6 – Record Keeping

**Senior Manager responsible for this process:** Deputy Vice Chancellor Academic

**Operational Responsibility:** International Support and Compliance Manager, International Compliance Officer; Academic Quality and Student Administration; International Support and Compliance Officers

6.1 Elsewhere in this document reference is made to the sourcing and recording of key documentation that the University will hold for each Student/Tier 4 visa sponsored student. The table below summarises the data that will be held for each student and the processes and sections of this document that are relevant to sourcing it.

|  |  |  |
| --- | --- | --- |
| **Document** | **How sourced** | **Notes** |
| 1. Identity |  |  |
| Copy of the student's passport details page(s)  | At point of application prior to issue of the CAS with details reconfirmed by the applicant when requesting a CAS | Original passport must be presented at Compliance check stage. Students must be advised that if they renew their passport for any reason (expired or lost), they must present their new passport to be retained on file by the University |
| Copy of the current visa page (plus any expired UK visas where there was previous study in the UK) / Biometrics Residence Permit (front and back cover), Entry Clearance Vignette with entry stamp, grant of leave letter if applicable.Where students have entered via eGates and have not obtained an entry stamp on their vignette, a copy of the flight ticket and/or boarding pass.Where a student is European and applied through the digital app or has applied for leave to remain from the UK, a copy of the digital immigration status document obtained by a member of staff. | Original viewed and digital copy verified at Compliance Check stage which is uploaded and attached to the respective student record on SITS (or though compliance team activity in respect of pending applications and visa extensions). During the processing of enrolment a share code will be requested and a copy of the immigration status | Students must be advised to inform the University immediately of any correspondence received from UKVI that amends their current immigration status i.e. curtailment letters |
| The student's UK contact details including residential address, telephone number, mobile number and email address | Through pre-registration process and annual re-enrolment. International Support and Compliance staff contact students on a termly basis to ensure this is up to date via emails held in SITS | Students can update contact details at any time via their Evision accounts and are advised via Terms and Conditions that these must be kept up to date. Historical contact details are retained on SITS including the dates that any changes are made.Students are informed of the requirement to provide their contact details and keep the University informed of changes in the General Student Regulations Section 01 - International Students (5.1) This information is also in course handbooks (for all students) and referenced in the International Student Induction, student web pages and communications from the International Support and Compliance Team. |
| Application form including all academic qualifications and other supporting documents used to assess the student’s ability and intention to study at London Met | Obtained at point of application prior to issuing a CAS. | Original qualification documents can be presented at document check stage during the enrolment process. |
| Evidence of method used to assess student’s English language ability | Obtained at point of application prior to issuing a CAS and verified online where possible | Original qualification documents must be presented at enrolment if this is in person and if a hard copy was given tot eh student.  |
| Results from pre-sessional English course, certifying all four skills | Obtained from English language unit and/or from partners delivering pre-sessional courses to our students and uploaded to a student’s record on SITS | Important for progression particularly where a single CAS has been issued and the University must demonstrate that B2 has been met prior to progression on to the main course of study |
| Ongoing academic performance | Assignment and examination results | Held in SITS |
| Attendance records | Through data sets provided on a weekly basis comprising of virtual engagement and any on-campus activity where relevant | Including evidence to support any approved absences, including academic approval |
| Work placement agreements including attendance records during work placement | Employer/ Institution agreement and where applicable time sheets or confirmations verified by employer or supervisor in relation to each student on placement. | Employer or Institutional concerns received by faculties to be reviewed by International Support and Compliance team and appropriate actions initiated. Held in My Career database |
| ATAS Certificate | Electronic copy | Condition of offer |

6.2 Similarly the University will source and record key documentation for all non-British or Irish national enrolled students subject to immigration control – including those with indefinite leave to remain and refugee status. From January 2021 EEA nationals will be required to provide the relevant evidence to indicate whether they have the appropriate leave allowing study in the UK. Documents held should include all those listed in the table below:

|  |  |  |
| --- | --- | --- |
| **Document** | **How sourced** | **Notes** |
| 1. Identity |  |  |
| Copy of the student's passport details page(s) Where a current passport is not available, as not required to be held by the student, a copy of a government issued photo identification document will be acceptable until October 2021 if the student holds Settled or Pre-Settled status. | At point of application immigration status will be ascertained by Admissions with the aid of the applicant portal and the passport copy will be viewed and held on file.  | Passport copy will be accepted digitally but must be checked by the International Support and Compliance team or enrolling officers. Students must be advised that if they renew their passport for any reason (expired or lost), they must bring in their new passport to be copied and retained on file by the University |
| Copy of the current visa page or immigration status document Biometrics Residence Permit (front and back), if applicable.Digital Immigration Status Document for EU Pre-Settled and Settled students | During the processing of the application via the portal a copy will be taken and held on file.During the processing of enrolment a share code will be requested and a copy of the immigration status uploaded to the student record by a member of staff | Provided virtually during the ID verification or Compliance Check stage for checking by the International Support and Compliance team or enrolling officers.  |
| The student's UK contact details including residential address, telephone number, mobile number and email address | Through pre-enrolment process and annual re-enrolment. | Students can update contact details at any time via their Evision accounts and are advised via Terms and Conditions that these must be kept up to date. Requirement mandated in General Student Regulations Section 01 - International Students (5.1) Historical contact details are retained on SITS including the dates that any changes are made  |
| ATAS Certificate | Electronic copy  | Condition of offer |

# Section 7 – Visa Expiry and Tracking Requests to Extend Student Visas

**Senior Manager responsible for this process:** Deputy Vice Chancellor Academic

**Operational Responsibility:**  International Support and Compliance Manager

7.1 Where a student needs to extend a Student visa in order to complete their studies, the International Support and Compliance team will track the stages of the process and ensure that the student acts in a timely fashion to request an extension and keeps the University informed of the progress of their application, supplying copies of all relevant correspondence which will be retained on file.

7.2 The International Support and Compliance Team will monitor the expiry dates of all enrolled students on Student/Tier 4 visas, identifying those that have a visa that will expire within the next three months. Students will be contacted to advise them of the need to apply for an extension if the likely duration of their studies will go beyond their expiry date. This contact will go out at three months and one month prior to expiry if no CAS has been issued or evidence of an alternative application provided.

7.3 For all enrolled non-Student visa holders with alternate visa categories a reminder will be sent to warn them of the consequences of not submitting an ‘in-time’ application before their current visa expires. Failure to submit evidence of an application submitted prior to the expiry date of their visa will result in a temporary suspension until such evidence is provided. This contact will go out at 3 months, 1 month and 1 week prior to expiry.

7.4 Where a non-Student visa holder presents evidence of an in-time application to UK Visas and Immigration, they will be allowed to remain enrolled and regular checks will be made with the student to update on the outcome of their application. Where required, the International Support and Compliance team may request consent to contact UKVI via the Premium Account Service for further information or their continued right to study.

7.5 The procedures for issuing a CAS and the documentation required are covered in Section 3 above.

7.6 Where a CAS is issued for an extension the CAS status will be monitored monthly and when the status changes to ‘Used’ the student will be contacted to remind them that they must supply a copy of any correspondence received from UKVI within five working days of its receipt.

7.7 During the period while the student’s extension application is under consideration by UKVI they will be regularly monitored by the International Support and Compliance Team with monthly communications sent requesting updates; if this period extends beyond three months the student will be advised to attend a meeting with the International Student Adviser. In some cases where applications are pending contact may be initiated with the UKVI Premium Account Manager ensuring confirmation that the application is still under consideration.

# Section 8 – Reporting (UKVI)

**Senior Manager responsible for this process:** Deputy Vice Chancellor Academic

**Operational Responsibility:**  International Support and Compliance Manager, International Support and Compliance team

8.1 Where possible, London Metropolitan University will seek to offer guidance to those at risk of breaching the conditions of their visa. However, where a student is unable to continue with or commence their studies due to failing to meet the University’s academic regulations, a breach of their visa conditions, or the inability to provide acceptable evidence of valid immigration permission to continue studying, the University will withdraw them from their course and inform UKVI in line with current legislation.The student will be notified of the decision and any appeal rights they may have.

8.2 Monitoring of CASs in relation to applicants will principally be carried out by the International Support and Compliance team. All compliance related staff in this team will be Level 1 Users of the Sponsor Management System.

8.3 The International Support and Compliance team will be responsible for the following activities in relation to registered students, and will report on them where necessary to the Sponsor Compliance Management Group:

* Monitoring the status of enrolled Student visa students

Weekly: International Support and Compliance team retrieves all Student/Tier 4 visa holders on the student database and a check is then carried out to ensure each student is still enrolled, and not withdrawn or suspended without permission. If there are any changes to a student’s status that are not permitted under the Student visa route, the International Compliance Officer is informed and an investigation conducted, reporting to UKVI as necessary in accordance to Student Sponsor Guidance.

* Initial processing of CAS for continuing students

Reminders are sent three months and one month before their visa expires, the expiry date held in the student record system, informing eligible students that they must contact the International Support and Compliance team to request a CAS to extend their visa if applicable. Students that are extending their visa will be sent a CAS request form to complete and send back. Students who do not respond are reported to Sponsor Compliance for follow up and are withdrawn if suitable evidence of a new visa application is not submitted.

* Monitor attendance records for students and follow up those students who have engagement (Section 5).

Weekly, an engagement report of all Student/Tier 4 visa holders’ activity is identified by the enrolment status. The International Support and Compliance Team analyse each students’ engagement and take necessary action/intervention in the form of a warning email or invitation to an attendance interview if necessary. Students who reach 30 days of unauthorised absence without contact are reported to the International Support and Compliance Manager for withdrawal. Students with continually poor engagement are also referred to the International Support and Compliance Manager for review and possible withdrawal.

* Identify those students whose visas are due to expire in the near future (Section 7).

Students are identified on a weekly basis from the information held in the student database. Students are reminded three months and one month before the expiry date. Students will be withdrawn if suitable evidence of a new, in-time visa application is not submitted.

* Track enrolled students with pending immigration applications (Sections 4 and 7).

When a student has provided acceptable evidence of in-time application, the International Support and Compliance team sets a new record within the SITS database, which is labelled “pending application” (either for Student /Tier 4 or non-Student/Tier 4 visa holders). The expiry date is used as a chase date for a pending application. The International Support and Compliance team will retrieve all the pending application students monthly and request updates on the application status. The chase date is then updated to the next month if required. Once the visa is granted the record is updated and no longer chased. If the application is refused, the International Compliance Officer is informed. If the application is outstanding for over four months, the International Support and Compliance team will chase via the UKVI Premium Account Manager.

* Issue any necessary reminders to ensure that returning students re-enrol within the time periods specified by the University (Section 4).

Before re-enrolment takes place, the International Support and Compliance team ensure that any record where a student has not presented up to date documentation is set to P4 (pending enrolment – visa compliance) so they are not able to re-enrol before doing so.

* Monitor any changes to a student’s period of study, in terms of course title, course duration and authorised absences etc. and report changes to Sponsorship Compliance.

Monthly reports are run to flag up changes in student module registration, School Office staff are also trained to inform International Support and Compliance of any changes to international students’ period of study.

Authorised absences are generally entered by academic staff and then identified weekly when the International Support and Compliance team undertakes the weekly attendance monitoring task. International Support and Compliance ensures that appropriate documentary evidence is uploaded to the student’s record to support the period of absence.

* Monitor changes / updates to work placements and report changes to the International Compliance Officer.

Weekly, the International Support and Compliance team performs a check on all Student/Tier 4 visa holder’s registered on a work placement module. This includes checking that the student has submitted a weekly timesheet or supervisor/employer confirmation of attendance and chase where necessary. The team also liaises with the placement supervisor in order to report changes to a student’s placement to the International Compliance Officer for subsequent reporting to UKVI.

* Report all interruptions / intermissions / withdrawals / terminations to the International Compliance Officer immediately.

ALL interruptions / intermissions / withdrawals are processed by the School Offices and Student Records Team. When they receive a request for an International student this must be approved by the International Support and Compliance team. The student withdrawal process on Evision sends automatic email to International Support and Compliance informing them of any international student’s withdrawal request.

* Report all those who are not able to continue academically (for example who have received a Fail/discontinue decision) once the results have been released to students

International Support and Compliance will review and report all student/Tier 4 visa holders who receive an academic decision that does not allow them to continue on the programme. This review will take place within 15 working days of the results being released to students and the reporting of withdrawal of sponsorship within the timelines laid down by UKVI. This will allow time for a student to submit an appeal to casework according to student regulations.

* Contact students by email at the start of each term to confirm that students contact details are current. Run reports to check that term-time addresses are in the UK and appear to be residential addresses.
* Immediately upon being notified, report to International Compliance Officer as required, any changes to a student’s immigration status.
* Upon being made aware of an error on a Student visa (vignette or BRP) the International Compliance Officer will report the error to UKVI via the Sponsor Management System and the student receives advice and support on how to rectify the error according to UKVI processes.

8.4 Reporting duties in line with UKVI Student Sponsor Guidance will be actioned by International Compliance Officer who is responsible for the following activities in relation to Reporting and will report on them where necessary to the Sponsor Compliance Management Group:

* Monitor non-enrolments and report to UKVI as required.
* Monitor deferrals of study prior to enrolment and report to UKVI as required.
* Monitor visa refusals and any subsequent Administrative Reviews / appeals submitted to UKVI. All refusals must be reported where they lead to the non-enrolment or interruption of a student.
* Report all interruptions / intermissions / withdrawals / terminations to UKVI within the timeframes required.
* Report to UKVI, as required, any changes to a student’s immigration status i.e. if the student has applied for, and obtained, immigration permission in a different category and evidence of this has been provided.
* Report errors on Student visas to UKVI via SMS
* Perform audits of documentation held on students following the enrolment period and ensure that any missing items are sourced and originals checked.

8.5 Copies of key communications sent as emails in connection with the above activities will be placed on the student’s record for future reference and retrieval. Notes of phone calls to students will also be added to the student’s records held on the relevant student database.

8.6The University may withdraw Student sponsorship as a result of:

* Failure to enrol/re-enrol during the identified period(s) without requesting a deferral of start date (new student) or an interruption of study (returning student).
* Failure to comply with requests to supply any required documentation (e.g. the progress of visa extension requests) within a reasonable period, such as work placement details
* Failure to request an extension to a visa prior to the expiry of the previous one.
* Failure to rectify issues that have led to a suspension from the University within at most three weeks of being suspended with shorter period applying if the nature of the course will prevent a student re-joining their cohort.
* Failure to comply with the engagement requirements for sponsored students through missing 30 days without authorisation or contact.
* A review of academic performance at the end of a year of study which determines that academic progress is unsatisfactory leading to a decision of Fail Discontinue being confirmed by the University Awards Board.
* Failure to abide by Academic Regulations
* In rare cases, a withdrawal may be actioned if the University has significant concerns that the student has breached their visa conditions.

# Appendix A

## Students visa holders on Work Based Learning Modules.

## Categorisation of Placements

The University is committed to providing all undergraduate students (and on certain postgraduate programmes) with the accredited Work Based Learning they need to help them become successful employees and/or employers in the future.

To ensure Student/ Tier 4 (General) visa holders are also able to enjoy this learning and remain compliant with the Home Office regulations on work placements, the following will apply. Work placements as defined by UK Visas and Immigration are those placements which are an integral and assessed part of the course.

1. **Compulsory placements** – All courses which include a compulsory placement module will be covered under this policy and defined as a UKVI reportable placement. A placement is compulsory if it is required to allow practice in the profession e.g. Social Work (UG and PG), PGCEs/Teaching, Dietetics, Sports Therapy, Early Childhood Studies and MSc Computer Networking and Cyber Security (with placement)
* Whether the placement takes place with an external company/institution or within London Met, they will be monitored for engagement and the International Support and Compliance Team will require evidence of engagement as described in section 5.3 of this policy.
* Where the course placement is more than 50% of the total course length due to statutory requirement, this will be defined in the course specifications and will be included in the CAS when this is assigned to the student at admissions stage.
1. **Sandwich year placement modules** – Where there is an option to undertake a sandwich year Work Placement, these will be monitored as an external work placement (point 1), including the provision of timesheets and detailed placement information prior to the start of the placement.
* Students wishing to undertake a sandwich year work placement should be initially referred to the International Advice Service to provide the relevant advice to the student regarding the impact the addition of the work placement year may have on the student’s immigration status and visa.
* Students on approved placements will be expected to maintain contact with the University once every four weeks. This should be updated by the course or module leader on Evision and the details provided to the placement team for uploading to My Career. These placements will be reported to UKVI as in point 1 and section 5.3 of this policy.
1. **Optional or Core Work Based Learning modules -**
* In any case where a student chooses to undertake an optional Work Based Learning module during their course, the placement cannot be more than 20 hours per week. This ensures that students are able to dedicate time to all other modules they are completing in the same semester.
* Students choosing this option will be expected to use their work allowance as indicated in the [Student Sponsor Guidance: Doc 2 Sponsor Duties](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/939471/Student_Sponsor_Guidance_-_Doc_2_-_Sponsorship_Duties_2020-12.pdf) and [Appendix Student of the Immigration Rules para ST26.1 -26.8](https://www.gov.uk/guidance/immigration-rules/appendix-student). Therefore, these placements will not be reportable to UKVI.
* Student who will be undertaking a placement during semester time and not taking any other academic module will continue to be considered as being in term time (when the module is registered) and therefore the work allowance will be a maximum of 20 hours per week.
* Guidance will be given to students to ensure they have the information required to remain compliant under the obligations of their Student visa through University induction information, dedicated information in the course and module guidelines as well as information provided in a dedicated handbook for Student visa holders and through advisory communication at the start of every term for newly registered students.

# Appendix B

## Engagement Policy ECA International Pathway Courses

### 1. Introduction

1.1 In partnership with ECA International College, London Metropolitan University is offering international students on Student visas foundation (IFP) and pre-master’s (PMP) integrated programmes for the academic year 2022/23 Autumn Term. Sponsorship for Student visas under these courses will end on 1 October 2022. These students are taught by ECA International College on London Met’s main campus on Holloway Road and sponsored for a Student visa on London Met’s Student Sponsor Licence. This policy establishes methods of monitoring engagement for students on Student visas, determines escalation points and contacts as well as ultimate outcomes.

1.2 This engagement policy has been developed in accordance with [UK Visas and Immigration Guidance for Sponsors (September 2021)](https://www.gov.uk/government/publications/student-sponsor-guidance), and the University [Student Regulations](https://student.londonmet.ac.uk/your-studies/student-administration/rules-and-regulations/) and Engagement Policy.

1.3 This policy will be in force for the 2022/23 academic year Autumn Term and reviewed regularly. It is subject to change following guidance from the UK government or the wider University policies and Student Regulations.

1.4 Due to the intensive study nature of the PMP and IFP courses, this policy outlines differences from the University Student Regulations and the Student Visa Policies and Procedures Section 5, with regards to Authorised Absence, monitoring timelines and appeals.

### 2. Engagement Methods

2.1 For the 2022/23 Autumn Term intakes of the Pre-master’s programme (PMP) and the International Foundation Programme (IFP), students will be offered a week of online induction and orientation activities followed by on campus teaching.

2.2 Students who hold a Student visa will be expected to attend all on campus activity unless there is good reason for them not to do so, such as illness.

2.3 Attendance registers will be taken manually on a daily basis by the academic team and shared in a live document with the International Support and Compliance Team for engagement monitoring purposes.

### 3. Engagement monitoring for Student visa holders

3.1 All students on a Student visa must be engaging with their studies as determined by their timetable and should aim for 100% attendance. There will be a minimum of 6 contact points per week.

3.2 Engagement activities that will be monitored include but are not limited to: induction activities, tutorial sessions, classroom teaching, online sessions, draft submissions, mock tests, final assessments and submissions. Students are expected to attend all teaching and tutorial sessions unless authorised absence has been agreed.

3.3 Attendance and engagement will be monitored on a weekly basis by the International Support and Compliance Team.

3.4 Where a student’s engagement is identified as being of concern (i.e. missing a key engagement activity as specified in 3.2), the International Support and Compliance team will reach out to students at the following points:

3.4.1 If a student has missed one week of on campus teaching or key engagement activity without authorised absence, we will remind students of their responsibilities and expect a response.

3.4.2 If a student has not engaged with or missed two consecutive weeks without authorised absence, we will provide a formal warning.

3.4.3 If a student has not engaged for three weeks without authorised absence, or has missed key engagement activities or formal assessment or submission we will provide a final warning and a review will be made by the Campus Director ECA IC and London Met Online in consultation with the London Met International Student Support and Compliance Officer and Manager to establish whether a student will continue on course.

3.4.4 If, following review, it is found that a student has not been engaging as expected and it is determined that they are unlikely to progress to the main degree, the student may be withdrawn from the programme and by consequence, have their student visa sponsorship withdrawn. This is one week earlier than for direct entry Student visa holders due to the nature of delivery of the pathway programme.

3.4.5 Students may also be contacted if a regular pattern of absence is noted which does not fall within the above policy but raises concern regarding engagement and genuineness as a student.

3.5 Students should aim to attend all morning and afternoon sessions throughout the course. The following arrangements will apply to class arrival times and attendance capturing for both morning (AM) and afternoon sessions (PM). Times are provided in the timetable at the start of the course:

1. The classes start promptly on time, we strongly advise students arrive 5-10 mins before each session;
2. Being in class while the register is being taken (usually within the first 5 mins of the session), means students will be marked ‘Present’;
3. Arriving after the register has been taken and within 15 minutes after the session starts, students will be marked ‘Late’; this applies to both AM and PM sessions;
4. Arriving after 15 minutes of the session start time, students will not be allowed to enter the classroom and will be asked to wait for the next short break to re-join; attendance for the session will be marked as ‘Incomplete’;
5. International Compliance Team will be working closely with the lecturers to monitor formal attendance and engagement on the course;
6. Any online activity, such as induction week, will also be monitored in the same way as on campus activity, detailed in 3.4 above.

3.6 If a Student visa holder is unable to attend classes, is unwell or needs to self-isolate, they should follow London Met University processes and reach out to their Course Leader or School Office on pmp@eca.edu.au if on the PMP, or ifp@eca.edu.au if following the IFP as well as eca-isupport@londonmet.ac.uk to inform the University they are unable to attend or engage in lessons.

3.7 The standard London Met Authorised Absence policy in general will not apply as three weeks’ absence will be detrimental to a students’ progress on both the IFP and PMP. All requests for Authorised Absence will be considered by the academic team on a case by case basis and if agreed, recorded on the shared engagement document.

3.8 For students presenting with reasons for absence under a protected category such as a recognised disability or pregnancy, the University will endeavour to provide reasonable adjustments as necessary and where possible within the delivery structure. Where a student cannot continue to engage effectively with reasonable adjustments made, the University may recommend a break in studies and may be referred under the Fitness to Study regulations. Any break in studies will be subject to the University General Student Regulations and the Student Visa Policies and Procedures document.

3.8 All absences for health reasons over five working days will require students to present a certificate from a verifiable and independent medical body such as their NHS GP.

3.9 Students should follow the University’s guidelines regarding staying safe and Covid-19, including any testing to access campus required. If a student tests positive and is unable to attend classes, they must provide evidence of the positive test in the form of either the email or text message received by the NHS service when the test is reported. Any quarantine period should follow the government guidelines for England and the University.

3.10 Where a student is informed that they have not progressed academically and will be withdrawn from their course, they will be able to follow the London Met appeals process. Where a student will be withdrawn due to poor engagement, this appeal process will not be permitted as students will have been contacted and notified of the withdrawal with time for them to re-engage and communicate with the team.

3.11 A withdrawal for engagement reasons is final.