

Student Sponsor Compliance

Associated Business Procedures and Processes

Version 1 for Academic Year 2025/26
Aug 2025
Natalia Mulley
Director of International Support and Compliance

Contents

Contents	1
Section 1 – Organisational Oversight and Review	4
Student Sponsor Licence Administration	5
Basic Compliance Assessment – BCA	5
CAS Allocation Request	6
Student Sponsor Licence renewal	6
Changes to Key personnel and any change of circumstance reporting	6
Section 2 – Recruitment and Admissions Practices	7
Introduction	7
International Student Recruitment	7
International Admissions standards	8
International Recruitment Strategy and UKVI compliance	8
Policy on Representatives	9
Appointing new representatives	9
Contracts of representatives	9
Training and Development of Agents	10
Review of the performance of recruitment representatives	10
International Admissions – Application Processing	11
Dealing with applications from representatives with which the University does not work ..	12
Relationships with potential and actual feeder institutions	12
Section 3 – Assessing English Language ability	13
Section 4 – Issuing a Confirmation of Acceptance for Studies (CAS)	14
Issuing a CAS – New Applicants	14
Issuing a CAS – Students applying to extend a course of study	15
General	16
Section 5 – Enrolment and Re-Enrolment	17
Section 6 – Monitoring of Attendance and Engagement	20
General	20
Engagement Methods	20
Monitoring	21
Monitoring of Students on work placements	23
Absences	24
Section 7 – Record Keeping	25
Section 8 – Visa Expiry and Tracking Requests to Extend Student Visas	29

Section 9 – Reporting (UKVI).....	30
Appendix A	34
Students visa holders on Work Based Learning Modules	34
Categorisation of Placements	34

Section 1 – Organisational Oversight and Review

1.1 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 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.

1.2 The University will monitor its continued compliance through attendance at the University Engagement Review Panel (ERP), which meets weekly. Membership of this panel includes:

- Deputy Vice Chancellor & Provost
- Deputy Vice Chancellor Student Recruitment & Business Development
- Chief Operating Officer
- Assoc. Pro-vice chancellor Student Success Director of International Support and Compliance (Interim) (Key Contact/ Level 1 User)
- Director of Planning and Insight
- Academic Registrar
- Head of Student Continuation and Completion
- Head of Student Services
- Director of Admissions and Enrolment
-
- Head of Student Experience (representative)
- Head of Student Zone
- Income Collection Manager
- Deputy Income Collection Manager

1.3 The Engagement Review Panel is tasked with monitoring all student engagement at the university, international, domestic and through partnership, from enrolment to completion. ERP agrees and follows up on any action where any element of student engagement is highlighted as of concern, including reviewing recruitment activity and financial risk, as well as on campus and virtual engagement. This includes weekly reporting of the Basic Compliance Assessment data.

1.4 The Director of International Support and Compliance and International Compliance Officer are tasked with the responsibility of ensuring that all processes and procedures 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 Engagement Review Panel following discussions between the Director of International Support and Compliance and the senior manager responsible for that particular section.

1.5 The Director of International Support and Compliance will be responsible for:

- Providing weekly updates to the ERP in relation to the University's Basic Compliance Assessment (refusal rates, enrolment rates and course completion rates.) Individual student

refusals are reported on an ongoing basis to the Deputy Vice Chancellor & Provost and Deputy Vice Chancellor Student Recruitment & Business Development as they are reported.

- Receiving reports as required on activities undertaken to ensure that all required documentation is stored in a retrievable form on the student records system, to be escalated at ERP as necessary;
- Receiving notification of any modules where attendance records are not being maintained and centrally recorded, to be escalated at ERP as necessary;
 - 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, to be escalated at ERP as necessary;
 - 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, to be escalated to senior leadership as necessary;
 - Receiving any legislative or guidance changes issued by UKVI, from Sponsor Compliance, identifying any consequent changes to policies and procedures that may be required, escalating as appropriate;
 - Ensuring that timely requests are made to request the CAS allocation and the Basic Compliance Assessment (annually);
 - Ensuring that the University notifies UKVI of any changes to key personnel by approved 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.

1.6 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.

Student Sponsor Licence Administration

1.8 The Student Sponsor Licence (Number D7G4NYBW3) requires that the named key personnel complete a set of tasks/ submission requests to maintain its validity:

- Basic Compliance Assessment – Annual
- CAS Allocation Request – Annual
- Updates of key personnel and changes to University circumstances – as necessary

1.9 All submission requests and changes to circumstances will be carried out in line with UKVI [Student Sponsor Guidance Documents 1-3](#)

Basic Compliance Assessment – BCA

1.10 Annual submission, made within a specified timeframe, directly calculated from the previous year's submission. For 2025, the BCA request window is 24 August to 24 September.

1.11 The BCA will be requested before the deadline using UKVI Sponsor Management System (SMS).

1.12 Responsibility for completing the request falls to the Director of International Support and Compliance. Failing this, the International Compliance Officer will complete the request prior to the deadline.

1.13 In the two months prior to the BCA submission window the Head of International Support and Compliance will report current and projected BCA figures for the submission period to the Authorising Officer and Senior Leadership stakeholders. These figures include:

- Refusal Rate – to be no more than 10%
- Enrolment rate – to be no less than 90%
- Completion rate – to be no less than 85%

1.14 A BCA submission date will be agreed with the Authorising Officer and Senior Leadership. Submission evidence will be held on file and shared with relevant stakeholders.

1.15 BCA outcome letters are sent to the Authorising Officer with details of the metrics calculated by UKVI using their internal records.

CAS Allocation Request

1.16 Annual submission, made using UKVI SMS. The 2025/26 academic year deadline for CAS Allocation renewal request is 26 March 2026.

1.17 CAS allocation requests will not normally exceed 50% of the previous year's CAS allocation. Requests over this amount are deemed exceptional and may be subject to additional scrutiny by UKVI before a decision is made.

1.18 The CAS allocation request will be determined and approved by Senior Leadership, including the Authorising Officer.

1.19 The CAS allocation renewal request can be made in two steps:

- i. UKVI SMS request – 2000 character limit and is obligatory for the request to proceed
- ii. An additional justification document, following a template provided by UKVI, giving supporting information related to recruitment projections and meeting compliance obligations.

1.20 All documentation and evidence of submission will be kept on file.

1.21 Outcome letters are sent to the Authorising Officer confirming the number of CAS granted and any reasons if this is different to the original request.

Changes to Key personnel and any change of circumstance reporting

1.26 In the event of changes to key personnel (Authorising Officer, Key Contact, Level 1 and 2 users), these will be notified to UKVI using the SMS system. The University must always have an active Authorising Officer, Key Contact and Level 1 user in line with UKVI Sponsor Guidance.

1.27 Changes to circumstances for the institution must be reported using SMS as soon as possible. Reporting includes:

- Changes to key personnel
- Change of address and/or name
- Add or remove a site, teaching partnership or exceptional arrangement as defined by UKVI
- Change of ownership
- Criminal prosecutions
- Change in status of governing body registrations, including changes to Educational Oversight
- Sale of all or part of the business, merger or takeover
- Insolvency
- Appointment or removal of a representative
- Surrender of the Student Sponsor Licence
- Civil penalties

1.28 Any changes in these circumstances should be reported to the Director of International Support and Compliance, who, as Key Contact, will carry out the report and liaise with relevant stakeholders to ensure any documentation or evidence is provided before any given deadlines.

Section 2 – Recruitment and Admissions Practices

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

Operational Responsibility: Director of International Development & Associate Director of Admissions

Introduction

2.1 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.

2.2 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.

2.3 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.

International Student Recruitment

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

2.5 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.

2.6 The University has regular contact with government and the UK HE sector organisations to ensure it is aware of any potential immigration risks.

2.7 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.

2.8 The University works with a range of international partners, including; recruitment representatives and academic partners. In addition, we have one representative in Canada, one in India and one in Nigeria, 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.

2.9 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.

2.10 International visits are coordinated by the International Recruitment team, and many are undertaken by specialist staff within the International Recruitment team, plus a selection of experienced academic staff and staff from the Senior Leadership team. 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

2.11 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

2.12 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.

Audit compliance interviews and provide support with complex compliance based recruitment and admissions decisions. 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.

Policy on Representatives

- 2.13 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

2.14 Requests to appoint new representatives are made only by the 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, second by the Deputy Vice Chancellor. Both signatures are required before contracts are issued for signature.

2.15 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.

Contracts of representatives

- 2.16 All representatives who work with the University are contracted via a valid mutually signed contract.
- 2.17 Any promotional material relating to the University produced by the representative must be approved by the University in advance of its use.

- 2.18 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.
- 2.19 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

- 2.20 All agents appointed by the University are required to evidence that they have completed the British Council training and 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.
- 2.21 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
- 2.22 University materials including admissions requirements and relevant updates are provided at the point of contractual engagement and periodically thereafter
- 2.23 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

- 2.24 The International Recruitment Team under the Head of International Development convenes an annual review of all recruitment representatives.
- 2.25 The University will usually terminate contracts of any recruitment representatives for whom no students have enrolled in the previous two years.
- 2.26 The annual review process will consider the total applications and enrolments by representative. Apparent anomalies between application and enrolment numbers will be investigated.
- 2.27 The University will review the number of visa refusals for each representative in this annual review
- 2.28 Contracts with those agents with an unsatisfactory refusal rate, or about whom compliance concerns have been raised, will be discontinued
- 2.29 There will be at least one meeting every year between the Head of International Development or relevant Regional Manager and the representative; if this is not possible in person, it will be by phone or video conference.
- 2.30 Representatives will receive regular training on the University's courses, admissions requirements, and procedures in place to ensure compliance with UK immigration regulations.

International Admissions – Application Processing

2.31 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.

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

2.33 The University may request the information from an applicant in order to make an informed admissions decision.

2.34 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, ENIC, the Admissions Database and guidance from faculties on the specific requirements for various courses.

2.35 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.

2.36 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.

2.37 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.

2.40 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.

2.41 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.

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

2.42 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'.

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

Relationships with potential and actual feeder institutions

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

2.45 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.

2.46 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.

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

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

2.49 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 3 – Assessing English Language ability

Senior Manager responsible for this process: Interim Deputy Vice Chancellor & Provost and Deputy Vice Chancellor Student Recruitment & Business Development

Operational Responsibility: Director of International Support and Compliance and Director of Student Recruitment

Associated Regulation: General Student Regulations 2025/26
Section 1 – International Students; 2. Admission Requirements

3.1 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.

3.2 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.

3.3 With the support of the DVC Student Recruitment and Business Development, the Director of Student Recruitment, in collaboration with the Director of International Support and Compliance, will identify cases for consideration where a combination of agreed qualifications and, where needed, a satisfactory interview may be accepted as evidence of English language competency. This process will also recognise qualifications gained through the University's globally delivered TNE programmes.

3.4 All such cases will be determined and approved by the University's Academic Board. Qualified staff will assess and confirm the alignment of relevant qualifications with CEFR (Common European Framework of Reference) Level B2 in reading and writing. Where appropriate, trusted and qualified third-party providers such as ECCTIS may be commissioned to evaluate qualifications and provide expert advice on equivalency. Where an interview is required, it must robustly assess the applicant's speaking and listening skills, and a written record must be retained on file. This process will be kept under regular review to ensure consistency, quality assurance, and compliance with institutional and regulatory standards.

3.5 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.

3.6 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 4 – Issuing a Confirmation of Acceptance for Studies (CAS)

Senior Manager responsible for this process: Deputy Vice Chancellor & Provost

Operational Responsibility: Director of International Support and Compliance

Issuing a CAS – New Applicants

Associated Regulation: General Student Regulations 2025-26

Section 1 – International Students; 2. Admission Requirements and 3. Issue of Confirmation of Acceptance for Studies

4.1 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.

4.2 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.

4.3 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 if relevant (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.

4.4 All CASs will include a clear course start date, a latest date of acceptance onto the course, and a course end date.

4.7 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 senior 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).

4.8 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.

4.9 See Section 8 (Visa Expiry and Tracking Requests to Extend Visas) for information on application tracking.

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

4.10 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, engagement and progression;
- Where the student has demonstrated their ability to meet the financial requirements of the Student visa route, including and tuition fees due and living funds required.

4.11 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 4.10. Any other supporting documentation not already held will be scanned and uploaded to the student record system

4.12 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.

4.13 Students will only be issued a CAS to extend their visas if there is an attendance or engagement requirement to complete their course, including assessment periods. Students who are retaking a module with attendance requirements will be issued a new CAS with a course end date to reflect the end of the assessment period for the relevant period as published. This will ensure all students have a course date on the CAS that covers all of the assessment dates possible.

4.14 Students who are registered as Assessment Only or have a resubmission or resit without attendance or engagement requirements will not be issued a CAS to extend their visa.

4.15 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, if applicable
- 6) Biometric enrolment attendance confirmation, if applicable

4.16 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, 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 AMP database.

4.17 The process described in 4.16 is also followed when checking visa expiry and new “in-time” applications made for students on non-Student visa routes.

General

4.18 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, including assessment and support of any relevant Administrative Review application.

4.19 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 5 – 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 Team and management

Associated Regulation: General Student Regulations 2025-26
Section 1 – International Students; 4. Enrolment

5.1 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 overseen by the Director of Admissions and Enrolment.

5.2 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 online.

5.3 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.

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

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

5.6 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 Enrolment and Graduation.

5.7 When a Student visa sponsored student attends Student Visa Holder Document Check the officer will check that all required documentation is held in electronic form and a student will only have their visa compliance check passed 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).
- Stamped 90 day Entry Clearance Vignette (where applicable)
- Copy generated by a trained London Met staff member of a student's evisa obtained via the UKVI online platform

- 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 2). These can be digital copies as verified by the Admissions Officer assessing the initial application.
- Copy of student's ATAS Certificate where applicable.

5.8 A student sponsored under the Student visa route 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.

5.9

5.10 In exceptional circumstances, and at the discretion of the Director of International Support and Compliance, a student may be able to enrol for 'supplementary study' as defined in the Student Sponsor Guidance Doc 2- Sponsorship Duties (4.58 – 4.60) 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.

5.11 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 if applicable, immigration status document, evisa), and verified copies are held on SITS. In the instance of any doubt the enrolling officer must refer to the International Support and Compliance management team. In the case of any pending non-Student immigration application; enrolment must be authorised by the International Support and Compliance management team.

5.12 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.

5.13 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.

5.14 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 date of entry to the UK. The arrival dates must allow for the full course of study to be completed within the permitted six month period.

5.15 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 Director of International Support and Compliance, 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.

5.16 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.

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

Section 6 – Monitoring of Attendance and Engagement

Senior Manager responsible for this process: Interim Deputy Vice Chancellor & Provost

Operational Responsibility: Director of International Support and Compliance

Associated Regulation: General Student Regulations 2025-26
Section 1 – International Students; 5. After enrolment

General

6.1 The monitoring procedures detailed in this document have been developed in accordance with [UK Visas and Immigration Guidance for Sponsors \(May 2025\)](#), and the University [Student Regulations](#) and Engagement Policy.

6.2 These procedures will be reviewed regularly and are subject to change following guidance from the UK government or the wider University.

6.3 All teaching is expected to be on campus for all international visa students following the below procedures. Student visa holders 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.

6.4 Following UKVI confirmation of a Remote Learning policy, London Met is reviewing changes to the academic structure to enhance the student experience. Changes to the academic architecture that will impact on the UKVI Remote Learning policy and the university's obligations on reporting, will be reviewed by the Deputy Vice-chancellor and Provost and senior International Support and Compliance team members.

6.5 Agreement of course reporting and changes which impact the university's obligation will be approved via the Engagement Review Panel and Authorising Officer.

Engagement Methods

6.4 All engagement activity will be monitored via access to registration data taken on a weekly basis.

6.5 Data from Weblearn for Tier 4/Student visa holders will be provided to the International Support team for review on a weekly basis as part of reporting from the Power BI suite of engagement reports.

6.6 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.

Attendance Monitoring

6.7 Any student on a Tier 4 or Student visa in the UK must attend on campus teaching activity.

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

6.9 Students will be considered engaging where there is evidence of weekly activity. Engagement activities include, but are not limited to,

- Attending required lectures, seminars or tutorials
- Undertaking required laboratory work
- Undertaking research or fieldwork
- Submitting essays, assignments and attending examinations, on campus or remotely

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

6.10.1 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.

6.10.2 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

6.10.3 Once a student reaches four weeks of unauthorised absence or contact, they will be contacted by the International Support and Compliance team indicating the termination process will begin, including withdrawal of Student visa sponsorship.

6.11 Students completing the dissertation element of a taught post-graduate degree do not attend on campus lectures or activities in the same timetabled way as during taught lessons. However, they will be expected to remain engaged with their studies on a regular basis, and there should be engagement activity noted at least once every four weeks, including, but not limited to, meeting with a supervisor, visiting the library or other related activity. This will be monitored with gate access to the University and using the attendance systems in place at the University.

6.12 Students completing dissertations will be contacted by the International Support and Compliance team using the following schedule:

6.12.1 Students who do not demonstrate any engagement in four weeks, will be contacted by the University to remind them of their responsibilities.

6.12.1 At eight weeks of non-engagement, students will receive a first formal warning.

6.12.2 Once the student has reached 12 weeks of non-engagement, they will receive a second warning indicating the termination process will begin, including withdrawal of Student visa sponsorship.

6.13 Students completing an intensive programme of study, such as the Pre-Masters Programme, will be monitored in the same way described in this section, however, the outreach may take place earlier; first warning at one week of unauthorised absence and a second at two weeks, followed by review for termination. This is due to the intensive nature of teaching on the shorter programme and students are required to attend more regularly

6.14 Students studying below RQF Level 5, for example on the International Foundation Programme, will be monitored weekly, as per the procedures in this document. However, there will be strict percentages followed for non-attendance and outreach, as below. These are in line with the

attendance monitoring requirements for Student visa holders as per [UK Visas and Immigration Guidance for Sponsors \(July 2023\), specifically Doc 2 \(7.21 and 7.22\)](#).

6.14.1 Students will be contacted with a formal warning at four weeks if their attendance falls below 85% for any given month. Students will be expected to provide evidence to explain their absences. Students and staff will be expected to provide information as to what steps are taken to improve their attendance. This will be kept on the student's attendance record and monitored the following month.

6.14.2 Students who reach three consecutive months of attendance below 85% but above 70% will be contacted for an interview with a member of staff. Students will be expected to provide evidence as to why their attendance has not improved and will be placed on notice. In cases where attendance does not improve, termination may be recommended.

6.14.3 Students who reach three consecutive months of attendance below 70% will be terminated and their visa sponsorship withdrawn. This decision is final and will not allow appeal.

6.14.4 Termination may also be as a result of any of the circumstances listed in sections 4.7 and 4.8 of the Academic Regulations.

6.14 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 using the attendance systems in place at the University.

6.14.1 Students following doctoral or post-graduate by research degrees (RQF 8) will be contacted at two months (eight weeks) of missed engagement or contact points and reminded of their responsibilities.

6.14.2 At 12 weeks without engagement, they will be contacted with a formal warning and reminded of their responsibilities

6.12.3 At 16 weeks of non-engagement, students will receive a final warning and the termination process will begin.

6.15 Students following doctoral or post-graduate by research degrees may, on occasion, request a period of overseas research. This period must be approved by the supervisor and notified to the International Support and Compliance team who will provide any required advice to the student. The student should continue to engage with their supervisor for the period of overseas research and will be subject to the same procedures as in this document.

6.16 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. This reporting will take place via a form submitted online.

6.17 Where there is an instance of missing data for engagement monitoring, including, but not limited to, on campus registers or events, the International Support and Compliance team will reach out to relevant colleagues in Schools or professional services as required to request the necessary information to complete the above procedures, escalating as necessary through the management line until the situation is resolved and data obtained.

6.18 The University will reach out to all students who are considered to be at risk of non-engagement with an offer of support and contact with relevant departments. This outreach is in addition to the above detailed process and interaction with colleagues without returning to study or a plan to return to study will not stop a withdrawal of sponsorship if the specified deadlines are hit.

6.19 Termination may also be as a result of any of the circumstances listed in sections 4.7 and 4.8 of the Academic Regulations.

Monitoring of Students on work placements

6.20 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](#).

6.21 Work placements for Student visa holders 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.

6.22 No placement can be more than 50% of the total length of the course (in time) unless there is a statutory requirement. This will be detailed on the CAS.

6.23 For Student/Tier 4 visa holders completing a core work placement module, the International Support and Compliance Team, using module registration data, will work with relevant module leaders to ensure student placement data is captured on a Weblearn form. This data will be downloaded by the International Support and Compliance Team member for review and reporting to UKVI..

6.25 The International Support and Compliance Team will maintain the attendance record for that module on a separate document based on engagement confirmations received directly by the employer using an online form sent by the International Support and Compliance Team.

6.26 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

- written monthly confirmation from the employer for all external placements taking place remotely and where the manager or supervisor is unable to provide a timesheet
- written monthly confirmation from the supervisor for students completing client briefs

6.27 Where a report is received that indicates that a student has been absent from their placement for a period of up to one month, the International Support and Compliance team will contact the student to seek explanation and to instigate the authorised absence procedures where appropriate, seeking evidence if necessary. Absences longer than one month will be treated within the standard monitoring procedures above and may result in termination of enrolment and subsequent withdrawal of visa sponsorship.

6.28 Students undertaking a work placement module tend to do so alongside other modules, also monitored as per the above methods.

Absences

6.28 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 or Module Leader as well as visa.compliance@londonmet.ac.uk to notify the University they are unable to attend or engage in lessons.

6.29 The standard Authorised Absence policy will apply permitting absence of a maximum of two 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

6.30 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 9 Reporting).

Appeals

6.31 Students who are informed of a termination of enrolment have the right of appeal according to the University [Appeals Policy](#).

6.32 Students will have a 10-day period to make an appeal according to University processes.

6.33 When 10 calendar days from the suspension have passed, the International Support and Compliance Team will contact Casework to establish if any students have submitted an in-time appeal.

6.34 For students with appeals made in time, the International Support and Compliance Team will work with Casework colleagues to establish relevant information within a clear timeline. This will be to enable issuing appropriate advice to students and completing relevant UKVI reporting, for example, if timeframes will not permit a student to return to studies and they will be required to start a module again or extend their visas, students will be advised of the next steps according to the relevant UKVI Student Sponsor guidance.

6.35 For students who have not submitted an appeal in time, they will be contacted by the International Support and Compliance Team to inform them their visa sponsorship will be withdrawn, giving the relevant reasons. The sponsorship withdrawal will take place within 10 working days of notification the appeal window was missed, as per UKVI Sponsor Guidance on reporting.

Section 7 – Record Keeping

Senior Manager responsible for this process: Deputy Vice Chancellor & Provost

Operational Responsibility: Director of International Support and Compliance, International Compliance Officer; Academic Quality and Student Administration; International Support and Compliance Officers

Associated Regulation: General Student Regulations 2025-26

Section 1 – International Students; 4. Enrolment and 5. After enrolment

7.1 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 document 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 i 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 enrolment process a share code will be requested and a copy of the immigration status kept on file	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 full 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 Evison 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.	. Qualifications are verified at the admissions stage.
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	Approved English language ability evidence is verified at admissions stage.
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 Weblearn.
ATAS Certificate	Electronic copy	Condition of offer

7.2 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	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

7.3 Retention of the above documentation and information is in line with our Student Sponsor obligations as per UKVI Sponsor guidance Doc 2, Sponsorship Duties 2.12: keeping records for sponsorship. Students who do not provide this information on request will be at risk of being terminated from their course and visa sponsorship withdrawal. Student will be contacted and given deadlines to meet the requests, usually two weeks from the time of request.

Section 8 – Visa Expiry and Tracking Requests to Extend Student Visas

Senior Manager responsible for this process: Deputy Vice Chancellor & Provost

Operational Responsibility: Director of International Support and Compliance

Associated Regulation: General Student Regulations 2025-26
Section 1 – International Students; 5. After enrolment

8.1 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.

8.2 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.

8.3 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.

8.4 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 AMP Service for further information or their continued right to study.

8.5 The procedures for issuing a CAS and the documentation required are covered in Section 4 above.

8.6 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.

8.7 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 Study Sector Support function ensuring confirmation that the application is still under consideration.

Section 9 – Reporting (UKVI)

Senior Manager responsible for this process: Deputy Vice Chancellor & Provost

Operational Responsibility: Director of International Support and Compliance, International Support and Compliance team

Associated Regulation: General Student Regulations 2025-26
Section 1 – International Students; 5. After enrolment

9.1 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.

9.2 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.

9.3 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 Senior International Support and 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 6).**
- **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 the timeframes of unauthorised absence detailed in Section 6 of this procedures document are reported to the Senior International Support and Compliance Officer for withdrawal. Students with continually poor engagement are also referred to the Senior International Support and Compliance Officer for review and possible withdrawal.

- Identify those students whose visas are due to expire in the near future (Section 8). 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 5 and 8). 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 5). 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 Take a Break process sends an automatic email to International Advice Service informing them of any international student's withdrawal request. Students are contacted, given advice and any withdrawal or deferral is passed to the International Support and Compliance team for reporting.

- 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 Senior International Support and 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 Study Sector Support System and the student receives advice and support on how to rectify the error according to UKVI processes.

9.4 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.

9.5 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.

9.6 The 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 the above timeframes 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 6 of this document.
 - 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.
2. **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 Evison 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 6 of this document.
3. **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](#) and [Appendix Student of the Immigration Rules para ST26.1 -26.8](#). 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.