College of Science and Engineering Learning and Teaching Committee:

Managed Migration- Attendance Monitoring:

In the earlier part of the summer there was a good deal of discussion on this issue. In the late summer, Bruce Nelson, Janet Rennie and I got together to consider what we thought would be workable procedures to monitor attendance in the University as a whole. This is the first of the attached documents. I have already discussed the concepts behind this with each of you verbally when we met and you all expressed the view that it made sense.

At the time that it was put forward, I stated to Bruce and Janet that I was not prepared to agree to a proposal without discussing it in the College first. I also thought that we did not have time to do this if we wanted to roll-out a process in September and we had quite enough to be dealing with. Janet was keen to pilot a system in CHSS however, and this is the second of the documents here. A digest of the most recent update from the UKBA forms the third document.

I propose the College adopts the rubric of the general University guidelines for attendance monitoring as outlined in the first paper. Each School would need to have a system in place for February, but I suggest we start in January. I firmly believe that having a system embedded in Schools will work best and where each School knows its own students best. I think this represents the minimum additional activity for the University as a whole and does not depend on creating a hugely bureaucratic and complex system. Schools have complete autonomy on deciding which contact points to define within courses, and on how to collate that information. It does not require us to create additional, artificial contacts. Finally, it has an added benefit that if Schools monitor attendance for all students, this has a potential benefit for general pastoral oversight.

NRJH 16/10/09
An Outline of University of Edinburgh Non-Attendance Monitoring

This document outlines a University-wide consistent approach to the UK Border Agency’s (UKBA) forthcoming requirements that we monitor the attendance of international students whose visa applications we have sponsored.

In designing this approach we have attempted to strike a balance between the need for a robust system which meets the University's legal requirements and the desire to build on existing processes and create the minimum amount of additional work. It should be remembered that failure to undertake adequate attendance monitoring could lead to our sponsor's license being revoked and hence our being unable to recruit international students and staff. The approach suggested also recognises existing good practice in monitoring student attendance for academic reasons.

1. Under forthcoming UKBA rules, international students with visas must be reported to UKBA as non-attending if they miss 10 academic contact points across their Programme of Study, but should be reported earlier where it becomes clear as a matter of fact that they are no longer attending or engaging with the course’s academic requirements.

2. Individual course organisers are best placed to decide what the appropriate contact points for their course should be in the light of the course’s structure. These might be tutorials, practical sessions, assessments or any other form of academic activity that can be easily monitored and demonstrate engagement with the course.

3. Each School must maintain appropriate non-attendance information for all students attending its courses. It should be noted that it is only necessary to record where points-of-contact have not been met, rather than keep a record of successful participation. Schools should collate this information for the courses which they administer. Good information on course non-attendance forms the basis for building up a reliable picture of non-attendance across a programme.

4. Schools will have responsibility for identifying programme non-attendance for all students registered on the degree programmes they administer or manage – generally, the programmes they own or for which they are the first-named subject in a joint honours degree. In the first instance, an alert to programme non-attendance can be based on course non-attendance solely for the courses the School also administers. It is not necessary for Schools to collate information routinely concerning non-attendance on all outside courses for which its Programme Students are registered: collecting such information will only be required if a student's non-attendance on a School's own courses triggers the need for this.

5. For their Programme Students, Schools should investigate quickly any unexplained non-trivial non-engagement with their own courses. Frequently we would expect the outcome to be that a satisfactory explanation is offered,
or that the School is satisfied that the student is re-engaging with the course. Where this is not so, the School should (a) if it “owns” the programme and hence is responsible for the student, ask the other Schools owning the ‘outside’ courses which the student is attending for any further evidence of non-attendance, or (b) if it does not “own” the programme it should pass the information it has collected on non-attendance to the “owning” School and ask it to investigate. If, after receiving this, and attempting to engage with the student, the “owning” School is convinced that the student is no longer attending/engaging with the programme’s academic requirements this should be reported to the relevant College Dean’s Office.

6. If a School has evidence of significant or repeated non-attendance by students whose programmes are owned by other schools, this should proactively be reported to those students’ home Schools. This might be, for instance, failure to take an examination without good reason or missing a significant number of contact points such as compulsory labs/tutorials. It will then be for the School owning the student to investigate further/decide on reporting to the College Dean as in 5.

7. Registry will report failures by students to enrol on programmes to the relevant owning School. Finance will similarly report failure to pay tuition fees to that School. Where the student is engaging with the academic requirements of the course, the School will explain the consequences of failing to enrol/pay tuition fees to the student. Where the student is not engaging with the academic requirements, or cannot be tracked down, this will normally trigger a report to the College Dean.

8. The decision to report a student as non-attending to the UKBA will be taken by the relevant College Dean. Registry will make the actual report to UKBA. UKBA have indicated that such reports will automatically lead to action to remove the student from the UK. They will also terminate the University's responsibilities as a sponsor of that student.

B Nelson/N Hulton/J Rennie
17 August 2009.
College of Humanities and Social Science

Guidance for Students: Monitoring Attendance

1. Why are we monitoring attendance?

From September 2009, the College of Humanities and Social Science will be monitoring the attendance of all students as this will enable us to give the benefit of closer attention to every student throughout the session and to learn early of any problems manifesting themselves as non-attendance, so that we can help. We intend to improve the support offered to all students. We will monitor all students and not simply those designated “international”.

This development was prompted in part by a wish to be able to assist students with problems early in their career, and in part by the UK Border Agency (UKBA) which has introduced new regulations governing the immigration of staff and students to the UK, an initiative instigated by the previous Prime Minister in 2004.

Under the new regulations, the University will have to keep records on all international students; verify students’ identity when they arrive; keep track of the students as they progress through the degree programme, and report international students to the relevant authorities if they fail to attend.

Although these requirements only come into force in February 2010, at which point we are required to monitor all international students, we are encouraged to report voluntarily prior to then. The College of Humanities and Social Science proposes to introduce these arrangements at the start of the new session from 22nd September 2009 in a pilot, in order to save upheaval and potential confusion mid-session and to give the new arrangements 6 months to settle in.

2. How will we monitor attendance?

Staff will keep track of all students regardless of their immigration status as they progress through the University, and will report them to the School for investigation if they fail to attend. The standard contact points for students where “failure to attend” will trigger investigation will be

- registration (including the confirmation of attendance);
- assignments/ submitting essays etc; exams;
- lab sessions and submitting work records; and
- attending PhD, MPhil, MSc by Research etc supervisory sessions.

There may be other contact points that apply to certain Schools only, which relate to the discipline – Schools therefore have the discretion to define their own contact points. Interruptions of study, placements etc are not counted as non-attendance.
A further factor that will trigger investigation is non-payment of fees, so Finance and Accommodation Services will be introducing measures to monitor this (which reflect the existing student debt policies).

3. How long is there to investigate non-attendance?

The University only has a short fixed amount of time (10 days) from when it confirms that a student is not in attendance before it must legally report the student to UKBA, at which point the student’s Confirmation of Acceptance of Study (used to gain an entry visa to the UK) and the visa are both withdrawn. In the event of non-attendance, we have been told that non-attendance crystallises at the point at which a student has not fully enrolled OR discontinues studies OR when the 10th contact point has been missed. However, we have the duty to follow up on all missed contacts and cannot wait until a high number of contact points have been missed before tracking down the student and giving him/her the opportunity to explain the situation. The College then has to decide if the student has to be reported to the UKBA.

4. What actions do we take when a student is reported missing?

School administrative and support officers will receive a report that a student is absent through non-attendance or non-participation in assessments etc, and will then:

1. Check registration: All registrations and confirmation of attendance has to be completed by 31 October.
2. Check with any other School or College (or institution) being attended by the student to establish if the student is missing from there too.
3. Attempt to contact the student including, potentially, via the classmates and, if necessary, the emergency contact numbers. (Students should note that their emergency contacts may be used in this way).
4. Check whether the Director of Studies and/or Course Organiser/Tutor/PG supervisor know why the trigger event was missed.
5. Check there is no special circumstances case for an Exam Board.
6. Check that the student’s fees are paid up-to-date and if appropriate that his/her Accommodation Services rent is up to date.
7. If the School finds, after it has investigated any non-trivial non-explained absences that there is no satisfactory explanation or that the academic colleagues are not satisfied that the student will re-engage with the academic work, then a report is required for the College Office. For an international student, the final stage would be submitting a recommendation to the Head of College to suggest that the student should be reported to the UKBA. If that happened, the University would also withdraw the Confirmation of Acceptance of Study, which would lead to the withdrawal of the visa. This is a very big step, which will not be taken lightly by the College, and only if every other route to find the student and discuss what has happened has been exhausted within the time frame available to us.

For a non-International student, if there is no trace of the student, the School has longer than 10 days to search/send emails trying to find him/her and to warn of the consequences of non-attendance and non-compliance with
assessment regulations etc. If necessary, the College can invoke the Procedure for Withdrawal and Exclusion (or Discontinuation) from studies.
UK Border Agency: New Sponsor Guidance for Tier 4 (Students) Valid from 5 October 2009

Summary of key changes


This makes a number of significant changes, the most important one being:

1. Universities now have **TEN DAYS** only in which to report a student. This applies when a student has not fully enrolled by end of the matriculation period; if a student discontinues studies, and if a student misses a tenth contact point.

Other changes of relevance, or new areas of emphasis, are:

2. A Confirmation of Acceptance of Studies (CAS) can only be used once. So, when a student applies for leave or needs to renew a visa, it cannot be used again. A new one has to be issued.

3. Visa letters will be phased out in February 2010, after which all students must be assigned a CAS. CASs will be valid for six months from the date of issue by the sponsor and can not be used to apply for a degree programme starting more than three months ahead. (Further information on the management of this work by admissions staff will be issued later.)

4. Where the degree programme involves periods of study outside the UK this is acceptable. But if a student intends to return to the UK to continue or complete the programme then the university may either continue to sponsor the student for the period he or she is abroad which means that we must continue to meet all the reporting duties in respect of the student: this will enable the student's leave to remain current and he/she will be allowed to return to the UK without having to apply again for a visa.

   If the student does not plan to return to the UK, the sponsor should end the sponsorship. Alternatively the sponsor can end it at the point at which the student travels overseas, and then when the student wants to return to the UK, he/she will have to make a new application for a visa.

5. If a student wants to move to study at another university, he/she must apply for a new Confirmation of Acceptance of Studies from the new sponsor university.

6. Re-sits and repeat study: if we as the sponsor approve a re-sit or repeat period of study for a student and requires the student’s continued participation, and where we are confident we can continue to meet sponsor duties relating to attendance during the re-sit or repeat period, then we should continue the sponsorship.

   Where we do not require that student’s continued participation within 60 days of the start of the next academic period (excluding recognised vacations), we should...
not continue to sponsor the student - we should advise the UKBA and advise the student to leave the UK.

7. **Continued sponsorship of a postgraduate student for the purposes of writing up:** where we require the student’s continued participation and can meet the sponsor duties for the period leading up to final submission of the dissertation or thesis including an oral examination, we should continue to sponsor the postgraduate student for the purposes of writing up. Where we do not require their continued participation for a period of time (normally 60 days or more), we must be confident that we are able to meet the sponsor duties for that student during the writing up period. If we cannot do, that we should notify the UKBA and advise the student to leave the UK. If we did that, we could then at a later point issue a visa letter and CAS for the student to return to the UK.

Janet Rennie  
Director of Academic and Student Administration  
7 October 2009