

ATTENDANCE POLICY & PROCEDURE FOR STUDENT ROUTE VISA HOLDERS

1. INTRODUCTION

Keele University is required to monitor the attendance and engagement of registered students who hold a Student Route Visa that is sponsored by Keele University. This policy details Keele's approach to monitoring attendance for students studying on a Student Route Visa.

1.1 Purpose

The purpose of this policy is to:

- Clarify the University's requirements in terms of student engagement and attendance for students holding a Student Route Visa
- Support students' health and wellbeing
- Promote academic attainment, standards and progression
- Enhance student experience
- Satisfy external reporting/accreditation requirements and legal obligations in relation to attendance

1.2 Scope

This policy applies to all students studying at Keele University or Keele University International College (KUIC) holding a Student Route Visa that is sponsored by Keele University. The policy:

- Applies across all schools and all years of study for students undertaking all modes of study, including undergraduate, postgraduate taught, postgraduate research, and apprenticeships.
- Is aligned to the University's <u>Regulation B8</u> which states that any student failing to engage appropriately with their studies may have their studies terminated by the University at any stage in their programme of study.
- Is aligned to Regulation A1 which sets out the requirements for students studying on a Keele sponsored Student Visa.

Beyond the information outlined in this policy, further expectations regarding engagement with learning and teaching materials, attendance at learning and teaching events and assessments and the timely submission of in-course assessments are set out in programme and module documentation, in the Student Attendance & Engagement Policy, the Harper & Keele_Vet School Academic Engagement Policy) and in the Postgraduate Research Degrees Code of Practice.

2. POLICY

2.1 Overview

This policy and procedure outlines the requirements for students studying on a Student Route Visa in relation to attendance and engagement with their academic studies and how the university will monitor and support that attendance and engagement.

2.2 Definitions

For the purposes of this policy, **engagement** encompasses engaging with, and participating in, guided independent or group study activities, assessment and feedback, and any other activity which supports learning and personal development, independently or in collaboration with peers. This includes, but is not limited to:

- Attending scheduled learning events
- Submitting progress reviews and assessments within defined deadlines
- Accessing and/or interacting with online learning materials (e.g., lecture recordings, learning materials)
- Utilising infrastructure in place to support student learning (i.e., the Library, Microsoft Teams, the Keele Learning Environment)
- Attending meetings with Academic Mentors and Supervisors (PGR specific)

Attendance is one component of engagement. For the purposes of this policy, **attendance** is defined as being present at scheduled learning, teaching and other activities required by a module and/or programme. This may include, but is not limited to:

 Attendance at scheduled teaching and/or other learning events as required by the module and/or programme (e.g., lectures, seminars, laboratory sessions, tutorials, field trips and examinations)

For the purposes of this policy the terms 'student' or 'students' refer to all those currently registered on an undergraduate or postgraduate programme.

2.3 Attendance and engagement monitoring principles for undergraduate and postgraduate taught students

- The University is required by UK Visas and Immigration (UKVI) to monitor the attendance and engagement of registered students who hold a Student Route Visa. Students holding a Student Route Visa are required to be in regular attendance as part of the ongoing conditions of their visa. As the student's immigration sponsor, the University has obligations to UKVI to closely monitor the attendance of these students at scheduled teaching sessions and to take appropriate action, including termination of studies, where attendance does not meet the requirements specified by UKVI.
- Students studying on a Student Route Visa will find that their visa status is impacted if
 their studies at the University have been terminated, suspended or interrupted (for the
 duration of the interruption). The University is required by law to inform UKVI of any

- changes to a student's status within 10 days. The University outlines its reporting requirements to UKVI in Regulation A1.
- Certain programmes, such as those accredited by professional or statutory regulatory bodies (PSRBs) and apprenticeships, may have their own specific attendance requirements, which must be met to fulfil the standards of that award. Where these are more rigorous than those set by the University in this policy, the requirements of the PSRB and/or apprenticeship provider shall prevail.
- Students are expected to be in attendance on campus for face-to-face learning for all timetabled events that take place on campus and all mandatory events, such as placements, that take place off-campus.
- Students will have their studies terminated if they do not comply with this policy.
- Students should live within a reasonable travelling distance of the University. Travelling
 distance is not an acceptable reason for failing to attend or engage with studies. The
 maximum travel time to the University should be no more than ninety minutes by public
 transport for Keele University students or forty-five minutes for KUIC students.
- Students, academic staff, faculty-based professional services teams, the Keele Doctoral Academy, Keele University International College (KUIC) and the Immigration Compliance & Advice team are expected to play an active role in monitoring attendance and engagement by facilitating and keeping up to date records.

2.4 Monitoring student attendance for undergraduate and postgraduate taught students

2.4.1 Monitoring student attendance at taught sessions

Students are required to register attendance at taught sessions using the Keele App or via Keele card readers where these are in place for specified laboratory entry. Students are required to enable the Keele App to access location services when registering attendance using a mobile device. In order to validate student attendance, data from the Keele App will be used to review student proximity to the learning event at the point of check-in. The university will undertake periodic audits of attendance data to check for instances of falsified attendance. Keele staff delivering teaching and learning events are required to check students out of sessions, where it is clear that they are not in attendance.

The minimum attendance threshold is set at 50% however higher thresholds are in effect in some areas due to professional or statutory regulatory body requirements. Students will be contacted about attendance if their overall attendance rate, based on all scheduled synchronous sessions, drops below the minimum attendance threshold over the preceding two-week period or they are absent from teaching sessions for 6 consecutive (working) days. At this point a message (contact point 1) will be sent to the student via the Keele App regarding their attendance. The message will check if they are well, signpost them to sources of support and recommend that the student returns to their timetabled teaching events. The students' Academic Mentor will be alerted to the message, and it will be visible to the Student Experience and Support Officer (SESO), via the attendance dashboard, for information.

If the student then meets the minimum 50% attendance for the next week, they will be moved out of the contact stage.

Should the student not respond to contact point 1 within five working days, or should their attendance remain below the minimum attendance threshold, they will be sent a second message (contact point 2) asking them to respond via the Keele App to explain the reasons for non-attendance. They will also be signposted to appropriate support where required. The students' Academic Mentor will be alerted to the message, and it will be visible to the SESO, via the attendance dashboard, for information.

If the student has not responded to contact point 2, within five working days via the Keele app or their attendance remains below the minimum attendance threshold, they will be sent a third message (contact point 3) advising that they must now meet with their Academic Mentor. -They will also be contacted by a member of the Immigration Compliance & Advice team to discuss their absence. This discussion will take place within two weeks of Immigration Compliance & Advice receiving notification of the student reaching contact point 3.. Immigration Compliance & Advice will liaise with the academic school and/or student services to check if there are any other academic or welfare concerns. The discussion will provide an opportunity for the student to explain their circumstances in more detail, and to put in place an agreed plan to support the student to resume attendance. If the student cannot be contacted by telephone, an email will be sent to their Keele and personal email address requesting they attend a meeting at a specified date and time.

<u>If a student does not attend the scheduled meeting,</u> they will be issued with a formal non-engagement warning.

Should a student who was given an agreed plan by Immigration Compliance & Advice then not resume attendance at the required rate within 1 week of the agreed plan being put in place, they will be issued with a formal non-engagement warning. All formal non-engagement warnings will include the following information:

- The reason for the warning being issued
- An overview of the students' attendance
- Details of communications between the student and the university about attendance and any actions taken to support the student's attendance
- What actions the student is required to take in order to resume attendance and to adhere to the conditions of the warning
- The consequences of failing to adhere to those conditions following issue of a formal nonengagement warning

If the student does not comply with the conditions of the warning or resume attendance at an acceptable level within a week, a second formal non-engagement warning will be issued.

Students who do attend and comply with the attendance conditions discussed with them following any formal warning from Immigration Compliance & Advice, will be moved out of the contact stage, but will have their attendance closely monitored for a four-week period to ensure they continue to meet required attendance levels.

If the student does not comply with the conditions of the second warning or resume attendance at an acceptable level within a week, their studies will be terminated.

2.4.2 Monitoring student engagement during dissertation

Immigration Compliance & Advice will run an engagement report every 2 weeks during the summer vacation. This report shows the level of engagement of each student based on their interactions with Keele University systems (KLE - Log on/access course content, Library - Loan of items, MS Teams calls/group chat/meetings/private chat, Campus WIFI). Students with a score lower than 5 will be contacted by Immigration Compliance & Advice to remind students that they are still in full-time study and to check for any welfare concerns. If a student's engagement remains below 5 in the next fortnight, they will be contacted by Immigration Compliance & Advice in line with students at contact point 3 (above).

2.4.3 Monitoring student attendance at placements in the UK

This relates to stand-alone placement activity which constitutes a period of structured, work-based learning that is undertaken as a formal component of a degree program. During this period, students are exclusively engaged in placement activities and are not enrolled in concurrent academic modules or coursework. The placement serves as a substitute for traditional academic study during the specified term or academic year.

The attendance of students undertaking placements will be monitored for the entirety of their placement. The details of the placement and provider must be reported to the Immigration Compliance & Advice Team by the Placement Team before the student starts their placement. The Placements and Projects Team and the Placement Team withing the Faculty of Medicine and Health Science are required to ensure that attendance is monitored through regular contact with the student and the placement provider during their placements. Details of these contacts must be recorded and shared with the Immigration Compliance & Advice team upon request. Placement providers are required to report any instances of non-attendance to the Placement Team in line with the attendance thresholds set out in this policy. Placement teams will report any attendance concerns to Immigration Compliance & Advice after 4 weeks of missed timesheets/attendance and no responses to contacts from placement officers. Immigration Compliance & Advice will arrange a meeting with the student to discuss reasons for non-attendance in line with Contact Point 3 (above).

2.4.4 Monitoring student attendance whilst undertaking official roles as Student Union sabbatical officers

Students undertaking a full-time sabbatical officer role for either the Students' Union or the Keele Postgraduate Association (KPA) have a specific visa for Sabbatical Officers. Their non-attendance will be reported to the Immigration Compliance & Advice team by the relevant union.

2.4.5 Monitoring student attendance on Study Abroad placements

For students studying on a student visa that is sponsored by Keele and that are undertaking an outgoing Study Abroad placement period (either for a single semester or up to one academic year),

the host institution will be required to provide regular attendance and engagement information to Keele if the student wishes to keep their current student visa. Specific arrangements for monitoring attendance are developed with host partner institutions depending on the students' circumstances. This is facilitated by the Global Opportunities Team.

2.5 Monitoring requirements for students studying at Keele University International College (KUIC)

For any further clarification on this clause or KUIC attendance in general, click here for the Navitas NPR M3: Attendance and Engagement Monitoring policy.

2.5.1 Band 1 Attendance Monitoring

Band 1 applies to students studying a Foundation level course (Year 0), whether standalone or as the first stage of a degree course.

At this level, students are required to attend a minimum of 15 hours classroom-based study per week (between 08:00 - 18:00). Classroom-based study is defined as requiring the student's presence.

Attendance is monitored and recorded by KUIC and measured in any given (consecutive) four-week period.

If a student's attendance is between 70 to 85%, their absence must be reviewed by staff and discussed with the student. Their record will be marked to show the reason for the non-attendance and an action plan created and agreed on, to bring them back to a satisfactory level of attendance.

If attendance levels drop below 70% the student will receive a Stage 1 warning letter with an action plan to improve their record. If their attendance remains below 70% over the following four weeks, a Stage 2 warning letter and action plan will be issued. If their attendance remains below 70% over the following four weeks, they will receive an Intent to Exclude (ITE) notice informing them their studies are being terminated. Students have five working days in which to appeal this decision.

KUIC will contact the ICA team at Keele University for ICA to process the termination.

2.5.2 Band 2 Attendance Monitoring

Band 2 applies to students studying International Year 1 or Pre-Masters courses.

All instances where a student is required to attend e.g. lectures, workshops, appraisal points, meetings, field trips etc, are classed as 'Scheduled Engagements'. Students must maintain a minimum 85% attendance in all scheduled engagements. Less than 85% attendance or multiple consecutive absences will result in the student being placed on the 'Compass Programme' (click here for details) and where applicable, referred to the Fitness to Study policy or withdrawn from the College.

2.6 Monitoring Attendance for Postgraduate Research (PGR) Students

All Student Route Visa PGRs are required to attend monthly, in-person meetings with their supervisor, as per the <u>PGR Code of Practice</u>. This includes during any period of corrections or revisions following examination. Where necessary it is permitted for a monthly meeting to be conducted virtually or over the phone. We would not expect more than 2 consecutive virtual or phone meetings.

Formal records must be maintained of supervision meetings; logged within the PGR records system (Skillsforge). These formally recorded supervision records will be used to evidence that the student is satisfying UKVI attendance requirements.

Progress reviews conducted every 6 months will also be used to ensure UKVI attendance requirements are met. Reviews are submitted by PGRs and supervisors individually, with both parties commenting on progress over the last 6 months. Issues including non-attendance at supervision meetings, lack of progress and/or failure to submit work by the required deadline are also recorded and reviewed by Faculty PGR Committee members.

If the PGR fails to attend regular supervisory meetings and/or fails to submit the required progress review, they will be issued with a first formal non-engagement warning. If they do not comply with the conditions of the first warning and resume engagement at an acceptable level within 4 weeks, a second formal non-engagement warning will be issued. If they do not comply with the conditions of the second warning and resume engagement at an acceptable level within a week, a final third warning will be issued. Failure to comply with the conditions of the final warning within a week will result in their studies being terminated. All warnings must be copied to ICA.

3. ROLES AND RESPONSIBILITIES

3.1 Responsibilities of students

- UG and PGT students are required to be in attendance on campus for face-to-face
 learning for all timetabled events that take place on campus and all mandatory elements
 of programmes of study that take place off campus, including placements and fieldwork.
- UG and PGT students are required to register attendance at taught sessions using the Keele App or via Keele card readers where these are in place for specified laboratory entry.
- When using the Keele App, UG and PGT students are required to enable location monitoring to ensure that their attendance at taught sessions can be validated. Failure to do this will result in attendance not being validated and the student being considered absent from the session.
- The University expects students to act honestly in relation to their records of attendance.
 Any attempt by a student to falsify their attendance records will be addressed in line with the University's Student Discipline Procedure.
- Students are expected to submit all required assessments. If a student has an exceptional
 circumstance, such as a personal difficulty or health problem, which has a negative
 impact on their ability to participate in assessment, they should follow the Exceptional
 Circumstances Process.

• A student may wish to consider interrupting their studies if there are valid reasons that may impact their ability to engage and/or result in their needing additional time to complete their degree programme. Students should discuss their circumstances with Immigration Compliance & Advice, their Academic Mentor, Student Experience and Support Officer, Supervisors (PGRs) or another relevant member of staff in their academic school. Staff will be able to advise the student on visa implications, funding implications, academic implications, such as the availability of the course and particular modules when they return and their ability to progress to the next level of study with their peers. Further information can be found in the Leave of Absence process and PGR Code of Practice.

3.2 Responsibilities of Staff

- Faculty professional services staff are responsible for monitoring and communicating with students about their attendance up to contact point 3, in accordance with this policy.
- Immigration Compliance & Advice are responsible for:
 - Monitoring student attendance for student route visa holders and communicating with those students about their attendance from contact point 3 onwards.
 - Issuing formal warnings and requesting withdrawal of Keele UG and PGT students (with the exception of KUIC students) failing to comply with the attendance requirements set out in this policy.
 - Monitoring engagement of PGT students during dissertation periods and making contact with students not meeting the required level of engagement.
- Placement teams are required to monitor student attendance during placements, reporting any non-attendance to the Immigration Compliance & Advice team.
- The Global Opportunities team are responsible for liaising with overseas partner
 institutions to ensure timely student attendance monitoring is provided to Keele in
 accordance with this policy.
- PGR Supervisors are responsible for carrying out supervisory meetings in accordance with
 the requirements set out in this policy and the PGR code of practice and recording this
 in Skillsforge so that appropriate warnings can be sent when required KUIC staff are
 responsible for carrying out attendance monitoring of students enrolled at the college in
 accordance with this policy.

3.3 Policy oversight

Strategic oversight of this policy is provided by the Head of Immigration Compliance & Advice, working closely with the Head of Timetabling & Attendance Monitoring.

University Executive Committee will review and monitor the policy on behalf of Council.

4. RELATED POLICIES AND PROCEDURES

This policy is aligned to Regulations A1 (Visa & Immigration) and B8 (Termination of Studies by the University).

Use of attendance and engagement data complies with Data Protection legislation (including the UK GDPR, the Data Protection Act 2018 and any supplemental legislation) and is handled in accordance with University Information Governance Policies. Further details can be found in the University's Information Governance pages.

Data on student engagement and attendance is managed in accordance with the <u>Student Privacy</u> <u>Notice</u>.

Operational guidance for staff undertaking attendance monitoring can be found in the <u>Education</u> <u>pages</u> on the Keele intranet.

Information for students on managing attendance via the Keele App can be found on the Keele App pages

5. REVIEW, APPROVAL & PUBLICATION

Review: This policy will be reviewed by the UKVI Compliance Group annually.

Approval: This policy has been approved by the Academic Registrar as the Chief Authorising Officer.

Publication: This policy will be published on the Keele website within the Policy Zone.

6. DOCUMENT CONTROL INFORMATION

Document Name	Attendance Policy and Procedure for Student Route Visa
	Holders
Owner	Academic Registrar
Version Number	1.1
Equality Analysis Form Submission Date	November 2024
Approval Date	28 November 2024
Approved By	Council (University Executive Committee, subsequently)
Date of Commencement	28 November 2024
Date of Last Review	18 November 2025
Date for Next Review	01 November 2026
Related University Policy Documents	[List all applicable]
For Office Use – Keywords for search	
function	