

**Student Attendance and Engagement Policy**

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# Part A – Principles

**Introduction**

The Student Attendance and Engagement Policy has been developed as part of our commitment to well-being and human flourishing: one that enables contributions to a learning community that respects individuals and promotes their growth into valuable members of society. As a conscientious student-centred University, we believe we should respond when aware of student absence and limited engagement. This enables us to employ supportive strategies for facilitating student completion of their programme of study.

Where a student’s attendance and/or engagement raises concern, activities to support the students will entail:

* + 1. Regular Academic Personal Tutor contact with the student.
    2. Establishing peer mentor support where appropriate.
    3. Programme leader discussions with the student re support needs to agree actions and/or referral to further specialised support.

**Purposes**

Monitoring academic attendance and Engagement helps the University to identify student wellbeing issues and support students through to successful completion as well as maintaining compliance with the external requirements of professional, regulatory and funding bodies.   There are two purposes:

* Student support – the university can offer advice and support to students who need help to re-engage with their studies, through both central provision and the students’ academic personal tutor
* UKVI – under the terms of its sponsor licence, the university must notify the UKVI of students who stop engaging with their studies

**Data**

The University will use engagement data in conjunction with assessment data (Attendance monitoring software) to monitor student progress and offer support to students when required. This policy outlines how the University records attendance and engagement as evidence that each student is actively and consistently engaging with their programme of study and sets out what we expect from students in terms of academic engagement. It also details how the University monitors academic engagement levels, the interventions we apply if overall academic engagement, including attendance, is deemed unsatisfactory, and subsequent outcomes

**Scope**

This university-wide policy applies to all programmes delivered by Birmingham Newman University, excluding those programmes delivered by collaborative franchise partners, provided those partners maintain their own local attendance and engagement policies, which are reviewed by the University to ensure that, at a minimum, they align with the standards of this policy.

It requires, in addition, that each professionally accredited programme articulate their own local Attendance and Engagement Policy, where required, to support retention-associated activities and where applicable, professional accreditation regarding attendance and engagement criteria. Such additional policies should adhere to the principles of this policy and to the Using Student Engagement Data Policy (January 2024[).](https://www.newman.ac.uk/knowledge-base/using-student-engagement-data-policy-2/) Provided below (Part D)

# Part B – Policy

**Introduction**

We expect students to attend all scheduled teaching sessions.  We monitor academic engagement via a range of information sources. This is primarily through attendance at timetabled teaching sessions on campus (normally recorded through the use of attendance monitoring system but also using local registers where applicable for specific subject areas) but also includes engagement with the learning sessions, Moodle, library resources and assignment submissions. The exact form of engagement monitoring, and any related interventions, will depend on the level of study and the programme of study.

**Definitions of Attendance and Engagement**

Attendance is defined as the recording of being present for any required timetabled sessions and any other required sessions agreed between the student and the academic tutor. Presence is normally recorded through the use of attendance monitoring system but also through local registers where applicable for specific subject areas. Appointments with Academic Personal Tutors are also recorded on Academic Personal Tutor records (part of the electronic attendance monitoring system).

Engagement includes engagement with the learning sessions, the virtual learning environment, library resources and assignment submissions. Engagement helps student to understand their learning and make the most of their activities.

**Expectations of Students**

The University expects students to attend all learning and teaching sessions associated with the programme on which they are enrolled. The University expects regular and full attendance, as attending less than 80% of all scheduled sessions often limits a student’s ability to be successful. Those programmes with Professional, Regulatory and Statutory requirements may also require 100% attendance for students to be awarded the fully accredited award. However, ill health and/or other legitimate reasons prevent students attending sessions and thus should be accounted for in any local policy initiatives.

Students must register their attendance in classes using the software downloaded onto their phones or electronic devices in line with the University regulations.

It is the responsibility of students to carry their electronic device/phone with them at all times, and to register electronically at the start of each timetabled class. Students will be registered as absent if data is recorded one hour after the timetabled session begins. They will be marked late if data is recorded more than 15 minutes after the start of the scheduled session.

In addition to attendance recorded through the electronic device/phone system, additional monitoring of attendance and engagement may take place. Examples of this include:

1. Class registers. These may also be used to record attendance at specific sessions when attendance at these sessions is a mandatory part of the programme, for example clinical sessions on nursing programmes.
2. Completion of mandatory requirements such as DBS checks
3. Attendance at scheduled meetings with academic tutors during placement.

Absences from placements are not permitted with the exception of illness (with medical evidence) and any student who misses part of their placement due to illness may be expected to make this up at a later date.

Students are responsible for informing the relevant programme/faculty personnel of their absence. If students are on placement or student experience, the host should be notified of any absence.

**Early Intervention Policy**  
The Early Intervention Process takes place within the first 15 days of teaching each year. It is designed to be supportive not punitive, and operated within the parameters of the Using Student Attendance and Engagement Data Policy, underpinned by the eight principles therein (See appendix D below). Programme teams are responsible for collating engagement data from student attendance, Moodle and Library activity that informs this process. Moodle reports and the attendance monitoring system are tools provided by the University to support staff in this endeavour.

The processes to be undertaken in the Early Intervention Policy are detailed in Part F.

# Part C - Protocols

###### **Faculties**

Each Faculty must have a clearly published process for students to request extended periods of absence. For sponsored students, any request for a period of absence must be sent directly to the University’s UKVI compliance manager.

**Programme Teams**

Programme teams should be monitoring student attendance and engagement recorded in the attendance monitoring system on a regular basis. Staff can also see a student's access to Moodle in their calendar on the attendance monitoring system, which can give a quick insight into whether they are accessing course content online. In addition, to assist in flagging up students who might be struggling with their studies, the attendance monitoring system has been configured to automatically email personal tutors of students whose attendance falls below 80% attendance the preceding week. Where it appears a student is struggling with their studies, the relevant member of the programme team, usually the personal tutor or programme leader, should investigate the data associated with the student on the attendance monitoring system and, where appropriate, contact the student to provide support and/or signposting to further support services.

There are further requirements for international students (**see Attendance Monitoring Policy and Guidance for UKVI below**)

**Programme Leaders**

Programme Leaders may also be tasked by their Head of Subject to investigate outcomes of the monthly attendance report sent to Retention and Continuation Task Group (RCTG), the Executive Deans, and Subject Heads.  
  
Programme leaders or nominated staff are responsible for leading on the Early Intervention Process where a student is at risk of withdrawal. Guidance is provided here on how to use the attendance monitoring system to support that process: see [Early Intervention Process](https://newman.topdesk.net/tas/public/ssp/content/detail/knowledgeitem?unid=6a33a766f4dc4790a778b7423714e262) listed in Part F below.

**Module Leaders**

Module leaders are likely to be tasked by Heads of Subject and Programme Leaders to ensure attendance records are being maintained and are accurate.

Module leaders should report any data problems such as missing classes or students to **ElearningServiceDesk@newman.ac.uk** as soon as possible so that these can be logged and resolved quickly.

**Tutors who teach classes**

Tutors who teach classes maintain a register in the attendance monitoring system for all scheduled on-campus activity. **If a student cannot record their own attendance in a scheduled on campus class using the Mobile App,** **then the tutor should record the student's attendance for them.**  Tutors who teach classes should report any data problems such as missing classes or students to **ElearningServiceDesk@newman.ac.uk** as soon as possible so that these can be logged and resolved quickly.  
  
**Personal Tutors**

Personal tutors pro-actively offer support that utilises engagement data in respect of their tutees’ attendance and/or weekly attendance stage movement, student calendar, and file notes. They should report instances of inaccurate or missing data to the module leader or programme leader so that this can be corrected.

**Student Responsibilities**

Engagement data presented to students is intended to help them understand their learning-associated activity, where subsequent suggestions may be made as to how they can improve their practices. Students are responsible for assessing how they can best apply any such suggestions in relation to their learning activity. Students will retain autonomy in decision making relating to their learning; using student engagement data is designed to inform their own decision making about how and what to learn.  
  
Further student responsibilities should be specified in any local Student and Attendance and Engagement policy for the programme, (professionally accredited programmes) for example, how they report any inaccuracies in their attendance recorded and deadlines for reporting this.  
  
Students are advised to regularly check their attendance and report any problems to the teaching team promptly. On some programmes, teaching teams may encourage students to record their own attendance at scheduled classes with the Mobile App. **But, if a student is not able to enter their own attendance with the app, then the tutor should record the student's attendance for them.**

**Direct use of the attendance monitoring system**

Programmes who choose not to have students use the Mobile App to record their attendance must ensure teaching staff and module leaders correctly record all student attendance directly in the attendance monitoring system.

**International Students**

There are also additional requirements for overseas students as required by the UKVI rules (see Part E below).

**Heads of Subject**

Heads of subject are responsible for monitoring adherence to Attendance and Engagement Policies on programmes of study that are under their remit, with the exception of international students for whom attendance and engagement are the responsibility of the University Student UKVI Lead.

**DLTS**

Guidance and support from the Directorate of Learning, Teaching and Scholarship can be accessed for using technology to capture and respond to attendance and engagement data. Further support for staff enacting an Attendance and Engagement Policy can be accessed from the Directorate of Learning, Teaching and Scholarship.

**Study Abroad programmes**

Monitoring the engagement of students while on Study Abroad programmes, including international students under UKVI regulations, is the responsibility of the Overseas Experience Co Ordinator., students must obtain a stamped arrival certificate from the partner institution and return this to the Overseas Experience Co Ordinator. Students must obtain an attendance certificate, stamped, and approved by the partner institution which confirms the student has been engaged in their programme/summer school at the partner institution.

**Absences**

The University understands that occasionally there will be good reason why a student cannot attend a class or engage in their studies for a short time. In such instances students must contact their Faculty Office and their Academic Personal Tutor. Depending on the length and nature of absence, they will be able to signpost relevant support and procedures to help students to stay on track.  Students will need to make sure they keep up with their work. Faculties should consider the grounds on which the request is made, the length of time requested and the impact of the absence on the student’s academic studies. The following is a non-exhaustive list of circumstances which the University would normally accept:

|  |  |
| --- | --- |
| • | Reasonable circumstances that may arise as a result of illness. |
| • | Death or serious illness of a close relative or friend. |
| • | Significant adverse personal/family circumstances – such as divorce, burglary, fire, major court proceedings, financial difficulties beyond the control of the student, which require the student to leave the University at short notice. |

Students must provide corroborating evidence for absences greater than one week. Absences for international students should be sent to the Student UKVI Lead for approval.

**Potential Abuse of System**

The University recognises the potential for abuse of the system in students scanning into scheduled teaching sessions for others or scanning and then not attending the scheduled learning session. Any suspected abuse of the system will normally be investigated by the Faculty and the student’s Academic Personal Tutor who may invite students to a meeting to discuss the circumstances in the first instance. Students suspected of abuse of the system may have their case investigated using the University’s Student [Disciplinary Procedure,](https://myuni.swansea.ac.uk/academic-life/academic-regulations/conduct-and-complaints/disciplinary-procedures/) depending on the nature of the situation.

**Requesting a Review of a decision to withdraw a student for non-attendance**

A student who is withdrawn for non-attendance under the University’s Attendance and Engagement Policy shall be entitled to request a review of this decision.

Review requests should be submitted within 14 days of the withdrawal decision being communicated to the student.

Review requests can be submitted on the following grounds:

1. That a procedural irregularity or administrative error has occurred in respect of the original decision which is of such a nature as to create a reasonable possibility that, in the absence of the procedural irregularity or administrative error, the decision in question would have been different;
2. That the decision is unreasonable given the facts of the case;
3. That the student has new material evidence which, for a good reason, they were unable to provide at an earlier stage in the process.

Review requests will normally be considered and a response provided to the student within 20 days of submission.

During the appeal process the student will continue to have full access to University facilities and be expected to attend and engage with their programme of study. Only at the end of the appeal process, if the decision is upheld, in the case of international students, will the student be reported to UKVI and sponsorship of the visa withdrawn. In the case of home students, the relevant funding body and the relevant professional body informed.

# Appendices

**Part D – The use of attendance and engagement data and Student Privacy Notice**

The collection and use of student engagement data provides opportunities for institutions to support learner success and to enhance educational processes. This is commonly known in the sector as ‘learning analytics. Learning analytics systems present visualisations of student activity with some providing predictions of attainment. Such systems will be used at Birmingham Newman University to assist current students in achieving their study goals, and to help us improve our overall education provision.

This policy covers all uses of student engagement data at the University. Ethical issues relating to the use of student data in academic research are further covered by the [University Code of Practice for Research](https://www.newman.ac.uk/wp-content/uploads/sites/10/2018/02/Code-of-Practice-for-Research.pdf?x37815) & [Ethical Guideline](https://www.newman.ac.uk/knowledge-base/research-ethics-governance/)s. The University bodies considering applications for research using student engagement data should assess if the research projects comply with the principles in this policy. The bodies may, within the remit of their own terms of reference, approve research proposals that test the boundaries of this policy.

Birmingham Newman University will use and analyse student engagement data to help meet the following strategic objectives:

* Enable more students to fulfil their potential through fostering the development of all students into autonomous learners, able to cope with complexity.
* Provide opportunities for students to proactively contribute to the enhancement of their experience within our learning community.
* Promote a sense of mutual ownership, belonging and fulfilment.
* Share and disseminate effective practice across all provision, including effective use of new technologies.
* Support team learning through communication and dialogue within, across and beyond University disciplines, departments and stakeholders[[2]](https://www.newman.ac.uk/knowledge-base/using-student-engagement-data-policy-2/" \l "_ftn2)

Birmingham Newman University will ensure that activities using student engagement data will be for the benefit of students, with complete transparency about the data that is being captured, processed and used. Our focus in using such data is to support students in their personal learning journeys towards degree attainment, concurrently maintaining our reputation as a student-centred university. All activities in this area will comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (GDPR). In particular, we will ensure that all processing complies with the Data Protection Principles

This policy is therefore founded on the following eight principles.

1. Using student engagement data is an ethical practice and aligns with our focus on formative education that seeks to develop the whole person through transformative learning.
2. Students cannot be wholly defined or limited by representations of their data nor any interpretations of it. **No decision that has a significant effect on student progression shall be made based solely on the results of learning analytics.**
3. In the spirit of mutual trust and respect, students as members of the relevant Committees and Task groups will be active partners in the design and implementation of systems and activities informed by data use and analysis.
4. The source, use and process of using student engagement data will be transparent and clearly explained to all stakeholders.
5. Using student engagement data will be based on informed consent explicitly requested at the point of initial registration and re-enrolment.
6. The use made of student engagement data will be clearly defined and assigned to specific individuals or groups, however, overall responsibility and accountability for the use and analysis of data at Birmingham Newman University rests with the University Data Protection Officer.
7. Effective use of student engagement data is dependent on accurate and up-to-date data and thus, staff and students alike are responsible for maintaining accurate student records.
8. Data will be generated and used appropriately and responsibly without bias and in accordance with data protection and equality legislation.

**Responsibility**

Overall responsibility for using student engagement data at Birmingham Newman University is held by the Academic Registrar. Responsibility for relevant areas of activity is allocated as follows:

* Collection of student engagement data to be used for analysis: E-Learning
* The anonymization or de-identification of data where appropriate: E-Learning
* The analytics processes to be performed on the data, and their purposes: Planning and Systems Development
* The interventions carried out that are informed by student engagement data: PVC (Students)
* The retention and stewardship of data used for and generated in using student engagement data: PSD.

Engagement data presented to students is intended to help them understand their learning-associated activity, where subsequent suggestions may be made as to how they can improve their practices. Students are responsible for assessing how they can best apply any such suggestions in relation to their learning activity.

The use of the engagement and attendance data policy is owned by Birmingham Newman University Learning, Teaching and Academic Quality Committee. This Committee monitors formal compliance with this policy.

**Transparency and consent**

Students are informed about how their data will be processed when they read the Privacy Notice for Students, provided before and during enrolment as well as anytime on the internet, as well as when they register for the attendance monitoring system. Student engagement data will be collected and analysed in compliance with the University’s data protection policies and as outlined in more detail within this document.

Student engagement data comes from a variety of sources, including the student record system, attendance monitoring system and the virtual learning environment.

Categories of data captured by the University as part of its interaction with students and potentially available as individual or combined data sets for analysis are:

* personal data provided by the student at registration.
* the student’s study record held by the University.
* Sensitive or special category data that the University may use. The use of ethnic origin and disability to identify students who may be in need of additional support is obtained at registration when students agree to the Data Collection and Privacy Notices
* details of contacts between the enquirer or student and the University
* interactive content generated by enquirers or students; for example: completing diagnostic tests, student responses to surveys and research etc.
* system-generated data such as the date and frequency of accessing VLE pages.
* data derived by the University from other data, for instance, whether a student falls into a widening participation category.
* data held or generated internally in combination with data provided by third parties may be used by the University to tailor support, where there is agreement to do so from the third party concerned. For example, the library gathers information generated by student use of a subscription service. Student data supplied to third parties is subject to existing guidance, such as Data Protection
* anonymised data from external sites, e.g. social networking sites not owned by the University, where this is used to generate information on the cohort rather than the individual student. For example, where this forms part of an activity within a module
* miscellaneous sources of data, for example, forum posts could be anonymised and analysed to shape module design.

The student engagement data collection or analysis activity must be conducted to fulfil regulatory reporting duties.

**Confidentiality**

 Personal data on an individual student will be provided only to:

* The student
* Birmingham Newman University staff members who require the data to support students in their professional capacity, in accordance with the terms and conditions of employment/
* Third parties which are processing student engagement data on behalf of the institution. In such circumstances Birmingham Newman University will put in place contractual arrangements to ensure that the data is held securely.

**Special Category Data**

The Data Protection Act 2018 / UK GDPR defines categories of “special category data” such as, but not limited to, the ethnicity of individuals or data relating to health including data relating to a disability.

In using student engagement data to provide student support, the University will not use the following types of data. This list is subject to review.

* Data that identifies individuals created on external sites, not owned by the University, third party sites where there is no permission to employ shared information, etc.
* Special category (i.e. sensitive information) on religious belief and sexual orientation will not be used as part of the analytical models. Should any other special category data items be required for learning analytics, the legal basis will have to be considered in consultation with the Data Protection Officer, data subjects informed, potentially consent will need to be sought. Any combinations of data or derived data that may contravene an individual’s right to respect for their private and family life will not be used.

Applications to use student data for the purposes of research will need to be made in accordance with the standard processes in place currently, such as the Research Ethics Committee. Bodies considering applications for research using student engagement data should assess whether the projects comply with this policy. The bodies, within the remit of their own terms of reference, may approve research proposals that test the boundaries of this policy. If the outcomes of that research may then be applied to operationally targeting individuals or groups of students, further alignment with this policy will be required.

**Validity**

The quality, robustness and validity of student engagement data and analysis will be monitored by Newman University, which will use its best endeavours to ensure that:

* Inaccuracies and gaps in the data are understood and minimised.
* The optimum range of data sources to achieve accurate predictions is selected.
* Spurious correlations and conclusions are avoided.
* The algorithms and metrics used for predictive analytics and interventions are valid.
* Using student engagement data is seen in its wider context and is combined with other data and approaches as appropriate.

**Student access to personal data**

Students have the right to correct any inaccurate personal data held about themselves.

Students should also be able to view any metrics derived from their data, and any labels attached to them.

If the student requests to see all their engagement data, it will be made available to them.

**Interventions**

    A range of interventions may take place with students.

* Prompts or suggestions sent automatically to the student via email, SMS message or mobile app notification (subject to the student’s consent)
* University staff contacting an individual on the basis of the analytics if it is considered that the student may benefit from additional support. Students cannot opt out of the offer of support: they are entitled to refuse any support offered or ignore guidance given.

Interventions, whether automated or human-mediated, will normally be recorded. The records will be subject to periodic reviews as to their appropriateness and effectiveness.

**Minimising adverse impacts**

The University will investigate and attempt to resolve any reports of adverse impacts on students resulting from generating student engagement data, such as confusion or demotivation.

The University recognises that using student engagement data cannot present a complete picture of a student’s learning, and that predictions may not always be accurate.

students will retain autonomy in decision making relating to their learning; using student engagement data is designed to inform their own decision making about how and what to learn.

It is intended to comply with advice from the relevant sections of the Quality Assurance Agency (QAA) UK Quality Code for Higher Education, Advice and Guidance and regulatory requirements and advice from the Office for Students

Capturing and responding to attendance and/or engagement information is viewed as a key component in supporting the retention, progression and success of our students. Moodle and SEAtS are current tools available to enable such data capturing.

* + Attendance is understood as either (i) physical presence at a campus based timetabled event or (ii) virtual presence at an online scheduled event as part of a programme of study.

* + Engagement is defined as being active across the physical and/or digital campus. For example: using systems such as the library, VLE, mynewman and/or involvement in curriculum-based or wider institutional activities. Such examples can be viewed in Moodle and the attendance monitoring system.

A blue and white logo with a lion and a shield

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**Student Privacy Notice**

**Learner Analytics & Engagement Data**

**Data controller: Birmingham Newman University**

Birmingham Newman University has a legitimate reason to collect and process personal data relating to how students engage with the university through learner analytics to ensure that it can support students through their academic programs effectively. Learner

This Privacy Notice sets out what data we collect for learner analytics and how we use it. If you have any questions about this notice or any other data protection matter you can email our Data Protection Officer at [dpo@newman.ac.uk](mailto:dpo@newman.ac.uk).

**What information does the University collect?**

The University collects and processes a range of information about its students to ensure that we can provide the appropriate level of support. Much of the data we collect will be aggregated and provided as statistical or analytical data but the underlying data set will consist of:

* personal data provided by you at registration.
* your study record held by the University.
* details of contacts between yourself and the University
* interactive content generated by you; for example: completing diagnostic tests, your responses to surveys and research etc.
* system-generated data such as the date and frequency of accessing your Virtual Learning Environment (VLE) pages for your course;
* data derived by the University from other data, for instance, whether a student falls into a widening participation category.
* data held or generated internally in combination with data provided by third parties may be used by the University to tailor support, where there is agreement to do so from the third party concerned. For example, the Library gathers information generated by student use of a subscription service.

As part of our work with learner analytics, we will also collect the following information which is considered sensitive and must be given extra levels of protection.

* Data about your ethnicity
* Data relating to disabilities or medical conditions

The University may collect this information in a variety of ways. For example, data might be collected through completion of accident forms; from correspondence with employees; or through interviews, meetings or other assessments.

Your data is passed to third parties only when the University is legally required to do so, or where it has a legitimate business purpose

Where data is used for learner analytics, this data will be stored on university systems and will only be able accessible to individuals that have a legitimate business need to access the data.

**Why does the University process personal data?**

The University needs to process personal data for learner analytics to ensure that we can meet our statutory public interest in processing personal data as part of our ability to award degrees and ensure that students receive the right level of support.

**Who has access to data?**

Learner Analytics data may be shared internally, including with members of our Learning & Development and Registry teams, academic staff and relevant managers. All access will be restricted to what is necessary for performance of a role or function. The personal data that is shared will be the minimum necessary to achieve the intended purpose.

The secure database we use to store your data is kept in the UK and this data is not transferred to or stored at a destination outside the European Economic Area.

**For how long does the University keep data?**

The University will hold personal data relating to learner analytics in accordance with the University’s Academic Records Retention Schedule.

**Information rights**

As a data subject, everyone has certain rights in respect to how their personal data is managed. They can:

• Access and obtain a copy of their data on request;

• Require the University to change incorrect or incomplete data;

• Require the University to delete or stop processing their data, for example where the data is no longer necessary for the purposes of processing; and

• Object to the processing of their data where the University is relying on its legitimate interests as the legal ground for processing;

* Request the University provide a portable copy of the personal data they have provided about themselves for the performance of contract.

If you would like to exercise any of these rights, please contact the University Data Protection Officer using the following contact details:

By email: [dpo@newman.ac.uk](mailto:dpo@newman.ac.uk)

By telephone: (0121) 476 1181 ext. 2500

By post: Data Protection Officer

c/o Newman University

Genners Lane

Bartley Green

Birmingham

B32 3NT

If you are not content with the how we handle your information we would ask you to contact our Data Protection Officer to help you. However, you do also have the right to complain directly to the Information Commissioner at:

Information Commissioner’s Office

Wycliffe House

Water Lane

Wilmslow

Cheshire SK9 5AF

Information about the Information Commissioner is available at: <https://ico.org.uk/>

**Changes to this privacy notice**

This privacy notice may be updated from time to time so you may wish to check it each time you submit personal information to the University. We encourage you to check this privacy notice from time to time to ensure you understand how your data will be used and to see any minor updates. If material changes are made to the privacy notice, for example, how we would like to use your personal data, we will provide a more prominent notice (for example, email notification or correspondence of privacy notice changes).

# Part E – UKVI Student Route Visa attendance monitoring policy

**Introduction**

As a Student Route sponsor Birmingham Newman University is responsible for ensuring that it meets United Kingdom Visa and Immigration (UKVI) attendance monitoring requirements for all students sponsored under the Student Route visa route. UKVI expects Student Route sponsors to monitor student engagement with the sponsor and to report to them via the Sponsor Management System (SMS) where a visa sponsored student is no longer attending in line with expectations. Failure to monitor Student Route student engagement would result in sanctions against Birmingham Newman University which could lead to the revocation of the Student Route sponsor licence.

The Student Route is a point-based visa system for all international students, including EU, EEA and Swiss students, who want to study in the UK.

**Scope**

This guidance applies to all students with a Student Route visa sponsored by Birmingham Newman University. This includes students studying on full-time and part-time attendance modes. It applies to all time spent under Student Route including time spent writing up or away from University, on a placement or study abroad year and on external study leave for research purposes. This guidance outlines the basic monitoring requirements for Student Route students and does not replace student attendance and engagement procedures.

No international student may attend a programme below level 6 with less than 15 hours of contact each week.

**Enrolment**

All Student Route students are required to enrol online at the start of each academic year and to register in person at the start of their programme. At in person registration Student Route students are required to present originals of evidence to confirm their visa status in the UK which will be logged and stored on Birmingham Newman University’s database in accordance with UKVI requirements. Students must complete all parts of enrolment with Birmingham Newman University within two weeks of the start date of the programme. Failure to enrol within this period without first receiving authorisation from the University could lead to withdrawal.

**Monitoring Policy**

This policy applies to all students with a Student Route visa. As a Student Route Sponsored student you are required to:

* attend all on-campus classes;
* attend any other scheduled academic engagements;
* log your attendance at all scheduled classes and engagements via the attendance monitoring system and ensure your attendance is logged via the app;
* meet your coursework/assessment submission requirements.

You are also expected to:

* live within a reasonable distance of the campus
* notify the university of a term time address
* keep your current addresses (both in your home country and the UK), email address and telephone number up to date. This is for your own protection as we will use these details to notify you if there is an issue with your attendance/engagement as detailed below.

If you fail to adhere to the Student Route Monitoring Policy requirements you risk being withdrawn from your course. Being withdraw from your course will lead to withdrawal of Student Route sponsorship, which would result in your Student Route visa being cancelled by the UKVI. You would then need to leave the UK, if you have not already departed.

**Engagement / Attendance Monitoring**

Birmingham Newman University uses several mechanisms to monitor attendance and engagement, including use of the Virtual Learning Environment (VLE), the Library Management System (LMS), and other systems referenced above in Part D. The attendance monitoring system will log student attendance at classes.

**Recording Attendance Information**

Birmingham Newman University is subject to compliance auditing by UKVI and is required to keep evidence showing that Student Route student attendance monitoring has taken place and that any concerns about attendance have been investigated.

The University will primarily monitor engagement through the attendance monitoring system as set out above. It will also however take into consideration other contact points, such as:

* a lesson, lecture, tutorial or seminar;
* confirmation of a supervisory meeting;
* a test, examination or assessment board;
* PhD progress review;
* a meeting with a personal tutor;
* a research-method or research-panel meeting, writing-up seminars or doctoral workshops;
* an oral examination (viva);
* an appointment with a welfare adviser or international student adviser;
* submitting assessed or unassessed coursework;
* an interim dissertation, coursework or report;
* dissertation supervision sessions
* registration with Birmingham Newman University.

This is a non-exhaustive list and subject leads should seek advice from the Student UKVI Lead when considering the suitability of other types of contact.

**Engagement monitoring stages for students on taught courses (undergraduate degree and postgraduate taught level)**

There are four escalation stages within the Student Route Attendance Monitoring policy. If you adhere to the policy you will remain at Stage 0, which means that no action is required as you are meeting the conditions of the Policy.

If you do not adhere to the policy requirements, you will be in breach and you will progress through the stages below.

The stages do not just apply to initial enrolment and first semester studies but continue in place throughout the year(s) of study.

**Stage 1 (7 days non-engagement)**

If you reach Stage 1, you will be sent emails reminding you to engage with your course, attend classes and submit assessments, where appropriate. The emails will be sent to your student and personal accounts. The email will direct you to where you can find support if you are facing difficulties and invite you to engage with our Student Success Team or your Personal Tutor.

**Stage 2 (21 days non-engagement)**   
After a further 14 days of missed interactions, you will move to Stage 2. You will be required to meet with the Student UKVI Lead and will be given an action plan for 14 days. Continuous failure to attend/engage thereafter will result in you being moved to Stage 3. Failure to meet with the Student UKVI Lead within seven days may result in the student being progressed straight to stage 4.

**Stage 3 (35 days non-engagement)**

After 35 days of missed interactions, you will move to Stage 3.  You will be sent a personalised email to your student and personal accounts stating that your action plan has been extended for a further 7 days.

**Stage 4 (42 days non-engagement)**

At Stage 4, you will receive a personalised email to your student and personal accounts notifying you of our intention to withdraw you from your course and withdraw Student Route sponsorship. You will be given 10 days to appeal the decision. Information regarding the appeals process and the deadline for submission will be provided in the email.

If you fail to lodge a successful appeal, you will be withdrawn from your course and your Student Route sponsorship will be withdrawn. Consequently, the UKVI (Home Office) will take steps to cancel your visa. You will receive a personalised email to your student and personal accounts confirming that you have been withdrawn from studies and that we have withdrawn Student Route sponsorship and that the UKVI (Home Office) have been informed accordingly.

Students subject to an action plan who subsequently re-engage with the University will be expected to maintain high levels of engagement. Should there be a further period of non-engagement for 7 consecutive days, the student will immediately progress to stage 2 of the process.

**Authorised Absence**

In some exceptional circumstances where the well-being of a student may be adversely affected by a visa curtailment Birmingham Newman University can permit an ‘authorised absence’ for up to 60 days (very exceptional circumstances). Absences of up to 14 days can be authorised by the Course but must be notified to the Student UKVI Lead. Any absence of 15 to 60 days must be authorised by the Student UKVI Lead. Students will not be permitted more than a total of 60 days absence in an academic year. During an ‘authorised absence’ the student will not be placed on an interruption, and they must be able to complete their programme within their existing period of leave. Birmingham Newman University must remain in contact with the student during the period of authorised absence and be able to continue to meet its sponsor duties.

Where a student is absent for longer than one week, it is advised that they maintain evidence explaining their absence, as this may be required if the University considers initiating stage 2 of this policy.

**Reporting Students to UKVI**

Reporting attendance concerns to the Student UKVI Lead will not result in an automatic report to UKVI. The Student UKVI Lead will review evidence and seek agreement from the student’s Faculty before taking any action to interrupt or withdraw a student from Birmingham Newman University.

**Work placements**

There is a UKVI limit to the total number of placement hours a student can undertake across any programme undertaken by a Sponsored student. The Student UKVI Lead will advise in advance of any CAS being assigned if a programme meets UKVI requirements.

**Students’ Union Sabbatical Officers**

Birmingham Newman University is not eligible to sponsor International students to take up a post within the University’s Students’ Union.

**Writing Up**

UKVI regulations allow Birmingham Newman University to sponsor postgraduate students who are writing up a dissertation or thesis. If a student resides in the UK whilst writing up there must be regular contact with their supervisor and their contact details (including telephone numbers) must be kept up to date. Where a student fails to meet with their supervisor, they will be required to meet with the Student UKVI Lead to discuss this. Failure to follow this process will result in the student being progressed to stage 4 of this process.

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

**Vacation Periods**

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

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

**Further Information**

For further support and advice on Student Route attendance monitoring requirements please contact the Student UKVI Lead at visacompliance@newman.ac.uk

# PART F - Early Intervention Process

The Early Intervention Process\* takes place within the first two months of teaching each year. It is designed to be supportive not punitive, and enacted within the parameters of the Using Student Engagement Data policy [(see here](https://www.newman.ac.uk/knowledge-base/using-student-engagement-data-policy-2/)) and underpinned by the eight principles therein.

Programme teams\*\* are responsible for collating engagement data borne from student attendance, Moodle and Library activity that informs this process. Moodle reports and SEAtS are tools provided by Newman to support staff in this endeavour.

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