



Cambridge Ruskin International College (CRIC) CPR M3: Right to Study, Attendance, Student Monitoring and Reporting Version 2.14

1.0 Introduction

1.1.1 This document sets out the CRIC and Navitas UK policy and procedure for record keeping, student monitoring and Home Office reporting. Each College has an obligation to ensure that it has accurate records of all students. This is critical to the management of the student experience, and compliance with the Home Office requirements under Appendix D of the [Sponsor Guidance](#).

CPR QS3 – Admission details that it is a requirement, before assigning a CAS to a prospective student (or issuing an unconditional offer), for the Sponsor (College and/or University) to have assessed that the applicant is eligible for such. This is most applicable, but not exclusive, to applicants that are already in the UK.

In addition to these admission checks, it is also a requirement to monitor the continued eligibility for students to be enrolled. This is clear as a Sponsor must “...take reasonable steps to ensure that every student studying has valid permission to be in the UK.”

1.1.2 In addition CRIC has an obligation to the Home Office to report on, as required, changes of status in an individual student’s study pattern for those holding a Tier 4 (General) student visa. Changes to a student’s study pattern may affect the terms of the visa and/or the Leave to Remain status of the student. Thus, it is a requirement for CRIC to have a robust student and CAS monitoring strategy in place that covers the entire period of Sponsorship and suitable contractual and operational agreements with Anglia Ruskin University on students once they have progressed (see Appendix A of this document and/or the Operational Manual).

1.1.3 Since CRIC is under Branch sponsorship, the obligation to monitor and report, as outlined above, is devolved to the College by the University. All operational responsibility for monitoring and reporting of the College’s students for compliance with the Home Office regulations rests with the College. The College then reports this on to the University.

1.2 CRIC recruits international students under the General student provision of Tier 4 and holds a current Tier 4 (General) Sponsorship License and operates under Branch/Partner Sponsorship. Reporting of the status of each applicant and enrolled student, to the Home Office, is managed via the Sponsorship Management System (SMS). The SMS uses a unique Confirmation of Acceptance for Studies (CAS) reference number that is generated by the Sponsor and assigned to each applicant. This reference number then stays with a student throughout their course of studies in the UK, providing they remain on the same visa.

1.3 Under the current [Sponsor Guidance](#)*, the Home Office requires Tier 4 Licence holders to report students who:

- Fail to enrol – including those where an application for leave to remain/enter is refused;
- Stops contact – including 10 consecutive missed points of contact (see below);
- Are no longer under the sponsorship of the institution – including Withdrawal, Terminations and Deferral (this includes students who transfer institution); and/or
- Indicate a significant change in circumstances – including a change in course of study, work placement change.

***Please note:** Direct reference should always be made to the most recent Sponsor Guidance and reporting Manual before carrying out any Home Office reporting. The current version can be found following the link.

When monitoring and reporting those students that 'Stop contact' the Sponsor needs to:

- Make at least two checkpoints (re-registrations) during any rolling 12 month period;
- Report on students who have missed 10 consecutive expected contacts (defined in para 76(e) of Document 3 sponsors' duties and compliance), without the Sponsor reasonably giving them permission and where the Sponsor is withdrawing sponsorship;
- Make these reports within 10 working days of the Sponsor completing the checkpoint process and determining to withdrawal of sponsorship; and
- Judge whether a student's absence is authorised ensuring that this is documented for inspection by the Home Office's Compliance Officers.

- 1.4 To ensure consistency of monitoring and compliance with the Home Office requirements, Navitas defines a contact point to be:

"Any day on which a student is required to attend a class of study, as timetabled on the College's Student Management System".

Therefore, if a student has three timetabled events in a day and they attend just one of those, the student is deemed to have successfully made that designated 'Contact Point'. This does not preclude the student meeting the College requirements, as indicated below in section 2.

2.0 College Attendance Requirements and Policy

2.1 Pedagogic Philosophy

NVT UK believes that students need to attend classes and participate in the learning process in order to obtain value for money and gain the education that will enable them to achieve their host University degree award.

Navitas UK attendance requirement

Students are expected to ***maintain a minimum of an 85% attendance record in each enrolled module*** failing which they will be placed on the student's in jeopardy programme. Students are generally expected to be no more than 10 minutes late to class and to return, in a timely manner, from any designated breaks during lessons. Entrance to the class outside of this timeframe is at the discretion of the lecturer and/or the College.

This practice is followed, not only to establish basic learning routines and time management, but to also guarantee that students have the opportunity to absorb and assimilate the information essential to understanding and comprehending a subject/module.

2.2 Student Monitoring

- 2.2.1 In order that the College complies with the Home Office requirements, as detailed in the [Sponsor Guidance141*](#) and [Immigration Rules](#), the College will monitor its students in accordance with the College's and/or the Host University's procedures.

- 2.2.2 Formal College scheduled engagement includes any interaction or event where attendance is deemed to be mandatory, these include events such as: class sessions, lectures, tutorials, workshops, labs, field trips, appraisal points, meetings or interviews, assessments and so forth. This should not be confused with the Home Office defined 'Contact Point' above in 1.4.

- 2.2.3 Any enrolled 'Current' (Navigate, current in programme) student whose attendance does not meet the expected 85% requirement or presents an inconsistent pattern across a set of modules, is placed on the Student in Jeopardy Programme for close monitoring (The College's Student in Jeopardy Programme – Operations are in the Operations Manual).

Where necessary (if permission has been given at enrolment, after referring to the Privacy Flags on Navigate), parents and/or agents may be contacted. The student is also formally contacted by one or more of the following methods: letter, email, text message and telephone, by Student Services within 48 hours of the breach being noted.

Initial contact by Student Services must be clearly communicated in a formal capacity and explained to the student that as a result of the breach in the Student Contract/Charter, the student is to be automatically placed on the Student in Jeopardy Programme.

Where such a student continues to not meet the expected 85% overall attendance requirement and has no CMT/CLTB approved extenuating circumstance, or approved leave of absence, then their situation is discussed further by the CMT. This breach should be considered in addition to any breach in the Home Office required 'missed 10 points of contact'.

- 2.2.4 Any student who has no approved extenuating circumstance, or approved leave of absence, and who habitually fails to respond to communication from the College and/or who fails to present at 10 consecutive scheduled contact points, as defined in 1.4 above, will be formally issued with 'Notification of Intention to Terminate – Exclusion'. The student is informed formally by Student Services of this intent via one or more of the following methods: letter, email, text message and telephone, within 24 hours of this regulatory breach. Agents and parents should be informed at this stage of the situation (after confirming the student's privacy setting through Navigate) and the Home Office reporting requirements.

Where such a student fails to meet any scheduled meetings or meet approved extenuating circumstances after a further five consecutive working days then they are formally issued with 'Notification of Termination – Exclusion' and the Home Office informed by report within the timeframes specified in the [Sponsor Guidance](#).

2.3 Student Records

- 2.3.1 The Home Office requires that all records, including attendance, be kept in accordance with Appendix D of the [Sponsor Guidance](#). The Navitas Document Management Policy states this should be for 6 years. Navigate holds all records of each student inclusive of their attendance and actions taken in perpetuity.

2.4 Student Timetable and Attendance procedures

- 2.4.1 Navitas UK policy determines that a student must be timetabled for a minimum of 15 contact hours per week over a period of at least three days in each week of a semester. The exception to this Navitas UK policy is where a student is repeating a module/s to complete a course/stage of study or where they are required to take up an approved core requisite module. Details of the Home Office requirements surrounding hours of study and repeating modules are included in the [Sponsor Guidance](#).

- 2.4.2 Attendance is recorded systematically by module by scheduled contact point in Navigate and through the College Student Portal attendance reports system, including non-attendance due to extenuating circumstances or CLTB/CMT approved leave of absence. Records are maintained by Student and Academic Services and formally monitored each week, by way of a report. They are also recorded on a fortnightly basis by the CMT and at then monthly at the CLTB. Regular feedback from academic teaching staff to the CLTB, along with ongoing reviews of individual student assessment performance, must also be collated following assignment submissions, through the Student in Jeopardy programme for Academic Reasons. These are formally noted in the current semester's Student in Jeopardy log and acted upon to ensure that attendance is accompanied by active learning.

Attendance registers must be taken at each scheduled contact point via direct entry to the Student Portal (therein Navigate).

Students who arrive more than 10 minutes late to a class are generally unlikely to be permitted to enter. Entrance to the class will be at the discretion of the lecturer and/or the College. Also, if a student has arrived more than 10 minutes late to a class, and is permitted to enter, they are normally recorded as a half absence. Students will also receive a half absence if they leave the class before the formal end of the session.

Similarly, if any student arrives late or fails to attend after a scheduled break in a class, will be marked half absent/absent, unless there are any extenuating circumstances, which are subsequently approved by the CMT/CLTB. Students who regularly demonstrate this behaviour will also be added to the Student in Jeopardy Programme.

2.5 Assessment Events and Attendance procedures

- 2.5.1 Attendance is mandatory at all scheduled assessment events throughout a semester. Only in CMT/CLTB approved extenuating circumstances may a student not present at such an event. Non-attendance at a scheduled assessment event (approved or not) are reported for consideration at the Module Panel and Progression Board, for consideration (if required by the College or University Academic Regulations).

Where a student has been approved as having met mitigating/extenuating circumstances by the Mitigating Circumstances Panel/CMT or a College Module Panel (for a final, end of semester, examination assessment), an approved absence should be noted and recorded with the Academic and Student Support Team. Re-sit assessment provision may be made for such approved students, as approved by the CLTB.

2.6 Other Required Engagement Events

All meetings, appraisal points and/or interviews that a student is informed as 'required to attend' by the CMT/CLTB or Student and Academic Services Team, must be attended. Where a student is unable to attend then the Academic and Support Services Team must be informed prior to the meeting and, where appropriate, the relevant member of the Academic Teaching Staff. A student may be granted a later appointment where approved extenuating circumstances have been met.

3.0 **Home Office Reporting**

3.1 The [Sponsor Guidance](#) makes clear the requirements for institutions to report various events to the Home Office and these are summarised in 1.3 above, however the complete and detailed requirements can be found in the [Sponsor Guidance](#).

3.2 Reporting under the College Sponsor Licence

3.2.1 The College must report on all aspects as required by the Home Office including, individual student absenteeism where the College withdraws sponsorship, changes of course and other reasons for withdrawal of sponsorship, directly through the Home Office SMS for all students issued a College CAS. Reports should be made in the following situations, but others may apply and should be considered by the College:

- i. Immediate change of enrolment status – Deferred, Withdrawn, Terminated (Excluded), and in some cases (Approved) Leave of Absence;
- ii. Change of enrolment status as a result of Student Census or re-enrolment – Deferred, Withdrawn, Terminated (Excluded), (Approved) Leave of Absence;
- iii. Any student who has missed ten consecutive expected 'contact points' or any student who misses a checkpoint (enrolment) without having gained formal permission from the College and the College is withdrawing sponsorship. The report should be made within 10 working days of the tenth missed contact point or after the tenth working day after the final date of any enrolment period;
- iv. Any change of course, where this meets the requirements laid out by the Home Office such as, change of course period or change of course work placement; and
- v. Where a student fails to enrol either due to deferral, visa refusal or no-show.

3.3 Reporting under the University Sponsor Licence

3.3.1 CRIC will comply and follow all reporting requirements of the University's stated policies and processes. These will override all other reporting requirements of CPR M3. These and their operational requirements are detailed in Appendix A and/or the Operational Manual.

3.4 Reporting of students under student visas that were issued prior to 5 October 2009

3.4.1 These reporting duties are not compulsory if the student was given permission to come to the UK on the basis of a visa support letter. However, Navitas UK policy is that these students should be reported and treated equally to all other students under Tier 4. In accordance with the requirements of the [Sponsor Guidance](#), these students can be reported by emailing the report to the Account Manager.

3.5 Recording of Home Office reports

3.5.1 All Reports made to the UK Home Office should be recorded, in their entirety in both electronic (on VT and Navigate) and on the student's file and should include all the information input in to the Home Office SMS or sent by email to Migrant Reporting.

4.0 **Enrolment Policy**

4.1 Right to Study Checks – Enrolment, Re-enrolment and monitoring of the right to study

4.1.1 Any student enrolled on any College/University programme is required under the Immigration Rules and [Sponsor Guidance](#) to have valid permission to study in the UK and this is the obligation of the Sponsor.

- 4.1.2 The College must ensure that there is a robust process of enrolment, which includes the confirmation that all students who commence studying with the College/University are eligible to do so.
- 4.1.3. The College must ensure that they retain copies of documents as per the requirements of Appendix D of the [Sponsor Guidance](#).
- 4.1.4 The College must also ensure that there is a monitoring process in place, which is rigorous and allows for the determination of students' continued eligibility to remain enrolled of a programme of study.
- 4.1.5 Consideration and reasonable steps need to be demonstrated that Sponsors have assessed a student to have valid leave to study and these should be made at specific checkpoints and for particular scenarios, including, but not limited to:
- i The initial enrolment of every student;
 - ii Any subsequent re-enrolment of every student; and
 - iii Students where they are currently in the UK and are enrolling under a previous, but current visa – This requires on-going monitoring until the new application outcome has been established and this process and outcome is required to be evidenced.
- 4.1.6 In order to verify documents, it is suggested that the document "Full guide for employers on Prevention of illegal working in the UK" produced by the Home Office is used as a basis for decision making. This document can be found here

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/304793/full-guide-illegal-working.pdf

5.0 Reference documents

Home Office – Immigrations Rules

<https://www.gov.uk/government/collections/immigration-rules>

Home Office – Tier 4 of the Points Based System – Policy Guidance for Sponsors (Sponsor Guidance)

<https://www.gov.uk/government/publications/sponsor-a-tier-4-student-guidance-for-educators>

Home Office – The Sponsorship Management System User Manual for Tier 4 Sponsors – How to Report Student Activity

[https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/330934/1. Introduction to SMS.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/330934/1_Introduction_to_SMS.pdf)

Home Office – Full guide for employers on preventing illegal working in the UK

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/304793/full-guide-illegal-working.pdf

Home Office- Appendix D

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/371576/Appendix_D_11.14.pdf

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