E22. Policy on Attendance Monitoring of Students

This policy explains the University’s approach to monitoring the attendance of students on their programmes. This policy also explains how the University carries out its specific obligations for international students who hold a visa under Tier 4 of the points-based immigration system (PBS). References to ‘international students’ in this policy refer to any student holding a Tier 4 visa for whom the University is sponsor.

1. The University recognises the value of attendance monitoring to help identify students in danger of leaving their course. Through early identification of such students, the University has an opportunity to be proactive by offering assistance and guidance to students to help encourage their progression and to avoid potential discontinuation. Due to the broader benefits of attendance monitoring, therefore, and to ensure equality of treatment, the attendance of all students (regardless of immigration status or level of study) is monitored through the same mechanism, as described in this policy. This policy therefore applies equally to all students unless specifically stated otherwise.

2. The University is also the sponsor for international students who hold a visa under Tier 4 of the points-based immigration system (PBS). As sponsor, the University is obliged to meet the expectations of the UK Border Agency (UKBA) laid down from time to time in their guidance and regulations\(^1\). Within these regulations, the UKBA requires sponsors to report any international students who have missed ten expected contacts. The UKBA has not specified a list of ‘expected contacts’ nor has it defined a minimum period during which these contacts must occur. Each institution must define and monitor its own ‘contacts’. Once an international student has missed the tenth expected contact, the University is required to notify the UKBA of that student’s absence within ten working days.

3. It is not in the interest of the student concerned, the University or the UKBA to report non-attendance for international students who have ceased to attend their course for some valid reason. This policy, therefore, sets out also a procedure for ensuring that international students in danger of being reported as non-attending are investigated prior to any report being sent to the UKBA.

4. The attendance of students on taught programmes is monitored via the submission of assessed work. Students are reported to the UKBA where they either miss ten expected submissions or miss all submissions in a single semester (whichever occurs first). If a student has missed seven submissions, the relevant Student Support Co-ordinator (or other individual nominated by the School) is notified via the student record system. The Student Support Co-ordinator (or other individual nominated by the School) is expected to make all reasonable efforts to contact the student and to determine the reason for non-submission and offer pastoral and/or academic support and guidance as appropriate. Where a student misses all submissions in a single semester, the Student Support Co-ordinator (or other individual nominated by the School) is contacted at the end of the semester via the student record system and allowed ten working days to contact the student. In respect of international students, if the non-submission remains unaccounted for (with reference to the regulations for mitigating circumstances), then the Student Support Co-ordinator (or other individual

\(^1\) The guidance and regulations can be found on the UKBA’s web-site: [http://www.ukba.homeoffice.gov.uk/](http://www.ukba.homeoffice.gov.uk/)
nominated by the School) will inform the Academic Registrar so that that UKBA can be notified that the student has missed the expected contacts.

5. For international students in Oxford Brookes International (OBI) on Certificate of English Language Studies (CELS), English for University Studies (EUS), International Foundation Diploma (IFD), Foundation Diploma for Liberal Arts (FDLA), Pre-Masters programmes and the International Summer School. The attendance of students will be monitored via class registers. Registers will be taken daily by the lecturers and attendances will be monitored by the specific Programme Coordinators Admin Team in OBI. If a student misses all planned classes each day for seven consecutive days the Programme Coordinator will make investigations into the reason why the student is absent. Appropriate remedial action will take place if it is required or if it is possible to support the student back into their studies. If the student still remains absent and does not respond to reasonable efforts made by OBI the Academic Registrar will be asked to notify the UKBA of the student’s absence when they have missed all planned classes each day for ten consecutive days. Any other students in OBI will be covered by the standard arrangements for taught students.

6. For international taught students on work placements, either in the UK or overseas, the University remains responsible as the student’s sponsor for monitoring their attendance even though there may be no submission of work during the period spent on the placement. When a student is on a work placement, therefore, non-attendance will be reported to the UKBA when a student misses ten working days. (This is the normal reporting expectation for individuals in the UK for employment.) The placement provider must notify their normal contact in the University when a student has missed seven working days. The normal contact within the University will notify the School’s Student Support Co-ordinator (or other nominated individual), who should attempt to make contact with the student. If the student’s absence remains unaccounted for after the tenth missed working day, the University will report the absence to the UKBA within ten working days of the tenth missed working day at the placement provider. Staff in Schools who organise work placements must ensure that every placement provider has signed an agreement to inform the University of the student’s absence (template agreement attached). The University must not allow students with a visa issued through Tier 4 to attend placement providers who are unable or unwilling to agree to report absences back to the University.

7. For home taught students on work placements, either in the UK or overseas, Schools may adopt their own monitoring processes (including the same process as is required for international students, as appropriate).

8. The attendance of all research students (home and international) will be monitored by register completed every two months. This register may be managed within Schools in any way which seems appropriate. A student should be recorded as in attendance where they are engaging with their research, i.e. the threshold for engagement is the equivalent of ‘attendance’ for taught students and is not a statement that academically satisfactory progress is being made. It is, therefore, possible that a student may be ‘falling behind’ for academic purposes but is, nevertheless, still ‘engaged in their programme’ for attendance monitoring purposes. Where a student is away from the University, whilst engaged in field research for example, e-mail and other electronic communications may be used as evidence of engagement. All completed registers must be returned to the Graduate Office by the tenth day following the two month period, e.g. registers for January-February must be returned by 10 March. Students notified as not engaging will be given one further two month period to re-engage. Once a student has been notified as non-engaged in two consecutive registers, the Graduate Office will liaise with the School and attempt to contact the student within ten working days. In respect of international students, if the student’s non-engagement remains unaccounted for, then the UKBA must be notified of the student’s non-attendance within a further ten working days.
9. When a Student Support Co-ordinator (or other individual nominated by the School) or the Graduate Office (liaising with an appropriate contact within the School) attempt to ascertain the reason for a student’s imminent non-attendance this may bring to light that the student is facing personal difficulties of some kind. This provides an opportunity for the student to be offered appropriate assistance whilst continuing with their course. Alternatively, the student may need a period of approved temporary withdrawal. For international students, such periods also need to be notified to the UKBA. ISAS should be contacted for advice on the appropriate steps to be taken for international students who need to take a period of approved temporary withdrawal.

10. The University is also required to report international students who do not enrol, decide to withdraw or are withdrawn by the University for whatever reason. These processes should not be confused with reporting students for non-attendance, which are separate. However, where a student is reported for non-attendance their enrolment at the University is withdrawn also.

11. All cases of international student non-attendance are reported to the UKBA by the Academic Registrar. Once the various investigations mentioned above are concluded it is the responsibility of the Student Support Co-ordinator, OBI or the Graduate Office, as appropriate, to contact the Academic Registrar and inform them that their attempts to contact the student and identify the reasons for non-engagement have been unsuccessful.

Matthew Andrews
Academic Registrar
December 2009
## Summary of Attendance Monitoring Policy (including UKBA reporting for international students)

<table>
<thead>
<tr>
<th>Taught students</th>
<th>Monitored contacts</th>
<th>Monitoring undertaken by</th>
<th>First approach over non-attendance</th>
<th>Approach made by</th>
<th>Contact period</th>
<th>Report of non-attendance sent to UKBA</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>Submission of assessed work</td>
<td>Student Support Co-ordinator (or other individual nominated by the School)</td>
<td>Either A) student approached after seventh missed submission</td>
<td>Student Support Co-ordinator (or other individual nominated by the School)</td>
<td>After seventh missed submission up to tenth missed submission</td>
<td>Report sent to UKBA within ten working days of the tenth missed submission</td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>Or B) student approached after all submissions in one semester missed</td>
<td></td>
<td>Ten working days after the end of the semester</td>
<td>Report sent to UKBA within ten working days of the end of the contact period</td>
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<tr>
<td>Taught students whilst on placement</td>
<td>Attendance at the work placement provider</td>
<td>Placement provider notifying their usual contact within the University</td>
<td>Student approached after seventh working day missed</td>
<td>Student Support Co-ordinator (or other individual nominated by the School)</td>
<td>After seventh missed working day up to tenth missed working day</td>
<td>Report sent to UKBA within ten working days of the tenth missed working day at the placement provider</td>
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<tr>
<td>Research students</td>
<td>Continued engagement with research</td>
<td>School submits register to the Graduate Office</td>
<td>Student approached after non-engagement in two consecutive registers</td>
<td>Graduate Office in liaison with the School</td>
<td>Ten working days after the submission of the second consecutive register to indicate non-engagement</td>
<td>Report sent to UKBA within ten working days of the end of the contact period</td>
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<tr>
<td>Specified Students in OBI</td>
<td>Daily Registers</td>
<td>Programme Co-ordinators</td>
<td>Student approached after seventh missed lecture/class day</td>
<td>Programme Co-ordinator</td>
<td>Between seventh missed class day and the tenth</td>
<td>Report sent to UKBA within ten working days of the end of the contact period</td>
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