



University of  
St Andrews

# Monitoring student visas for ukvi compliance purposes: principles of engagement management

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<b>Purpose</b>	The University of St Andrews is required to ensure that the engagement of all Student visa students is monitored for the purposes of compliance under the Student route framework.

<b>Version number</b>	<b>Purpose / changes</b>	<b>Document status</b>	<b>Author of changes, role and school / unit</b>	<b>Date</b>
1.2	Policy approved for the new academic year (2022/23).	Published	Heather Dudek, Unit Administrator, Registry	28/09/22

## Monitoring Student visa students for UKVI compliance purposes

### Principles of engagement management

#### 1. Operational oversight

The University of St Andrews will ensure that the engagement of all Student visa students is monitored for the purposes of compliance under the Student route framework. The responsibility for overseeing compliance will rest with the UKVI Compliance Group and will be operationally managed from within Registry. Escalation by the Compliance Group of individual student cases will be through the VP Governance. Data will be managed in accordance with statutory legislation and the University's own policies on Data Protection.

#### 2. Coherent monitoring

The University will ensure that compliance is coherent and founded on or aligned with relevant existing strategies, policies and processes wherever possible. The University will monitor individual students within identified student cohorts using existing definitions wherever possible. Normal patterns of student engagement at St Andrews encompass a variety of academic and non-academic activities. These engagement activities will be monitored in a light-touch and non-intrusive way without interference in the University's primary functions of learning, teaching and research.

#### 3. Co-operative monitoring

The academic and professional services communities at St Andrews will co-operate to address any weak processes which may be highlighted during engagement monitoring if these are identified as potential causes for irregular patterns of student behaviour as defined by UKVI guidance. In addition, the University will use intelligence from the engagement monitoring process to ensure that appropriate and sufficient levels of support are available to all its students engaged in academic and non-academic activities at the University.

#### 4. Consistent monitoring

Whenever possible, the University will treat all students equally, whether they are studying with a Student visa or not, and all policies and procedures will be applied fairly across each cohort. Separate engagement rules appropriate to each student cohort will be developed to enable consistent and non-intrusive monitoring. The University will be consistent in its approach to monitoring engagement activities across all student cohorts and will actively assess all relevant engagement patterns as defined below, trends and rules as part of regular operational process reviews.

#### 5. Checkpoint monitoring

The University will monitor compliance of its Student visa students using a series of academic and other engagements over the course of each academic cycle (usually a 10-12 month period).

The University has identified a series of *compulsory touch points*, *expected touch points* and *possible touch points* that make up expected patterns of engagement across each student cohort.

1. Compulsory touch points – two per year for all students
  - a. Compliance engagement will be monitored using existing compliance activities based on **Matriculation** and the **Confirmation event** held in Week 3 of Semester 2. All students are required to attend these events and Registry monitor and follow up all students who have not attended to ensure they do so within the required timeframe.

- b. Students who fail to complete matriculation by Monday of Week 4 (or week 4 of their own programme for PhD students) will have their studies terminated under the [Failure to Matriculate policy](#). Students who fail to complete the Confirmation event by the end of Week 7 of Semester 2 will be reported to the UKVI as not engaging, the University will withdraw its sponsorship and the student will have their studies terminated.
2. Expected touch points – cohort specific academic and engagement will accrue per student per academic cycle using existing academic monitoring policies and processes.

### ***Foundation, Undergraduate and taught postgraduate students***

- Academic monitoring will be primarily based on the [University's Academic Alerts](#) policy, which is available at: [Academic Alerts Policy](#). Schools are expected to follow the protocols outlined within this document and submit alerts for those students who are not engaging appropriately.
- Registry will flag and monitor all **academic alerts** issued to Student visa students and will follow up these students to review engagement.
- In addition, Registry will flag and monitor all students who have received a **0X in any exam diet**, and those who have **not received any credits** during a semester, and will follow up these students to review engagement.
- Supplementary academic engagement monitoring, where required, will include monitoring tutorial, seminar and laboratory attendance, and coursework submission, on a school and/or cohort basis.

### ***Research students***

- Research student monitoring will utilise the existing [Postgraduate Annual Progress Review](#) and will be facilitated through the online Progress Review tool in accordance with the guidelines.
3. Possible touch points – all students should have at least 2-3 per semester, depending on cohort and programme. Systematically gathered information, e.g. exam attendance, swipe access, etc. may be used to provide supporting evidence of ongoing engagement with the University.

## **6. Reporting to UKVI**

The University will report students, within 10 days, to the UKVI for non-compliance using the UKVI SMS after each of two expected engagement activities which have been assigned checkpoint status in the academic cycle, i.e., matriculation and a rolling face-to-face confirmation event no later than six months after matriculation. Students whose pattern of engagement is deemed unreasonably irregular will be discussed by the University's UKVI Compliance Group and, after all possible checks have been carried out to investigate and verify non-compliance, will be reported through the UKVI SMS at the appropriate point. The University will also report any student who is identified as in breach of any of their visa conditions, as soon as the University becomes aware of the situation.

<b>Version number</b>	<b>Purpose / changes</b>	<b>Document status</b>	<b>Author of changes, role and school / unit</b>	<b>Date</b>
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1.0	Current policy placed into Governance Zone template.	Published	Heather Dudek, Unit Administrator, Registry	21/04/21
1.1	Policy approved for the new academic year (2021/22).	Published	Heather Dudek, Unit Administrator, Registry	02/08/21
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