



University of
St Andrews

Monitoring Student Visas for UKVI Compliance Purposes: Principles of Engagement Management

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| Purpose | 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. |

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| 1.4 | Clarification to terminology in section 5 (academic year 2023/24). | Published | Heather McNeill, Deputy Academic Registrar | 29/11/23 |

Monitoring Student visa students for UKVI compliance purposes

Principles of engagement management

1. Operational oversight

- 1.1 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.
- 1.2 The responsibility for overseeing compliance will rest with the UKVI Compliance Group and Compliance Advisory Panel and will be operationally managed from within Registry.
- 1.3 Escalation by the Compliance Advisory Panel 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

- 2.1 The University will ensure that compliance is coherent and founded on or aligned with relevant Existing strategies, policies and processes wherever possible.
- 2.2 The University will monitor the engagement of individual students within identified student cohorts using existing definitions wherever possible.
- 2.3 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

- 3.1 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.
- 3.2 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

- 4.1 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.
- 4.2 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

- 5.1 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).
- 5.2 The University has identified a series of *compulsory contact points*, *expected contact points* and *possible contact points* that make up expected patterns of engagement across each student cohort.

5.2.1 Compulsory contact points (Monitored by Registry) – 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](#).
- c. 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.

5.2.2 Expected contact points (Monitored by Schools) – cohort specific academic and engagement will accrue per student per academic cycle using existing academic monitoring policies and processes.

5.2.2.1 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 review engagement, following-up directly with students as appropriate to ascertain the reasons for absence.
- 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 with these students to review engagement.
- Supplementary academic engagement monitoring, where required, may include monitoring tutorial, seminar and laboratory attendance, and coursework submission, on a school and/or cohort basis.

5.2.2.2 Postgraduate 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.
- It is essential that at least 3 contact points per semester (including the Summer semester period (semester 3)) are identified for Postgraduate Research students, in addition to the Postgraduate Annual Process Review. These should be reasonably spaced throughout each semester (approximately monthly intervals), including the summer period.
- Schools are responsible for ensuring that adequate and easily accessible records are kept of possible contact points for postgraduate research students. These must be produced upon request to aid engagement monitoring.

5.3 Possible contact points (Monitored by Registry) – 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

6.1 The University will report students, within 10 days of the relevant compliance deadline, 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.

6.2 Students whose pattern of engagement is deemed unreasonably irregular will be referred to the Compliance Advisory Panel for consideration. If the Panel deems that there has been unsatisfactory engagement without good reason, after all possible checks have been carried out to investigate and verify non-compliance, a recommendation will be made to the Vice-Principal Governance to withdraw sponsorship for compliance reasons.

6.3 The decision to withdraw sponsorship will result in the termination of the student's studies. This will be reported through the UKVI SMS within 10 days of the student record being updated to reflect the termination.

6.4 The University will also report and withdraw sponsorship of any student who is identified as in breach of any of their visa conditions, as soon as the University becomes aware of the situation.

7. Appeals relating to Withdrawal of Sponsorship

7.1 Where the University takes a decision to withdraw sponsorship, resulting in a termination of studies, it does so to comply with its responsibilities as a Sponsor of students.

7.2 Appeals will **only** be considered where one of the following grounds applies:

- a) Substantial extenuating personal circumstances directly relevant to the student's academic engagement (supported by evidence), of which the University was not aware when the decision to withdraw sponsorship was taken, and which could not reasonably have been disclosed by the student (an explanation for earlier non-disclosure **must** be provided).ⁱ
- b) Evidence of irregular procedure, improper conduct, or lack of due diligence in the decision-making process which led to the withdrawal of sponsorship.

7.3 Should an appeal be upheld; the University will withdraw its reporting if a decision has not yet been made to curtail the visa. If the visa is curtailed, the University will issue a new CAS if the student is required to be in the UK for the remainder of their studies.

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| 1.3 | Policy approved for the new academic year (2023/24). | Published | Heather McNeill, Deputy Academic Registrar | 13/09/23 |
| 1.4 | Clarification to terminology in section 5 (academic year 2023/24). | Published | Heather McNeill, Deputy Academic Registrar | 29/11/23 |

ⁱ Students are instructed to bring such evidence of extenuating circumstances to the attention of the Compliance Advisory Panel at the time their engagement profile is considered **prior** to a decision being made. Thus, in order to establish this ground for appeal, a student must be able to show valid reasons for non-compliance with this instruction and specifically explain why the extenuating personal circumstances now relied upon to support an appeal were not disclosed to the Compliance Advisory Panel. Students **must** also provide full details (plus supporting documentation as relevant) of extenuating personal circumstances when first submitting their appeal.