UKVI Engagement Policy

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1.0	UKVI Engagement Policy 2024/25	Student Experience	Approved by Senate July 2024	Academic year 2024/25

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1 Purpose

1.1 As a Student Sponsor, the University of Strathclyde is required to monitor the engagement of all Student Route (previously Tier 4) students in line with UK Visas and Immigration (UKVI) regulations as well as the Immigration Rules that underpin immigration into the UK. The University of Strathclyde is committed to meeting all of its duties by demonstrating that our sponsored students are engaging in their programme of study and that there are active procedures in place to identify and address any concerns. Therefore, the following engagement policy provides details on all our processes.

1.2 The policy also supports the improvement of the overall student experience by identifying where students may be experiencing difficulties and ensuring timely intervention and appropriate support.

2 Scope

2.1 This policy is to be adhered to by all Student Route (previously Tier 4) students who are currently enrolled on a programme of study with the University of Strathclyde registered under the following categories:

i. All students who currently hold a Student Route visa, including PGRs registered as 'writing-up'.
ii. Students who have made an application for a Student Route visa within the UK using a Confirmation of Acceptance for Studies (CAS) number from the University of Strathclyde and a decision on the application is outstanding;
iii. Students who have made an application for a Student Route visa outside the UK using a Confirmation of Acceptance for Studies (CAS) number from the University of Strathclyde and a decision on the application is outstanding;
iv. Students who have made an application for a Student Route visa leave within the UK using a CAS number from the University of Strathclyde, have had their application refused and are currently undergoing an administrative review;
v. Students who have made an application for a Student Route leave within the UK using a CAS number from the University of Strathclyde, have had their application refused and are currently undergoing an appeal.

2.2 This policy does not apply to:
i. Students holding Dependents leave;
ii. Students holding Short Term Study Leave;
iii. Students who have officially completed their programme of study;
iv. Students in Voluntary or Academic Suspension (who are expected to return home during the period of suspension);
v. Any other immigration categories.

2.3 Sponsored students are subject to this policy at the University of Strathclyde until the end of their programme of study on their student record or the duration of their visa, whichever is the earliest of the two dates.

2.4 All Student Route students will also be exempt from this policy at the University of Strathclyde if they return to their home country, provide evidence that they have left the UK and sponsorship of their Tier 4 or Student visa has been withdrawn.

3 Faculty Structure

3.1 The University of Strathclyde has four Faculties each led by its own Executive Dean:

- Humanities and Social Sciences
- Strathclyde Business School
- Engineering
- Science

3.2 This policy provides detail on the overall university position on attendance monitoring. Each Faculty has their own specific processes across the range of programmes.

4 Academic engagement of all full-time UG, PGT and PGR students

4.1 Student Route students on taught programmes are monitored centrally by the Visa Compliance Team and by Department/Faculty Administrators through the University 'Student Engagement and Attendance Monitoring system' (SEAMS) in line with each Department/Faculty academic attendance monitoring procedures.

4.2 The University expects Student Route students in the UK to actively engage in their chosen programme be attending face-to-face sessions including, but not limited to lectures, seminars, study groups, practical classes, tutorials, examinations, supervisory meetings, industrial placements, field trips or other activities which students are expected to engage with. Each of these are known as a 'contact'.

4.3 Where students are unable to attend a scheduled learning session on campus for extenuating circumstances such as illness or medical appointments, Faculties/Departments must be notified. If students require an extended period of absence, they will need to discuss this with relevant Faculty/Department who will then engage with the Visa Compliance and Student Business teams on the appropriate action.

5 What is academic engagement?

5.1 When we use the term academic engagement, we are describing ways in which students can interact with their programme of study through activities such as attending required lectures, seminars, or tutorials; undertaking required laboratory work; undertaking research or fieldwork; submitting essays, assignments and attending examinations.

5.2 The policy applies to on-campus students 'in attendance', those who are registered as writing up their thesis, and those students who are "away" from the University e.g., undertaking a work placement, or fieldwork.

5.3 **'Contact'** is the term we use for any type of learning activity which demonstrates a student's academic engagement with their programme of study.

5.4 Academic engagement ('**contact**') can also include the use of learning resources such as the library, and the university virtual learning environment **(Myplace).** Engagement may also include taking opportunities to interact with tutors, academic advisors and/or supervisors.

6 Commutable Distance

6.1 For Student Route students to fully comply with this policy, the University expects students to live within a commutable distance from the University.

6.2 The University of Strathclyde defines 'commutable distance from the University' as a distance that enables the student to attend the University during the core teaching hours of 9 am to 5pm, Monday to Friday.

6.3 The location of where a Student Route student chooses to reside cannot, in any circumstance, be considered an adequate reason for non-compliance with this policy.

6.4 Students studying on full-time PGR programmes are also expected to remain in the Glasgow area to engage with their research and attend supervisory meetings in-person with their supervisor.

6.5 Student Route PGR students who would like to return to their home country to complete their 'writing up' need to discuss this with their supervisor and the Visa Compliance Team.

6.6 In exceptional circumstances, where their viva examination has taken place, PGR students may be permitted to live further than 50 miles from the University campus where the student studies, however, they must still be able to adhere to the attendance monitoring requirements defined in this policy. Such cases must obtain prior approval from the supervisor and the Visa Compliance Team.

7 Student Communication process

7.1 Sponsored students are made aware through Registration emails of the sponsor/student relationship including the Student Sponsor's legal responsibility to report to UKVI non-attendance and lack of academic engagement at the start of their studies by email.

7.2 Students are provided with details on their expected attendance and engagement highlighting that reporting a sponsored student to the UKVI is a serious step and that poor academic engagement can lead to the curtailment of the student's Student visa and a requirement to leave the UK.

7.3 All Student Route (previously Tier 4) sponsored students on Work Placements or Study Abroad elements of their programme.
7.4 It is a UKVI requirement that engagement must be monitored for all Student Route sponsored students undertaking a study abroad element or an industrial placement that forms an integral and assessed part of their programme.

7.5 Faculties/Departments must inform the Visa Compliance Team of a student's placement or study abroad location and the duration as soon as the details are confirmed as this must be reported to UK Visas and Immigration within ten working days. It is the student's responsibility to ensure that their contact details (e.g. term time address and contact telephone number) are kept up to date on their student Record.

8 Repeat of modules and the 60-day regulation

8.1 UKVI regulations state that if a Student Route student is not required to participate in their programme of study (either in scheduled learning sessions or by some other contact) for more than 60 days, sponsorship should not continue. In such instances, the University will withdraw sponsorship of the student and advise them to leave the UK. The student record will be set to 'suspended' and UK Visas and Immigration will be informed of the circumstances.

8.2 The 60-day regulation applies to all Student Route students who fail modules and have to undergo repeat of failed modules in one term only (i.e. they do not undertake any study or attend any classes in the intervening period) as in the following, but not exhaustive, circumstances:

i.   The student has a reassessment in Semester One and then no further contact is required in Semester Two: the student should complete Semester One as required and then return to their home country for Semester Two;

ii. The student has a reassessment in Semester Two, but there is no contact required during Semester One: the student must return to their home country for Semester One and only return to the UK for Semester Two.

8.3 The 60-day regulation applies to all Student Route visa holders who fail their assessments and have to undergo reassessment (i.e. they do not undertake any study or attend any classes in the intervening period) as in the following, but not exhaustive, circumstances:

i. The student fails in September and the next available opportunity will be in the following assessment period in January: the student must return to their home country and only return to the UK on a Student Route or visit visa for the reassessment (dependent on whether they will be undertaking further study);

ii. The student fails in January (e.g. January intake) and the next available opportunity will be in the following assessment period in June: the student must return to their home country and only return to the UK on a Student route or a visit visa for the reassessment (dependent on whether they will be undertaking further study).

9 Withdrawing Sponsorship

9.1 If a decision is made to withdraw sponsorship of a student's Student Route visa through lack of engagement, the Faculty will confirm this decision to the Visa Compliance team who will send an email to the student's University and personal email address, as detailed on the student record, to advise them of the implications for their visa and detail the action they need to take.

9.2 Following withdrawal of a student's Student Route visa (because they were unable to provide satisfactory evidence of their engagement) the decision will not normally be reversed. This is because the student has failed to meet the conditions of their Student Route visa. Sponsorship of the student's Student Route visa will be withdrawn, as will their student status, and the student must return home.

10 Authorised absence and sickness periods

10.1 Departments/Faculties should ensure that they are able to identify whether their students are studying on campus or away from the University to fully comply with Home Office requirements.

10.2 To comply with Tier 4 / Student Route sponsor duties, the Departments/Faculty needs to stay in contact with any student who is away from the University for field-work, data collection, conference or for research purposes. The Department/Faculty should agree the schedule and form of contact prior to the student leaving campus. These ideally should be face-to-face contacts via Microsoft Teams or, where this is not possible, Skype.

10.3 Any official absences need to be authorised by the academic member of staff concerned. Please note that authorised absence, without maintaining contact with the University, cannot exceed 60 days. Exceptional circumstances due to illness or injury will be reviewed on a case-by-case basis and should be referred to the Visa Compliance Team.

11 Other Policy Considerations

The policy should be implemented in conjunction with all other relevant procedures, guidelines & regulations, including:
- UKVI Student Visa guidelines
- Student Sponsor Guidance
- Faculty and/or departmental attendance & engagement policies.
- Procedures for withdrawal and expulsion form studies.
- Student Discipline Procedure
- Research Code of Practice

Appendix 1: Student Engagement and Monitoring Systems (SEAMS)

Overview

As a Student Route Visa Sponsor, the University has a responsibility to evidence student attendance and engagement. The University is required to demonstrate that all student route visa-holding students are attending and engaging in their programme

of study and that there are active procedures in place to identify and address attendance/engagement patterns of concern.

How we monitor engagement.

- Faculties and/or department should set out expectations about the extent to which students are required to engage, and specifically how they will be expected to engage during their programme of study. Programme handbooks (and individual module descriptions) will set out the likely time that will be required to dedicate to various activities designed to meet learning outcomes.

- Faculties are required to monitor and record a sponsored student's meaningful engagement with their studies and should incorporate a variety of types of academic engagement.

- The Student Engagement and Monitoring System (**SEAMS**) is the tool we use to monitor engagement on a daily basis (university working days only). The SEAMS tool assists staff and students by sending engagement alert emails when non-engagement reaches a specified level (i.e., time elapsed without contact being recorded or too many consecutive expected contacts missed). Emails alerts act as a prompt for action to be taken by either the student or their academic department.

- We use several metrics to measure academic engagement and data is available to those Academic and Support staff members, whose role it will be to support 'at risk' students. All personal data will be processed in accordance with the University's Data Protection Policy and data protection legislation.

Definition of a contact

- Student engagement will be recorded on SEAMS as either an 'active' contact or a 'passive' contact, and different contacts will have an appropriate weighting within SEAMS :

  > An **'Active' contact** is where departmental staff have recorded academic engagement and have confirmed **contact** on SEAMS.
  > A **'Passive'** is when **contact** is recorded electronically.

- Electronic contacts are 'passive' and are recorded to give additional information about a student's attendance pattern. Passive contacts should not be used as an alternative to academic engagement (active contact points).

- Contact data will be drawn from the following sources, but the exact contribution of each source to any final metrics, and the associated weighting within SEAMs, may vary depending upon the nature of your programme and mode of study:

  > Attendance: If modules have specific attendance requirements e.g., tutorials, labs, lectures.
  > Interaction with Programme Staff (Academic and Support) for academic reasons e.g., scheduled meetings with dissertation supervisors.

- Assessment: Completion of required assessment components e.g., exam attendance, submission of coursework (in person and electronic).
- Virtual Learning Environment (VLE) Interaction: Time spent using, and interaction with the VLE (absolute and relative to other students on the same modules/programmes).
- Library: Electronic and physical usage.
- Engagement with University processes: Exceptional Circumstances, Academic Appeals.
- Information on work placements, and off campus study (fieldwork), should be updated in SEAMS and regular contacts should continue to be recorded.

- Similar systems are used widely across the sector and rely, to some extent on sponsored students interacting honestly with the systems, complying with any requirements, and accurately recoding all aspects of their engagement.

- Staff will take appropriate measures to help reduce the risk of error and/or fraudulent activity. Any student found to have falsified information within the system will be subject to sanction under the Student Discipline Procedure.

When are students monitored?

- The days that SEAMS monitors depend on the academic timetable for the University.

- SEAMS does not monitor on days the University is closed or during vacation periods designated for their student group. (Thus, UGs are not monitored during the summer vacation period but PGTs and PGRs are monitored all year).

What does SEAMS monitor?

- SEAMS is designed to monitor students passively (using electronic activity only) or actively (where department staff are confirming contacts and are adding these contacts to SEAMS).

- If a contact has not been recorded for a student SEAMS will start adding up the number of days where no contact has been recorded (this is shown under Days on a student's SEAMS record). The number of days will continue to add up until another contact is added, then the "Days" will reset to zero.

SEAMS Alerts

If a student fails to meet the required level of engagement an alert will be triggered when the student reaches the RED monitoring state and an automatic email sent to the student. If the student responds and engages, the department should record a contact such that the student's status will be reset (to "GOLD").

If the student does not respond, they will continue to move through the SEAMS sequence of monitoring states (as the Days increment, they trigger the states below):

GOLD > GREEN > AMBER > RED > REPORT WARN > REPORT FOLLOW-UP.

If no contact is recorded when the student's status is REPORT WARN, the student has not met
University requirements for expected engagement and attendance. At this point the student's
situation is referred to the Vice-Dean (Academic) to decide whether the student should be
withdrawn from study. The department will be asked to provide the Vice-Dean with information
about the student's situation. If there is no valid reason for the lack of contact, the student will be
required to withdraw from the University and UKVI will be notified.

How should a department monitor and manage engagement and attendance?

The department should use SEAMS to keep an audit trail of student engagement at all expected contact points. Academic staff (e.g. PGR supervisors), and nominated administrative staff should record all engagement or attendance during the monitoring period.

The department should use appropriate mechanisms to monitor engagement of and attendance by each group of students through one or more of

- recording attendance at lectures, labs, tutorials, etc.;
- recording attendance at a meeting with a supervisor (for project, dissertation or thesis);
- recording attendance at any other meeting with any member of staff (e.g. Personal Development Adviser);
- recording submission of an assessment task (e.g. lab report, assignment);
- recording attendance at class tests and examinations.

Where a student has failed to meet the required level of engagement, the department should use all possible means to contact the student. Potential contact mechanisms include e-mail, phone, letter sent by registered mail, Facebook and other social media platforms to which the student has subscribed.

It is essential that the department acts quickly to follow up on a student who has failed to engage at any expected contact point.

How will we determine what constitutes low levels of engagement?
SEAMS records the number of consecutive working days without a contact being logged (i.e., there has been no recorded academic engagement). The number of days without an entry accrues until a contact is added. **A student record on SEAMS starts with a Gold Status**.

The University has determined the level of expected engagement and attendance for each course type. SEAMS monitors engagement and attendance against these requirements and generates an alert when a student fails to meet the requirement.

The University has considered the level of expected engagement with studies per course type. Once the student reaches a certain number of days without contact, an

alert will be triggered, and an automatic email is sent to the student and associated staff members.

Once an alert has been sent, the Department must update SEAMS with any confirmed activity, if applicable. A contact can only be added if it is evidence of academic engagement. Once evidence of academic engagement is added, the student SEAMS engagement record will be reset.

If a student reaches an unacceptable level of non-engagement (i.e., they reach the third alert stage), the Vice Dean Academic will be asked by the Visa Compliance Team to assess the situation and decide whether the student should be compulsory withdrawn due to non-engagement. If yes, the student will be reported to UKVI, and sponsorship of the visa will be withdrawn.

Alternatively, if evidence of satisfactory engagement has been produced, the engagement record on SEAMS will reset.

A SEAMS flowchart setting out the operational process and timeline for recording contacts, and the current alert levels, is available to all staff and students on the [Visa Compliance Sharepoint](#).

Acceptable levels of engagement must be met, and this policy applies across all academic levels, including postgraduate research (PGR). However, the policy allows for differentiation in our approach to research students. The timelines for recording contacts and sending alerts are more generous for PGR students to reflect this approach.

If engagement levels using the above metrics lead to engagement concerns being flagged, we may also consider other metrics, as appropriate and where available, to help determine an overall picture of engagement:

- Any specific requirements, as may be determined by the relevant office of the UK Government, for students who require a visa to study in the UK.
- Any specific Professional, Statutory or Regulatory Body requirements which are applicable to the student's course of study.
- Meaningful engagement with relevant academic staff, including but not limited to, Academic Advisers of Studies/Personal Tutors, dissertation supervisors and Research supervisors.

What action will the University take when we have identified low levels of engagement?

We believe that it is important to ensure that we can identify and highlight instances of very low levels of engagement or where engagement is significantly out of line with a designated peer group and intervene to support students where we feel that it is important to do so. Supportive interventions can take many forms but will primarily be designed to support all students and try to maximise their opportunities to succeed in their programme of study.

Sponsored students requiring a visa to study in the UK will be made aware that the University has a specific requirement under our UKVI Sponsor License to monitor

engagement and where non-engagement is identified we may ultimately need to withdraw visa sponsorship and report this withdrawal to UKVI.

Additional Considerations:

If the student is on a year abroad

- For students who hold a student visa on a **year abroad**, year in industry or any other type of work placement, monitoring arrangements will be agreed in advance for these students, as well as students who will be studying at a partner institution, either in the UK or overseas, for a specified period of time during their programme of study.

- A member of staff at the partner university will act as a co-ordinator and report on the academic engagement of students on a regular basis. If the student fails to keep two or more of their expected points of contact without authorisation, the Visa Compliance Team will discuss this with the Programme Lead and relevant academic adviser.

Appendix 2: SEAMS Flowchart

SEAMS FLOWCHART
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