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## **ATTENDANCE MONITORING AND RECORD-KEEPING OF INTERNATIONAL STUDENTS**

We recently met to discuss attendance monitoring and student engagement with their studies. I agreed to clarify our expectations in writing so that you could then share this with your members.

### **Attendance Monitoring**

The fundamental principle of the Points Based System is that those who benefit from immigration must play their part in controlling it. The intention of the Tier 4 attendance monitoring policy is to ensure that students who have been given permission to come to the UK to study continue to do so. We expect all sponsors to have a system in place to

continually monitor student attendance that enables you to identify when a student has stopped studying.

We deliberately do not prescribe a particular attendance monitoring or record-keeping system due to the number and diverse range of education providers licensed under Tier 4. We understand that policies and systems are likely to vary between institutions and each sponsor's arrangements should be appropriate to its own circumstances.

Our attendance monitoring policy does not automatically require sponsors to create separate monitoring systems for international students. Although the implications of non-attendance may be different for international students due to their immigration status, the requirements for Tier 4 students can be incorporated into existing policies and systems for all students, as long as these are sufficient to meet the monitoring requirements. It follows therefore that if HEI processes are already sufficient to meet the Tier 4 requirements through established academic contact points, then HEIs do not necessarily need to consider introducing physical checks in addition to and separate from these.

Our compliance officer network is starting to collect examples of systems that meet our requirements with the intention of producing detailed case studies and sharing these with the sector over the next few months.

#### Compliance Visits

The fundamental questions that we consider when looking at a sponsor's attendance monitoring arrangements are: whether students we have given permission to come to the UK to study at your institution are continuing to do so and whether you know that they are continuing to attend.

Our compliance visits will focus on three main lines of enquiry when considering attendance monitoring arrangements:

1. Is the individual continuing to study at an institution?
2. Is there a robust policy and process in place to monitor continued engagement with studies?
3. Is this process being followed in practice?

#### Reporting Non-Attendance

We are aware of concerns within the sector about what sponsors need to report to us and when they need to report it in order to remain compliant. I can confirm that we no longer require you to report to us when a student has missed 10 expected contacts. During 2012 we changed the Tier 4 reporting requirements so that we only require you to notify us at the point that you withdraw sponsorship.

Sponsors should notify us that a student is no longer attending within 10 days of deciding that the student has stopped engaging and that you wish to withdraw sponsorship or at the next contact point after you have made the decision to withdraw sponsorship if you are highly trusted and have chosen to make two checkpoints during the year. This could be a number of weeks or months after you first started to chase a student for not attending.

As a result of this concern we are currently re-writing the relevant section of our Tier 4 policy guidance for sponsors on reporting students who do not maintain contact. This guidance will

be available very shortly on the UK Border Agency website and we will let you know when it is published.

Future work

I am keen that we improve the support we provide to sponsors and want to work with the sector on a number of areas. As part of a wider agenda on co-regulation a senior steering group has been established, which brings together representatives from the relevant government departments and the sector to address key issues. More specific information on this will be communicated by the steering group shortly.

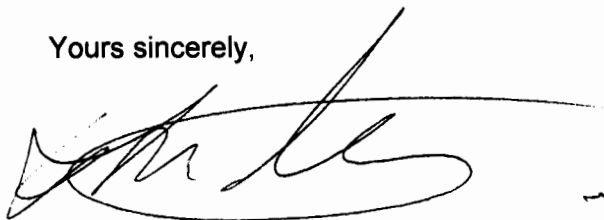
We are setting up a dedicated team of compliance officers for Higher Education Institutions. This team will develop a detailed working knowledge of the sector which should help to improve the consistency of audits. This team will consider how we provide written feedback to sponsors following an audit where no concerns were identified.

Finally, we will continue to work closely with UUK to support future workshops on sponsor obligations and to work with sector agencies to agree a series of principles around attendance monitoring.

I hope this provides the clarification that you and your members need. Please get in touch if I can help with anything further.

I am copying this letter to the Equality Challenge Unit and the National Union of Students.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'George Shirley', with a long horizontal flourish extending to the right.

George Shirley  
Head of PBS Sponsorship