

Student learning Engagement Policy – Guidance on our duties as an immigration sponsor

Introduction

As an immigration sponsor, Queen Mary is obliged to adhere to its sponsor duties in order to retain a Student sponsor licence and continue recruiting international students.

One key duty is the requirement to effectively monitor the engagement of those students who are sponsored on a Student visa (previously known as a Tier 4 student visa).

In order to comply with UK Visas and Immigration (UKVI) requirements, the university must be able to demonstrate a single and robust academic engagement policy that applies consistently to all international students across the institution. It can be the same policy that applies to all students and may differentiate between levels of study (for instance, doctoral and masters by research students will likely have their engagement recorded in a different way to undergraduate and postgraduate taught students).

Sponsors must be able to produce their academic engagement policy on request and demonstrate:

- how it is being applied
- that systems are in place to monitor academic engagement
- what information is being recorded to confirm that students are academically engaging
- what actions are expected when a lack of academic engagement is identified
- the maximum period of non-engagement before intervention takes place does not exceed 60 days in duration (excluding postgraduate research and doctoral students)
- that they have a robust system in place to identify any student who has ceased to engage with their studies and the action they will then take to support the student to re-engage
- that they have a clear policy on when non-engagement will lead to withdrawal of sponsorship.

For students sponsored on a Student visa by QMUL, the University is required to maintain attendance records and to report absence in accordance with its sponsor duties to the UKVI. The University must be able to evidence sponsored Students' engagement records to demonstrate that engagement is recorded and that non-engagement is acted upon in the event of a UKVI audit.

Each School/Institute will set their own expectations for appropriate attendance and engagement levels. This will be reflective of the nature of the programmes being delivered in that area, as well as the requirements of any professional, statutory or regulatory body. Engagement Monitoring Plans will therefore be reviewed periodically to ensure compliance with requirements.

Sponsored Students are permitted to apply for an interruption in studies from their programme for personal or medical reasons. They may also request a short period of authorised absence. This is assessed on a case-by-case basis. Guidance and advice on

these processes can be sought from the appropriate School/Institute contacts (academic advisor / Student Support team / supervisor).

For absences and breaks in study of more than 60 days, as well as failure to meet the minimum requirements as set out in this guidance, the University must withdraw sponsorship of the student's visa and deregister them for lack of academic engagement (except in exceptional circumstances).

This guidance sets out measures for sponsored Student engagement monitoring as per UKVI requirements.

Academic engagement requirements for higher education providers

Band 1 – Study at a higher education provider at RQF level 5 and below

Students studying courses below degree level must be required to attend a minimum of 15 hours daytime (08:00 to 18:00, Monday to Friday) classroom-based study per week.

Where the student has not reached 85% attendance of their classroom-based study in any given month, the school/institute must review the reason for the student's absence. The student's record must then be annotated with the reason for the non-attendance and the steps being taken to improve the student's attendance.

Where a student's attendance falls below 70% for three consecutive months, the sponsor must withdraw sponsorship due to lack of academic engagement unless there are exceptional and evidenced reasons for the non-attendance (e.g. illness).

Band 2 – Study at a higher education provider at RQF level 6, RQF level 7 (Taught and Research) and RQF level 8

Schools/Institutes are expected to be able to evidence engagement for those who are registered on a Taught programme (i.e. a bachelors or masters degree). However, during the masters dissertation period, monthly confirmation of engagement is permitted.

For UG/PG Taught students, engagement evidence should be retained and monitored via attendance input through systems feeding into the University's analytics platform.

For PG Research students, engagement should be recorded in line with the Attendance and Supervision sections as defined by the Code of Practice for Research Degree Programmes.

Academic engagement evidencing a student's academic participation with their programme is indicated by activities including (but not limited to):

- Attending required lectures, seminars or tutorials
- Undertaking required laboratory work
- Undertaking research or fieldwork
- Submitting essays, assignments, projects and attending examinations

This is not an exhaustive list and not all programmes will contain all these study elements. Additional forms of engagement are outlined in the main Student Learning Engagement Policy and can also include:

- Records of supervisory meetings
- Attending progress reviews (to include upgrade/downgrade recommendation meetings)
- Attending Viva Voce examination

The academic engagement policy must also set out the sponsor's policy for retaining contact with students:

- on work placements/research programmes/field research trips if the student is studying at RQF Level 6 or above
- on Postgraduate Doctor or Dentist courses
- on study-abroad programmes (outward from the UK)
- during dissertation periods, where the student has no taught elements during this period
- whilst undertaking official roles as Student Union sabbatical officers

Where a student opts to or must defer their studies for more than 60 days, sponsors are required to notify UKVI and withdraw sponsorship (unless exceptional circumstances apply).

Band 3 – Exceptions

During the following periods, sponsors are not required to monitor academic engagement of their students in any way for immigration purposes:

- During published/programme vacation periods
- During the post-study period (immigration permission between expected course completion date and visa expiry date)

Non-engagement

Any sponsored Student who fails to engage with any of their scheduled classes or meetings, without authorised absence or extenuating circumstances, risks their sponsorship being withdrawn, whether they are in the UK or overseas. Students should therefore contact their School/Institute if they are unable to attend scheduled teaching events or meetings.

The Immigration Compliance Team carries out its monitoring reports and continues to check for evidence of non-engagement. We will contact academic departments and expect to receive information pertaining to students regarding instance of non-engagement. The maximum period of non-engagement before intervention takes places must not exceed 60 days in duration (calendar days as confirmed by the UKVI) otherwise we must withdraw sponsorship and they will be de-registered from their programme.

Should Schools/Institutes become aware of a sponsored student with unsatisfactory attendance/engagement and/or failure to re-engage after exhausting all opportunities, they should contact the Immigration Compliance Team on immigrationcompliance@qmul.ac.uk.

REMINDER:

It is a criminal offence, punishable by fine and/or imprisonment, for anyone to provide, or offer to provide, immigration advice and services without being approved to do so by the Office of the Immigration Services Commissioner (OISC) (or is otherwise covered by the Immigration and Asylum Act 1999).

The Immigration Compliance Team and Advice and Counselling Service are therefore the only departments permitted to provide immigration advice to students.

Queries

Schools/Institutes with queries about attendance/engagement and the associated policies, please contact the Immigration Compliance Team on immigrationcompliance@qmul.ac.uk.

Students with immigration queries should be referred to contact the [Advice and Counselling Service](#).

Graduate Route Eligibility

For sponsored Students who intend to apply for the Graduate Route upon successful completion of their programme, they will need to meet the Study in the UK requirement of the eligibility criteria.

This means for students whose programme is 12 months or less in duration, they should spend the full duration of the course in the UK on Student immigration permission.

Students who are absent from the UK during a required study period (during term time) may find that their eligibility for the Graduate Route is at risk if they chose to undertake a period of study activity/their dissertation/project while outside the UK or take a period of authorised absence even if permitted to by the School/Institute and we continue to sponsor their visa.