

## Attendance and Engagement Monitoring Procedure for Student Visa Sponsored students

### 1. Purpose

- 1.1 All King's College London students on a Student visa must actively engage in their studies. King's must report disengagement to the Home Office as per the Student Sponsor Guidance Document 2: Sponsorship Duties. Failure to report jeopardises King's Sponsor Licence. King's documents students' academic involvement to ensure compliance and provide support, advice, and guidance to address study barriers and prevent issues.
- 1.2 We expect all students to fully engage in their studies throughout their programme at King's. Academic engagement means actively and consistently following their course of study.

### 2. Scope

- 2.1 This policy applies to all students sponsored by the University under a Student visa. Academic engagement is required from the course start to end date, with in-person activity as the primary mode of engagement.

### 3. Responsibilities

- 3.1 Faculties must monitor and record academic engagement and report at-risk students to the Visa Compliance Service.
- 3.2 The Visa Compliance Service sends final warnings to students and submits timely reports to UK Visas & Immigration (UKVI) if necessary.

### 4. Data storage

- 4.1 All academic engagement registers and submission records must be stored locally or attached to the central Student Record.
- 4.2 Other evidence, such as emails about academic engagement and medical evidence, must be held with the student's record, either centrally or locally. Locally held records must always be accessible upon request.

### 5. Procedure

- 5.1 **Courses below degree level:**  
For Foundation and Pre-Sessional students below degree level, UKVI requires a minimum of 15 hours of daytime classroom study per week (08:00 to 18:00, Monday to Friday).
- 5.2 If a student's attendance drops below 85% in a month, their absence reasons must be reviewed and recorded, along with actions to improve attendance.
- 5.3 If attendance remains below 70% for three consecutive months, the university may withdraw visa sponsorship unless there are verifiable, exceptional reasons, such as illness.

Faculties must be able to produce monthly attendance reports for all visa sponsored students below degree level upon request by the Visa Compliance Service.

#### 5.4 Recording Requirements and Procedure for Attendance and Engagement Monitoring. Frequency for Below Degree Level - Foundation and Pre-Sessional Students:

- **Monthly Review:**  
On the last working day of the month, faculty must review student attendance rates.
- **Documenting Attendance Below 85%:**  
Record instances of attendance below 85% and actions taken to improve attendance and the reason for any absences.
- **Attendance Below 70%:**  
If attendance drops below 70%, contact the student to encourage reengagement and explain visa risks. Document all communications and actions taken.
- **Consecutive Low Attendance:**  
If attendance remains below 70% the following month, take further measures to reengage the student and document risks. For two consecutive months below 70%, assess attendance mid-month in the third month.  
Inform Visa Compliance if attendance is still below 70%. Visa Compliance will consider sponsorship withdrawal unless valid, exceptional reasons are documented.
- **Withdrawal Decision:**  
If faculty decides the student should be withdrawn or interrupted, inform Visa Compliance for reporting to UKVI.
- **No Engagement for 60 Days:**  
Inform Visa Compliance if there has been no engagement for 60 days to report sponsorship cancellation.

#### 5.5 UKVI Academic Engagement Requirements for taught students above degree level

For above degree level (full-time and part-time study at RQF 6 and RQF 7 Taught programmes), UKVI requires the faculty to determine the essential study components for each course, defining what qualifies as academic engagement, and ensuring that the timeframe between essential study components does not exceed a period of 60 days during term time.

5.6 The faculty is responsible for informing students about their responsibilities related to academic engagement and clearly outlining what is expected of them to ensure transparency.

##### 5.6.1 Indicators of Academic Engagement:

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

*(Note: This list is not exhaustive, and not all courses will include all listed activities.)*

5.6.2 Academic engagement refers to a student's active participation in their academic course, therefore examples of what academic engagement does not include are:

- Non-academic activities, such as attending social events/clubs even if related to the university
- Administrative engagement, for example, meeting with administrative staff, attending visa compliance sessions etc.
- Non-Study related visits to campus, for example coming to campus for personal reasons

## 5.7 Maintaining Contact with Students During Periods Without Taught Elements

There must be procedures in place for maintaining contact with students during periods when there are no taught elements.

### 5.7.1 During Dissertation Periods for Taught Students

Faculties must establish and document contact procedures during the dissertation period.

Methods of Contact:

- Scheduled meetings with a dissertation supervisor
- Milestone submissions (e.g., proposal drafts, progress reports)
- Final dissertation submission

*Contact must occur at least every 60 days.*

### 5.7.2 Dissertations from overseas for Taught Programmes

Students may complete dissertations from overseas with agreed contact points every 30 days to comply with UKVI Distance Learning regulations. Contact points are set by the faculty and can be any or a combination of the following:

- Supervisory meeting (face to face, MS Teams, Telephone)
- Email check-in (with response) from academic or professional service team within faculty.

Contact points would need to be recorded by the faculty against the student record so that we can evidence upon UKVI audit.

### 5.7.3 Dissertation retakes/deferrals:

This section refers to students who have a visa extension to complete a dissertation retake/deferral with agreed contact points.

For students who are retaking their dissertation 'in attendance' – a CAS can only be issued where contact points are put in place at least every 60 days.

Contact points should be set by the faculty and can be any or a combination of the following:

- Supervisory meeting (face to face, MS Teams, Telephone)
- Email check-in (with response) from academic or professional service team within faculty.

Contact points need to be recorded by the faculty against the student record.

### 5.7.4 Retake Exams

For students retaking in-person exams without teaching, their exam attendance must be recorded. If they do not attend, notify Visa Compliance to withdraw sponsorship.

### 5.7.5 Off-Campus Study Periods for Taught Programmes

During agreed off-campus study periods, faculties must retain contact with students and document this in the student record. This includes time at non-King's premises for:

- Work placements
- Study abroad placements
- Data collection
- Research projects
- Joint-degree programmes
- Intercalated study modules

Contact points should be set by the faculty and can be a combination of the following:

- Supervisory meetings (in-person, MS Teams, telephone)
- Email check-ins with responses from academic or professional services

Contact must occur at least every 30 days and be recorded in the student record.

## 6.0 UKVI Academic Engagement Requirements for Research Students

The faculty is required to specify the minimum level of engagement necessary to fulfil academic requirements for research students undertaking a PhD or MRes programme. This definition must be clearly outlined and recorded.

### 6.1 Indicators of Academic Engagement for students studying PhD or MRes:

- Progress reports
- Supervisory meetings in person, or via Teams
- Chapter submissions
- Submission of thesis
- Viva

*(Note: This list is not exhaustive, and not all programmes will include all listed activities.)*

## 6.2 During Periods of Off-Campus Study for Research Programme

### 6.2.1 Off Campus Study:

Postgraduate Research (PGR) students may need to travel overseas for research as part of their degree. If approved, this research period outside the UK will not affect the student's visa, regardless of duration, as long as it is integral to their degree. Students must complete an Off-Campus Study Form, have it signed, and send it to Visa Compliance to report their alternative study location.

### 6.2.2 Living outside the UK:

If students wish to reside outside the UK, it may impact their visa, and sponsorship may need to be withdrawn. According to Student Sponsor Guidance, students cannot reside outside the UK and study on a student visa. Therefore, if students plan to be outside the UK for more than 60 days for reasons not related to their studies, the University will be required to withdraw visa sponsorship. In these circumstances, student is strongly encouraged to seek guidance from the Visa & International Student Advice team to understand the impact on their student visa and eligibility for the Graduate route.

## 7. Disengagement Escalation Procedure for taught students at degree level and above

### 7.1 Timeline

#### **Stage one –**

#### 7.1.1 Deadline 30 days of non-engagement:

If student has not engaged academically for 30 days, or if concerns arise earlier regarding unsatisfactory academic engagement as per faculty policy, faculties must begin the non-engagement process by reaching out to the student to attempt re-engagement in studies.

#### 7.1.2 First contact with student regarding non-engagement (must take place after no more than 30 days of non-engagement). Initial contact triggers the 60 day count down (30 days for

off campus study).

### **Stage Two –**

- 7.1.3 An additional attempt to contact the student regarding non-engagement if no satisfactory response is received or no re-engagement has been seen. Therefore, correspondence from faculty should clearly outline the risk to their student visa. (See Appendix 1).

### **Stage Three –**

- 7.2 **Guidelines on the Action for non-engagement for degree level and above**  
If a student remains disengaged for 60 days, their visa sponsorship will be revoked. However, in exceptional circumstances such as serious illness or injury, the University may continue sponsorship beyond 60 days, provided the student can still complete their course within their current visa validity upon resuming studies.
- 7.3 UKVI sets timeframes enabling institutions to reengage students and safeguard their visas. This procedure aims to identify students of concern and those at risk of disengagement to provide necessary support and protect their student visas. It also outlines the necessary steps to comply with UKVI guidelines on academic engagement and sponsorship withdrawal when required.
- 7.4 Outcome of attempts to re-engage.
  - 7.4.1 A decision has been made to withdraw/interrupt the student – Visa Compliance are informed within 60 days of initial contact with student.
  - 7.4.2 In the event of unsuccessful engagement, the faculty is required to notify Visa Compliance at least 10 calendar days before the 60-day deadline. Subsequently, Visa Compliance will send an email to the student, informing them of withdrawal of sponsorship. Student Records will also receive notification to facilitate the withdrawal of the student from the course in accordance with 8.3 of the Academic Regulations. If the student reengages with their studies and can complete them within their current visa period, the matter can be considered resolved and closed. No further action will be required.
  - 7.4.3 Every action and measure taken must be documented and recorded against the student's record.
- 7.5 Where there are concerns for the student's welfare, faculties should follow the [Prolonged Lack of Contact Student Procedure](#) / [Student of Concern Procedure](#) in parallel to this procedure to ensure that the student receives support.

## **8. During Recognised Vacation Periods for all levels of study**

We are not required to monitor academic engagement for immigration purposes, during vacation periods and during the post-study period.

- 8.1 For clarity, for postgraduate taught students on a 12 month programme the summer period is not a vacation period.
- 8.2 Postgraduate research students do not have specified vacation periods. Any time taken from study will be agreed as part of their annual leave entitlement and contact points are not required during this time.

## **9. UKVI Academic Engagement Requirements for Sabbatical Officers**

UKVI state that as a sponsor we must set out how we retain contact with students who are sponsored as Sabbatical Officers, and we ensure that this is recorded. King's College London Students Union (KCLSU) are responsible for maintaining and documenting contact with Student

Visa sponsored Sabbatical Officers in accordance with their local staffing policies.

- 9.1 In the case of no contact, KCLSU will follow their local performance management procedures and notify the University's Visa Compliance service where there is no response from the sabbatical officer after a period of 30 days. The University Visa Compliance service will then contact the sabbatical officer, copying in the KCLSU, outlining the risk to their Student Visa. Where no further contact is made by the Sabbatical officer after a period of 60 days, Visa Compliance will report a withdrawal of visa sponsorship to UKVI.

## 10. Extension of Enrolment/ Non-Enrolment

UKVI require Universities to confirm students are enrolled and engaging with their programme within 10 days of their latest date of Enrolment.

### 10.1 Timeline

- 10.1.1 Student records will disseminate student lists to faculties at the start of Week 3 identifying students who have not completed full enrolment or have failed to engage with the enrolment.
- 10.1.2 During Week 3 Faculties engage students to confirm academic engagement with their course and encourage completion of full enrolment.
- 10.1.3 Week 4 Faculties identify any students who have failed to engage academically and advise Visa Compliance.
- 10.1.4 Any students who request an extension to their enrolment deadline should also be identified at this point to the Visa Compliance service with details of how they will be academically supported until they arrive.
- 10.1.5 Visa Compliance will notify the UKVI and the student of withdrawal of their visa sponsorship.

## 11. Absences/Authorised Interruption

Faculties should establish a way for students to inform them that they are absent and hold records of approved pro-longed absence. Pro-longed Absence is defined in this procedure as more than 30 days or less than 30 days where the absence will delay the end of their programme.

(Please note that this does not include vacation periods, during which there is no requirement to monitor sponsored students.)

- 11.1 Students are generally not permitted to be absent during designated teaching and examination weeks. It is crucial that faculties provide clear information to students on how to report an absence and encourage students to reach out if they are unable to engage with their studies.
- 11.2 Unauthorised Absences:  
If a student is granted permission to miss academic engagements due to illness, for example, this does not need to be reported to Visa Compliance, so long as it does not exceed 60 days and they can still complete their course within their student visa validity.
- 11.3 Absences must not exceed 60 days, and the student must be able to complete their course within the validity of their current Student visa. If an absence looks like it may exceed 60 days and/or if the course end date will be extended due to the absence, the faculty must inform Visa Compliance, as the student may need to be interrupted from their studies.
- 11.4 In exceptional circumstances, such as serious illness or injury, the university may extend sponsorship for a student who is absent beyond 60 days, provided the student can complete their course within the existing period of visa permission upon resuming their studies. Faculties

must notify Visa Compliance in these situations to establish if continued sponsorship is permitted and if so, document the supporting evidence.

## 12. Authorised Interruption

Faculties may also grant permission for absences under other circumstances. It is up to the faculty to support such absences and, if necessary, provide evidence to UKVI if questioned.

- 12.1 Any authorised interruption must be officially reported through Student Records, following standard procedure.
- 12.2 The university may continue to sponsor a student who has interrupted their studies for up to 60 days, provided the student can complete their course within the existing period of permission. If the student will not resume their studies after 60 days, the faculty must inform Visa Compliance to withdraw sponsorship.

## 13 Break in studies resulting from a university action.

Where a student cannot engage in studies due to a university-initiated action for a consecutive period of 60 days or more (excluding official vacation periods), or if the break from studies prevents course completion within the current visa validity, Visa Compliance Service must report withdrawal of visa sponsorship to the UKVI.

- 13.1 Examples of study absences resulting from university actions include:

- Mandatory Interruption
- Suspension of studies

- 13.2 The student will be informed by the Visa Compliance Service of the risk to their student visa, should there be no change in their status after 60 days or if they cannot complete their course within their current visa validity.
- 13.3 If the faculty is uncertain of what may be permitted, they can contact Visa Compliance for further guidance.

## Appendix 1 – Templates for communicating with student who is disengaging.

### Stage 1 – Sent on day 1 (student not engaged for 30 days)

Emailed to Student King's email address.

Subject: Checking in regarding your attendance

Dear <<Known As Name>>

<<Student ID>>

We have noticed that you have not been attending or engaging with your course in the last 30 days. We wanted to contact you to see if you require any support and to highlight your responsibilities as a Student visa holder.

#### Support Available:

If you are facing any difficulties, either with your course or outside of your academic life at university, we offer a range of student support through [Student Services Online](#). We encourage you to engage with the resources available if this applies to you.

#### Your responsibilities as a Student Visa Holder:

As a Student visa holder, engagement on your course is a condition of your visa and of your enrolment at King's College London, as outlined in the University Attendance and Engagement Policy.

Failure to academically engage, may result in the withdrawal of your Student visa sponsorship and therefore withdrawal from your programme of study as per paragraph 4.1.4 of the [General Terms and Conditions for Students](#).

For further guidance on this process please contact the university [Visa Compliance Service](#).

For general advice related to your visa, support is available via the University [Visa & International Student Advice team](#).

#### Next Steps:

Please reply to this email by <<'(Please enter the date by which the student needs to contact us in response to this email)'"DD/MM/YYYY">>so that we can support you moving forward.

Kind regards,

Name

Job Title

Department

Faculty



**Stage 2 – Sent on day 30 (student not engaged for 60 days)**

Emailed to student King's email and personal email cc'ing [visa-reg@kcl.ac.uk](mailto:visa-reg@kcl.ac.uk)

Subject: Urgent – Response Required

Dear <<Known As Name>>

<<Student ID>>

Further to our email on <<enter date of stage 1 email>> We have noticed that you have continued to not attend or engage with your course in the last 60 days.

It is urgent that you respond to this email to allow us to support you moving forwards. Failure to do so could result in the withdrawal of your Student Visa sponsorship and therefore your ability to continue studying with us.

Your responsibilities as a Student Visa Holder:

As a Student visa holder, engagement in your course is a condition of your visa and of your enrolment at King's College London, as outlined in the University Attendance and Engagement Policy.

Failure to academically engage, may result in the withdrawal of your Student visa sponsorship and therefore withdrawal from your programme of study as per paragraph 4.1.4 of the [General Terms and Conditions for Students](#).

The university Visa Compliance service is copied into this email as a formal record of this second attempt to contact you.

Support Available:

If you are facing any difficulties, either with your course or outside of your academic life at university, we offer a range of student support through [Student Services Online](#). We encourage you to engage with the resources available if this applies to you.

For general advice related to your visa, support is available via the University [Visa & International Student Advice team](#).

Next Steps:

It is urgent that you reply to this email by <<'(Please enter the date by which the student needs to contact us in response to this email)'"DD/MM/YYYY"'>>so that we can support you moving forward.

Kind regards,

Name

Job Title

Department

Faculty

**Stage 3 – Sent on day 50 (student not engaged for 80 days)**

Emailed to student King's email and personal email cc'ing [visa-reg@kcl.ac.uk](mailto:visa-reg@kcl.ac.uk)

Subject: Urgent – Withdrawal of Visa Sponsorship

Dear <<Known As Name>>

<<Student ID>>

We have noticed that you have not been attending or engaging with your course in the last 80 days. We have tried to contact you on <<date of stage 1 and stage 2 communications>>.

In our previous communications we confirmed that failure to academically engage, may result in the withdrawal of your Student visa sponsorship and therefore withdrawal from your programme of study as per paragraph 4.1.4 of the [General Terms and Conditions for Students](#).

Due to the above, we are writing to confirm that the University Visa Compliance service (who are copied into this email) will take action to report the withdrawal of your Student visa sponsorship. They will submit this report to the UKVI within 10 days of this email after which you will be notified of both this report and your withdrawal from your programme of studies.

Support Available:

We would like to remind you that the University offers a range of support through [Student Services Online](#). We encourage you to engage with the resources available if this applies to you.

For general advice related to your visa, support is available via the University [Visa & International Student Advice team](#).

KCLSU can provide free, confidential and impartial guidance; advisors can be contacted via an [online form](#).

Appeal:

You reminded of your right to appeal the University's decision to withdraw your Student Visa sponsorship. Any request for an appeal must be submitted in the form of a written statement to [appeals@kcl.ac.uk](mailto:appeals@kcl.ac.uk) within 10 working days of the date of this email.

Kind regards,

Name

Job Title

Department

Faculty