INTO WUNIVERSITY OF EAST ANGLIA

Student Attendance, Engagement and Progress Policy and Procedures

4.0 - June 2023

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Creation and Revision History

To be reviewed annually by Academic Support Manager. Next review due June 2024.

Version	Owner	Purpose/Change	Date
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2.2	Natalia Ponomareva, Academic Support Manager	Update to Lateness policy	August 2017
2.3	Natalia Ponomareva, Academic Support Manager	Update to Procedures	August 2017
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4.2	Natalia Ponomareva, Academic Support Manager	Amendments to 3.4	August 2023

1 **Statement of Policy**

This policy applies to students studying on both UEA validated programmes and non-UEA validated (Academic English and A Level) programmes. The policy shows the procedures for monitoring student attendance in cases of lateness and non-attendance, ensuring UK Visa and Immigration (UKVI) compliance whilst providing a structure of support for students at risk and promoting a culture of attendance across the Centre.

For the policy to function effectively, both students and the teaching staff who record registers are required to understand the expectations upon them.

1.1 **Expectations of teaching staff**

For the attendance and warning process to function effectively and to support students at risk, registers must be completed during the first 5 minutes of the lesson. For practical reasons, registers for big lectures (33+ students) will be taken by a member of the Academic Support Team

1.2 Expectations of students in relation to attendance, engagement and progress

We expect students to attend 100% of their scheduled classes (whether delivered online or incentre). We expect students to arrive on time for online and in-centre classes. For online classes, students should use laptops or a personal computer, as content may not be mobile-friendly. Students should complete all tasks assigned by teachers and demonstrate that they are interacting with others, for example, regularly posting on the group chat for any classes being taught. Where students are not able to attend the live lessons, they are expected to inform their teachers and academic support in advance of the class and provide evidence as to why they have not attended the session – all absences must be authorised for all classes, whether they are delivered online or in centre.

In the event that internet connectivity prevents participation in the online lessons, this should be documented and evidenced by taking a screen shot. In such cases students will be able to access the learning materials after the live session has taken place through a recording.

1.3 UKVI reporting regulations and centre context

Where a student has been granted a visa by UKVI to study in the UK under the sponsorship of the University, failure to comply fully with some or all of the expectations set out in this policy may be deemed a breach of the conditions of the visa in accordance with UKVI regulations.

INTO UEA/UEA is obliged to make reports to UKVI in the following situations in line with UK immigration law:

- If students do not arrive on the expected start date for their studies (or within a short period after they expected start date with the consent of the University) without a valid reason;
- If students withdraw from their programme before the expected end date for their studies;
- If a student has attendance of less than 70% for three consecutive months
- If students interrupt (intercalate) their studies for any reason. If students do intercalate, they will probably no longer be in the United Kingdom for the purpose for which their visa was obtained and students should make arrangements to leave the country;
- If their course changes significantly (including changes in length). If their period of study reduces, we will be obliged to inform the UKVI and their entitlement to remain in the UK may be shortened.

Celebrating student attendance 1.4

As part of creating our culture of high attendance and engagement, we celebrate 100% attendance on an annual basis. Students who obtain 100% attendance are invited to a celebratory "tea party" hosted by the Academic Director, Programme Manager, AST and Student Services.

1.5 Lateness policy

INTO UEA follows a 'zero tolerance' lateness policy. Students arriving late, but during the registration or within the first 5 minutes of the lesson, will be invited into class and marked as late. If arriving to class more than 5 minutes late or after registration has been completed, the student will be denied entry and marked as absent (excluding 'under exceptional circumstances' which have been reported to AST, Welfare or the Programme Manager). The Academic Support Team will notify the teacher if a student should be allowed entry 'under exceptional circumstances' (see below). Students must be treated consistently and equally in terms of access to class.

Students under the age of 18 should be allowed entry and must remain on site for the remainder of the teaching period.

Registers must reflect reality, so all colleagues are available to access "real time" data. Therefore, a student must be marked as 'late' if they are in class for any period of time. Correspondingly, a student must be marked as 'absent' if excluded from class for the whole duration. Similarly, a teacher should mark a student as 'leaving early' if the student has left before the end of class.

2 **Absence Policy**

Student absences during any period of the academic year are classified as "authorised" or "unauthorised". This policy is implemented from the second week of induction and includes Self-Study Weeks.

A consistent, common sense approach is taken with regards to whether an absence should be authorised. AST and Programme Managers will make this decision. The following definitions will act as guiding principles.

Authorised absence ('exceptional circumstances')

- **Evidence of Police Registration**
- Evidence of initial visa and bank appointment
- Evidence of GP / hospital appointment
- Fit note

Unauthorised absence

- Self-certified "low level" medical issues (e.g. headache, cold, sore throat, period pain, overslept / tiredness, fever)
- Appointments for a Schengen visa
- Bank appointments
- Religious holidays or ceremonies
- Medical conditions supported by practitioners of alternative medicine

Students must complete an online absence form on their return and supply documentary evidence where appropriate. They may include a statement from Student Services where appropriate. AST will make it clear to students on submission of their form whether their absence is being authorised or not. AST will consult with the Programme Manager for a decision where necessary. When absences are retrospectively authorised, attendance figures will be re-calculated.

3 Procedures for dealing with matters relating to attendance, engagement and progress

3.1 Reporting of causes for concern about student attendance, engagement and/or progress

A weekly meeting is held between members of AST and Student Services to discuss student absence. Any concerns regarding attendance or engagement from these meetings will be reported to the student's Programme Manager or nominee. Additionally, regular meetings between Programme Managers and Student Services are scheduled to ensure a holistic approach to supporting students in engaging with their studies.

3.2 Weekly monitoring of attendance, actions and outcomes

Weekly monitoring of student attendance patterns allows AST to regularly identify and respond to students with whom there may be welfare concerns and/or signs of habitual non-attendance. The regularity of this recording allows AST and wider teams to respond quickly, allowing a potential build-up of problems to be "nipped in the bud". Four "zones" and contact approaches are used for this monitoring as detailed in the table below. At a Programme Manager's discretion, attendance intervention may take place prior to the unacceptable "Warning Zone".

Zone	Unacceptable "Warning Zone" <90%	Unsatisfactory "Monitoring Zone" <85%	Collapsed Attendance <50%	Non attendance 0%	
Attendance Level	85%-89% attendance in any consecutive 2 weeks	50%-84% attendance in any consecutive 2 weeks	49% or lower attendance in any consecutive 2 weeks or 10 consecutive contact points missed *	0%	
Contact With Student	Email of concern from AST	Contacted by AST / PM and Attendance Meeting arranged.	Contacted / located by AST / Student Services	Student Services must aim to make urgent contact	
Action	Student is made aware that attendance is unsatisfactory at lower than 90% in any given week. In the absence of acceptable evidence, the student will progress on the attendance warning levels if this pattern continues for four weeks.	Student is made aware that attendance is unacceptable at lower than 85% in any given week. In the absence of acceptable evidence, a formal warning process (Level 1) will be triggered or the student will be escalated to the next level where a previous warning has been issued. Any student with a prolonged (six week plus), non-improving accumulated attendance figure of lower than 85% should be recommended for withdrawal by UEA's SSDC.	AST will follow up as a matter of urgency as this could indicate a welfare concern. AST will appraise the Programme Manger and Head of Student Services of the situation who will address accordingly. In the absence of acceptable evidence, this will result in a Level 2/3 warning meeting.	After 5 days of no contact the police should be contacted on the advice of the Centre Director. After 10 missed contact days UKVI must be informed. (See 3.3 for further details of action.)	
	A subsequent formal warning will normally follow a previous formal warning even we for the warnings may be different and/or occurred in different academic years. How Academic Director may, exceptionally, decide to give the student a repeat formal we same level if he or she decides that this fits the circumstances of the case. Where the behaviour which led to an initial formal warning has not been reformed, a subseque warning should normally be issued. Please also note 3.4 when considering progression of students through Attendance.				
Level / Outcome	Initially Level 0 Level 1 if still in zone after 4 weeks Level 2 if still in zone after an additional 2 weeks	Level 1 and/or subsequent Levels / referral to SSDC +	Level 2/3 and/or subsequent Levels / referral to SSDC	N/A Visa revocation	

- * INTO UEA defines a contact point as a timetabled session (note a two-hour session is considered one contact point), a test or examination, a meeting with a member of academic or welfare staff or the submission (in person) of a piece of work. Email or phone communication is not deemed to be a contact point.
- + The Senate Student Disciplinary Committee has the power to suspend or exclude from further study any student that breaches General Regulation 13. Please note that INTO UEA may operate a 'fast track' withdrawal process independent of the SSDC where deemed necessary from a compliance point of view.

Please see the policies and procedures for the Senate Student Disciplinary Committee.

The process and procedures for the conduct of meetings is further detailed in 3.5.

3.3 Welfare absence recording and essential actions

The weekly monitoring process conforms to UKVI expectations that institutions identify and respond accordingly to students missing consecutive points of contact without prior approval. In the case of zero attendance over the recorded period, Student Services must take steps to make contact with the student in our accommodation, homestay families or administrators of private accommodation. At this point, the Programme Manager should be contacted for additional information or to alert them to the issue.

If Student Services / AST are successful in contacting the student, they will ascertain why the student has been absent from class. If colleagues are not successful in contacting and communicating with the student, AST will email and telephone the student's education consultant (agent), regional offices, sponsors (where applicable) and other relevant bodies and inform of absence and investigate further. Before sharing this information, AST will check the student consents recorded in Salesforce to ensure we have permission to share the information with the relevant parties. In the event that the student has not given their consent, data may only be shared if there is a significant concern for the student's welfare. Before any data is shared, a welfare risk assessment for sharing student data form must be completed and referred to the Centre Director for approval.

The following UKVI-directed actions are required in cases of continuing non-attendance:

- If after five working days there has still been no contact with the student, the Police should be contacted on the advice of the Centre Director.
- Where a student is to be withdrawn, this must be reported to UKVI via the Sponsor Management System (SMS) and UEA visa compliance Team must give approval. For further government guidelines, https://www.gov.uk/government/publications/sponsor-a-tier-4-student-guidance-foreducators. In advance, AST must ensure that the student is warned of the risk that their visa will be revoked and that they will therefore not be able to continue with their programme of studies in the UK.
- Students who do not meet their visa expectations may be withdrawn from their Programme of Study. The Centre Director will review each case and apply discretion. If the decision is made to withdraw a student INTO will report to the Home Office (UKVI) that we are withdrawing sponsorship of your Tier 4 visa, where relevant, and this will result in curtailment of your leave to remain in the UK.

This will also apply where a student has not pre-warned us of an absence following a period of holiday and is not able to supply medical or alternative acceptable evidence remotely within 10 days.

3.4 **Cumulative attendance as driver of subsequent attendance meetings**

Cumulative attendance provides a more complete picture of student attendance than weekly measurements. Therefore, whereas weekly attendance records are important in identifying potential welfare problems at a particular point in time or creeping patterns of habitual nonattendance, the cumulative measurement provides the holistic measure. As such, cumulative attendance figures are the main driver of progression through the levels of attendance meetings. Students on extended courses should be made aware that their attendance on the initial part of the course is aggregated into their overall attendance when progressing to a pathway programme. Where a student is issued with a Level warning on the extended part of their course, this is also carried over to their pathway programme.

In the case of accelerated or intensive programmes, the interval between cumulative attendance warnings will be reduced to one week in order to account for the shorter time they are present on the course, and the nature of the accelerated programme providing a full academic year of content in a shorter span of time. Therefore, if a student on such a programme receives an attendance warning in any given week, they must immediately achieve a minimum of 90% attendance in the following week or progress to a further warning.

Note that on grounds of fairness, an interval of two weeks is required between cumulative attendance warnings to allow the student the opportunity to build on their previous cumulative attendance figure. As long as a student is attending a minimum of 90% attendance in any given week since a previous warning, the student should not be progressing to a further warning or withdrawal meeting. This rule applies even if the overall cumulative attendance is below 85%.

3.5 Warning levels: Process and procedures

In addition to the attendance triggers detailed above, this policy also covers wider nonengagement through the failure to submit any required piece of work or non-participation in taught sessions. Repeated non-engagement will also result in warning meetings being conducted.

Initial Stage (Level 0)

Once a cause for concern about a student's attendance, engagement or progress has been notified to a Programme Manager or their nominee by a member of staff, the Programme Manager (or their nominee) will attempt to resolve the matter informally by contacting the student to discuss the cause for concern. At this Stage a Programme Manager (or their nominee - AST) may decide to give the student a verbal warning regarding their attendance, engagement and progress, or may decide that no action is required. Given that this initial intervention is primarily of a pastoral nature, the Programme Manager may request that the Head of Student Services (or their nominee) investigate the matter.

Level 1 Meeting

If following a verbal warning a cause for concern about a student's attendance, engagement or progress continues, or where a serious concern has been notified to the Programme Manager or their nominee by a member of staff, the Programme Manager or their nominee will invite the student to a Level 1 meeting to discuss the issues giving rise to concern. This meeting will take place within 5 working days of notification to the Programme Manager of a cause for concern.

The student will be informed in writing of:

- The concerns about his/her attendance, engagement and/or progress.
- The date, time, place of the meeting.
- The right of the Programme Manager to take action (as set out below) in the event that, having been properly informed, the student does not attend or request a different time or date for the meeting and there is not a good reason to explain the absence.

The notification will be delivered to the student's UEA email account and/or contact address.

The meeting will be informal with a view to finding out the causes leading to poor attendance. Following this initial meeting, the Programme Manager will decide what kind of action should be

If, having been properly notified, a student does not attend the initial meeting, does not provide an explanation for the absence or does not seek a different meeting date or time, the meeting will be held in their absence and any warning delivered directly to the student. If delivered directly, recorded evidence should be generated and stored on the student's file to ensure that the student is aware of its seriousness.

If the student has not attended any lessons or meetings (0% attendance) the Centre will follow the Missing Student Policy as there may now be serious concerns about the student's general welfare. The Programme Manager will suspend the investigation. If the student is located after the Missing Student Policy has been followed and it has been established that he/she has not officially withdrawn from INTO UEA and had a valid reason for not attending the meeting, the Programme Manager will reschedule the original initial meeting.

Following the initial meeting, the Programme Manager may decide the following action(s):

- Refer the student to appropriate student support services where the Programme Manager considers that a student would benefit from the support service(s).
- Take no further action on the grounds that there is not enough evidence that the student has failed to meet INTO UEA's attendance, engagement and progress requirements.
- Decide that the student has committed a Level 1 offence as there is enough evidence that the student has failed to meet INTO UEA's attendance, engagement and progress requirements, and issue the student with an attendance, engagement or progress warning. This is the first formal Academic Director's warning, in accordance with Section 4 Outcomes, below.

A written record of the meeting will be made containing clear action notes and obligations placed on the student to ensure that the cumulative attendance and / or events leading to this initial meeting will be addressed. A copy of this record will be given to the student, will be sent to parents and/or sponsors and agents if the student has consented, and also placed on the student's file for the duration of the student's period of registration with INTO UEA. The action plan will be reviewed within two weeks. Should the concerns which led to the Level 1 meeting continue or be insufficiently addressed within the time period, a Level 2 meeting will be convened.

Level 2/3 Meeting

Once it has been decided that actions placed on the student after the initial meeting may not have been followed or may have been insufficiently followed by the student, the Academic Director, in consultation with the student's Programme Manager and/ or Personal Tutor as appropriate, may decide that further enquiries should be made to find out the facts and to gather the documentary evidence available concerning the attendance, engagement and/or progress of the student concerned.

The Academic Director may nominate one or more members of staff to conduct these further enquiries on his or her behalf.

Once any further enquiries have been completed, the Academic Director shall review the evidence assembled and determine either:

- That at first sight the evidence does not merit further consideration of the student's attendance, engagement and / or progress at this stage.
- That at first sight the evidence gives cause for concern regarding a student's attendance, engagement or progress and that a formal attendance, engagement and/or progress meeting should be arranged.

If the Academic Director decides that there is sufficient evidence to give cause for concern regarding a student's attendance, engagement and/or progress, he/she will set up an attendance, engagement and/or progress meeting. The Academic Director or nominee shall write to the student to:

- Outline the matters of concern.
- Enclose / attach the documentary evidence available.
- Explain that, if proved, the matters of concern might lead to formal action against the student on the part of INTO UEA.
- Explain who will be at the meeting in addition to the Academic Director and student.
- Provide the student with at least 3 working days' notice of the time and place of the meeting for a Level 3 meeting.
- Explain the policy relating to non-attendance at such meetings.

The notification will be delivered to the student's UEA email account and/or contact address.

The Academic Director may also invite the student's Programme Manager and other members of staff, as appropriate, to determine the facts giving rise to the cause for concern. These other members of staff can either submit written statements or attend part of the meeting as witnesses. The student may bring a friend, colleague or a representative with them, who may represent the student if the student wishes. Neither the student nor INTO UEA shall normally be represented by a legal practitioner. The student should notify the Academic Director at least one working day in advance of the meeting (not including Saturdays, Sundays and INTO UEA closure days) if they want to bring somebody with them.

If a student fails to attend the meeting at the correct time and does not have a good reason, the Academic Director may continue with the meeting to consider the case in the student's absence. The Academic Director may agree to rearrange the meeting if requested by the student but will not normally do so without a good reason, or more than once.

If a student does not attend the Level 2/3 meeting and cannot give a good reason for doing so the Academic Director may start disciplinary action as a breach against this policy. A student may submit a written statement but may not be represented by a third party if absent from a meeting.

If the student does not attend and has also not attended any lessons or meetings (0% attendance) the Centre will follow the Missing Student Policy as there may now be serious concerns about the student's general welfare. The Academic Director or nominee will suspend the investigation. If the student is located after the Missing Student Policy has been followed and it has been established that he/she has not officially withdrawn from INTO UEA and had a valid reason for not attending the meeting the Academic Director will reschedule the original initial meeting.

The meeting shall proceed in the following order:

- The Academic Director will set out the concerns and evidence regarding the attendance, engagement and/or progress of the student. The student will have an opportunity to ask questions about the concerns and supporting evidence.
- The student will have an opportunity to present information relevant to the matters of concern raised. Wherever possible, information presented, in particular relating to any personal or other circumstances which the student considers have affected their attendance, engagement and/or progress ('extenuating circumstances'), should be supported by documentary evidence.
- The Academic Director will have an opportunity to ask questions concerning the information presented by the student.

Once all the evidence has been heard, the Academic Director will decide on a course of action as set out in Section 3 above. In addition, the following courses of action shall also be available to the Academic Director:

- Decide that the student has committed a Level 2 offence as there is enough evidence that the student has failed to meet INTO UEA's requirements in relation to attendance, engagement and/or progress and give the student a second formal Academic Director's warning;
- Decide that the student has committed a Level 3 offence as there is enough evidence that the student has failed to meet INTO UEA's requirements in relation to attendance, engagement and/or progress and, because a second formal warning has already been given to the student, the matter should be referred to the Senate Student Discipline Committee for consideration;
- The case is sufficiently serious that it would be inappropriate to give the student a second formal warning, but that the matter should be referred directly to the Senate Student Discipline Committee (SSDC).

In deciding whether a Formal Warning should be given to the student, the Academic Director may take into account any information presented by the student to explain his or her actions in the course of this process. However, in deciding whether this information should be taken into account the Academic Director must consider whether such information was, or could have been, presented to INTO UEA in a timely manner, noting that students must inform INTO UEA of any change of circumstances and whether the non-disclosure of this information is further evidence of the student's failure to engage with their studies.

The Academic Director should confirm his/her decision in writing to the student. A written record of the meeting including any formal warning given will be kept on the student's file for the duration of the period of the student's registration with INTO UEA and with UEA (where relevant). In the case of Level 3 meetings, a copy of the minutes shall also be shared with the student.

A copy of the outcome of the meeting shall also be given to the student and sent to parents and/or sponsors and agents if the student has consented.

3.6 **Appeals**

There is no appeal against the outcome of a Level 0, 1, 2 or 3 meeting. A student who is referred to the University's Senate Student Discipline Committee (SSDC) may appeal to the Senate Student Appeals Committee provided one or more grounds for appeal are met. This appeals procedure is published under the University Disciplinary Procedures.

Students on programmes that are validated by UEA can lodge a complaint with the Office of the Independent Adjudicator for Higher Education (OIA) if they are unhappy with the outcome of the Senate Student Appeals Committee and details will be given to students once UEA's formal procedures have been completed.

Students on programmes that are not validated by UEA do not have the right to complain to the

3.7 Confidentiality

As noted above, a copy of the formal record of an attendance, engagement and/or progress meeting and of any formal written warnings will be retained on the student's file during their period of study and registration with INTO UEA (and UEA where relevant) and will be sent to parents and/or sponsors and agents if the student has consented. Where appropriate, this information may be kept in a more secure format, for example where highly personal or sensitive material is disclosed and discussed. These records will be removed from the file in accordance with normal records retention/GDPR processes once the student has completed their studies.

Information relating to actions taken under these procedures will remain confidential to the Programme Manager, Academic Director, the Personal Tutor and such other members of INTO UEA staff that have been involved in the process.

Information relating to actions taken under these procedures will not be shared with prospective employers through references or with others external to INTO UEA or UEA without the consent of the student.

3.8 Reporting the outcomes of attendance and progress meetings

The Academic Support Manager / Academic Director will complete an annual monitoring report to the Joint Board of Study of the outcomes of attendance, engagement and/or progress meetings.

3.9 CAS/visa letter issuance for students studying courses online

One of the key points of INTO's response to the Covid-19 pandemic is the ability for students to arrive in the UK 'when they can', if they are unable to begin their course in a face-to-face t as a result of travel restrictions or other Covid-related disruption.

In line with INTO's expectation that students should engage with 100% of their online course, INTO reserves the right to not provide a Confirmation of Acceptance for Studies (CAS) enabling a Tier 4 visa application, or a visa letter enabling a STSV application, if a student has an attendance/engagement rate on their online course of less than 70%.

Students who become able (or willing) to travel to the UK to continue their studies, but do not meet this 70% attendance hurdle will have a meeting with the Centre Director to determine if there are any exceptional circumstance for the low level of attendance. Individual student circumstances will be considered in an ultimate decision to either issue a CAS/visa letter, or for the student to continue studying online until their attendance improves.