

CPRM3 Attendance and Engagement Monitoring

Document

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Brief Description of Policy	This document outlines the procedures and expectations of monitoring student attendance and engagement at Navitas UPE. It defines the roles and responsibilities of the students and the college services team in recording and addressing attendance requirements. It aims at ensuring compliance with the college's attendance monitoring duties whilst providing support to students.

Version Control

Date	Version	Summary of changes	Approver
Mar. 2020	2020/3	- Changes incorporated in responses to the new Student Visa Route - Changes to Navitas terminology - Changes to improve clarity and understanding	Head of Compliance
May. 2020	2020/01	Covid-19 Addendum	Head of Compliance
Aug. 2020	2020/02	Covid-19 Addendum	Head of Compliance
Feb. 2021	2021-01	Changes incorporated in responses to the new Student Visa Route	Head of Compliance
		- Changes to Navitas terminology - Changes to improve clarity and understanding	
Jun. 2021	2021/1/EU	Detailed record of changes not available	Head of Compliance
Sept. 2022	22_01 (UK)	Removed reference to online learning	Head of Compliance

Jan. 2025	25_01	• Contact points redefined by attendance band. • Added classification of Band 1 and Band 2 • Added clarification of applicable band for programmes at more than one level of study • Provided examples of Authorised absences.	Head of Compliance
Sept. 2025	25_02	• Policy reviewed, restructured and reorganised for clarity and flow. • Student led attendance recording (use of the QR code functionality) mentioned. Attendance Band 2 process revised and updated to reflect the latest engagement monitoring requirements.	Head of Compliance

Related Documents

Name	Location
Student Monitoring and Engagement Process (version 25_01)	Compliance SharePoint
NPR/CPR QS12 Fitness to Study Policy	College website
NPR/CPR QS07 Support	College website
CPR M3 Attendance and Monitoring Policy	College Website

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Policy Introduction

Navitas is committed to providing quality education and support to students in achieving their academic goals. Through regular attendance students obtain value for money and gain education that will help them achieve the intended degree qualification awarded by their host University.

In accordance with university partnership agreements, Navitas colleges are required to monitor student attendance and engagement. This policy outlines the expectations, responsibilities and regulatory requirements for attendance monitoring across all Navitas programmes and students- particularly international students who are studying in the UK under Student Visas.

Our Expectations

Students are expected to maintain a minimum of an overall 85% attendance record in any given month, failing which they will be contacted and encouraged to re-engage with their studies. Those who fail to re-engage with their studies and continue to fall below this threshold will be monitored through the Compass Programme guided by CPR QS07 (or other relevant CPR).

To ensure consistency and adherence with the regulatory bodies, the Navitas Academic Registry defines an engagement point (one that creates a positive attendance mark) to be:

“Any formal ‘scheduled engagement’ of which a student is required to attend, as timetabled on the student management system”.

For the College to comply with regulatory requirements (outlined in the Regulatory and Professional Body Responsibilities section), as well as to ensure the best student outcomes, the College will monitor its students in accordance with the latest Monitoring and Engagement Process and in conjunction with policies such as NPR QS07 Support (Compass Programme), NPR QS12 Fitness to Study etc. Relevant University Partner policies and/or College policies (CPRs) may be followed, as applicable. Colleges are also required to follow the relevant attendance band while monitoring a student's attendance and engagement. Within the UPE Division, depending on the programme stages being offered, a college might need to follow one or more attendance bands.

Student Responsibilities

- Attend classes from the first day of teaching.
- ensure that they record their attendance using the scanned QR code functionality if this option is available.
- ensure that their attendance does not drop below the required levels. Students studying on a UK Student visa issued by the UKVI (Home Office), must attend their studies in line with their visa conditions and the relevant Attendance Band (Band 1 or Band 2), depending on the course level.
- ensure that they attend all meetings/ support initiatives organised by the College as failure to do so, could be detrimental to their immigration status.
- notify the college of their absence (in advance where possible, unless exceptional circumstances prevail e.g. being involved in an accident). The scenario given in the table below are not exhaustive but serve as a guide.

If a student is unwell.	Call or email College Services before their scheduled class. They may be required to provide a letter from their doctor if they are unwell for an extended period. Band 2: self-certification may be accepted by the college. It is recommended that further checks/evidence is requested in situations involving prolonged illness.
If a student has an important appointment (such as a at the embassy).	Call or email College Services before their scheduled class to ask for permission. They will be asked to provide evidence of the appointment.
If a student has a serious personal problem (such as a very unwell family member or will be attending a funeral).	Call or email College Services before their scheduled class to ask for permission.
Any other serious reason that will results in a student being unable to attend class.	Call or email College Services to discuss their situation as soon as possible.

Note:

- Notifications provided after the scheduled class/engagement will be considered on a case-by-case basis (at the discretion of the college).
- If a student is studying at Foundation level or below i.e programme stage below Year 1 of an Undergraduate Degree or Pre-Master's level, they might be required to complete an Absence Form.

- It is important that students attend scheduled sessions promptly and at the relevant times to maintain good attendance. If a student has unauthorised absence, the attendance code for that scheduled engagement will be 'none' (not present). This will affect their overall attendance percentage. The overall attendance percentage will also be affected where a student is marked as late or has missed half of their timetabled class/ scheduled engagement.

Regulatory and Professional Body Responsibilities

Some of our programmes carry a professional accreditation and/or are regulated by a national body. This can bring with it specific minimum attendance requirements which differ from the level set out in this policy or from other courses provided by the College. Where such a requirement exists, students will be made aware of this via the appropriate course or unit handbook and will be expected to adhere to this localised requirement.

For students sponsored under the Student Visa Route, the College and University have an obligation to the Home Office to report on, as required, changes of status in an individual student's study pattern. Changes to a student's study pattern may affect the terms of the visa and/or leave granted to the student.

The College must comply and follow all reporting requirements of the associated regulatory or accrediting body, and the University's stated policies and processes.

Regulatory and Reporting Requirements for Student Visa Sponsored Students

As a licenced sponsor, under the Student Immigration Route, the University Partner and College have an obligation by law to monitor and report on sponsored students.

Under current Sponsor Guidance, the UKVI requires sponsor licence holders to report students on a programme of study who:

- Stop engaging – those that do not consistently partake in formal scheduled engagement as outlined in this document),
- Are no longer under the sponsorship of the institution – including withdrawals, terminations, and deferral of studies (this includes students who transfer institutions),
- Indicate a significant change in circumstances – including a change in course of study, work placement change, completing a course earlier than expected,
- Are suspected of not being genuine.

Where the college has exhausted and evidenced all re-engagement opportunities, and withdrawal conditions are implemented (Notification of Termination/Exclusion), the college must:

- Make the University Partner aware that sponsorship is to be withdrawn; and,
- Evidence a student has actively dis-engaged with their studies; and,
- Cite all methods of re-engagement activity undertaken; and,
- Report to the Home Office within 10 working days of the College/Sponsor confirming withdrawal.

Regulatory and Reporting Requirements for students sponsored by the Student Loans Company

The Student Loans Company (SLC) does not set specific attendance percentages but requires learning providers to have an auditable attendance policy that confirms a student's ongoing engagement with their course and for providers to report confirmed attendance to the SLC at three liability points in the academic year to release fee payments. Providers must not claim funding for students who do not meet these attendance expectations, and students are liable for loan amounts paid to them even if they leave their course.

SLC requirements from providers:

- **Published Attendance Policy:** Providers must have a policy that defines attendance, considers the specific demands of the course, and accounts for personal circumstances like disabilities.
- **Communication:** Providers must communicate their attendance policy to students.
- **Auditable Process:** Providers must maintain a record-keeping system to prove attendance.
- **Attendance Confirmation:** Providers must confirm a student's attendance to the SLC at three designated points each academic year.

Monitoring Attendance and Academic Engagement

Scheduled Engagement, Timetable Management and Attendance Recording

Scheduled Engagement

Scheduled engagement is determined by the academic requirements for each subject/programme, as outlined by the Academic Registry and the awarding body's minimum requirements. In certain cases, further regulatory requirements establish the minimum engagement expectations that will be reflected into the student's timetable e.g attendance Band 1.

Exceptions may occur if

- a student is repeating a module/s to complete a course/stage of study or
- where they are required to take up an approved core requisite module/s.

Note: Students subject to Band 1 attendance monitoring must comply with all the Band 1 requirements.

Timetable management

The College Academic team is responsible for timetable management and together with the Student/College Services support team oversees attendance monitoring.

Attendance recording

Attendance is recorded systematically by module and scheduled engagement points in the student management systems and the College student portal. Registers are taken at every engagement point – recording methods include:

- Direct entry by staff into the student management system or college student portal,
- Student-led entry through scanning of the QR code displayed in class.

The attendance system also records authorised absences, including those arising from extenuating circumstances.

Absence

Absence is defined as:

- A student does not attend a scheduled engagement/timetabled class,
- A student whose absence has not been formally approved.

Colleges can approve a student's absence. In such cases, this will be considered as 'Authorised absence'.

Authorised absences will only be granted under exceptional circumstances, and the college reserves the right to request relevant evidence in support of an authorised absence. Absences can be authorised by senior members of staff for example the College Director and Principal, Director of Academic Services or College/Student Services Managers.

Examples of authorised absence could include:

- A medical/hospital appointment (with the relevant evidence)
- Illness (accompanied by a sick note where appropriate)
- Personal injury from an accident
- Family emergency where the family member/s are gravely ill

- Compassionate leave e.g. bereavement
- Religious holiday (college may use their discretion)

It is important that students attend scheduled sessions promptly and at the relevant times to maintain good attendance. If a student has unauthorised absence, the attendance code for that scheduled engagement will be 'No' (not present). This will affect their overall attendance percentage. The overall attendance percentage will also be affected where a student is marked as late or has missed half of their timetabled class/ scheduled engagement.

Behavioural expectations

Students are expected to attend on time and remain for the full session. Admission to class is at the discretion of the lecturer and/or the College. Students arriving more than 10 minutes late may be refused entry; if permitted to enter they will be recorded as late. Students attending half a session or leaving before the scheduled end, will be recorded as half absent (attendance code: half in person).

Attendance at scheduled assessments during the semester is mandatory. Students may only be excluded in cases of approved extenuating circumstances (noted and recorded on the student management system). Non-attendance at scheduled assessment events (approved or not) must be reported and assessed at the College Module Panel and Progression Board.

Student Records

The college has an obligation to ensure that it has accurate records for all students. This is critical to the management of the student experience, as well as regulatory requirements.

The student management system will record student attendance and highlight student absence. Attendance warnings will be populated through the system, the frequency of which is determined in the Monitoring and Engagement Process. The system will also hold details of actions and activities taken to re-engage a student, records of meetings held, and any engagement plans put forward where non-engagement is apparent.

Student Monitoring and Intervention

Attendance records are regularly monitored over time in line with the Student Monitoring and Engagement process. Students who are persistently late, those with irregular attendance or those not meeting the band attendance requirements may be referred to the Compass Programme.

Feedback from academic teaching staff, along with on-going reviews of individual student assessment performance, must be added to a student record to give a complete overview of attendance and engagement.

It is expected that concerns around student attendance and engagement are discussed at relevant meetings such as the College Management Team meetings, college academic board and any other relevant college meetings on a regular basis.

Eligibility for monitoring

Students may be placed on the Compass programme for closer monitoring if they do not meet the attendance criteria set out for each of the attendance monitoring bands (Band 1 attendance monitoring, Band 2 attendance monitoring).

Initial intervention

Where attendance falls below the required threshold, and no approved extenuating circumstances or leave of absence exists:

- The student should be formally contacted through the student management system. Initial contacts are intended to reinforce the importance of attendance (attendance reminder emails) and/or create awareness about the consequences of poor attendance (attendance warning emails).

Post intervention reviews

- Through interventions, staff will aim to establish:
- The reason for non-attendance
- If there is a welfare concern
- If the student requires additional support to re-engage
- If the student is likely to re-engage

After sending out the appropriate warning and considering the student's response (including no response) staff will need to determine if the student's absence:

- can be justified and therefore approved (e.g. illness/medical grounds), or
- can be justified but not approved (absent without good reason, technical IT issues), or requires referral (welfare or academic support required), or
- needs an appropriate warning.

Based on the outcome of the communication, if further action is deemed necessary then intervention activity

will be scheduled and implemented.

Escalations

Students within certain attendance thresholds (refer to relevant attendance monitoring band) will receive stage warnings. As part of the escalation, they will be admitted to the to the Compass Programme.

Where permissible, and deemed necessary, (if consent has been given at enrolment, or prior to this through the admissions process), parents and/or agents may be contacted (informed of the situation) to encourage student re-engagement or participation.

If no improvements in attendance are noted or students that are deemed to have actively disengaged with their studies, they will be issued with an Intention to Exclude (ITE) in line with the relevant attendance band requirements.

Where a student has been issued with an ITE they will have a period of appeal of 5 working days, to justify their reasons for continuation on their course. If a student fails to respond, or their appeal is unsuccessful, the College will formally issue a 'Notification of Termination/Exclusion'. The student will then be withdrawn/terminated/excluded from the course, and the University Partner will be notified. At this point, the student will no longer be eligible to study at the college.

For those students under Student visa sponsorship, the University Partner will notify the Home Office within a designated timeframe confirming sponsorship has been withdrawn. For the student this will cancel the student visa and will give a short window to leave the UK or find an alternative sponsor.

Attendance Monitoring Bands

Attendance monitoring bands outline the expected level of attendance and engagement. They define the minimum attendance standards that must be met and provide a framework for monitoring, intervention and escalation.

In accordance with the Home Office requirements, Navitas programmes are required to adhere to the following attendance bands:

- Band 1 attendance monitoring – applicable to programmes below undergraduate year 1.
- Band 2 attendance monitoring - applicable to programmes at year 1 or above.

Band 1 attendance monitoring

Band 1 attendance monitoring is to be followed by UK colleges for all programmes/course stages below Undergraduate Degree Year 1. This will be applicable to all Foundation (Year 0) programmes and Pre-sessional English courses which are not considered Year 1 Undergraduate Degree or Pre-Master's level of study.

Each student in this band must be required to attend a minimum of 15 hours of daytime classroom-based study per week.

A contact point is defined as classroom-based study that occurs during the designated daytime hours (8:00 am to 6:00 pm, Monday to Friday). This includes:

- Scheduled Classes: Lectures, tutorials, workshops, or practical sessions that require physical attendance.
- Assessments or examinations: Participation in formal assessments or examinations requiring the student's presence.
- Other verifiable academic activities: Timetabled academic activities such as group projects, supervised research provided they are classroom based and formally scheduled and logged.

Where the student has not reached 85% attendance of their classroom-based study in any given month (4 consecutive weeks), the college 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.

Colleges are expected to record any authorised absences, and/or self-certification and to ensure that the student can complete their course within the permitted visa duration.

Where a student's attendance falls below 70% for three consecutive months, the college must withdraw the student's sponsorship due to lack of academic engagement unless there are exceptional and evidenced reasons for the non-attendance (e.g. illness). In instances of prolonged absence due to illness, the Fitness to Study policy is to be referenced to determine if a pause/break in studies due to changes in circumstances would be applicable and appropriate steps taken in line with Home Office requirements.

Colleges must also withdraw the student's sponsorship and notify the Home Office (through their University Partner) where a student has deferred their studies or has not been attending their studies for more than 60

days.

Note: Under exceptional circumstances, if a student is permitted to repeat modules or semesters, they must still meet the 15hrs per week timetabled requirement.

Attendance	T/W 1 (start of attendance monitoring)	T/W 4 (1 st monitoring month end)	T/W 8 (2 nd monitoring month end)	T/W 12 (3 rd monitoring month end)
85% & above	No Action Plan. Recommendation: - Positive email to students above 85% - Soft touch/slight concern email to those at 85% attendance.			
71-84%	Alert and Explore email.	Personalised action plan to improve attendance with record annotated.	Personalised action plan to improve attendance with record annotated.	Acknowledgement of improvement (those at stage warnings at previous intervention weeks) - invited to discuss further support or potential reasons for likely drop in attendance.
0-70%		Stage 1 Warning Letter with action plan.	Stage 1 Warning Letter with a recorded action plan for first time offenders. Stage 2 (those previously at Stage 1 Warning) Warning Letter with a recorded action plan.	Stage 1 Warning Letter with a recorded action plan for first time offenders. Stage 2 (those previously at stage 1 warning) Warning Letter with a recorded action plan. Stage 3 Intent to Exclude (ITE) for those previously at Stage 2 warning. Students in this category can appeal within 5 working days.

Variations to Band 1 attendance monitoring

Variation to Band 1 monitoring will apply to colleges with course stages below Year 1 of Undergraduate Degree where the semester duration differs from the standard 12-week semester.

Shorter Programmes

For semesters that are shorter than the standard 12-week semester, the third intervention checkpoint should be conducted at the end of the semester.

Longer Programmes:

For semesters extending beyond the standard 12-week duration, colleges are advised to adopt a holistic approach while reviewing student attendance either at the end of the semester or at the first intervention week of the following semester. This means that, the college should consider attendance trends over time instead of isolated absences, the trends in students' attendance.

Band 2 attendance monitoring

Band 2 attendance monitoring will apply to all colleges within the UK for all course stages at Undergraduate Degree Year 1 or above, including Pre-Master's programmes.

A Contact Point under Band 2 is defined as a scheduled engagement. Scheduled engagement includes any interaction or event where attendance is deemed to be mandatory. These include events such as:

Orientation, class sessions, lectures, tutorials, workshops, supervised lab work, field trips, appraisal points, meetings or interviews, assessments and so forth.

All meetings, appraisal points and/or interviews that a student is informed (included in the timetable) as 'required to attend' by the College are classified as scheduled engagement points and must be attended.

Students are expected to maintain an overall attendance of 85% in all modules, failing which they will be placed on the Compass Programme. Students might also be placed on the Compass Programme or referred to the relevant Fitness to Study Policy if they have a higher number of consecutive absences, for example 10 consecutive absences and might be at risk of not completing their studies within their student visa duration.

The following are examples of expected attendance contact points:

- registration with the College or University;

- a lesson, lecture, tutorial or seminar;
- a test, examination or assessment board;
- an appointment with a welfare adviser or student service adviser;
- submitting coursework;
- an interim dissertation, coursework or report; etc

Attendance	T/W 1 (start of attendance monitoring)	T/W 4 (1 st monitoring month end)	T/W 8 (2 nd monitoring month end)	T/W 12 (3 rd monitoring month end)
85% & above	No Action Plan. Recommendation: • Positive email to students above 85% • Soft touch/slight concern email to those at 85% attendance.			
70-85%	Alert and Explore email.	Attendance reminder email		
50-70%		Attendance warning email		
30-50%		Stage 1 Warning Letter with action plan.	Stage 1 Warning Letter with a recorded action plan for first time offenders. Stage 2 (those previously at Stage 1 Warning) Warning Letter with a recorded action plan.	Stage 1 Warning Letter with a recorded action plan for first time offenders. Stage 2 (those previously at stage 1 warning) Warning Letter with a recorded action plan. Stage 3 Intent to Exclude (ITE) for those previously at Stage 2 warning. Students in this category can appeal within 5 working days.
Below 30%		Stage 1 Warning Letter with action plan.	Stage 1 Warning Letter with a recorded action plan for first time offenders. Stage 3 Intent to	Stage 1 Warning Letter with a recorded action plan for first time offenders. Stage 3 Intent to Exclude (ITE)

			Exclude (ITE) for those previously at Stage 1 warning. Students in this category can appeal within 5 working days.	for those previously at Stage 1 warning. Students in this category can appeal within 5 working days.
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Variations to Band 2 attendance monitoring

Variation to Band 2 monitoring will apply to colleges with integrated courses or where the semester duration differs from the standard 12-week semester.

Integrated Students: Where a course of study has an integrated element (part-taught by the University Partner) the University Partner will monitor attendance of the integrated element (class, module, etc). Students undertaking integrated elements will be subject to the monitoring requirements set out by the University. These requirements may differ from the scheduled engagement required by the College but must be adhered to progress with the course. The College will request regular access to the University Partner's attendance data to identify if a student requires further support. The data may also be used to supplement attendance recorded by the College.

Shorter Programmes: For semesters that are shorter than the standard 12-week semester, the final intervention point (within the semester) will be at the end of the semester.

Longer Programmes: For semesters extending beyond the standard 12-week duration, colleges are advised to adopt a holistic approach while reviewing student attendance either at the end of the semester or at the first intervention week of the following semester. This means that, the college should consider attendance trends over time instead of isolated absences, the trends in students' attendance.

Confidentiality and Data Protection

Navitas is committed to maintaining the highest standards of confidentiality and data protection in accordance with relevant legislation, including the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). All personal and sensitive information must be handled lawfully, fairly, and transparently, and used only for legitimate organisational purposes.

Employees and partners are required to respect the confidentiality of all information obtained through their work and must not disclose or share such information without proper authorisation. Appropriate technical and organisational measures are in place to protect data against loss, misuse, unauthorised access, disclosure, alteration, or destruction.

Any suspected or actual breach of confidentiality or data protection must be reported immediately in line with the Navitas' data breach procedures.

Policy Review

This policy will be reviewed every two years unless there are internal or legislative changes that necessitate an earlier review.