

RVC Student Attendance Monitoring Procedure

(For Students in Receipt of US Federal Loans
or Studying in the UK under a Student Route
Visa)

Version	Update and Reason	Author and Title	Committee Approval	Effective Date	Review date
4.0	Update to support AR Restructure and compliance audit	AR for SRC	SPWG CEC	TBC	TBC
3.0	Update to confirm method of student attendance for those enrolled on UG/PG taught programmes of study.	Head of Course Support	Noted: 11 th Oct 2023	25 th Sept 2023	Sept 2024
2.0	Update to reflect amendments to the frequency and types of timetabled events used to monitor engagement for students on taught courses of study.	Head of Course Support	3rd Feb 2023	9th May 2023	Sept 2023

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1. Introduction and Purpose

1.1 This policy applies to:

- All students studying at the Royal Veterinary College (RVC) on a Student Route Visa issued by the UK Visas and Immigration (UKVI).
- All students studying at the RVC who are in receipt of a US Federal Loan from the United States Department of Education (William Ford Direct Loans Programme).
- “All students” includes students enrolled on taught undergraduate courses (e.g. BVetMed, BSc, FdSc), taught postgraduate courses (e.g. MSc, Interns and Residents) and postgraduate research programmes (e.g. MRes, MPhil, PhD) and students undertaking modules at the RVC as part of a collaborative partnership or exchange, including Study Abroad programmes.

1.2. We are required to demonstrate to the UKVI and the United States Department of Education that students enrolled at the RVC who are part of their schemes are adequately engaged with their studies.

1.3 A student's attendance will be monitored over a minimum of 10 contact points throughout the academic year, comprising of enrolment, attendance at assessments, classes and signing-in sessions. Contact points take place every 2 – 4 weeks throughout term time.

1.4 Non-compliance with the UK [Immigration Rules](#) and US Department of Education may result in serious consequences, including the potential revocation of the RVC's Student Sponsor Licence. This would impact the RVC's ability to sponsor international students and could have significant institutional and reputational implications. It is therefore essential that all staff and students adhere strictly to UKVI reporting and compliance requirements.

1.5 If a student is not able to demonstrate their in-person attendance and engagement with their programme within a 60-day window (not inclusive of non-term time periods – holiday/vacation), they are considered non-compliant, and consequences are outlined in Section 16 and Section 17.

1.6 The RVC's [Academic Registry](#) department administers the attendance monitoring processes.

2. Timeliness of Monitoring Attendance and Engagement

- 2.1 For undergraduate taught and some postgraduate taught (e.g. taught Masters) courses, we monitor attendance and engagement during term-time. Term dates for taught courses are available on our [Intranet](#). Non-term time periods (holiday/vacation periods) are not subject to attendance and engagement monitoring.
- 2.2 For some postgraduate taught (e.g. Interns and Residents) and research programmes, there are no set term dates, as educational activity will vary according to the programme's nature and stage. The supervisor will agree on a schedule of supervisory meetings, educational activities and vacation periods with the student. Holiday/vacation periods are not subject to attendance and engagement monitoring.

3. Attendance and Engagement Expectations

- 3.1 Our [General Regulations for Study and Award](#) set general expectations for all students to engage fully with their programme by attending scheduled teaching/accessing online learning materials/engaging with supervisors as appropriate to their course.
- 3.2 For students on a Student Route Visa and students in receipt of a US Federal Loan, there are additional attendance and engagement expectations as follows:
- Students on undergraduate taught and postgraduate taught masters programmes/modules - to maintain an overall attendance and engagement level of at least 50% of contact points within a term and/or loan disbursement period.
 - Students on postgraduate research programmes - to maintain a minimum of monthly contact with their supervisor.
 - Interns and Residents – to maintain a minimum of monthly contact with their supervisor.
 - Students on Study Abroad Programmes – to maintain a minimum of monthly contact with their RVC academic tutor while overseas.
 - Students with dissertation/project activity – to maintain a minimum of monthly contact with their dissertation/project supervisor.
 - Students on research field trips – to maintain a minimum of monthly contact with their RVC tutor/dissertation supervisor.
 - All students – to ensure that they are absent for no more than two consecutive contact points without authorisation.
 - All students – to check their RVC email inbox regularly for pertinent correspondence.

- Due to the variation of contact requirements, those students who have a monthly requirement to communicate their attendance and engagement will need to be mindful that if any period where they miss a contact point and/or period of no attendance or engagement with studies equates to 56 - 60 days, this will initiate progression as detailed in Section 17 in this policy.

3.3 For students on Intercalated programmes:

- Students who currently hold RVC visa sponsorship and wish to intercalate at a different institution, or who are returning to RVC after intercalating under a different sponsor, do not need to submit a new visa application for this purpose.
- In such cases, it is the responsibility of the current or incoming sponsor (i.e. the institution delivering the intercalated year) to notify their UKVI Account Manager or the Educator's Helpdesk (for non-premium sponsors). This ensures the Home Office's records accurately reflect the change in teaching provider.

4. Expectations of Providing UKVI Documentation

- 4.1 The RVC has a legal obligation to maintain up-to-date records and report specific information to the Home Office in accordance with UKVI Sponsorship Duties.
- 4.2 All students sponsored under the UKVI Student Route are required to comply with documentation requests in a timely and accurate manner.
- 4.3 Students must:
 - Provide valid, original immigration documents (e.g. visa, passport, BRP) as requested by the RVC.
 - Ensure that all personal details, including contact information and visa status, are kept up to date and promptly notify the RVC of any changes.
 - Respond to any documentation requests from Student Records within the stated deadlines.
- 4.3 Failure to provide required documentation may result in the RVC being unable to continue sponsorship, which could lead to the withdrawal of a student's visa sponsorship and potential reporting to the Home Office. This may also affect a student's right to remain in the UK.
- 4.4 The RVC takes its sponsor responsibilities seriously, and students are expected to do the same to protect their immigration status and the RVC's ability to continue sponsoring international students.

5. Consequences of Not Providing UKVI Documentation

- 5.1 Students who do not respond to requests related to their visa or evidence of entry to the UK within five working days will be given a final reminder and must respond within a further five working days.
- 5.2 Students who do not respond to requests related to passport expiry within 1 calendar month will be given a final reminder and must respond within a further five working days.
- 5.3 If a student fails to respond within the period of the final reminder in 5.1 or 5.2 above, they will be required to meet with the Vice Principal for Students to address their lack of response. If the student does not attend the meeting the following actions will be initiated:
- A referral will be made to the Academic Registry (Student Records) for formal de-registration.
 - The Student Records team will send written confirmation to the student that their RVC sponsorship has been withdrawn, and the RVC will notify the UKVI.
 - The student will be issued a written 60-day notice from the date of the withdrawal notification and advised to make arrangements to leave the UK in accordance with immigration regulations.
- 5.4. The RVC understands that there can be long delays when dealing with passport renewals. Such delays will not constitute a failure to provide documentation where the student communicates this delay within the periods defined in 5.1 and 5.2.

6. Confidentiality and Record Keeping

- 6.1 We will limit the sharing of individual students' attendance and engagement data to those necessary to monitor course/programme attendance and as required for audit purposes by either the UKVI or US Department of Education. We may report aggregate and anonymised attendance data to relevant RVC committees or external bodies as required by law.
- 6.2 We will limit the sharing of individual students' absence or deferral requests to those necessary to consider the requests, action the outcome or provide the required

support to assist student re-engagement. We may report aggregate and anonymised absence or deferral data to relevant RVC committees or external bodies as required by law.

- 6.3 Student UKVI and US Federal Loan attendance data records are administered centrally by the Student Resolution and Compliance (SRC) Team within the Academic Registry department and are held on the Attendance Monitoring System.
- 6.4 Records of attendance and engagement monitoring must be retained by the RVC throughout their sponsorship, and whichever is earlier:
- One year has passed from the date on which the sponsorship of the student ended, *or*
 - The date on which a compliance officer has examined and approved them, if this is less than one year after the sponsorship of the student ended.

7. Support and Advice for Students

- 7.1 The RVC understands that studying in the UK may be challenging, particularly for international students. We want students to feel confident and supported so that they can fully engage with their studies and have every chance of successful progression. We have a range of services and teams as listed below to provide this support. Resources and appointments can also be accessed from the [Student Hub on LEARN](#).

- The [Advice Centre](#) (advice@rvc.ac.uk) provides general advice on student issues, counselling and mental health support. They also have a dedicated Disability Advisors (disability@rvc.ac.uk).
- The Student Participation Team (studentparticipation@rvc.ac.uk) manages and facilitates compliance with UKVI and US Federal Loan attendance monitoring.
- The Student Records Team (studentrecords@rvc.ac.uk) manages student records, timetabling, and institutional data, ensuring compliance, accuracy, and a seamless experience for students and staff.
- The [Study Skills team](#) support students to maximise their learning by finding effective techniques that help them to succeed in their university life.
- [Student Success Coaches](#) provide coaching support from RVC alumni to help students deal with specific issues or acquire new coping skills.
- Student tutors/supervisors provide pastoral support and signposting to key information and services.

- The [Chaplaincy](#) offers non-judgmental support to deal with issues that arise through work or study.
- [Report and Support](#) allows students to report a variety of issues and access appropriate support as part of our commitment to providing a safe and inclusive community.
- The [RVC Students' Union](#) provides support independent of the RVC and has dedicated welfare and international reps
- The Equality, Diversity and Inclusion (EDI) team (edi@rvc.ac.uk) can give independent advice on our EDI values and ethos.
- The Financial Aid Office (financialaidoffice@rvc.ac.uk) are responsible for dealing with US student loan administration, UK student loan administration, and Student loan company liaison.
- The UKCISA (UK Council for International Student Affairs) provides advice and support to international students in the UK. The website can be accessed here: www.ukcisa.org.uk, or they can be contacted via phone: 020 7288 4330 or the student advice line: 020 7788 9214.

8. Partner Institution Considerations

- 8.1 In order to provide educational and other student experiences the RVC may partner with other Higher Education Providers (HEP) or organisations. Examples of these include joint degree programmes, credit accumulation and transfer, and partnerships with veterinary practices to provide clinical training.
- 8.2 The responsibility for overseeing compliance in respect of visa national students' academic engagement and attendance is held by the Higher Education Provider (HEP) that sponsors them. Where the RVC is the sponsor of a student who undertakes study or a work placement at a partner HEP or other partner organisation, the RVC continues to be responsible for monitoring of that student's attendance. The contractual documents governing the partnership activities will specify which of the RVC's responsibilities are delegated to the partner HEP or organisation.
- 8.3 The RVC has a responsibility to support our partners to fulfil their UKVI Student Route Visa sponsorship and US Federal Loan duties. Therefore, if a student of a partner HEP undertaking a period of study at the RVC (for example to gain credits toward the award they are studying for at their home institution) fails to meet RVC course/programme attendance requirements as outlined at Section 3 (Attendance and Engagement Expectations), we will inform the partner HEP so that they can consider next steps and

further action to ensure compliance with their responsibilities as a student sponsor and/or to the United States Department of Education (as applicable).

- 8.4 We also ask that our partners who help us deliver educational experiences for RVC students share course/programme attendance monitoring data on request and alert us if they believe that an RVC student undertaking an educational activity with them is not engaging with study. This is so we can consider if further intervention or action is required to ensure compliance with our responsibilities as a student sponsor and/or to the United States Department of Education (as applicable).
- 8.5 Having a shared or joint role means that either partner organisation must share student attendance data between the parties as required to ensure compliance with specific record-keeping duties as mandated by the UKVI. As noted in Section 8.2, RVC holds the primary responsibility for ensuring that all students under its sponsorship comply with visa conditions, attendance monitoring requirements, and reporting obligations.

9. Monitoring Attendance and Engagement for Students on Taught Courses of Study

- 9.1 For students on a taught programme, fortnightly course attendance will be monitored via the taking of registers with digital student signatures and GPS locations attached, for all types of timetabled events including, but not restricted to, lectures, practicals, seminars or directed learning sessions. All types of sessions may be monitored. Paper registers may also be used in some circumstances and students will be informed at the beginning of a session if this is the case.
- 9.2 Students who are unable to use any of the attendance monitoring systems (i.e. experience technical difficulties) must report to the Registry Student Services Helpdesk at either Camden or Hawkshead. This must be completed within 30 minutes from the end of the scheduled monitored session. Students are expected to contact the Student Participation team to report any technical or other difficulties with accessing any attendance monitoring systems.
- 9.3 For Interns on the PG Dip VCP programme, and Residents on the MVetMed programme, attendance and engagement will be monitored by supervisors in the clinical environment on a monthly basis. Supervisors are responsible for alerting the Student Participation team of any unauthorised absence.

- 9.4 For taught students participating in a research element of their course (for example a research project) or for students participating in a placement element of their course, attendance and engagement will be monitored on a monthly basis. Supervisors are responsible for alerting the Student Participation team of any unauthorised absence.
- 9.5 For students on BVetMed / BVSc Intra Mural Rotations (IMR), course attendance and engagement will be monitored by supervisors and rotation leads in the clinical environment, with an alert to the Rotations Office of any unauthorised absence. The full IMR attendance policy can be found on the relevant IMR RVC LEARN course page for each academic year.
- 9.6 Submission of assessments and taking of examinations will also be used to demonstrate continued course attendance and engagement.

10. Monitoring Attendance and Engagement for Repeat Year Students

10.1 In cases where repeat year students have returned to timetabled teaching but are not required to attend certain academic components, such as assessments, revision sessions, or part-module periods, attendance monitoring will be managed on a case-by-case basis, taking the following into account:

- The RVC is unable to monitor attendance during periods where no formal study or assessment is scheduled.
- Such gaps in attendance monitoring may only be allowable for 2 - 4 weeks and will be treated under the non-term time attendance rules (refer to section 2.1).
- Any period of inactivity extending beyond 4 weeks must be reported by the Student Participation team to the Student Records team to ensure appropriate regulatory and compliance measures are followed.

10.2 Students returning solely to complete assessment-only requirements (e.g. following a deferral or appeal outcome) are not subject to attendance monitoring. These students will typically have had their sponsorship suspended and must return to the UK to sit assessments as Visitors, under immigration regulations.

11. Monitoring Attendance and Engagement for Postgraduate Research Students

11.1 The Student Participation team will monitor attendance and engagement on a monthly basis including, but not restricted to, supervisory meetings, appraisals and

scheduled training events. The applicable Postgraduate Research management system will be utilised to check the attendance and engagement data.

11.2 Additionally, supervisors must notify the Student Participation team if they have been unable to contact their student at any point during the monthly period of expected educational activity.

11.3 The Visa sponsorship will finish at the end of the studentship (i.e. end of the PhD and/or funded period).

- For example, if a student has enrolled on a 3-year PhD, their funding will end at the end of the 3-year period. Usually, a student's Visa expiry date will match up with the end of their studentship, and they are expected to leave the country at the end of their studentship. After this point, there are no further requirements to monitor attendance and engagement.
- Students are permitted a 6-month 'writing up' period after the end of their studentship (which is not funded). Usually, the Visa would have expired before this writing-up period begins, and the student will be expected to leave the UK and complete the writing up in their home location.
- In exceptional circumstances, a Visa may be extended past the end of the studentship, and in these cases, the monthly monitoring would be continued until the Visa has expired, and the student has left the country.

12. Monitoring Student Engagement During Off-Campus Activities

12.1 For students engaged in off-campus activities, such as Study Abroad programmes, dissertation or project work, placements, change of study location or research field trips, engagement must continue to be monitored. This will take place on a monthly basis. If a student is unreachable during any monthly period of expected educational activity, the following actions are required:

- For students on Study Abroad programmes, undertaking dissertation or project work, or on a research field trip, the student's supervisor and/or academic tutor must notify the Student Participation team and relevant Programme Administrator.
- For students on a Placement, the student's placement supervisor and/or clinical coach must notify the Student Participation team and relevant Programme Administrator.

- 12.2 The supervisor/tutor must declare any changes to the student's mode of study on the attendance monitoring form prior to the change taking place. This ensures full compliance with UKVI Border Agency reporting requirements. Upon receiving such a declaration, the Student Participation team must inform the Student Records team to enable them to meet their reporting obligations.

13. Reasonable Adjustments

- 13.1 In exceptional circumstances, a student may be permitted to engage with course content for a restricted period through remote delivery as part of an agreed, individual reasonable adjustment. Such adjustments may be considered where a student's circumstances, such as a disability or long-term health condition, meet the criteria for support under the Equality Act 2010.
- 13.2 Requests for fixed-term remote participation must be supported by relevant evidence (e.g. medical documentation or a recommendation from the Disability Support Team) and assessed on a case-by-case basis. Approval will be granted only where this form of engagement does not compromise learning outcomes or professional day one competency requirements.
- 13.3 It is important to note that this provision applies to individual students only. Remote delivery cannot be implemented as a blanket adjustment for an entire cohort based on the needs of a specific student. Each case must be managed individually, ensuring that reasonable adjustments are made without altering the course delivery model for all students.

14. Absence and Other Difficulties

- 14.1 Students may be unable to attend timetabled teaching events or other scheduled contact points for good reason – for example, sickness or bereavement. It is important that we know, in advance wherever possible, when students are unable to engage with their studies so that we can provide additional support to assist future engagement.
- 14.2 For students on taught courses, further information is available in the [General RVC Handbook on RVC LEARN](#) under the section 'Absence and Other Difficulties'.

Students should use the relevant absence form to inform the RVC as soon as possible if they are unable to engage with their studies.

- 14.3 Postgraduate taught and research students (Postgraduate Research, Interns and Residents) should use the procedures outlined in the relevant Code of Conduct to let the appropriate team know as soon as possible of requests to be absent from study.
- 14.4 RVC staff approving absences for students must make the relevant Programme Administrator and Student Participation team (as appropriate) aware of the approved absence so that it can be accounted for when assessing the students' attendance and engagement with their studies.
- 14.5 Retrospective approval is only permitted up to 14 days after the missed contact point using the absence forms.
- 14.6 Where a student misses an attendance monitoring point across two consecutive terms, this will be carried over but without counting any out-of-term time, i.e. any non-teaching time does not count towards the 60 days of required contact.

15. Deferral of Assessment or Examinations

- 15.1 Students may be unable to submit assessments or take examinations for good reason – for example, sickness or bereavement. We must know, in advance wherever possible, when students are unable to engage with their assessments and examinations so that we can provide additional support to assist future engagement.
- 15.2 Students should follow the “Deferral of Assessment” procedure as outlined on their RVC LEARN course pages (taught course students) or relevant Code of Conduct (for Postgraduate Research students, Interns and Residents) to let the appropriate team know as soon as possible of requests to be absent from study.

16. Consequences of Non-Attendance or Non-Engagement as a Taught Student (*UKVI and US Federal Loan Requirements*)

- 16.1 For students on taught programmes of study that utilise the online Attendance Monitoring System to capture attendance data (Undergraduate Taught and Postgraduate Taught Masters programmes): In the first instance, a student who misses two consecutive contact points will receive an automated email from the

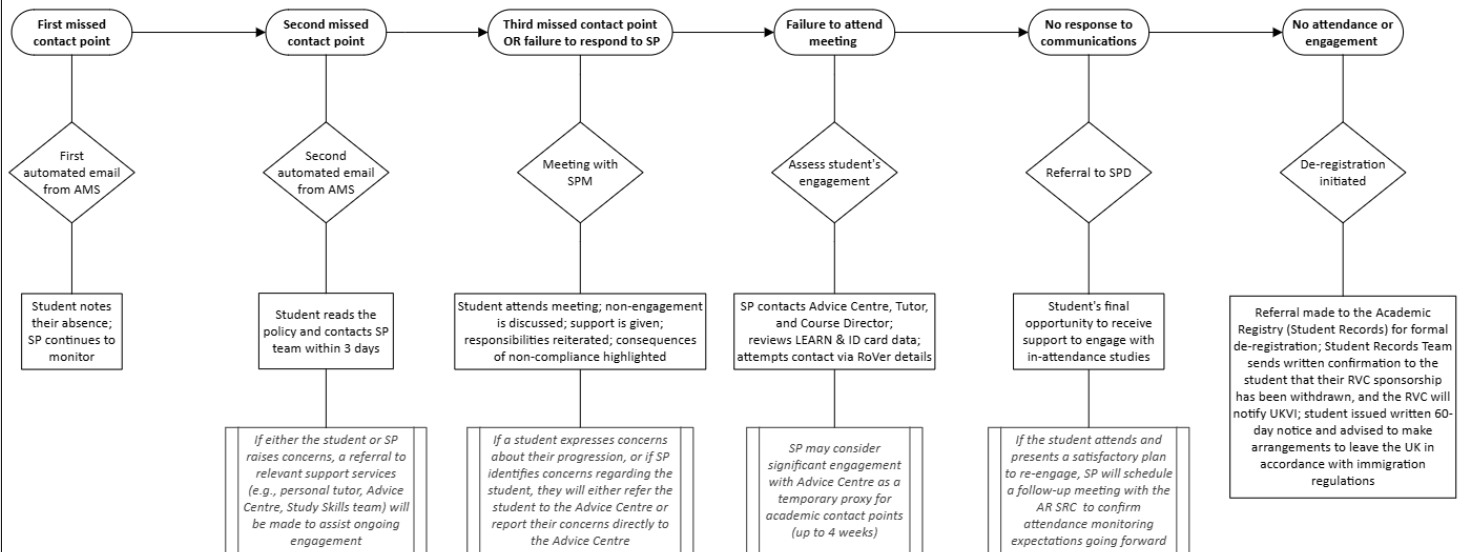
Attendance Monitoring System. This email will invite the student to contact the Student Participation team in writing within three working days.

- 16.2 If, during communication, either the student or the Student Participation team raises concerns, a referral to relevant support services (e.g., personal tutor, Advice Centre, or Study Skills team) will be made to assist ongoing engagement.
- 16.3 If the student fails to respond and/or subsequently misses a third contact point, they will be invited to a meeting with the Student Participation Manager and or their nominee to address their non-engagement and lack of response. This meeting may take place in person at the relevant campus or online.
- 16.4 Missing three consecutive contact points that are spread out across two academic terms will also trigger an invitation to meet with the Student Participation Manager or their nominee.
- 16.5 The meeting will aim to support the student and raise awareness of their responsibilities as a UKVI-sponsored student and/or US Federal Loan recipient. Students will be informed that failure to comply with any of the contact points within 60 days (counting term-time days only) will result in reporting to the UKVI and potential withdrawal from their programme.
- 16.6 If a student expresses concerns about their progression, or if the Student Participation team identifies concerns regarding the student, they will either refer the student to the Advice Centre or report their concerns directly to the Advice Centre.
- 16.7 If the student attends and meets the expectations of the meeting with the Student Participation Manager, their attendance monitoring record will be reset. The Student Participation team will clarify ongoing attendance monitoring expectations in writing, and a record of this will be retained in the student's file (refer to Section 6).
- 16.8 Should a student fail to attend the meeting with the Student Participation Manager; the following steps will be taken to assess attendance and engagement and support the student's welfare:
 - Notification to the Advice Centre, the student's tutor, and the Course Director to identify any welfare concerns related to the absence.
 - Review of RVC LEARN activity and Campus ID card swipe data to determine whether the student has attempted to engage with their studies.
 - Attempt to contact the student using the contact details recorded in RoVer.

- 16.9 Where a student is engaging with the Advice Centre and/or other relevant Support Services and there is clear evidence that they are experiencing exceptional personal circumstances preventing them from demonstrating attendance and engagement, the Student Participation team may, at its discretion, consider this engagement as a temporary proxy for academic contact points.
- 16.10 This substitution may be applied for a maximum period of four weeks. After this period, the student's attendance monitoring record will automatically re-set, and standard attendance requirements will resume.
- 16.11 If a student fails to respond to any attendance monitoring compliance communications following the 3rd missed contact point¹ they will be referred to an SPD meeting. This meeting serves as the final opportunity to explore all possible measures to support the student in re-engaging with their in-attendance studies. If there is no attendance or engagement, the following actions will be initiated:
1. A referral will be made to the Academic Registry (Student Records) for formal de-registration.
 2. The Student Records Team will send written confirmation to the student that their RVC sponsorship has been withdrawn, and the RVC will notify the UKVI immigration.
 3. The student will be issued a written 60-day notice from the date of the withdrawal notification and advised to make arrangements to leave the UK in accordance with immigration regulations.
- 16.12 If the student attends the SPD meeting and presents a satisfactory plan to re-engage, the Student Participation team will schedule a follow-up meeting with the Assistant Registrar for Student Resolution and Compliance (or their nominee) to confirm attendance monitoring expectations going forward. This meeting will confirm expectations regarding attendance monitoring. From this point, the attendance monitoring process will reset.

¹ It is likely at this point they would have missed the 4th contact point and would be within a period of 48 – 56 days without any in-person contact, attendance or engagement being demonstrated.

16. Consequences of non-attendance or non-engagement as a taught student



KEY:

AMS - Attendance Monitoring Service
 AR SRC - Assistant Registrar for Student Resolution and Compliance
 SP - Student Participation
 SPD - Student Performance and Development
 SPM - Student Participation Manager



17. Consequences of Non-Attendance or Non-Engagement as a Postgraduate Research, Placement, Project or Clinical Programme Student (UKVI and US Federal Loan Requirements)

- 17.1 For students enrolled on a Postgraduate Research programme, Clinical programme (Internship or Residency), undertaking a clinical placement or undertaking a dissertation or project element where the online Attendance Monitoring System is not used, the student and their designated tutor and/or supervisor must demonstrate monthly contact. If no contact is confirmed within the relevant monthly period, the Student Participation team will contact both parties to request written confirmation of attendance and engagement within three working days.
- 17.2 If the student (and tutor/supervisor, where applicable) responds within the required timeframe, the student's attendance monitoring record will be re-set, and they will be reminded of the importance of maintaining regular engagement.
- 17.3 If the student fails to respond to the Student Participation team's communications, the following steps will be taken to assess engagement and support the student's welfare:

- Notification to the Advice Centre, the student's supervisor, and the Course Director to identify any welfare concerns related to the absence.
- Review of the student's campus or hospital ID activity data to check for signs of physical engagement.
- Attempt to contact the student using the contact details listed in RoVer.

17.4 Following these checks, the Student Participation Team will contact the student confirming one of the following actions:

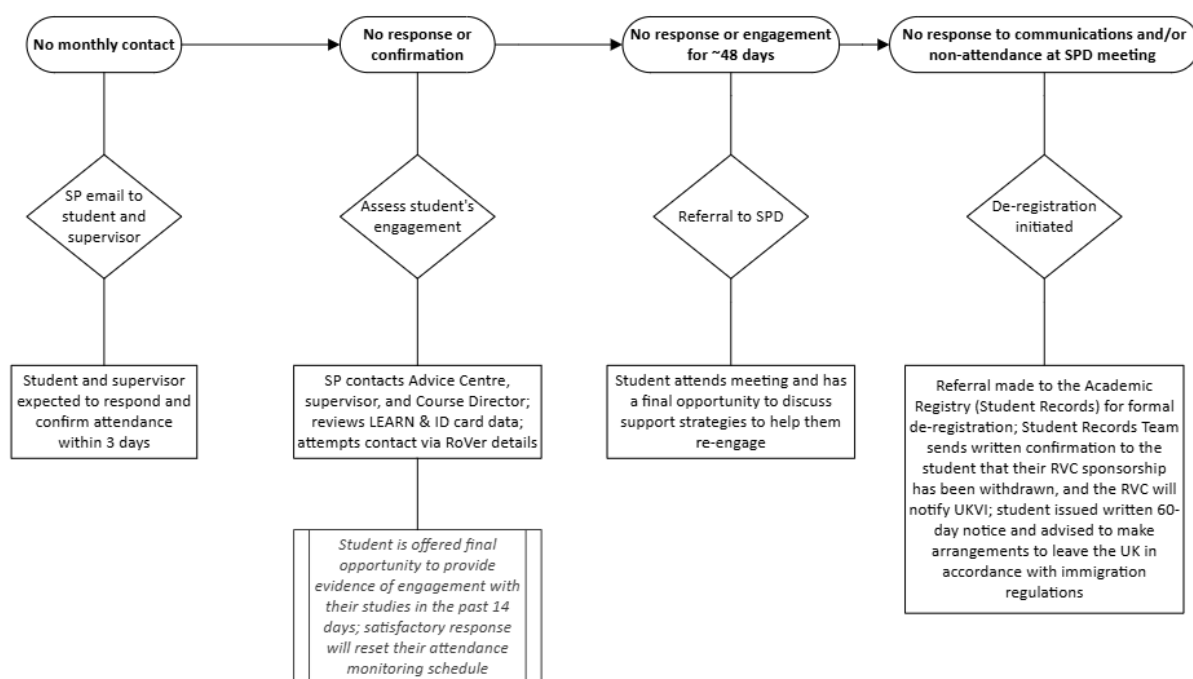
- **Final opportunity for evidence:** The student will be offered one final chance to provide evidence of engagement with their programme in the past 14 days. If the student responds satisfactorily, their attendance monitoring record will be reset.
- **Referral to SPD meeting:** If the student has been unresponsive for a period nearing 48 days, they will be referred to an SPD meeting. This meeting represents a final opportunity to discuss support strategies to help the student re-engage.

17.5 If the student fails to respond to all compliance communications and/or does not attend the SPD Stage 3 meeting, the following actions will be taken:

- A referral will be made to the Academic Registry (Student Records) for formal de-registration.
- The Student Records Team will send written confirmation to the student that their RVC sponsorship has been withdrawn, and the RVC will notify the UKVI immigration.
- The student will be issued a written 60-day notice from the date of the withdrawal notification and advised to make arrangements to leave the UK in accordance with immigration regulations.

17.6 If the student attends the SPD meeting, the same process will be followed as aforementioned in Section 16.12

17. Consequences of non-attendance or non-engagement as a postgraduate taught, placement or research student



KEY:

SP - Student Participation

SPD - Student Performance and Development

Trigger

Action

Response

Additional information or mitigations

18. Additional Consequences of Non-Attendance or Non-Engagement as a Student in Receipt of a US Federal Loan

- 18.1 In addition to the standard attendance and engagement requirements outlined in this policy, students in receipt of a US Federal Loan must maintain a minimum 50% attendance level. If a student fails to do so without good reason (and approval by RVC), loan payments may be suspended and US Federal Funds returned to the US Department of Education in line with their guidelines.
- 18.2 A student's attendance will be monitored over a minimum of 10 contact points throughout the academic year, comprising of enrolment, attendance at assessments, classes and signing-in sessions. Funds will not be disbursed to a student who misses consecutive contact points which result in attendance rate falling below 50%.

- 18.3 The Financial Aid Office (financialaidoffice@rvc.ac.uk) is responsible for monitoring that students receiving a US Federal Loan have maintained at least 50% attendance prior to each disbursement of funds.
- 18.4 Any request for information made by the Financial Aid Office to a student will be to support their assessment and decision-making regarding the release of disbursements.
- 18.5 Part of the assessment might be to check with the Student Participation team to identify if the student participated in the following:
- Attended another monitoring point within 14 days (if there is one).
 - Submitted an assessment within 14 days of the missed monitoring point.
 - Attended a tutorial within 14 days of the missed monitoring point.
- 18.6 Failure by a student to respond to requests for information necessary to determine whether the 50% attendance threshold has been met may result in the disbursement being placed on hold.
- 18.7 If, following assessment, the Financial Aid Office determines that a student has not met the 50% attendance requirement, the student will receive formal written confirmation that the disbursement for that funding term has been denied. The Financial Aid Office is required to report this to the US Department of Education and return the relevant funds.
- 18.8 In cases where a disbursement is denied, the Financial Aid Office will refer the case to the Student Participation team. The student will be invited to a meeting with the Student Participation Manager and/or their nominee.
- 18.9 The purpose of this meeting will be to:
- Provide an opportunity to refer the student to appropriate support services (e.g., SPD, personal tutor, Advice Centre, or Study Skills team) to assist with re-engagement and offer advice or support strategies to help improve engagement with studies.
 - Clarify whether failing to meet the 50% attendance threshold affects the student's UKVI responsibilities (for those with dual responsibilities) and explain any related consequences and expectations.
 - Highlight the ongoing impact of failing to maintain 50% attendance, specifically in relation to ineligibility for future disbursements.

- Inform the student that the Student Participation team will now be responsible for monitoring their attendance until the next scheduled disbursement date and/or the end of the academic year. If attendance requirements are subsequently met, the case will be returned to the Financial Aid Office for review and possible resumption of disbursements.
- 18.10 This process will reset at the beginning of each academic year, meaning a student's attendance percentage will start at 0% (zero) at the start of each academic year.
- 18.11 Should a student be withdrawn as a result of the procedure, they will have the right of review using the Final Formal Review Procedure outlined in Section 19.

19. Final Formal Review (FFR)

- 19.1 A student can request an FFR if they have grounds to believe:
- That there is **new evidence** that could not have been, or for good reason, was not, made available at the time of the previous decision.
 - That evidence can be produced of a significant **procedural error(s)** made before or during the previous process.
 - That any remedy or outcome proposed by the previous decision is **manifestly unreasonable**.
- 19.2 Students requesting a Final Formal Review must complete and submit a Final Formal Request Form to the Student Resolution and Compliance Team at ffr@rvc.ac.uk within 14 calendar days of the withdrawal outcome. Full details and process are outlined in the [Final Formal Review Procedures](#).

20. Completion of Procedures

- 20.1 A Completion of Procedures (CoP) letter is issued when any student process has reached the end of internal procedures.
- 20.2 If the RVC determines that an appeal is unjustified or that a case is not permitted to proceed under their internal procedures, the RVC will provide a CoP letter to the student. This letter will include an explanation of the decision reached.
- 20.3 A CoP letter is required should the student wish to advance a complaint to the Office of the OIAHE regarding the UKVI Student Attendance and US Federal Loan

Procedure. The RVC will usually only issue a CoP letter once the procedure has concluded, and a final decision has been provided to the student.

21. Office of Independent Adjudicator for Higher Education (OIAHE)

- 21.1 Students who are dissatisfied with the outcome of an FFR can apply to the OIAHE for an independent review. Requests for OIAHE review must be made no later than 12 months after the FFR decision.
- 21.2 Further guidance on submitting a complaint to the OIAHE and the OIAHE Complaint Form can also be found on the OIA's website.