

London South Bank University

	PAPER NO: 38(12)
Board/Committee:	Audit Committee
Date:	27 September 2012
Paper title:	Report on LSBU Tier 4 UKBA compliance and UKBA Audit visit on 14 June 2012.
Author:	John Baker, External Strategic Projects Manager & Jenni Parsons, Director of Internationalisation
Executive sponsor:	Bev Jullien, Pro Vice Chancellor (External)
Recommendation by the Executive:	None
Aspect of the Corporate Plan to which this will help deliver?	5.15: International Student Recruitment
Communications – who should be made aware of the decision?	For information

Executive summary

The UKBA has recently taken a decision to suspend highly trusted status for sponsoring and teaching international students at London Metropolitan University.

LSBU has recently been successfully audited by the UKBA and has just applied for the extension of its highly trusted status licence to issue CAS letters (Confirmation of Acceptance of Studies) and sponsor full-time international students under tier 4 - In the light of the recent successful audit, we expect this to be granted early in 2013.

The Audit Committee is requested to note the work of the international office in ensuring institutional compliance with the conditions of our Highly Trusted Sponsor Status.

Background to the audit

1. UKBA compliance:

To satisfy the requirements of its Tier 4 licence, LSBU has to:

(A) ensure that all sponsored students satisfy the requirements for UK study and have completed all necessary paperwork to enter the UK.

Then, once they are here, the international office (I.O.) at LSBU have a responsibility to UKBA to:

(B) maintain accurate records for these students, supply information on all students at regular intervals, and report within a shorter timeframe any students who stop meeting the terms of their visa for study.

2. Regular review:

The I.O. conducts regular reviews of systems and processes in this area, as UKBA are well renowned for changing their expectations of sponsors without making proactive communications to them.

The June Audit

1. LSBU received notice of a visit by UKBA in mid June at end May
2. Paolo Marchi of UKBA attended on 14 June 2012
3. The outcome of this visit was satisfactory
4. UKBA do not have resources in place to provide written reports of their visits
5. Feedback provided was as below:

<i>Issue identified</i>	<i>Further Action taken as a result</i>
Letter from UKBA after visit requested further information about 60 students who were 'unreported'.	Investigation of these revealed that majority of these were students who had had visa rejected in previous years, when the UKBA online reporting tool did not have an option for reporting visa refusal, or were students who had come here, completed their studies and then returned home, so did not meet any of the criteria for UKBA reporting. This was communicated to UKBA in Sheffield by letter, and no further response has been received.

Ongoing Process improvements

During the last review cycle, there was full confidence with visa provision process managed within the international office, that only students correctly meeting all the requirements for international study were being sponsored by LSBU.

There is also confidence in regular reporting on all students, where we provide information to UKBA more regularly than their base requirement.

However in terms of student conduct once enrolled here, there was concern that in a handful of cases, information about students being collected elsewhere within the university may not reach the international office in the most timely way, which could mean that a student may need to be reported to UKBA for non-attendance, at a point prior to this fact reaching the I.O. staff.

A team was drawn up to explore how these processes could be adapted to remove this potential risk.

Clarifications to existing processes: steps taken to mitigate potential risks in current LSBU information and reporting processes.

<i>Issue identified</i>	<i>Action taken as a result</i>
Faculty withdrawal request to fees too late for I.O. intervention, and for timely reporting on students who stop attending the course of studies. (10 scheduled contacts)	Faculty managers now agreed new procedure whereby whenever Course administrators write to any student who is flagged up through the non attendance monitoring procedures for all students, where these are international students, they will now send a copy of this letter to the international office, who can contact the student to explore the reason for this (NB – there are still ongoing issues with the veracity of some of the attendance reports)
Fees team backdate withdrawal dates on QLS system for tuition fee refund purposes, which created potential for students withdrawn to fall outside the exiting crystal reporting cycle implemented by the I.O. team	Now the Fees team manager has agreed that when withdrawal requests are received from course administrators via the Course change log managed by Registry, this information will be automatically provided to the I.O. at this point Additionally the registry team updated a crystal report available on their website to enable improved reporting of visa and enrolment issues for international students, including those for whom exam board decisions impact on ability to continue their studies in the UK)
Potential lack of evidence of institutional policy regarding	Work being carried out with Business faculty as a exemplar to ensure that we can evidence how all LSBU supervisors

<i>Issue identified</i>	<i>Action taken as a result</i>
decisions made and required related actions by dissertation supervisors regarding work plans submitted by full time postgraduate international students	are fully cognisant of the impact of any decision to allow an international student to return home to write up their dissertation, and the reporting obligation to the I.O. where this decision is made
Lack of knowledge of the implications of non-attendance amongst international students	This information is being included in the 12/13 international student orientation, to ensure all students are fully cognisant of the importance of using the electronic attendance monitoring system
4 week reporting system in faculties could result in student no being flagged up until 1-2 weeks after 10 contacts missed.	The Student Records Development Taskforce has now implemented a new attendance monitoring procedure whereby a student is contacted if they do not attend any 2 week period, rather than the previous fixed 4 week monitoring cycle
Out of date contact information held for students within the QL student database system.	I.O. working with fees and registry to determine whether international students could be forced to complete face-to-face re-enrolment sessions, or have additional screens to process during online re-enrolment
Some students fail to update I.O. with latest visa information	Working to determine what penalty we might apply to those who do not supply us with up to date visa details? An attempt to withhold results was not permitted by the appeals team as student had paid fee, although not conformed with visa criteria

Further checks

A mock internal audit is scheduled for the end of the autumn term, in a bid to check whether the above actions have resolved the stated reporting concerns, and to check systems against any updated UKBA requirements. The team also plans to ask an external specialist reviewer to come in once per year, to check that we continue to comply with all UKBA requirements.

Internal communication

A significant number of members of staff are involved in recruiting, teaching and supporting international students across the central functions and Faculties. The International Office are going to conduct annual briefings of all key staff on the procedures and the importance of adhering to them, as well as providing written updates when necessary in the event of changes.