



BUCKINGHAMSHIRE
NEW UNIVERSITY

EST. 1891



Partner Student Attendance Monitoring & Data Verification Procedure



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Purpose

- 1 This document sets out the policy and procedure employed by Buckinghamshire New University to monitor student attendance and engagement of those registered with the University to undertake a programme of study leading to a named academic award or just the award of academic credits at a Partner institution.
- 2 This policy is aimed at meeting the legal obligation and compliance requirements that the University has in monitoring the attendance and engagement of its learners. This includes, for those students studying with a partner institution in the United Kingdom, legal obligations to the Office for Students (OfS) and the Student Loans Company (SLC).
- 3 The University has a responsibility to ensure that:
 - those who are accessing public funds are genuine learners who are attending / engaging with their course; and
 - all appropriate withdrawals of students are being made promptly.
- 4 Failure by the University to monitor and verify attendance, to maintain records or immediately to report students who are in breach of the terms and conditions of their registration, may result in suspension of both maintenance loans and grants to certain students. Failure may also result in punitive action being taken against the University by OfS.
- 5 The University aims to improve the attendance and engagement of all students and therefore has a separate Attendance & Engagement Policy for all its learners and for students sponsored by the University under the UK Visas and Immigration (UKVI) student visa route, in accordance with the University's statutory obligations under the terms of its UKVI licence.

Applicability and Scope

- 6 This procedure applies to undergraduate and taught postgraduate learners including apprentices, whether studying by classroom attendance or by distance learning with any partner institution.
- 7 The procedure applies only to those students registered with the University under a Franchise Sub-contractual arrangement.
- 8 The purpose of this document is to set out the protocols, criteria and processes that are used to monitor and record attendance. The verification process is in place to provide assurances to the relevant external stakeholders.
- 9 The procedures herein will have a risk-based application, using the overall hierarchy of risk captured in the Partner Risk Assessment Register monitored at each meeting by University Partnerships Board (UPB).
- 10 Importance is attached also on ensuring that the most scrutiny is placed on the attendance and continuing engagement of students in their first year(s) of study on a programme i.e. L0, L4, L6 for UG Top Up, and PGCert stage for L7, although the procedures should not be seen as limited to students at these levels of study.

Responsibilities

- 11 Responsibility for oversight of the attendance verification procedure lies with the **University Partnerships Board** and the implementation is carried out by the **Partnerships Team**. The policy and procedures are monitored and reviewed regularly by the University to reflect sector best practice and any new or revised guidance from OfS and SLC.
- 12 The University **Student Records and Data Team** is responsible for confirming student attendance verifications with the SLC and timely withdrawal of any students.
- 13 The **Partnerships Team** will manage the attendance verification process from planning and requesting of timetables and registers from partners, through the conduct of the attendance verification visits, to the recording of partner student attendance data for the sample set of students, programmes and partners identified for audit in any given Academic Year.
- 14 The **Partner** must provide information as requested by the University and ensure local arrangements are in place for the visit. There is a standard contractual obligation on all partners to allow access for University staff to all teaching premises given reasonable notice and to provide all information requested to enable the University to comply with its statutory obligations.

Schedule

- 15 The Head of University Partnerships and Principal Partnerships Officer will be responsible for drawing up an annual schedule of attendance verification visits with oversight from UPB.
- 16 The schedule will be kept under review and be updated to take account of any changes in partnership activity, such as specific enquiries from SLC or a heightened level of risk attached to a specific partner.
- 17 At the start of each semester or term, the Partnerships Team will request from all its Franchise Sub-contractual partners their teaching delivery patterns in the format of a timetable. This will include weekly teaching patterns for all programmes, at all levels, including all cohorts. Separate timetables will be requested for separate campuses.
- 18 At a minimum, an attendance verification visit will be made to each partner three times per academic year.

Procedure

- 19 The Head of University Partnerships or the Principal Partnerships Officer will allocate members of the Partnerships Team to conduct particular visits. The date and time of the visit will be decided based on the timetables received with opportunities to capture attendance data for large numbers of students at one visit being especially useful, although on occasion visits may be undertaken where only small numbers of students are scheduled to have a class.

- 20 Partnership Tutors for Franchise Sub-contractual partners will be required wherever possible during their scheduled Partner Visits to undertake an additional attendance audit. The Partnerships Team will liaise with the appropriate Partnership Tutors each year to make the arrangements and notify the Partner of the intention in accordance with this procedure.
- 21 At times there may be a requirement for checks to be conducted outside standard University office hours, i.e. in the evenings or at weekends. The schedule will seek to minimise such activity but colleagues undertaking such visits will be granted appropriate time off in lieu according to their terms and conditions of employment.
- 22 Colleagues undertaking the visit will notify the key contact at the Partner of the intended visit by no later than 10am the working day before the visit.
- 23 The visit notification and the Partner will be asked to confirm certain arrangements for the visit, such as the contact details of which partner colleague will meet the University visitor upon arrival, the emergency contact details of a second (back up) colleague.
- 24 The official notification to the Partner will normally be sent by email and provide the name of the University visitor, date, campus to be visited, expected time of arrival, list of programmes, and cohorts to be checked.
- 25 The email will include a requirement for the Partner to submit registers of student details (forename, surname, and BNU ID) for each of the selected groups by no later than 2pm on the working day before the visit. The partner will be required also to provide hard copies of these registers to the University visitor upon arrival.

Conduct of Visit

- 26 The University visitor must ensure that they take with them their BNU staff ID card and identify themselves and the purpose of the visit to the nominated partner representative.
- 27 Travel arrangements must be made as per the usual process for staff travel bookings.
- 28 Upon arrival the Partner representative must conduct the BNU visitor to the teaching room(s). The Partner representative will be given a form of words to explain the purpose and procedure of the audit to the students in the classroom.
- 29 It is at the discretion of the University visitor to decide, of the full register of students due to attend a particular class, the attendance of which they wish to check. There may be just one name checked in any given class, there may be several, or indeed every student may be checked. As each name is read out the student in attendance must present their student ID card or other appropriate form of acceptable photographic identification.
- 30 The University visitor will record the attendance of each individual selected and present and whether or not photo ID has been confirmed.

Data Gathering

- 31 Upon return to the University the visitor must ensure the transfer from paper copy to electronic record of the attendance information gathered. A central log of completed registers will be kept by the Partnerships Team.

- 32 The Partnerships Team will maintain a log showing the number of students checked at each partner and at each location and the percentage of those who were present at each visit. The log will also show the overall attendance percentage for each of BNU's franchise sub-contractual partners.
- 33 All records will be kept by the Partnerships Team as part of the audit record and may be used to provide information to external bodies such as the SLC and OfS. Records will be kept securely and disposed of in line with the University's records retention policy.

Use of Data

- 34 Attendance records for individual students will not be used as the definitive record of students' attendance. Instead the use of attendance audit data will be used to compare with attendance statistics provided by the partner to check if the two percentages are broadly in line.
- 35 If this is the case then the University can have a high degree of confidence that partner attendance statistics, and therefore confirmation of ongoing attendance / engagement for individual students, are reliable.
- 36 If this is not the case, additional auditing visits will be scheduled in order for a more comprehensive dataset to be obtained.
- 37 Should the additional data gathered still not provide the necessary degree of confidence in partner-provided attendance / engagement information, this will be reported to UPB to agree what measures are necessary to ensure that the University achieve such confidence.
- 38 Data gathered will be used as an evidence base for confirmation and verification of overall partner attendance data records of continued partner student attendance / engagement to SLC and as such will be stored confidentially for retention by the University for 4 years.

Table of Definitions

Franchise Sub-contractual	An arrangement by which the University authorises a Partner to deliver, but itself collects any SLC funding associated with students on, a programme.
Office for Students	The non-departmental public body of the Department for Education, acting as the regulator and competition authority for the higher education sector in England or any successor body which carries out substantially the same function.
Partner Risk Assessment Register	A detailed partner risk register is monitored and maintained by UPB to ensure that a comprehensive assessment of risk is considered at individual partner level and that appropriate

	strategies for the mitigation of risks are identified and implemented at the earliest opportunity.
Records Retention	Describes the methods and practices the University will use to safeguard important records and maintain them for the required period of time until they need to be stored, redirected or otherwise disposed of.
Student Loans Company	The Student Loans Company is an executive non-departmental public body company in the United Kingdom that provides student loans. It is owned by the UK Government's Department for Education, the Scottish Government, the Welsh Government and the Northern Ireland Executive.
University Partnerships Board / UPB	Reports to Academic Planning Committee and holds delegated responsibility for the development and maintenance of the University's Partnerships Strategy and operational framework; exercising effective managerial responsibility in respect of partnership arrangements; and monitoring student achievement and the quality of the student experience for those registered under a partnership arrangement.
UKVI	UK Visas and Immigration (UKVI) is a division of the Home Office responsible for the United Kingdom's visa system.

Appendix: Equality Impact Assessment

1. What is changing and why?				
This document sets out the policy and procedure employed by the University to monitor student attendance and engagement at a Partner institution. This policy is aimed at meeting the legal obligation and compliance requirements that the University has in monitoring the attendance and engagement of its learners. This includes, for those students studying with a partner institution in the United Kingdom, legal obligations to the Office for Student (OfS) and the Student Loans Company (SLC).				
2. What do you know?				
Partner learners are generally from areas of disadvantage who typically require greater levels of support. Without support such learners are at greater risk of underperformance or disengaging with their studies.				
Partner students account for approximately two thirds of the total student population of the University with approximately 9,000 of these students claiming Government funds through the Student Loans Company. Attendance and engagement monitoring have been the sole responsibility of the teaching institution, however with greater scrutiny from the SLC, the University will now be managing a new attendance verification process.				
3. Assessing the impact				
	Could benefit	May adversely impact	What does this mean? <i>Impacts identified from what you know (actual and potential)</i>	What can you do? <i>Actions (or why no action is possible) to advance equality of opportunity, eliminate discrimination, and foster good relations</i>
a) How could this affect different ethnicities? <i>Including Gypsy, Roma, Traveller, Showmen and Boaters, migrants, refugees and asylum seekers.</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Presence of University staff at the partner institutions will highlight the importance of student attendance and engagement. Samples selected by the auditor will be picked at random or full class attendance will be checked. Attendance checks only identify students by their forename and surname.	Ensure that visit outcomes are appropriately recorded, and datasets clearly identify areas of low attendance so that action can be taken to ensure students who may be experiencing challenges with their attendance are offered appropriate support.

			It is not anticipated that there will be any impact, but this can be reviewed, and guidance updated if required.	
b) How could this affect cisgender and transgender men and women (including maternity/pregnancy impact), as well as non-binary people?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Presence of University staff at the partner institutions will highlight the importance of student attendance and engagement.</p> <p>Samples selected by the auditor will be picked at random or full class attendance will be checked. Attendance checks only identify students by their forename and surname.</p> <p>Those students on a maternity break should be indicated as interruption of studies and not appear on attendance registers.</p>	Ensure that visit outcomes are appropriately recorded, and datasets clearly identify areas of low attendance so that action can be taken to ensure students who may be experiencing challenges with their attendance are offered appropriate support.
c) How could this affect disabled people or carers? <i>Including neurodiversity, invisible disabilities and mental health conditions.</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Presence of University staff at the partner institutions will highlight the importance of student attendance and engagement.</p> <p>Samples selected by the auditor will be picked at random or full class attendance will be checked. Attendance checks only identify students by their forename and surname.</p> <p>An announcement is made by the partner staff at the start of the session which gives the details behind the checks.</p>	Ensure that visit outcomes are appropriately recorded, and datasets clearly identify areas of low attendance so that action can be taken to ensure students who may be experiencing challenges with their attendance are offered appropriate support.

d) How could this affect people from different faith groups?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Presence of University staff at the partner institutions will highlight the importance of student attendance and engagement.</p> <p>Samples selected by the auditor will be picked at random or full class attendance will be checked. Attendance checks only identify students by their forename and surname.</p> <p>It is not anticipated that there will be any impact, but this can be reviewed, and guidance updated if required.</p>	<p>Ensure that visit outcomes are appropriately recorded, and datasets clearly identify areas of low attendance so that action can be taken to ensure students who may be experiencing challenges with their attendance are offered appropriate support.</p>
e) How could this affect people with different sexual orientations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Presence of University staff at the partner institutions will highlight the importance of student attendance and engagement.</p> <p>Samples selected by the auditor will be picked at random or full class attendance will be checked. Attendance checks only identify students by their forename and surname.</p> <p>It is not anticipated that there will be any impact, but this can be reviewed, and guidance updated if required.</p>	<p>Ensure that visit outcomes are appropriately recorded, and datasets clearly identify areas of low attendance so that action can be taken to ensure students who may be experiencing challenges with their attendance are offered appropriate support.</p>
f) How could this affect different age groups or generations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Presence of University staff at the partner institutions will highlight the importance of student attendance and engagement.</p>	<p>Ensure that visit outcomes are appropriately recorded, and datasets clearly identify areas of low attendance so that action can be taken to ensure students who may be experiencing</p>

			<p>Samples selected by the auditor will be picked at random or full class attendance will be checked. Attendance checks only identify students by their forename and surname.</p> <p>It is not anticipated that there will be any impact, but this can be reviewed, and guidance updated if required.</p>	<p>challenges with their attendance are offered appropriate support.</p>
g) How could this affect those who are married or in a civil partnership?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Presence of University staff at the partner institutions will highlight the importance of student attendance and engagement.</p> <p>Samples selected by the auditor will be picked at random or full class attendance will be checked. Attendance checks only identify students by their forename and surname.</p> <p>It is not anticipated that there will be any impact, but this can be reviewed, and guidance updated if required.</p>	<p>Ensure that visit outcomes are appropriately recorded, and datasets clearly identify areas of low attendance so that action can be taken to ensure students who may be experiencing challenges with their attendance are offered appropriate support.</p>
h) How could this affect people from different backgrounds such as: socio-economic disadvantage, homeless, alcohol and/or substance misuse, people experiencing domestic and/or sexual violence, ex-armed forces, looked after children and care leavers.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Presence of University staff at the partner institutions will highlight the importance of student attendance and engagement.</p> <p>Samples selected by the auditor will be picked at random or full class attendance will be checked. Attendance checks only identify students by their forename and surname.</p>	<p>Ensure that visit outcomes are appropriately recorded, and datasets clearly identify areas of low attendance so that action can be taken to ensure students who may be experiencing challenges with their attendance are offered appropriate support.</p>

			It is not anticipated that there will be any impact, but this can be reviewed, and guidance updated if required.	
i) How could this affect people with multiple intersectional experiences?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Presence of University staff at the partner institutions will highlight the importance of student attendance and engagement.</p> <p>Samples selected by the auditor will be picked at random or full class attendance will be checked. Attendance checks only identify students by their forename and surname.</p> <p>It is not anticipated that there will be any impact, but this can be reviewed, and guidance updated if required.</p>	Ensure that visit outcomes are appropriately recorded, and datasets clearly identify areas of low attendance so that action can be taken to ensure students who may be experiencing challenges with their attendance are offered appropriate support.
4. Overall outcome				
No major change needed <input checked="" type="checkbox"/>	Adjust approach <input type="checkbox"/>	Adverse impact but continue <input type="checkbox"/>	Stop and remove <input type="checkbox"/>	
5. Details of further actions needed				
No specific actions needed, beyond ensuring that data analysis continues to evolve and any challenges with attendance identified with the partner and remedial actions put in place.				
6. Arrangements for delivery and future monitoring				
The process will be reviewed every five years in line with University requirements and when sector practice requires a change.				
7. Completed by:	Shabana Hussain	Principal Partnerships Officer	Date	07/06/2023
8. Signed off by:	Ian Harper	Commercial & Business Development Director	Date	Click or tap to enter a date.



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