

Student Attendance and Engagement Monitoring Policy		Ref: PL.041-v010		
Brief Description & Purpose:	This document sets out the University's Policy for student attendance and engagement monitoring and provides guidance to students and staff on our processes.			
Applicable to (list cohorts):	Staff: All staff	Students: All students	Third Parties: All who are in a formal relationship with the University	
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1. Introduction to Policy

- 1.1 This document sets out the University's Policy for student attendance and engagement monitoring and provides guidance to students and staff on our processes.
- 1.2 This Policy applies to all Enrolled, Taught students at Northumbria's Newcastle and London Campuses. Defining eligibility and exceptions are outlined in Appendix G.
- 1.3 In line with the Northumbria University <u>Student Charter</u>, all students are expected to actively engage with their learning opportunities. Monitoring attendance and engagement is therefore a mandatory part of the University's enrolment contract with a student.
- 1.4 Monitoring student attendance and engagement enables Northumbria to ensure we are compliant with our reporting obligations to external bodies and agencies, e.g., Student Finance England (SFE), UK Visas and Immigration (UKVI), Education and Skills Funding Agency (ESFA), and third-party sponsors.
- 1.5 Monitoring student attendance and engagement complements our wider strategy for proactive Student Support. It is one of several approaches which enables the University to provide timely and supportive interventions to students who, as a consequence of their non-attendance or non-engagement, risk failing to achieve their learning outcomes and potential. Student success in assessments, progression through the programme, and overall degree classification is dependent upon student engagement with the learning opportunities available to them.
- 1.6 Several research studies have shown that there is a strong correlation between positive attainment, enjoyment of course, student success and attendance. We undertake this activity to ensure that our students take the best advantage of all their learning opportunities to support their success.



2. University Responsibilities

- 2.1 The University will:
 - Monitor student attendance and engagement using data collected in line with university policy.
 - Contact students to offer support when levels of attendance and engagement may be of concern.
 - Contact students and employers regularly to confirm attendance at Placement and ensure the Time Management System is available to record placement hours.
 - Take appropriate action as set out in this Policy to meet requirements set out in the <u>Handbook</u>
 <u>of Student Regulations</u> and those required by relevant external reporting bodies and
 stakeholders.
- 2.2 The University reserves the right to withdraw students who do not engage satisfactorily with their academic study without an accepted reason for non-attendance. Where students fail to attend classes or engage satisfactorily with their studies, students may be withdrawn as per Appendix D and (Taught Students) and Appendix I (Placement Students) of this Policy.
- 2.3 The Student Engagement Service (within Student, Library and Academic Services) oversees the end-to-end management of the student attendance and engagement monitoring Policy and processes. This includes supporting colleagues from across the institution to understand local roles and responsibilities relating to attendance and engagement monitoring.
- 2.4 The Student Success Team offers specialist support and advice with technical issues surrounding attendance monitoring. Please refer to their Student Portal article, 'Registering your attendance and notifying us of absence' for further guidance.
- 2.5 When we contact students about attendance and engagement, we may make referrals to relevant university services. This supports our wider strategy on student success, retention, attainment, inclusivity, and wellbeing. See Support for Students for more information about our student support services.
- 2.6 The <u>Student Life and Wellbeing Service</u> is able to offer specialist advice on the support of students who may be experiencing serious welfare concerns which impact their attendance and engagement, and specialist advice on attendance issues surrounding international students studying on a VISA.

3. Student Responsibilities

- 3.1 Students are expected to:
 - Attend all scheduled learning and placement activities and engage with Blackboard regularly during term time.
 - Register their attendance at all scheduled (timetabled) events and/or as requested by the Placement Provider or University.
 - Comply with any programme specific attendance standards where specified by Professional Statutory and Regulatory Bodies (PSRB, see appendix B for information or individual



Programme Handbooks for further details).

- Notify the University (in advance where possible) of an absence and provide a reason for the absence (see <u>Registering your attendance and notifying us of absence</u> article on the Student Portal). Placement students should inform their Placement Provider in compliance with local arrangements as determined by the Provider.
- Take responsibility to make arrangements to catch-up with any missed classes and learning activities.
- Check their university email account/personal email account and the Student Portal regularly for communications from the University and respond as requested.
- Placement students should inform the Placements and Internships Team of any issues whilst in Placement, regarding changes to their start/end date, working arrangements and issues related to attendance.

4. Student Visa Attendance Requirements

- 4.1 Students who are studying on a Student Visa should:
 - Ensure that they fully engage with all aspects of their programme in accordance with the attendance requirements specified in this Policy.
 - Notify the University of any absence and provide a reason for this. Details of how to register an absence can be found at Registering your attendance and notifying us of absence.
 - Students should be aware that travel during term time is not permitted. If students need to travel
 during term-time for a short period of time due to an exceptional/unavoidable circumstance then
 they should register their request in advance by raising a request at <u>Registering your attendance</u>
 and notifying us of absence. Before making a request students should ensure they have read
 the <u>Visa implications of travel or absence during term time</u> article.
 - Respond to all communications from the University regarding concerns about their engagement to ensure that a reason for absence is noted and that support can be provided to reengage with studies.
 - Attend all project/dissertation supervision meetings in person. It is unlikely that the University
 will be able to continue sponsorship if a student decides to complete assessments remotely.
- 4.2 Students studying at RQF level 5 and below should be aware of the following Band 1 Visa attendance requirements:
 - Each student in this band must be required to attend a minimum of 15 hours of daytime (08:00 to 18:00, Monday to Friday) classroom-based study per week.
 - Students should attend at least 85% of classroom-based studies in any given month. The University will contact students if their attendance is less than 85%.
 - Where a student's attendance falls below 70% for three consecutive months students may be withdrawn due to lack of academic engagement unless there are exceptional and evidenced reasons for non-attendance.



- For Band 1 students it is a Visa requirement to provide a reason for any absence. Students should provide one as soon as possible via the Attendance Monitoring System (My Attendance via the Student Portal). If requested, students must complete the Programme Engagement Survey and provide a reason for absence. Failure to complete the Programme Engagement Survey when asked to do so may be considered as misconduct as detailed in Section 3 Appendix 2 of the Handbook of Student Regulations (Taught Awards).
- 4.3 If a student fails to re-engage with their studies for 60 days, then the University may be required to withdraw sponsorship, except in exceptional evidenced circumstances.

5. Attendance Monitoring on Standard Taught programmes

- 5.1 Northumbria monitors both on-campus attendance and online engagement as both aspects form the overall learning opportunities of the programme design:
 - On-campus attendance is monitored for all timetabled, in-person learning activities at Newcastle
 and London campuses; students are expected to attend each activity at the date, time and
 location specified on their personal teaching timetable which is produced via the NU timetabling
 system.
 - It is the student's responsibility to record their own attendance at each activity using their university smartcard on the wall-mounted readers. Attendance is registered at Amsterdam campus using QR code readers under local arrangements (see Appendix G).
 - Full student guidance on how to register attendance and absence is available on the student portal at Registering your Attendance and Notifying us of Absence.
 - If a student forgets or loses their smartcard, they should record their attendance online via My Attendance accessible through the digital app (NU Connect) or the Student Portal (see 5.3 below).
 - Failure to register attendance either by smartcard or online will be recorded as non-attendance at the activity.
 - Online engagement is monitored using Blackboard module activity data. Students are not expected to record their online engagement, it is done automatically.
- 5.2 The use of online attendance recording for in-class activities is permitted only where a student has forgotten or lost their Smartcard (or in the rare event that a smartcard reader is not available). Online registration must be completed on the same day that the scheduled activity took place for it to be recorded.
- 5.3 Students who lose their smartcard must seek a replacement immediately by contacting Ask4help. Further details on obtaining a new smartcard are available via this article <u>Understanding your university smartcard</u> on the Student Portal.
- 5.4 Continued online attendance registration is monitored by the University and if found to be misused (i.e., relied upon for longer than 2 consecutive weeks), this functionality may be withdrawn from a student. See Appendix E for more information on Attendance Fraud.
- 5.5 The University will take appropriate and timely action to help ensure that expected and actual attendance information is accurate due to circumstances outside of a student's control such as:



- A significant IT systems issue, resulting in the student being unable to register their attendance via any approved method (in class or online).
- An exceptional event, resulting in a decision by the University to suspend attendance monitoring, e.g., government-determined pandemic restrictions, severe weather.
- Learning and Teaching activity that did not take place at the scheduled date, time, and location and where the student's personal teaching timetable was not updated in advance of the event.

5.6 Attendance and engagement communication

- At key times throughout each semester, the University will consider a student's attendance to date and determine whether to make contact to offer support. This is the Formal Intervention Schedule for standard taught programmes identified below (5.9). The University will endeavour to make contact in line with this schedule.
- Students will be contacted by email to their NU email accounts and personal email address. This is the student's opportunity to inform the Student Engagement Service of any issues affecting their attendance or engagement.
- At key points of the process students will be invited to complete a brief Programme Engagement Survey. Students will be provided specific support and advice based on their response to the survey.
- Throughout this process, students will be encouraged and supported to re-engage with their programme or to engage with other supportive case-managed processes or student services where appropriate e.g., to formally take time out from their studies.
- At the end of the escalation procedure outlined in Appendix D, students deemed to be no longer engaging with their studies may be withdrawn from their programme. This is a legal requirement of our external reporting obligations. I
- If a student has initiated a request to interrupt their studies or leave the university through the Change of Circumstances procedure, escalation will be paused whilst the case is ongoing. However, where a student has initiated a request to transfer programmes (within the university) through the Change of Circumstances process, their continued engagement with their current course is expected and their attendance will continue to be monitored.
- The Formal Intervention Schedule details the study type, reason for monitoring, frequency of monitoring, the intervention date, and the reason for the intervention (the trigger).
- Students with PSRB requirements around attendance will also be monitored monthly and a summary of their cumulative attendance percentage will be shared with Programme Leaders and PSRB Academic Leads. Apprenticeship students' attendance data will also be monitored monthly and shared with Northumbria's Educational Partnership Team and Employers.
- Informal Interventions and supportive contact may be made to students with low rates of attendance and engagement, to offer advice, guidance, and support. This is in line with the University's overall student engagement and retention strategy. Students receiving informal interventions will not be subject to potential escalation and withdrawal but are encouraged to respond and seek support when needed.



5.7 Taught Students Formal Intervention Schedule:

Student	Reason for monitoring	Monitoring frequency	Formal Intervention Schedule	Formal Intervention Trigger
Standard taught students who meet the criteria outlined in Appendix G.	Compliance with external reporting obligations Proactive support to students needing help engaging with their teaching	during term time support s needing ging with	Three times per semester (minimum)	Student has missed an entire week, or more than one consecutive week, of scheduled on campus activity.
Students studying on an accredited PSRB programme outlined in Appendix B at Newcastle or London Campus				Informal Interventions and support may be provided in between Formal Interventions.
Students sponsored by the University through a Student Route Visa studying at Newcastle or London campus at Band 2*				
Students sponsored by the University through a Student Route Visa studying at Newcastle or London campus at Band 1*		Weekly and monthly during term time	Three times per semester (minimum) and Monthly interventions based on attendance percentage	Student has missed an entire week, or more than one consecutive week, of scheduled on campus activity. <85% cumulative monthly attendance <70% cumulative 3 monthly attendance thereafter Informal Interventions and support may be provided in between Formal Interventions.

^{*}Band 1 and Band 2 refer to the qualification level at which the student is studying according to the Regulated Qualifications Framework (RQF), as set out in UK Visas and Immigration (UKVI)

Sponsorship Duties, i.e. Band 1 = RQF Level 5 and below, Band 2 = RQF Level 6, 7 and 8.



6 Mental Health Support

- 6.1 Students who complete the Programme Engagement Survey as part of the Monitoring Process for Standard Taught Students, and who indicate 'emotional or mental health issue' as a barrier to their attendance and engagement, will receive links to sources of support, including access to Silvercloud, advice on how to register with the University's specialist Counselling and Mental Health Team, information on the university's Student Accessibility Team, and links and telephone numbers for those needing immediate help.
- 6.2 Students who do not complete the Programme Engagement Survey will still receive signposting to the above as part of the Formal Intervention and Escalation procedure. A check with the Counselling and Mental Health Team will be made as part of the escalation procedure outlined in Appendix D and Appendix H to determine whether students are known to the service, prior to any potential withdrawal decision being taken and communicated.

7 Attendance Monitoring Process at Placement

- 7.1 Northumbria University monitors attendance on Placements differently based on the type of Placement undertaken (Appendix J):
 - Students will, wherever practical, be monitored via the ARC Time Management System (TMS), where students are required to submit their hours for each day on Placement for Line Manager's approval.
 - Students not using the Time Management System are monitored via monthly email check-ins with both the Student and the Placement Provider.
- 7.2 The process for contacting a student about their attendance or engagement on Placement is outlined in Appendix H.

7.3 Placements Formal Intervention Schedule

Student	Reason for monitoring	Monitoring frequency	Formal Intervention Schedule	Formal Intervention Trigger
Students undertaking any of the following activities: • Sandwich Year Out Placements • Modules defined as having a placement requirement/opportunity • Advanced Practice 60 Credit Internship module (London Campus)	Compliance with external reporting obligations Proactive support to students needing help engaging with their teaching or placement activity	Monthly during term time	Monthly during term time	Student and/or employer does not respond to monthly contact



7.4 Guidance and Support to students on Placement is provided by Placement and Internships team, Graduate Futures (Newcastle campus) and London Support Team and Lead Placement Supervisor (London campus) as an initial point of contact, particularly focusing on health and safety, changes to placement start/end dates, placement location, provider etc. Students can access this support at any time by searching placements on the student portal or by contacting:

For Newcastle campus:

- Searching 'placements' on the student portal.
- <u>practiceplacements@northumbria.ac.uk</u> (Nursing, Midwifery, Physiotherapy, Occupational Therapy, Operating Department Practitioners, Education, Social Work, Clinical Physiology).
- <u>as.placements@northumbria.ac.uk</u> (all other subjects).

For London campus:

- https://northumbria.targetconnect.net/student/home.html
- nul.careers.internships@northumbria.ac.uk
- 7.5 Module Leads, Academic Assessors, Programme Lead, visiting tutor/lecturer and/or Personal Tutors are available to assist for support with the placement, including academic related matters.

8 Attendance Monitoring of Postgraduate Research

- 8.1 For postgraduate research students, failure to attend and/or absence without permission can result in serious consequences through the Unsatisfactory Academic Progress Procedures given in Annex 1 of the University Handbook of Student Regulations (Research Programmes).
- 8.2 Postgraduate Research Support Teams will offer specialist support and advice concerning postgraduate research students.
- 8.3 Attendance of each student at the University, whether Home/EU or International is formally monitored and recorded at monthly supervision meetings between the student and their Principal Supervisor. Meetings may be face to face, or exceptionally via a virtual equivalent, such as a telephone or virtual meeting. Students and Supervisors share responsibility for maintaining contact. At the conclusion of each monthly meeting, and as part of their academicand personal development, each student completes an on-line Supervision Meeting Record Form within e:vision and submits it to their Principal Supervisor in a timely manner.
- 8.4 For international students based at the University Campus, the completed monthly supervision record forms part of the attendance monitoring process for international students, as required by the Home Office.
- 8.5 The Graduate School must have in place procedures for contacting students:
 - Who have failed to attend supervision meetings for two consecutive months or;



- Where there is a pattern of absence which is affecting the student's work or causing concerns for the student's wellbeing.
- 8.6 The escalation procedure for contacting students is as follows:
 - Stage 1 is a reminder to the student to re-engage and update monthly supervision meeting records (within 10 working days of 2 consecutive meeting records not having been completed by the student).
 - Stage 2 is a further reminder to the student and copying in the Principal Supervisor within 10 working days of Stage 1.
 - Stage 3 is a last warning to the student copying in the Principal Supervisor, requiring both to meet to set engagement goals, within 10 working days of Stage 2.
- 8.7 Failure to engage with stage 3 of the escalation procedure within 10 working days regarding attendance will be taken into consideration under a separate procedure (Withdrawal of a Student for Unsatisfactory Academic Progress) in line with Annexe 1 of the <u>University Handbook of Student Regulations (Research programmes)</u>. Procedures related to Annex 1 of the University's Handbook of Student Regulations (Research Programmes) should involve the Principal Supervisor and Faculty Research Degrees Sub-Committee.
- 8.8 Where an international student is deemed to not have met attendance requirements, the Graduate School will withdraw their record and the University Compliance Team will report this to the Home Office as 'non-attendance'.

9. Dissertation & Project Requirements

9.1 Students completing a dissertation or project should actively participate with their assessment and supervision requirements in accordance with guidelines set out in their Module Specifications.

10. Exemptions to Policy

- 10.1 In cases where students may be away from the University as part of their degree programme (e.g. Advanced Practice students undertaking year-long 60 credit module study abroad, research group, distance learners, students with extensions for study, project research, study abroad), student attendance will be systematically monitored using alternate methods e.g.
 - Emails and phone calls to and from e.g. the personal tutor, programme leader, module tutor, work placement coordinator, study abroad co-ordinator.
 - Submission of work.
- 10.2 Outgoing study abroad students with a Student Route Visa will be required to provide confirmation of their attendance from their host institution as requested by the University's International Mobility Team on a monthly basis. If this information is not provided, students will be reminded on two occasions via email to provide this information. Failure to provide this information or to respond to communications from the International Mobility Team may result in withdrawal from the programme and withdrawal of sponsorship.



- 10.3 Students who take a break in study to become a Sabbatical Officer with Northumbria Student's Union (NSU) will be monitored in accordance with the relevant NSU Employment Policy. If the role is terminated during the academic year due to non-engagement or the student decides to withdraw then the NSU will inform the Student Record Data Management Team and the student record will be amended to reflect this decision.
- 10.4 Submission of work does not constitute an attendance point when considering Formal Interventions however may be taken into consideration during escalation procedures (Appendix D).
- 10.5 The attendance of students participating in field work will be monitored by the fieldwork leader and any absence followed up through the briefings and progress meetings that students undertake as part of the normal activity.
- 10.6 A definitive list of student and study types exempt from this Policy are listed in Appendix G.



10. Equality and Diversity

- 10.1 In line with the University's Policy on Equality and Diversity, the University will make every effort to accommodate the needs of disabled staff and students for attendance and engagement monitoring purposes
- 10.2 Disabled students must make their needs known to the Student Accessibility Team who, in conjunction with the Student Engagement Team, will ensure that the requirements of disabled students requiring reasonable adjustments are communicated promptly to the Timetabling Team and other relevant staff with attendance monitoring responsibilities.
- 10.3 Disabled staff should make their needs known in line with the Disability Disclosure and Reasonable Adjustment Procedure in order that required adjustments can be considered.
- 10.4 The University understands that there may be times when a student is unable to attend a lecture or seminar due to religious observance. Where this is the case students should contactAsk4Help at any Student Central location in advance to explore whether alternative arrangements can be made.



11. Appendices

Appendix A – Data capture to support Attendance and Engagement monitoring

Student attendance

The following data will be captured when a student registers their attendance at Learning and Teaching activities via a wall mounted smartcard reader or online:

- Student ID.
- Activity information (location and date).
- Time attended from.
- Module.

Student absence notification

The following data will be captured when submitting a notification of student absence from Learning and Teaching activities, whether submitted online or via Ask4Help:

- Student ID.
- Absence details (how it was submitted and the reason for absence).
- Date absent from and to.
- Date and Time absence notification received.

Online engagement

The following data will be captured when engaging with online Learning and Teaching activities:

- Student ID.
- Date and time of online activity.
- Type of online activity e.g., course materials accessed.

Programme engagement survey

The following data will be captured via the Programme Engagement Survey:

- Student ID.
- Student's self-declared engagement with studies (this is not in itself counted as a means of or record of attendance or engagement in the context of this Policy).
- Student self-reported issues impacting engagement.



Access to Attendance Information and Data Privacy

The University will collect student data for attendance at scheduled activities/events as outlined in this Policy. This Policy forms part of the University Learning and Teaching contract (as set out in the <u>Handbook of Student Regulations</u>) and by enrolling at the University, students agreed to the University processing their data under the legal basis 'processing is necessary for the performance of a contract'.

All Placement Providers have confirmed their agreement to provide the information required for attendance monitoring purposes for students on placement.

Limited processing of special category data relating to sickness may be required under this Policy in relation to non-attendance of Programme events/activities and consenting to the University collecting and analysing data for Reasons for Absence. Students will be consenting to processing of this data upon submission of such information. Reasons for Absence (collected as top-level categories) will be made available to the Student Engagement Service and Academic Staff within students' academic departments. Further processing of data for management reporting which does not affect the student may be permitted under 'Legitimate Interests'. All student information is retained in accordance with the University Records Retention Policy and communicated via the <u>Student Privacy Notice</u>.



Appendix B – Programmes with specified attendance standards

Programmes which may carry specific attendance standards defined by Professional, Statutory and Regulatory Bodies are shown below (students should consult their Programme Handbooks for further information).

Health and Social Care

- BSc (Hons) Nursing Science/Registered Nurse (Adult, Mental Health, Children and Learning Disability Nursing) – 3-year programme.
- MSc Nursing Science/Registered Nurse (Adult, Mental Health, Children and Learning Disability).
- MSc Midwifery.
- BSc (Hons) Midwifery.
- Registered Nurse Degree Apprenticeship BSc (Hons) Nursing Science/Registered Nurse (Adult).
- Registered Nurse Degree Apprenticeship BSc (Hons) Nursing Science/Registered Nurse (Child).
- BSc Physiotherapy
- MSc Physiotherapy.
- BSc (Hons) Occupational Therapy
- MSc Occupational Therapy
- Occupational Therapist Degree Apprenticeship BSc (Hons) Occupational Therapy
- BSc (Hons) Operating Department Practice
- Operating Department Practitioner Degree Apprenticeship BSc (Hons) Operating Department Practice
- BSc (Hons) Social Work

Other

- Programmes subject to Office for Standards in Education (OFSTED) requirements
- Initial Teacher Training (ITE) Provision both Undergraduate and Postgraduate

Students studying Degree Apprenticeship programmes must have evidence of active learning in line with Education and Skills Funding Agency (ESFA) requirements at least every four weeks (or a break in learning/study must be used). Attendance at scheduled teaching sessions is one element of active learning, and as such attendance information will be provided to the Educational Partnership Team on a monthly basis.



Appendix C – Glossary of Terms

Term	Meaning
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Expected attendance	For Learning and Teaching activities, expected attendance is defined as all scheduled Learning and Teaching activities in the student's personal Teaching timetable. For Placement activities, expected attendance will be required to be in line with course/module requirements and/or defined within the University's Placement Management System. In all instances these will be agreed in advance between the student and their Placement provider.
Late Attendance	Attendance at a scheduled Learning and Teaching activity wherethe student has registered the time of their arrival as being more than 15 minutes after the scheduled start time for the activity.
Learning and Teaching activities	Any learning and teaching session expected to be delivered as part the Module or Programme in a Semester. For example, lectures, seminars and workshops. Learning and teaching activities for a Programme will typically be scheduled on any day between Monday and Friday (excluding Public and University holidays). For some specified Programmes, learning and teaching activities may be scheduled on any day between Monday and Saturday (excluding Public and University holidays).
Learning activities for postgraduate research programmes	For students on postgraduate research programmes (PhD, MPhil, Professional Doctorate research component) learning activities are defined as formal monthly supervision meetings. For further details, please refer to the Northumbria University PGR Code of Practice.
Low Attendance	A pattern of attending some but not all scheduled Learning and Teaching activities where on campus attendance is expected.
Low Engagement	A pattern of engaging with some but not all expected scheduled Learning and Teaching activities on campus combined with a pattern of infrequent access to the University's Virtual Learning Environment (Blackboard).
Non-Attendance	A period of absence from scheduled Learning and Teaching Activities where on campus attendance is expected.
Non-Engagement	A failure to engage with both expected scheduled Learning and Teaching activities on campus or with the University's Virtual Learning Environment (Blackboard) for a sustained period of time greater than 7 days.
Notified Absence	Notification by a student that they are absent, or planning to be absent, via an agreed University process such as My Attendance on the Student Portal
Placement activities	Any designated placement activities, whether undertaken on or off campus, which form part of a student's chosen Programme whilst enrolled at the University. This includes practice placements (see Appendix B), and non-practice placements.



Appendix D – Withdrawal for Non-Engagement (Taught Students)

D.1 Introduction

The University will make every effort to identify and support disengaged students. Students who are unable to engage are encouraged to seek help and support proactively via Ask4help, the Student Portal, their Personal Tutor or Programme Leader, or any other key University Service. Responding to the various contact opportunities outlined within this Policy is also deemed essential. Whereappropriate, students who are unable to engage may be counselled to take a break in their studies.

Programme Leaders and Personal Tutors may be informed when a student has been contacted and asked to comment on a student's engagement during this process.

There is a legal requirement to inform various partner organisations and key stakeholders when a student is no longer engaging with their studies. Partners and stakeholders include UK Visas and Immigration (UKVI), Student Finance England (SFE), Education and Skills Funding Agency (ESFA) and any Professional Statutory and Regulatory Bodies (PSRBs) relevant to the Programme. As a result of these requirements, the University must reserve the right to withdraw a student for non-engagement. This is in line with the Handbook of Student Regulations (Taught Programmes, Section 8: Withdrawal of a Student for Unsatisfactory Academic Progress or Non-Engagement).

D.2 Procedure and Case Management (Standard taught, Band 1 and 2 students)

Standard taught students (meeting the criteria outlined in Appendix G), including students studying on an accredited **PSRB** programme (outlined in Appendix B) at Newcastle or London campus:

D2.1 Formal Intervention Schedule – First Intervention

Students who are identified through the attendance and engagement monitoring process will be contacted by the Student Success Team, in line with the published Formal Intervention Schedule outlined within this Policy (see Formal Intervention Schedule, table 6.7):

- Students will be given 1 week to respond.
- Students will be supported to seek help to improve their attendance where necessary.
- Students will be given the opportunity to improve their attendance <u>over a two-week period</u> (where applicable) or supported to access alternative case-managed procedures such as a break in study/approved absence.

D2.2 Formal Intervention Schedule - Second Intervention

Where attendance or engagement fails to improve after this period, the Student Success Team will send a second email advising students to respond and that they should engage with their programme within one week.



D2.3 Formal Intervention Schedule - Stage 1 Case Management

All students identified for Case Management will be referred to the Student Casework, Conduct & Community Team, who will initiate further contact to attempt to re-engage the student and explore any extenuating circumstances that may have led to non-attendance. This will include signposting to this Policy along with relevant articles on the Student Portal regarding attendance and engagement. Students must respond to this contact within one week.

Failure to improve attendance and engagement after one week of this contact, may lead to escalation to Stage 2. Attendance and engagement information which may be taken into consideration when escalating to Stage 2 can vary dependent upon the Student Type identified in table 4.4:

• Escalation to Stage 2 may be required based on <u>attendance and engagement data</u> (i.e., absence of Blackboard usage or non-submission of assessments).

Students sponsored by the University through a **Student Route Visa** studying at Newcastle or London campus at **Band 2**:

Escalation to Stage 2 may be required based on attendance data alone.

Students sponsored by the University through a **Student Route Visa** studying at Newcastle or London campus at **Band 1**:

• Escalation to Stage 2 may be required based on <u>attendance data alone</u>. Either through consecutive weeks of non-attendance, or failure to meet minimum attendance standards (percentages) set by UKVI (see D.2.2.3).

D.2.3 Stage 2 Case Management

If the case is escalated to Stage 2 an internal audit will take place, which may consist of the following:

- Contact with the student (contact history) relating to this Policy.
- Level of engagement with the programme including testimony of the programme team.
- Confirmation of prolonged period of absence covering at least 1 week prior to Formal Intervention and throughout the escalation procedure up to this point, or confirmation of a cumulative attendance level at <70% for up to 3 months for UKVI Band 1 students.
- Consideration of any failure of the student to respond meaningfully to engagement outlined within or beyond this Policy (e.g., through Programme teaching teams or Personal Tutor).
- Consideration of any known Personal Extenuating Circumstances or known serious issues that may impede attendance.
- Consideration of any recent attempts at assessment.



This audit will determine whether the student should be withdrawn from the University for non-engagement. Advice may be sought from the:

- University Student Visa Compliance Team
- Welfare, Immigration and Funding Team
- Counselling and Mental Health Team
- Legal department
- Apprenticeships Team and Employers as necessary (Apprentices only)

The Student Casework Manager (or nominee) will make a recommendation to the Assistant Director (Student Engagement) (or nominee) who is responsible for taking the decision to withdraw a student under this procedure.

- Formal Case Management may also commence if non-attendance for a prolonged period of time continues as outlined below in D.2.2.
- For Band 1 UKVI Students, escalation may also take place on the basis of not meeting minimum attendance standards set by UKVI i.e. <70% for 3 consecutive months since the start of the relevant programme academic year as outlined in D.3

At each stage, the Programme Leader will be informed and may provide input into the escalation decision based on any relevant knowledge of the student's circumstances, engagement, and academic progress to date. Where Apprenticeship students are identified for Case Management, the Apprenticeship Team will be notified as may the student's Employer and Coach. Students are encouraged to respond in a timely fashion to any contact about their attendance and engagement.

D3 Procedure and Case Management (Standard taught, Band 1 Students)

Students who have not met the UKVI Band 1 requirements detailed in 4.2 will be contacted by the Student Engagement Team in line with the published Formal Intervention Schedule outlined within this Policy (see Formal Intervention Schedule, table 6.7.

D3.1 Formal Intervention Schedule - First Intervention - Stage 0

Students who have a monthly attendance percentage greater than 70% and less than 85% will be contacted by the Student Success Team.

- Students will be given <u>1 week</u> to respond by completing the Programme Engagement Survey.
- Students must provide a reason for their absence.
- Students will be given the opportunity to improve their attendance over the next month.



D3.2 Formal Intervention Schedule - First Intervention - Stage 1

Students who have a monthly attendance percentage less than 70% for one month will be contacted by the Student Success Team.

- Students will be given 1 week to respond by completing the Programme Engagement Survey
- Students must provide a reason for their absence
- Students will be given the opportunity to improve their attendance over the next month.

D3.2 Formal Intervention Schedule – Second Intervention – Stage 2

Students who have had a monthly attendance percentage of less than 70% for two consecutive months will be contacted by the Student Success Team.

- Students will be advised they must respond to email within 1 week to confirm they are able to meet attendance requirements for the following month.
- Students must provide a reason for their absence.
- Students will be advised that they are at risk of withdrawal from the programme if their attendance remains below 70% for three consecutive months.

D.3.3 Stage 2 Case Management – Stage 3

If the case is escalated to Stage 3 an internal audit will take place, which may consist of the following:

- Contact history relating to this Policy.
- Level of engagement with the programme including testimony of the programme team.
- Confirmation that students have not met the attendance standards set by UKVI i.e. <70% for 3 consecutive months
- Consideration of any failure of the student to respond meaningfully to engagement outlined within or beyond this Policy (e.g., through Programme teaching teams or Personal Tutor).
- Consideration of any known Personal Extenuating Circumstances or known serious issues that may impede attendance.

This audit will determine whether the student should be withdrawn from the University for non-engagement. Advice may be sought from the:

- University Student Visa Compliance Team
- Welfare, Immigration and Funding Team



- Counselling and Mental Health Team
- Legal department
- Apprenticeships Team and Employers as necessary (Apprentices only)

The Student Casework Manager (or nominee) will make a recommendation to the Assistant Director (Student Engagement) (or nominee) who is responsible for taking the decision to withdraw a student under this procedure.

At each stage, the Programme Leader will be informed and may provide input into the escalation decision based on any relevant knowledge of the student's circumstances, engagement, and academic progress to date.

D.4 Intervention, Escalation and Programme Withdrawal – Critical Path

Upon considering Programme Withdrawal under D.2 Procedure and Case Management, in line with sponsorship requirements, the university is required to ensure that:

- The maximum period of non-engagement before intervention takes place does not exceed 60 days in duration.
- Students must be withdrawn from their programme if they fail to re-engage with their studies within 60 days of the first intervention (except in exceptional circumstances).
- The minimum and maximum timeframes that the university will look to apply are as follows:
- Maximum number of consecutive days absence before first intervention takes place will be between 7 and 28 days (excluding vacation periods) and will not exceed 28 days.
- Maximum number of consecutive days absence between first intervention and programme withdrawal will be 35 to 49 days (excluding vacation periods) and will not exceed 49 days.
- Student records are updated within 3 working days of any programme withdrawal decision.

Advice and guidance on the approach and timelines for staff are available in <u>Staff</u> and <u>Student</u> <u>Guidance</u>.



Appendix E – Attendance Fraud

E.1 Introduction

Attendance fraud is included with the Student Disciplinary Procedures (Section 3 <u>Handbook of Student Regulations</u>, Taught Programmes). Attendance Fraud, in the scope of this Policy, includes:

- The deliberate misuse of a smartcard by a student to register attendance at a Learning and Teaching activity without having legitimately attended. This includes scanning and leaving early or scanning on behalf of another student (or as a student, having someone else scan your smartcard).
- The deliberate misuse by a student of the online functionality to register attendance at a Learning and Teaching activity without having legitimately attended.

Students should never share their personal Smartcards; doing so may result in disciplinary procedures as outlined in our <u>smartcard guidance</u>. Staff should report incidents of attendancefraud, observed and/or suspected, to The Student Conduct Team including as much detail aspossible about any alleged infraction.

Where Faculty report attendance fraud to Student, Library and Academic Services they may also request to mark the student as being absent from the activity. The Student Success Team will monitor misuse of online attendance recording functionality and will raise concerns with The Student Conduct Team where patterns of unusual activity suggest misuse. The Student Conduct Team may also perform spot checks of in-class registration throughout the year.

E.2 Procedure and Case Management

Informal and Formal procedures will be implemented, to be managed by the Student Engagement Service in collaboration with academic colleagues, to record instances of misuseand to issue informal warnings and support progress to formal action where appropriate. Spot-checks of real-time on campus attendance to verify that the class size matches the number of registrations, will be undertaken by the Student Engagement Service in collaboration with academic colleagues.

E.3 Informal procedures

- Smartcards may be confiscated by a tutor where attendance fraud is witnessed. When
 collecting the smartcard from the tutor a verbal warning will be given. Student Conduct must
 be notified by the academic member of staff where this has occurred as this constitutes
 evidence of a first offence.
- A warning email with accompanying advice will be sent by Student Conduct; the student should be referred to the <u>Student Portal article</u> regarding Smartcards and the <u>Handbook of</u> <u>Student Regulations (Taught Programmes)</u> Section 3.



E.4 Formal procedures

Where a second instance is reported to the Student Conduct Team, the student will be required to attend a meeting with the Student Conduct Manager or nominee and a formal written warning will be issued.

Where a first or second offence is deemed to be a serious breach or has other implications, the University reserves the right to proceed immediately to the Formal Disciplinary stage.



Appendix F – Attendance and Engagement Monitoring in an Emergency Scenario

In an emergency scenario, e.g. a pandemic, industrial action or IT Disruption, where Attendance and Engagement Monitoring is affected, the University will seek to ensure that the supportive principles of this Policy are upheld and continue to meet the obligations outlined in Section 1.

Whilst an emergency scenario may change the way in which learning and teaching activities are delivered, all students, irrespective of programme or background, are expected to actively engage with their learning opportunities in these situations. As a result, it may be necessary, exceptionally, to vary normal Attendance and Engagement Monitoring protocols.

The University does not hold a definitive list of circumstances in which alternative Attendance and Engagement monitoring arrangements may be applied, however it is expected that the application of these changes will be rare and reserved for extreme occasions. An emergency scenario is one which affects the whole university or specific cohorts. It does not apply to individual or personal emergencies.

Emergency scenario protocols

- In the event that physical, on campus attendance is suspended or where there is a technical failure in the solution for capturing physical attendance, Northumbria will look to utilise online engagement with Blackboard. This only applies where engagement with Blackboard is expected as defined by the timetable for online events.
- In the event that digital engagement with Blackboard is suspended or where there is a technical failure in the solution for capturing digital engagement, Northumbria will look to utilise physical attendance on campus. This only applies where physical attendance is expected as defined by the timetable for physical events.
- In the event that both physical attendance and digital engagement is suspended or where both solutions are rendered inoperable, the Student Engagement team will look to other existing datasets which are available to meet the obligations outlined in Section 1 and continue to support student progression. Where no suitable datasets exist, students may be asked to self-register via an interim solution e.g. a self- registration survey, in class register, or online form. Before any contingency solution is deployed which captures data about attendance or engagement a Data Privacy Impact Assessment is required. This will be approved by the University's data protection officer.
- Where students are sponsored by the University on a Student Route Visa, Northumbria
 reserves the right to adapt emergency Attendance and Engagement Monitoring protocols
 to ensure that data availability and accuracy meets the requirements set out by the Home
 Office in the latest guidance at the time.
- Should the University take the decision to suspend normal protocols for Attendance and Engagement monitoring and assume emergency scenario protocols this must be communicated to all impacted students along with detailed information on the specific protocol being deployed (as relevant to the emergency).



Appendix G – Defining Eligibility for Attendance and Engagement Monitoring

There are some students who may be studying with us in a way which means we do not routinely monitor their attendance and engagement, or local monitoring arrangements are in place.

The below table sets out which types of students or study are currently in scope or exempt from this Policy and its procedures.

Type of Student or Study	In scope	Rationale
QA Pathway Students (formerly identified as International Foundation Year Pathway) taught at Newcastle Campus	Yes	Requirements for monitoring under UKVI Band 1
International Students studying at English Language Centre Newcastle over summer	Yes	Requirements for monitoring under UKVI
Police Degree Apprentice Students (PCDA)	No	Local monitoring arrangements
Students without an active in-year enrolment status (including temporarily) e.g., excluded for financial reasons, provisionally enrolled, dormant, withdrawn etc.	No	Student not enrolled
NU Students studying at other institutions (collaborative ventures or franchised)	No	No requirement for monitoring
Sponsored students studying at St. George's University	No	Local monitoring arrangements. Please see appendix K.
Sponsored St George's University studying at Newcastle Campus	Yes	Requirements for monitoring under UKVI Band 2
Distance Learning Students	No	No physical attendance required
Postgraduate Research (PGR) Students (see 7)	No	Local monitoring arrangements
Northumbria Students at Amsterdam Campus	No	Local monitoring arrangements



Appendix H - Contacting a student about their attendance or engagement on Placement

- 1. Contacting a student about their attendance or engagement on Placement (Student not using the Time Management System)
- 1.1 Placement Providers are contacted monthly via email as part of the Placement Providers Agreement from the start date of the Placement and asked to Confirm student attendance.
- 1.2 In the event that confirmation is not received from the Placement Provider within 5 working days, the Placements and Internship Team will follow up via telephone and email to establish confirmation of attendance, whereby a further 5 working days to confirm will be provided. Confirmation of attendance should normally be provided by email. Where confirmation of attendance is provided by telephone this should not take place for two consecutive months.
- 1.3 In the event that after the 10 working days stated above confirmation has not been received from the Placement Provider, the Placement and Internships team, Graduate Futures (Newcastle campus) and London Support Team and Lead Placement Supervisor (London campus) will contact the student by email/phone to establish attendance. The student will have 5 working days to confirm attendance.
- 1.4 As student confirmation would not be accepted for consecutive months, the student would only be contacted for confirmation if this would only be actioned if provider confirmation as provided for the previous month. If this is the second month of no provider confirmation the case should be escalated under Case Management as part of the Internal Escalation Procedures (Appendix B).
- 1.5 In the event that confirmation is not received from the Placement Provider the following month, a meeting either in person, online or by telephone as appropriate and depending upon the factors such as location of the placement provider or meeting may be arranged to confirm attendance under Internal Escalation Procedures (Appendix B).
- 1.6 In the event that the Placement Provider confirms that students are not in attendance, or neither the Provider nor the student responds to initial contact, then after a period of not more than 6 weeks, the student will be contacted under Case Management as part of the Internal Escalation Procedures (Appendix B).
- 1.7 Following termination of a placement, students are afforded 4 weeks to confirm a new placement, followed by a period of 3 weeks to then start. These timescales exclude the student vacation periods that apply to their specific programme. During this period, it is the responsibility of the Faculty/Department to provide suitable activities and to confirm attendance monitoring to satisfy Home Office requirements. If/when the student does not identify a further placement, attendance monitoring will no longer be covered by this policy.



2. Contacting a Student about their attendance or engagement

- 2.1. In the event that after 5 working days of the month, student timesheets covering the previous month have not been completed by the student and/or signed off by their Line Manager, the Student and Line Manager will be contacted via email by the Placement and Internships team, Graduate Futures (Newcastle campus) and London Support Team and Lead Placement Supervisor (London campus). This email will include a request to complete over the next 5 working days.
- 2.2. If the timesheets have not been completed within the further 5 working days stated above, a final, Formal Reminder will be sent to both the Student and the Line Manager requesting completion of timesheets as confirmation of attendance. Timesheets must be completed within a further 5 working days of this notification.
- 2.3. If the final, formal Reminder which gave 5 working days the timesheets have not been signed off, the student will be contacted under Case Management as part of the Internal Escalation Procedures (Appendix B).



Appendix I – Withdrawal for Non-Engagement, Placement Students

I.1 Introduction

The University will make every effort to identify and support disengaged students. Placement Students who are unable to engage with their Placement must seek help and support proactively via the Placements and Internship Team. Help and support is also available via Ask4help, the Student Portal, their Personal Tutor or Programme Leader, or any other key University Service. Responding to the various contact opportunities outlined within this Policy is also deemed essential. Where appropriate, students who are unable to engage may be counselled to take a break in their studies.

There is a legal requirement to inform various partner organisations and key stakeholders when a student is no longer engaging with their studies. Partners and stakeholders include UK Visas and Immigration (UKVI), Student Finance England (SFE), Education and Skills Funding Agency (ESFA) and any Professional Statutory and Regulatory Bodies (PSRBs) relevant to the Programme. As a result of these requirements, the University must reserve the right to withdraw a student for non-engagement. This is in line with the Handbook of Student Regulations (Taught Programmes, Section 8: Withdrawal of a Student for Unsatisfactory Academic Progress or Non-Engagement).

I.2 Procedure and Case Management

I.2.1 Initial Contact

- Students identified as potentially not attending their Placement or meeting the requisite attendance and engagement requirements of the Placement will be contacted by the Placements and Internship Team, Graduate Futures (Newcastle campus) and London Support Team and Lead Placement Supervisor (London campus) in the first instance.
- Students must actively monitor their University Email Accounts throughout the duration of their Placement and respond when contacted.
- Failure to respond to contact identified in Sections 4 and 5 of this Policy may lead to Formal Case Management detailed below.

I.2.2 Stage 1 Case Management

All students identified for Case Management will be referred to the Student Conduct Team, who will initiate further contact to attempt to re-engage the student. This will include signposting to this Policy. Students must respond to this contact within one week.

<u>Failure to re-engage with the Placement and Placements and Internship Team after one week of this contact, may lead to escalation to Stage 2.</u>

I.2.3 Stage 2 Case Management

If the case is referred to the Student Casework Team an internal audit may take place consisting of:



- Contact history relating to this Policy.
- Level of engagement with the Placement including Testimony of the Placement Provider and Placements Internship Team.
- Confirmation of prolonged period of absence from Placement covering a minimum period of 1 month.
- Consideration of any failure of the student to respond meaningfully to engagement outlined within or beyond this Policy.
- Consideration of any known Personal Extenuating Circumstances or known serious issues that may impede attendance.

This audit will determine whether the student should be withdrawn from the University for non-engagement. Advice may be sought from the:

- Placements and Internships Team
- Student Visa Compliance Team
- Welfare, Immigration and Funding Team
- Counselling and Mental Health Team
- Legal department

The Student Casework Manager (or nominee) will make a recommendation to the Assistant Director (Student Engagement) who is responsible for taking the decision to withdraw a student under this procedure.

I.3. Notification of Outcome and Requests for Review

The Student Casework Manager (or nominee) will confirm any decision to withdraw a student from their Programme of study in writing, to the Student, their Programme Leader, and to the Placements and Internship Team. The reason for the decision will be outlined, as will information regarding the student's opportunity to request a review of the decision in line with Appendix G of the Handbook of Student Regulations (Taught Programmes).

Students will also be signposted to the Students' Union for further advice and guidance, and the Welfare, Immigration and Funding Team (WIFT) where appropriate to discuss any concerns arising from any change in a student's status as a result of this decision.



Appendix J - Placement Definitions

J.1 Northumbria University – Placement Definition

A Placement is work and/or work experience, which in most cases is with an external employer, that is for academic credit, has a confirmed start/end date and is either allocated or approved through the Placements & Internships Team. All placements will be subject to meeting the University Health and Safety and Insurance requirements. This approval mechanism is the formal placement approval mechanism for Northumbria.

The start/end date will also align with the specific Placement Module, or the Placement elements embedded into a wider module, including the relevant minimum and maximum placement durations. Each placement will have been approved in line with the University's Students Placement Approval and Allocation Policy.

In line with Module specifics for each course, deadlines for Placement start dates will be confirmed annually.

For clarity, students can officially no longer undertake placements with external providers on Advanced Practice courses delivered through Newcastle Campus. Students on Advanced Practice courses through London campus can still undertake placements.

J.2 Term Time and Non-Term Time Placements

Due to the delivery pattern of placement activities, attendance monitoring of students undertaking placements will take place during term and non-term time. Where there are simultaneous Taught elements alongside a Placement the standard approach to monitoring the attendance and engagement of Taught activities will apply.



Appendix K - St George's University Local Arrangements

1. Attendance and Participation Monitoring

- 1.1.1 Students are expected to participate fully for the entire duration of all required activities of the MD program and to be present from the start to the end date of each term. Students should consult the official academic calendar for the published start and end dates for each term, prior to making travel arrangements. Travel conflicts are not valid reasons for missing required course activities
- 1.1.2 Students must participate in all required educational activities as defined by the course syllabus and course schedule. Such academic activities include (but are not limited to) lectures, labs, small group discussion, directed learning activities, examinations, SGU Wisdom, and continuous quality improvement measures such as module and instructor evaluations. Non-participation may adversely affect grades and may result in a failing grade as outlined in the course syllabus.
- 1.1.3 Students should consult their course Syllabi for additional information related to course participation.

2. How attendance and participation is monitored

- a) Attendance and participation is monitored using the audience response system Point Solutions. Point Solutions reflects the participation and performance of the student to whom the device or account is registered.
- b) Each student is responsible for the activity on their device(s)/account registered through the audience response system.
- c) Students should only respond to formative Point Solutions questions whilst physically in class and with their own device/account that is registered to them. Use in class will be taken to indicate the presence of the student registered to the device.
- d) To earn participation credit, students must attend their assigned class activities in person (assigned by College, cohort or any other means outlined in the syllabus or course management site) and participate in every formative assessment item. Students can only earn participation credit for presence at their assigned scheduled activities. To earn participation for a session, students must participate in every formative assessment question and complete any location checks when required.
- e) Although students are expected to make every effort to participate in all required academic activities, they must participate in at least 80% of required course activities to earn credit for the course.
- f) It is the responsibility of every student to have registered devices and be able to participate in formative assessment questions, to ensure their devices are in working order and functional during course activities, and to check the course gradebook weekly to detect any problems with their participation records. Failure to do so may result in the loss of participation credit for which the student will be held responsible.



3. Contacting a student about their attendance and participation

- a) Where a student fails to participate in five consecutive days of scheduled teaching, this will result in an immediate referral to the Dean of Students.
- b) Participation data is published weekly on the course management site and students must not have less than 80% participation in course activities by the end of the term. Students with less than 80% participation may have academic penalties as outlined in the syllabus which may affect academic progression.
- c) Students will be required to attend a meeting if they have not met the necessary attendance and participation requirements.

4. Outcomes of non-engagement or participation

- a) Students with less than 80% participation may have academic penalties as outlined in the syllabus which may affect academic progression. In accordance with St. George's University regulations, students may be withdrawn from the course.
- b) Following dismissal, if a student holds a Student Route Visa, then Northumbria University will withdraw sponsorship and notify the UK Visas and Immigration (UKVI)

5. Notification of outcome and requests for review

- 5.1 The Academic Progress Committee will confirm any decision to dismiss a student from their programme of study in writing to the student. The reason for the decision will be outlined, as will information regarding the student's opportunity to appeal the decision.
- 5.2 Appeals will be considered by the Committee for Academic Progression and Professional Standards. The appeals process will be completed within one week of the issue of results.

6. Attendance and participation fraud

- 6.1 Misrepresentation of participation and/or performance through the misuse of the audience response system constitutes academic dishonesty and is a violation of the Honor Code.
- 6.2 Students may face academic penalties for attempting to misrepresent their participation record for their assigned learning activities. Location checks are used in class to determine presence.
- 6.3 Attempting to earn participation credit for an activity that has been partially attended, or for which the student has not attended physically, will result in referral to the Faculty Panel for Academic Professionalism (FPAP) for a review of the incident and students may be subject to academic penalties and disciplinary action.
- 6.4 Random participation checks will be carried out on a weekly basis
- 6.5 Anyone who is registered as participating through the audience response system, but who is not present on the location "check-in," may be subject to penalties which includes loss of professionalism and participation points, referral to FPAP and referral to the Senior Associate Dean of Basic Sciences Office



6.6 Non-compliant students flagged during random location checks will receive an e-mail requiring them to explain, in writing or to the FPAP, the reasons for the discrepancy between the audience response system and the location data. Appropriate academic penalty may be levied for non-compliance with the participation policy. Students may be referred to the Judiciary Office for repeated non-compliance.