

Student Route: Record keeping duties policy

1. Purpose

This document sets out the University's policy regarding its record keeping duties as a Student (formerly Tier 4) sponsor of students under the points based immigration system. This document applies only to the record keeping requirements for sponsored Student visa holders (and some legacy Tier 4 visa holders with leave issued prior to the change in immigration rules on 5 October 2020).

2. Key Responsibilities

Responsibility for the management and implementation of this policy and any accompanying procedures lies with the Director of Strategy, Planning and Performance who is the Home Office Authorising Officer, with assistance of the Student Immigration Compliance Team, Central/Medway Student Administration Offices, International Recruitment office, Admissions teams and Divisions.

Despite the overall key responsibilities, all staff working with students covered by the points based immigration system must ensure the policy is adhered to accordingly. All staff have a responsibility to adhere to good record keeping practices.

3. Retention of Documents

The University will retain specified documents for sponsored Students in accordance with Appendix D of the Student Sponsor Guidance as well as any other guidance or policy provided by the Home Office.

All documents will be retained for the length of time outlined in accordance with the University's Quality Assurance: Document Retention and Archiving Policy, but in all cases documents will be held for a minimum of one year from the date the University ends sponsorship of the student.

4. Documentation Held on Student Record

The University will retain copies of the following documents and information for each student it has sponsored under Student/Tier 4 route across its application/student record and associated systems including but not limited to SITS, KentVision, Validate, University network drives:

- Current passport, as well as previous passports, Entry clearance certificate(s), Biometric Residence Permit (BRP) or other immigration status document showing the student's entitlement to study in the UK at the University of Kent, including previous visas
- Student attendance / absence record
- Student contact details including UK residential address, telephone number or mobile
- History of student contact details
- Academic Technology Approval Scheme (ATAS) clearance certificate, where applicable
- Copies of any evidence assessed by the University as part of making an offer to a student. This will vary by course and level of study but may include references, English language testing, qualifications, portfolios, transcripts and interviews (where applicable).

Appendices of this policy outline the location of specific documents.

5. Immigration History Checks/Evidence of an in-time application/Appeal Documents

In certain cases, where the University has conducted a check with the Home Office to verify a student's permission to stay in the UK, documentation may be retained on KentVision (SITS) or held within secured student case files by the Student Immigration Compliance Team.

A student who cannot provide a valid BRP, entry clearance certificate or other document outlining their ability to study in the UK at the University of Kent must produce evidence they have made an in-time visa application which would entitle them to study at the University. Acceptable proof of a pending application includes:

- Document Checklist from the application
- Copy of the Submitted Application
- a biometric appointment letter from the Home Office
- Home Office acknowledgement letter

Any evidence to support a visa application has been made will be attached to a student's record on Validate.

Where a student has an ongoing appeal with the Home Office, they must have a Home Office Immigration History check together with evidence of the Home Office receipt of an in-time appeal. This documentation will be attached to a student's record on Validate.

Any student who cannot produce their current passport and valid visa, or proof of having made an in-time visa application, will not be permitted to register at the University.

6. Student Contact Details

Student contact details including address, email address and phone numbers are retained on SITS/KentVision. All students of the University are required to keep their contact details up-to-date on KentVision. The Student Immigration Compliance Team will conduct checks on a regular basis to ensure all students hold a valid term-time address. Students who do not provide an up-to-date term time address within a reasonable commuting distance from their respective campus may have their sponsorship withdrawn.

7. Academic Technology Approval Scheme (ATAS) Clearance Certificate

In accordance with the University's ATAS policy, ATAS clearance certificates will be retained by the University for any student requiring ATAS clearance.

8. Evidence of Documentation Assessed as Part of Making an Offer

Any document taken into account and assessed as part of making an offer to a student will be retained on file. This includes but is not limited to Secure English Language Tests, HEI English language assessments, copies of qualifications and transcripts, portfolios, personal statements, recording of video/audio interviews and references. The type of documentation used to assess a student may vary depending on the course and level of study.

If any assessment (e.g. SELT) was confirmed through an online verification checking system then the online verification shall be retained on file (either through a screenshot saved to KentVision or a print out of the online verification which includes the date the verification took place).

Where an online interview (via Skype, Teams or similar) is part of the decision for making an offer of study, interviews will be recorded and securely retained against the appropriate application.

9. Attendance Records

An attendance record will be retained for each student of the University. The attendance record will be held on KentVision with the following exceptions:

- Students on work placement - evidence of engagement will be held by Schools/divisions.
- Students on year/term abroad - The International Partnerships office will retain evidence of monthly interaction with the partner institution.

10. Immigration Appeals

The University will retain information about any appeal which a student makes against refusal of leave decisions.

11. Policy Review

This policy will be reviewed on a regular basis to ensure it remains compliant with the Student Sponsor Guidance and Immigration Rules as well as good sector practice.

Version	Effective Date	Activity	Previous Version
1.0	17/01/2014	Initial version	N/A
2.0	29/04/2016	Updated by former Compliance Manager (Overseas Students)	1.0
3.0	21/02/2019	Updated by former Head of Student Immigration Compliance	2.0
4.0	19/12/2022	Updated by Student Immigration Compliance Manager	3.0
5.0	14/07/2023	Updated by Student Immigration Compliance Manager	4.0