

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 UK immigration system. This document applies only to the record keeping requirements for sponsored Student visa holders (and some legacy Tier 4 visa holders).

2. Key Responsibilities

Responsibility for the management and implementation of this policy and any accompanying procedures lies with the Chief Operating Officer and University Secretary who is the Home Office Authorising Officer, with assistance of the Student Immigration Compliance Team, Central/Medway Student Records Offices, International Recruitment office, Admissions teams and Schools.

Despite the overall key responsibilities, all staff working with students with immigration permission 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 Document 2 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 required by UKVI 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 route across its application/student record and associated systems including but not limited to SITS, KentVision, Validate, Presto and University network drives:

- Current passport, as well as previous passports, Entry clearance certificate(s), Biometric Residence Permit (BRP), eVisas or other immigration status document showing the student's entitlement to study in the UK at the University of Kent, including previous visas (KentVision and Validate)
- Student attendance / absence record (Presto)
- Student contact details including UK residential address, telephone number or mobile (KentVision, SITS)
- History of student contact details (SITS)
- Academic Technology Approval Scheme (ATAS) clearance certificate, where applicable (KentVision Admissions student record and student file)
- 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). (KentVision Admissions student record)

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, eVisa, entry clearance certificate 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 or KentVision.

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/remain registered 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 once a term to ensure all students have 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 Presto 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.
- Postgraduate Research students – whose progression reviews are held on KentVision.

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
6.0	02/01/2025	Updated by Student Immigration Compliance Manager	5.0
7.0	03/03/2026	Updated by Student Immigration Compliance Manager	6.0