



UNIVERSITY OF
LINCOLN



UKBA Audit – A Tale of Two Cities

A Tale of Two Universities

University of Lincoln

- Student population approximately 13,344
- 1,100 are overseas students who hold a Tier 4 visa
- The top three countries we recruit from are: China, Hong Kong and India
- The split of overseas students is approximately 60% undergraduate and 40% postgraduate taught and research

Teesside University

- Student population (2011/2) approximately 10,585
- Current international student population of approximately 650 students
- From these 650, approximately 600 hold a Tier 4 visa
- Main countries of recruitment are India, Malaysia and China. Regional offices based in these countries to assist recruitment and work with local agents

Audit History

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- October 2012

Teesside University

- July 2010
- October 2011
- Teesside University's HTS licence was suspended on 2nd February 2012
- March 2012 (large scale audit as part of suspension period)
- Teesside University's HTS license was reinstated on 30th April 2012
- September 2012

Pre-Audit

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- University Registrar received a call from UKBA on 6th August 2012 to inform visit will be taking place in 2 weeks time
- This was negotiated to 3rd October 2012 due to enrolment in September
- UKBA requested a full list of all overseas students stating their names, nationalities, DoB, immigration status and course timetables prior to the visit

Teesside University

- Academic Registrar received call from UKBA on 10th October 2011 to inform visit will be taking place on 18th October 2011
- Email received from UKBA on same date confirming date of audit and that a sample of 30-40 files would be audited, 3 UKBA officers would conduct the audit and a list of 3 students they want to interview
- List of overseas nationals currently studying at Teesside to be prepared for the audit

Audit

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- Only 1 officer arrived at the UKBA visit and audit lasted 4 hours
- The authorising officer (Registrar), key contact (Admissions Manager), Student Affairs Director and UKBA Compliance Officer was present at the audit
- Representatives from the University's HR department was also present at the audit
- The audit followed a set format dictated by the pro-forma the UKBA officer used

Teesside University

- 3 UKBA officers arrived for the audit which lasted 1 full working day
- The key contact (Registrar) and Admissions Manager were present
- 1 UKBA officer returned 2 days later to tidy up loose ends (had also accidentally taken sample student files with them back to their office so these needed to be returned to Teesside)

Audit - part 2

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- From the list of all overseas students, the officer pre-selected and interviewed 3 students
- Approximately 30 student files were requested and reviewed during the visit
- The student files consisted of application form, supporting evidence, copy of passport and visa etc
- The UKBA officer reviewed not only Tier 4 student files but also students with other immigration status

Teesside University

- From the list of all overseas students, 36 students were selected for the audit sample. 3 student names provided in advance for Teesside to arrange interviews on date of audit
- The student files consisted of passport and visa copies, academic and English language qualifications
- Student interviews and audit sample conducted on same day

Post-Audit

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- At the end of the audit, the officer advised that a report will be written and submitted to the UKBA sponsor licensing department
- The University were informed that we would not receive copy of report
- The University will not receive feedback from the UKBA on the audit unless there were problems highlighted in the report
- HTS renewal was approved in December 2012

Teesside University

- 23rd Nov 2011: Summary of visit including areas for improvement sent by UKBA officer to Registrar
- 24th Nov 2011: Call received from UKBA Account Manager to say he was in the area and would come in to meet with Academic Registrar to discuss audit
- 25th Nov 2011: Email sent to UKBA Account Manager from Registrar confirming changes to be made e.g. tightening up on attendance monitoring

Teesside University: Licence Suspension

- Phone call on 1st February 2012 from UKBA to speak directly to Vice Chancellor
- Phone call arranged for 2nd February 2012; UKBA informed Vice Chancellor that Teesside University's HTS Licence was being suspended with immediate effect
- Follow up email sent on same date with suspension letter which was also sent by recorded delivery detailing the reasons for the suspension including a breakdown of each of the 36 student files from the October 2011 audit sample
- 28 days given from date of letter for University to provide written representations to UKBA in relation to issues stated in the letter
- Teesside University responded with substantial written representation of approximately 170 pages

Teesside University: Licence Suspension

Part 2

- **23rd February 2012-** visit from UKBA (higher level met with Vice Chancellor's Executive and compliance officers met with Academic Registrar and the International team) to discuss progress of implementing changes since suspension letter was received and preparation for audit
- **27th February 2012-** letter received from UKBA confirming that large scale audit as part of suspension would take place between 12th and 16th March 2012. Letter included list of 200 students and stated that a further 100 would be provided on day 1 of audit (sample of 300 in total). No students to be interviewed
- **12th-15th March 2012-** audit with 9 UKBA representatives of 300 files. On day 3 of the audit, UKBA Account Manager conducted a HR Systems assessment of 5 areas (monitoring immigration status, migrant contact details, record keeping and recruitment practices, migrant tracking and monitoring, general sponsor duties)

Teesside University: Suspension Onwards

- 30th April 2012- phone call from UKBA to Vice Chancellor to confirm that Teesside University would be reinstated on Tier 4 Sponsor Register shortly
- 1st May 2012- SMS access reinstated (ability to issue CAS's)
- 4th May 2012- UKBA visited Vice Chancellor at Teesside University to discuss implications of suspension and reinstatement including reduction of CAS allocation by approximately 60% until another audit had taken place
- 5th September 2012- UKBA audit of 30 files. Positive feedback provided on same day and shortly afterwards. 1 week later CAS limit was lifted and Teesside could request its annual CAS allocation (no limit) which were granted and added to SMS with immediate effect

Implementation of Compliance Processes

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- Enrolment process changes
- Attendance monitoring systems
- Maintaining student documents and files
- Conducting a internal attendance monitoring audit

Teesside University

- Attendance Monitoring systems
- Development of exception reports e.g. passport/visa expiry
- Change in format of files to include more documentation
- Monthly audits by Grant Thornton and appointment of internal compliance auditor
- Reduction in no. of staff issuing CAS's to only those experienced to do so

Impact on recruitment processes

Teesside University

- NARIC assessment to be included on all files to show how qualification has been equated (or articulation/approved country sheet if NARIC is not applicable to the qualification)
- Problems for qualifications such as Indian 12th which NARIC equates to AS Level only, not A Level
- SELT's only; no longer accept other English Language qualifications, only in exceptional circumstances where student is also tested by Teesside University's English Language Department so that all 4 components can be demonstrated
- WAEC from Nigeria no longer accepted for English Language
- More vigilance in all areas including making offers which takes more time but ensures compliance at all times
- Teesside University's market viability- all of the above having a negative impact on securing students, but, UKBA compliance ensured which is our main priority

Impact on recruitment processes

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- Checklist completed for each application received - this includes: academic qualifications, English language proficiency, previous study in the UK and visa history
- English Language proficiency qualifications accepted include: SELTs, GCSE equivalents (e.g. WAEC) - checked with NARIC, University pre-sessional English course, University of Lincoln English Language Test (available to overseas partners and UK based students)
- GCSE equivalents are accepted using guidance from NARIC and performance of previous students e.g. Indian students with Standard 12
- Students who have obtained an academic qualification equivalent to a UK Bachelor degree from a majority English speaking country as determined by UKBA do not require a SELT
- 'Nationals from English speaking countries also do not require a SELT'

HEIs and the UK Border Agency



Changes to UKBA Compliance Visits

- From April 2013 onwards, there will be a dedicated UKBA team specifically conducting Tier 4 visits
- All UKBA compliance visits will be the same across all HEI institutions and unannounced visits will only be conducted when the UKBA are concerned that there are systematic problems with the institution
- Depending on the overseas student numbers, UKBA Tier 4 audits will take approximately 3 - 4 days with about 4 officers present and other Tier licences are to be reviewed separately
- At the UKBA Compliance audit, 18 - 20% of all Tier 4 student files will be reviewed. A list will be provided to the institution, approximately one week beforehand, of the files that they wish to review. The list will only contain a portion of files UKBA want to review, the rest of the files will be requested during the visit.
- UKBA will examine the files to ensure that institutions are carrying out what they say they are doing and will be review the institution's regulations and policies to ensure that this is being followed

Any questions?