

# Approaches to Managing Immigration Compliance /

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(Overseas Students)*



# Objectives

- Understanding of the key aspects of a compliance framework
- Discuss the different structures for managing compliance and the pros and cons of each
- Describe the compliance structure at Kent and how Compliance and Student Records work together

# Overview at Kent

Category	Number of FT Students
UK students	12130
EEA students	2380
Non-EEA students	3365
<b>Total</b>	<b>17875</b>

Non-EEA students	Number
Tier 4	2757
Other visa	608

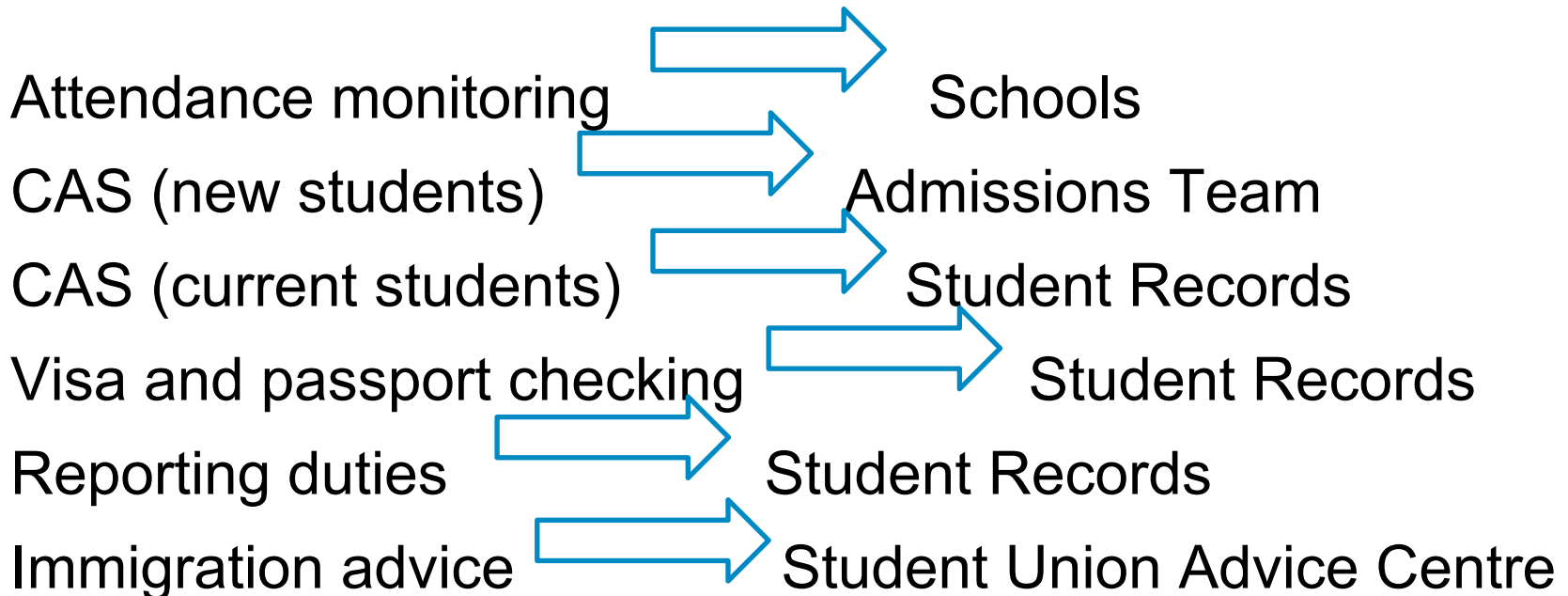
- Authorising Officer and Key Contact: Academic Registrar

# In the beginning....

- 2008/2009 PBS introduced
- Reporting duties and record keeping duties
  - Report when student doesn't enrol
  - Keep copies of documents
  - Sponsor students
  - Appoint key personnel
  - Monitor attendance
  - Comply and co-operate with the Home Office

# Implementation of Tier 4 at Kent

- Integrate Tier 4 into existing teams



## Fast forward to 2012....

- First University sponsor licence revoked
- New compliance position created
- internal audit with recommendations

# Observations – from a compliance perspective

- Staff completing Tier 4 related tasks with little or no Tier 4 training
- Additional Tier 4 duties, but not written into JD
- No escalation of compliance issues
- Oversight
- Unclear roles and responsibilities
- Policies not documented

# Activity

What are the key components to a robust compliance framework?



# Elements of a Compliance Framework

- Clear roles and responsibilities
- Education and training
- Reporting to management / audit committee
- Policies and standards
- Internal monitoring and audit
- Responding to breaches and non-compliance
- Effective communication

# Tier 4 Compliance Structures

- Centralised: Compliance team conducts all compliance tasks
- Devolved compliance structure
- Combination – centralised with devolution

# Activity

What is the compliance structure at your institution?

- Centralised
- Devolved
- Combination

What are the pros and cons of each of the structures?

# Considerations of compliance structure

- Resourcing
- Knowledge of staff and ability to carry out compliance tasks
- Knowledge of internal systems, regulations and processes
- Resistance to change and differing views on UK immigration policy?
- Responsibility of visa data – Student Records or someone else?

# What changed for us – post 2013

- Phased approach
- Roles and responsibilities
- Policies and procedures
- Passport and visa checking
- Reporting duties
- CAS issuing for visa extensions
- Attendance monitoring

# Compliance Team and Student Records Working Together

- Compliance conducts visa checks at main registration and issues BRPs; Student Records registers students and scans documents
- Compliance updates and manages visa related data, whilst Student Records maintains ownership of the system
- Scanning of visas/passports throughout the academic year – Student Records with assistance from compliance
- New for this year....compliance assisting with registering students

# Successes

- Enhanced knowledge of Tier 4
- Compliance issues are escalated
- Greater awareness of Tier 4
- Better reporting to management of key issues
- Accurate data and record keeping

# Vision

- Compliance is embedded into existing processes
- Quarterly sign-off of compliance requirements by departments
- Compliance Management System
- University wide training programme; all staff attend
- Include immigration compliance in staff probation/induction, job descriptions
- Keep it simple – simple processes, systems, interpretations of rules



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