

# Equality Impact Assessment Form

Please ensure you have read the EIA Policy and Guidance document before completing this form. If you need assistance, please contact the EDU. Please return the completed form to the EDU.

## STEP 1 – Define policy/practice

i. Name of policy/practice/significant change

UKVI Attendance Monitoring

ii. Owner of policy/practice (College, School/Research Institute or Service)

Registry

iii. Date of policy/practice approved

January / 2025

iv. Approved by? (Committee, College, School or Service)

Registry UKVI Immigration Compliance, UKVI Response group

## STEP 2 – Description of policy/practice

i. What are the aims?

The University of Glasgow has an obligation to show that we can fulfil the requirements set out by the UK government on our Student Sponsor Licence.

Due to the urgency of the change necessitated by the UKVI Action Plan, the new process will initially impact approximately 11,000 UG & PGT UK visa-holder students. While schools currently monitor these students using various methods, these approaches have not consistently ensured that the University maintains accurate and comprehensive records of all UK visa holders. Lack of engagement over a time-period specified by UKVI rules could lead to the suspension of students' sponsorship and so it is essential that accurate data is collected.

The new process and policy aim to ensure that the University collects timely and accurate data, enabling compliance with the requirements of our Student Sponsor licence.

The aim of the new process and policy is to ensure that the University of Glasgow complies with the UK Visas and Immigration (UKVI) rules and guidance for sponsoring international students and staff. By maintaining high levels of compliance, the University can retain its sponsorship licence, which is essential for enabling international students to study and work in the UK.

This policy emphasises the importance of understanding and adhering to immigration rules. It also outlines the responsibilities of different departments within the University in safeguarding these compliance requirements.

ii. Who does it cover?

All sponsored Student Visa holders that come to study to the University of Glasgow at any of our campuses

iii. How often is this policy/practice reviewed?

To be reviewed annually

## STEP 3 – Could there be any implications for a protected characteristic group (as defined by the Equality Act 2010) in this (or the development of) policy/practice?

### STEP 3a – Yes, there is a potential implication or barrier for a protected characteristic group.

Please tick all that are relevant

Protected Characteristics	Tick ✓	Notes
Age		
Disability (including BSL users)	✓	
Gender Reassignment (including Gender Neutral Language)		
Marriage and Civil Partnership		
Pregnancy and Maternity		
Race	✓	At the moment we are only implementing this new process

		for UK visa holders due to the requirement from the UK government to monitor their attendance and engagement.
Religion or Belief		
Sex		
Sexual Orientation		
Socioeconomic	✓	Some students may not have access to smart phones. Additionally, we have received feedback from students who are unable to download the SafeZone app because their phones do not support it.
<b>If any of the above have been ticked - Go to Step 4</b>		

**STEP 3b – No**, there are no potential implication or barrier for a protected characteristic group.

**Go to Step 8**

#### **STEP 4 – What evidence do you have for this conclusion (potential implication for a protected characteristic group)?**

##### **Briefly explain:**

Due to the urgency of implementing this new process following the audit results, it will initially apply only to UK visa holders. This therefore impacts students on the basis of Nationality, which forms part of the protected characteristic of 'Race' in the Equality Act 2010. The overarching aim is that student engagement data would be collected to support student wellbeing, retention and success for all students, regardless of nationality. However, this will require a different method and currently the requirement is aligned with immigration compliance procedures and thus, the approach taken relates mainly to this.

At the time of writing, it is considered a proportionate means (minimum request of at least 1 weekly check-in to ensure accurate data collection) of achieving a legitimate aim (legal obligations) of complying with UKVI requirements. The benefit of ensuring accurate data collection on student engagement outweighs the burden of requiring students to check-in on the SafeZone App at least once weekly. Moreover, this minimises impact on employees delivering learning and teaching who may find it overly burdensome and difficult to ensure registration of attendance, especially in large lectures and classes. This leads to inefficient and at times inaccurate data and could generate risks for students and the institution via the implications for sponsorship.

Additionally, the new policy and process has been shared with the SRC, and feedback has been requested to ensure their input is considered as part of this implementation. Furthermore, multiple communications have been issued to all UKVI students during this period.

Based on feedback from students who are unable to install the SafeZone app on certain phone models, the University has taken steps to address these concerns by directing affected students to available financial aid resources. This support aims to ensure that all students can access the required tools, regardless of financial or technological constraints.

#### **STEP 4a – Does the evidence show a positive impact?**

Please provide an example and attach evidence:

The implementation of this new process, along with supporting information (such as FAQs), communication strategies, and financial assistance, is expected to positively impact the student

population. Students will be self-sufficient when reporting their attendance, while the new process and tools will validate the reported attendance with live timetable data from CMIS .

Students will be able to self-check-in to their classes up to 10 minutes before and after the class start time, or at any point during the class. Additionally, this approach allows academic staff to focus on teaching rather than taking attendance. By streamlining the check-in process, students also benefit from more time dedicated to learning and engaging with class content.

A consistent, student-led approach to engagement monitoring will enable potential welfare issues to be identified in a timelier manner, with students signposted to relevant support services.

The resources available to students are:

[University of Glasgow - MyGlasgow - Registry - Immigration Compliance](#)

[University of Glasgow - MyGlasgow - Registry - Immigration Compliance - Student Visa Responsibilities](#)

[University of Glasgow - MyGlasgow - Registry - Immigration Compliance - Student Check-Ins \(For Current Students\)](#)

[University of Glasgow - MyGlasgow - Registry - Immigration Compliance - Student Visa Responsibilities - SafeZone App](#)

Future process enhancements may require all students, including non-visa holders, to check in with SafeZone, enabling the monitoring of student well-being if implemented.

**Go to Step 5**

#### **STEP 4b – Does the evidence show a negative impact?**

You need to consult with relevant stakeholders – the EDU will assist with this process.

Provide brief details and attach evidence:

Potential negative impacts outlined above were identified during consultation with SRC and through feedback from affected students and are discussed above in relation to socio-economic considerations and the additional burdened on students to check-in. As discussed above – mitigations were implemented via financial hardship support. The additional requirement on visa-holders is considered proportionate, as detailed above.

Concerns raised around privacy and data sharing have been addressed through updated FAQs detailing how data are stored and shared.

**Go to Step 6**

#### **STEP 4c – Does the evidence show NO impact?**

Attach evidence:

**Go to Step 8**

#### **STEP 5 – Continue to promote good opportunity for all people**

Promote and implement as exemplar policy/practice

**Go to Step 8**

#### **STEP 6 – Involve and consult stakeholders to address any negative impacts?**

EDU will assist with this process. Provide brief details of involvement and consultations:

SRC members have been consulted on the changes, and their feedback has been incorporated into the process.

Information sessions are being organised for all staff supporting students to ensure they are well-informed. Additionally, a microsite has been created to keep staff updated on developments related to the new process and policy.

[University of Glasgow - MyGlasgow - Student Engagement Monitoring](#)

Registry and Academic Services have ownership of the staff and student sites and will be monitoring and updating these sites when required.

### Go to Step 7

### STEP 7 – Outline any changes made to the policy/practice as a result of the consultation

Provide details of changes:

These are detailed above, per Steps 4 and 4b

### Go to Step 8

### STEP 8 – Publish results (as required by law)

Return this form, once completed, along with copy of amended policy or practice and any relevant information, to the EDU for annual reporting and for inclusion on the University website.

Please note items sent to EDU here:

EIA shared with EDU for publishing online.

### Go to Step 9


### STEP 9 – Regular review

Regular reviews ensure that policy and practice is kept up to date and meets the requirements of current equality legislation. Where a negative impact has been identified and remedial actions are being implemented, the policy owner should define a timescale for review.

Please give details of review process:

Regular reviews have been conducted throughout the process, addressing student concerns regarding difficulties in downloading or using the app on their phones. Communications have been issued regarding unsupported mobile devices and where to seek assistance. [Non-checked-in student reminder week 3.docx](#)

### SIGN OFF PROCESS

<b>Name of EIA Owner</b>	<b>Chris Buckland</b>
<b>Signature</b>	
<b>College/School/RI/Service</b>	Registry
<b>Date of Completion</b>	04/02/2025
<b>Date received by EDU</b>	04/02/205
<b>Approved in Principle?</b>	YES NO
<b>Any actions required? Please specify</b>	Ongoing monitoring and review, as detailed in the Assessment above. Information sought regarding future ambitions to broaden student engagement procedures for all students.
<b>Signed on behalf of EDU</b>	Katie Farrell
<b>Date</b>	Actions updated – May 2025