



Guidance for Programme Approval

Scope

All taught programmes leading to an award of City, University of London.

Specific arrangements for validated provision are set out in the Validation and Institutional Partnerships Handbook.

Date approved/re-approved

May 2018

Minor Amendments Jan 2019

To be read in conjunction with:

Quality Manual, Section 3.

Guidance for Programme Approval

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1. Policy for Programme Approval

The Programme Approval Policy can be viewed online in Section 3 of the Quality Manual: <https://www.city.ac.uk/about/education/quality-manual/3-programme-development-approval-and-amendment>. This guidance should be considered in conjunction with the policy.

2. Introduction

Programme Approval is City's formal process for reviewing, and approving new programmes, and in certain cases significant amendments to existing programmes. The process is made up of stages, involving different members of staff, students, and an External Advisor, which allows for a robust review of the proposals from a range of perspectives.

The Deputy President and Provost is responsible for Programme Approval on behalf of Senate, ensuring comparability across City's programmes.

3. Stages of Approval

Any changes to the Stages of Approval resulting from PSRB requirements will be considered on a case by case basis. Programme Directors should talk to their School Quality Team in the first instance who will liaise with Student and Academic Services.

Stage 0

Stage 0 is only for proposals involving partnership provision. This stage involves institutional consideration of the new partner, including oversight of the organisation and its strategic and educational fit for City. It will also involve due diligence checks on the proposed partner including an institutional engagement meeting at the partner institution, and consideration of the specific responsibilities of the School and the proposed partner.

More information can be found at: <https://www.city.ac.uk/about/education/quality-manual/10-partnership-provision>
Stage 1

The aims of the Stage 1 approval are to assess the market, viability and educational purpose of the proposal. Stage 1 will specifically consider the following for all proposals:

- The financial and educational rationale
- Market research undertaken
- Fit with School and University plans
- Resource implications
- Promotion and recruitment issues
- Consultation with relevant professional services
- Programme management and quality assurance issues
- Outline of programme including assessment and programme learning outcomes

The following will be considered when included in the proposal:

- Exceptions to University Assessment Regulations, Credit Framework and/or Academic Year
- Viability of any placement component of the programme
- Evidence of agreement with any Schools/Departments providing service teaching
- Progress of collaborative arrangements when another institution is involved in delivery of the programme
- Details of flexible course delivery.

The template for Stage 1 submissions can be found at <https://www.city.ac.uk/about/education/quality-manual/3-programme-development-approval-and-amendment#tab=tab-3>

Please ensure that all relevant appendices are completed and submitted along with the Stage 1 form.

After approval from the School Dean, Programme Director, Chair of PARC and relevant professional colleagues, the submission should be sent to Student and Academic Services to be presented to the University Programme Approval Committee (UPAC), which advises the Deputy President and Provost. The terms of reference for UPAC can be found at <https://www.city.ac.uk/about/education/quality-manual/3-programme-development-approval-and-amendment#tab=tab-2>. The programme team is invited to attend the UPAC meeting to provide clarification and answer queries on the documentation.

As part of the Stage 1 process, the School is expected to put forward an academic External Advisor for Stage 2. Stage 1 UPAC will approve the External Advisor. Further details are provided in Section 7.

UPAC will either recommend approval of the Stage 1 submission, rejection of the proposal, or invite the School to re-submit with amendments. As part of the approval process UPAC can agree conditions which must be met and signed off by the Chair of Stage 1 UPAC prior to Stage 2 submission, as well as make recommendations for programme development. Responses to conditions and recommendations need to be approved by the Chair of Stage 1 UPAC before approval is considered final at Stage 1. No programmes can be advertised before City Stage 1 approval is granted. Upon receipt of Stage 1 UPAC approval, marketing of the programme may commence, including the caveat “*This programme is currently under development and is subject to final approval.*”

For further information, please contact the [name of School/Department]", subject to any pre-marketing conditions being met and approved by the Chair of UPAC. Places cannot be offered on the programme until it has full Stage 2 approval.

Stage 2

The aims of the Stage 2 approval are to undertake a rigorous overview of the academic detail of the proposed programme, in particular:

- To provide institutional oversight of proposals to ensure high quality provision, a high quality and inclusive student learning experience, appropriate academic standards and accordance with University academic policy and regulations.
- To consider the quality and standards of the overall proposal, including curriculum content; learning, teaching and assessment delivery, methods and overall coherence; and curriculum structure.
- To ensure and confirm sufficient external and independent consideration of the quality, standards and relevance of the proposed programme.
- To ensure appropriate consideration has been taken of student views.
- To confirm that proposed programmes are in line with relevant internal and external reference points, including any professional body requirements.
- To consider the quality, accuracy and accessibility of the programme documentation, including the information to be provided to students.
- To propose any final enhancements.

The template for Stage 2 submissions can be found at <https://www.city.ac.uk/about/education/quality-manual/3-programme-development-approval-and-amendment#tab=tab-3>

For certain types of partnership provision based on pre-approved University programmes, some of the information requested in the main Stage 2 form may not be applicable, and University Stage 2 approval may not therefore be required following School Stage 2 approval. Student and Academic Services will confirm the University Stage 2 approval requirements for such partnership programmes during Stage 1.

The Stage 2 submission, including responses to the Stage 1 conditions and recommendations must be submitted to the School Programme Approval and Review Committee (PARC) for scrutiny. The Programme Team should obtain approval from the School Dean, IT Services, and sign-off from the Library, and Learning Enhancement and Development (LEaD), prior to submission to PARC. The PARC terms of reference can be found at: <https://www.city.ac.uk/about/education/academic-services?a=334640>. The External Advisor will produce a written report for PARC giving their view on the proposed programme. PARC will then approve, or invite the programme team to revise and re-submit the submission. PARC can set conditions, which must be met prior to submission to UPAC, or make recommendations to support programme development.

After approval by PARC the proposal will be submitted to Student and Academic Services for consideration by UPAC. Proposals which do not include the necessary approvals and sign-offs will not be considered by UPAC. The Programme Team will be invited to the Stage 2 UPAC meeting to discuss the proposal and to offer clarification, if needed.

The External Advisor will also act as a member of Stage 2 UPAC, providing an external perspective, and ensuring that the recommendations from their report to PARC have been addressed. UPAC can recommend approval, rejection, or an invitation to re-submit the proposal with amendments.

Following the meeting, UPAC will make a recommendation to the Deputy President and Provost. If it is recommended that the proposed programme is approved, this may be subject to certain conditions being met by a set deadline which will normally be evidenced by:

- a formal, written response to the conditions, clearly detailing the changes and enhancements that have been made to the programme documentation to meet the conditions;
- full supporting documentation such as: updated programme or module specifications (including module period information), evidence of any required authorisations or input, any other items/documents which will demonstrate that which has been undertaken to meet the conditions.

Stage 2 conditions will need to be met by the Programme Team and signed off by the PARC Chair. The responses will then be presented to the President and Provost for formal approval. UPAC may also make recommendations for programme enhancement.

Once responses to conditions set by UPAC have been approved by the Chair of UPAC Stage 2, Student and Academic Services will liaise with the relevant Professional Services to communicate the approval and initiate the final programme set-up. Once all Stage 2 conditions have been met and the programme has full approval and this is confirmed by Student and Academic Services, students may apply to and be accepted onto the new programme.

Summary of Programme Approval stages

Stage 0 – for proposals with partnership provision	
Requirements: <ul style="list-style-type: none"> • Institutional consideration of new partner • Compatibility of organisation, strategic and educational fit of proposals • Requirements for institutional engagement meeting at partner institution, where necessary • Consideration of the specific responsibilities of partner institution and School for the programme 	Sign Off: <ul style="list-style-type: none"> • Dean of School • Deputy President and Provost • Vice-President International (for international proposals)
Prior to Stage 1 submission	
Requirements: <ul style="list-style-type: none"> • Programme title, outline proposal and structure • Strategic fit with School and University strategy and plans • Market opportunities and risk • Potential level of demand • Mode of delivery • Admissions criteria (and recognition of prior learning if applicable) • Programme management and staffing • Employability and destinations • Student numbers and marketing • School resources, budget and other financial matters • For partnership provision – institutional engagement meeting report and due diligence 	Sign Off: <ul style="list-style-type: none"> • Dean of School • Chair of PARC • Finance • Marketing • LEaD • Timetabling • Programme Director

Stage 1 – University Programme Approval Committee (UPAC)	
Requirements: <ul style="list-style-type: none"> • All above requirements should be submitted to Student and Academic Services with completed sign-offs • All sections of the Stage 1 form should be completed 	Sign Off: <ul style="list-style-type: none"> • Chair of UPAC
Prior to Stage 2 submission (covered by the Stage 2 form)	
Requirements: <ul style="list-style-type: none"> • Respond to any conditions and recommendations made by Stage 1 UPAC • Academic standards and quality • Enhancement of the proposal drawing on internal and external good practice • Endorsement of proposal by students and industry • Consideration of the specific responsibilities of the partner institution and School for the programme 	<ul style="list-style-type: none"> • Chair of UPAC to approve responses to Stage 1 conditions
Stage 2 – PARC	
Requirements: <ul style="list-style-type: none"> • All above Stage 2 requirements should be submitted to the Secretary of PARC • Peer review of detailed proposal: curriculum, structure, credit values and exit points, learning and teaching, assessment • Student support and overall student experience, including evidence of student consultation • External consideration of proposal, including quality and relevance of the provision, learning experience and academic standards 	Sign Off: <ul style="list-style-type: none"> • Chair of PARC • Dean of School • LEaD • Library • IT Services
Stage 2 – UPAC	
Requirements: <ul style="list-style-type: none"> • All above Stage 2 requirements should be submitted to Student and Academic Services with completed sign-offs 	Sign Off: <ul style="list-style-type: none"> • Chair of UPAC

4. Support for Programme Approval

The Programme Approval process requires a substantial amount of work to ensure that City has appropriate and robust oversight of the quality and standards of its provision. Template forms have been provided to facilitate this process and they can be found online in Chapter 3 of the Quality Manual.

Support is provided by a range of staff and professional services colleagues during the Programme Approval process, and approval or sign-off is required from specific individuals at key stages. It is important to factor in time for this approval; further information on the timescales for approval and key contacts can be found in Appendix 1:

School Quality Staff

School Quality Staff can provide full details of School-based considerations of proposals and how this is managed. They will be able to advise on PARC and UPAC dates and deadlines. They will also be able to support the preparation of documentation.

Associate Dean (Education) (ADE) or equivalent

As the Chair of PARC and a senior member of academic staff with responsibility for education in the School the ADE can provide guidance and advice. Their sign-off is also required at various stages of the process.

Learning Enhancement and Development (LEaD)

The LEaD representative plays a crucial role in programme development, as well as being a formal member of UPAC and their sign-off is required at Stage 1 and Stage 2. LEaD can provide full support for the designing and development of programmes and modules, including the development of the required programme documentation. It is important to involve LEaD in new programme development as early as possible for provision of support and to ensure there is time for the LEaD representative to review documentation in advance of submission dates. Programme developers should contact your School academic LEaD contact in the first instance for initial advice and guidance.

Timetabling

Sign-off from Timetabling is required prior to submission to Stage 1 UPAC to ensure appropriate space resources are available. At least three weeks should be given to allow for Timetabling to undertake a space modelling exercise and confirm the appropriate space resources are available.

Finance

Sign-off from Finance is required prior to submission to Stage 1 UPAC. Finance should be contacted by programme developers and will provide support with this aspect of the process.

Library

Library sign-off is required prior to submission to Stage 2 UPAC to demonstrate that the Library has approved the suggested reading material identified within the documentation, and accounted for any budgetary concerns which may have been identified by Finance.

Marketing

Marketing can assist in the competitor analysis and help programme teams identify routes and strategies for marketing which should be included in the documentation. Marketing sign-off is required prior to Stage 1.

Programme teams are advised to work closely with marketing early in the development process to ensure accurate provision of information.

Please download and complete the Appendix found here: [\(link\)](#) working closely with marketing colleagues, this should be submitted along with the Stage 1 form.

Student and Academic Services

Student and Academic Services manages the Programme Approval process and can be contacted with any queries. Student and Academic Services also services UPAC and provides information on dates and deadlines for UPAC meetings, as well as managing the payment of the External Advisor.

5. School Programme Approval and Review Committee (PARC)

The School Programme Approval and Review Committee plays a crucial role in the consideration of new programme and significant amendment proposals. Through its peer-review scrutiny of proposals, it should support the development and enhancement of proposals as well as providing an opportunity for the sharing of best practice from elsewhere within the School.

The minutes from PARC meetings support University Programme Approval Committee discussions particularly where they demonstrate a clear view on the key areas of the proposal as outlined in the table in section 3, above.

PARC should also ensure that proposal documentation is complete and of an appropriate quality prior to University-level consideration. Proposals considered by the University Programme Approval Committee that are not of adequate quality will be referred back to the Programme Team and PARC for reconsideration and amendment.

6. Cross-School Provision

There are a number of additional considerations that must be taken into account when proposing cross-School provision. If arrangements to deal with these aspects are not considered and documented in the proposal submissions, it is likely that conditions will be applied to the approval of the programme:

- Financial planning: how will the costs (space, academic staffing, support staffing, marketing and resources) be divided? This should be signed off by the Dean of both Schools.
- Communication channels for programme amendments: how will the other School be made aware of proposals to amend any elements of the programme?
- Which School will be the programmes' "home"? i.e. which School will take ownership of the programme? The Home School is responsible for the oversight of all quality and standards mechanisms including:
 - External Examiner payment and oversight
 - Processes relating to compensation, marking/moderation and assessment extensions
 - Oversight of assessment, including Assessment Boards
 - Oversight of Annual Programme Evaluations (APEs)
 - Programme Handbook production
 - Administration of students on SITS
 - Oversight of Peer Review
 - Oversight of module evaluations and other student survey results
 - Management of Programme Committees and Staff Student Liaison Committees (SSLCs)
 - Oversight of Periodic Review processes

All proposals which involve cross-School provision should be signed by the Deans of both Schools and the relevant Programme Directors. Proposals without these approvals will not be considered.

7. Student involvement in Programme Approval

City places significant value on the input of students into the processes for managing the quality and standards of its educational provision.

Students can be involved in a variety of ways, both formally and informally, such as through discussions at Staff-Student Liaison Committee meetings, or through student membership of PARC.

City encourages informal student input into the development of proposals. This could include formal or informal discussions with current students on related programmes, at the end of lectures, through Moodle forums, and/or with alumni.

Programme Approval submissions should include information on how any informal input contributed to the development of the proposal. While indication of support for a new programme is helpful, developmental contributions demonstrate a more considered approach. If the proposal has been discussed in a more formal meeting with students, such as SSLCs, an extract of the minutes should be provided.

Significant Amendments

Student consultation is mandatory for all significant amendments and time requirements should be considered as part of the development process.

A template for gathering current student feedback can be obtained within Section 3 of the Quality Manual 'Forms': <https://www.city.ac.uk/about/education/quality-manual/3-programme-development-approval-and-amendment#tab=tab-3>

New Programmes

Appropriate evidence of student consultation can include but is not limited to:

- Emails
- Surveys
- Moodle Responses
- SSLC Meeting Minutes
- Summary of verbal interaction
- Programme Representative engagement

All consultation requests for both New Programmes and Significant Amendments should be issued with a deadline for response, typically 2 weeks, with a reminder 7 days prior to the deadline.

Student and Academic Services and the Students' Union are available to provide support for programme teams in collecting feedback from students.

The Students' Union President or Vice-President (Education) is a member of Stage 2 UPAC.

Whilst student members are equal members on PARC and UPAC it is not expected for them to critically scrutinise the content, as this will be undertaken by the other Panel members, including the External Advisor. However, the student representative should be able to provide a student-focused view of the proposals and offer commentary on things such as the student experience.

In particular the student representative may focus on:

- Is the student facing documentation (Programme/Module Specifications, Programme Handbook) of a high quality? Does it look useful, relevant, and accessible to students?
- Are there adequate resources to support students in their learning?
- Has there been any consideration of student support?
- Are the learning, teaching, and assessment methods appropriate? Are they inspiring? Is there appropriate use of Moodle?

Consultation should allow for and encourage a range of responses, and teams should either demonstrate responsiveness to student feedback or provide a rationale for maintaining original proposed amendments, where appropriate (E.g. PSRB, Regulatory Amendments).

8. The role of the External Advisor

External input is fundamental to programme approval; City's approach encourages informal external input from both academia and industry throughout the development of the proposals. City also appoints an External Advisor in a formal capacity to support the assurance of the quality and standards of a proposed programme, its relevance and its comparability with similar programmes.

External Advisors are formally involved by:

1. Providing a written report, based on a template, to the School for consideration at the Programme Approval and Review Committee. The Chair of PARC would also be able to contact the External Advisor before or after a meeting to clarify any aspects of that report.
2. Attending the University Programme Approval Committee meeting for Stage 2 discussions as a Committee member.

Appointment Criteria

An External Advisor will:

- Have Right to Work in the UK (See Appendix 3)
- Have sufficient authority and knowledge of the discipline area under discussion.
- Normally be at least Senior Lecturer level
- Not be appointed from a department in an institution where a member of the inviting department is serving as an External Examiner.
- Not be a former member of staff (including visiting lecturer) or student unless a period of five years has lapsed since their departure from City
- Not be used as an External Examiner on the programme, or by the Department/School.
- Not have any other conflict of interest so that independence and objectivity can be demonstrated.

External Advisors will be paid a fee to reflect their involvement in the process and to enable them to dedicate their time to the proposal. There is a fixed fee and payment of reasonable expenses in line with City policy. Student and Academic Services will manage the payment of the fee and of any expenses, in liaison with the Finance Team.

External Advisors must be able to demonstrate that they are eligible to work in the UK, and provide a copy of their passport or other documentation to Student and Academic Services. Following UPAC approval of a proposed External Advisor, Student and Academic Services will contact the External Advisor to confirm arrangements for the UPAC Stage 2 and provide an expenses form. After the UPAC meeting the External Advisor should complete their expenses form and return it to Student and Academic Services who will authorise payment of the fee.

Role and Management of the External Advisor

In line with the criteria above, the Programme Team will identify an External Advisor and include their details, including a recent CV, in the Stage 1 submission for formal approval by Stage 1 UPAC. The School should then confirm the arrangements with the External Advisor, including the PARC and UPAC dates, and the submission of the report:

- The External Advisor should receive the Stage 2 PARC submission 5 weeks before the PARC meeting.
- The External Advisor should then submit their report, based on the template, to the School within 3 weeks of receipt of the submission.
- The External Advisor will also be a member of the Stage 2 UPAC panel.

In exceptional circumstances, where the External Advisor cannot attend the Stage 2 UPAC, a separate meeting should be held in advance with at least the UPAC Chair, Programme Director and UPAC Secretary, and the minutes of this meeting included within the documentation. Authorisation may also be granted for External Advisor to attend the UPAC via Skype.

Appendix 1 - Timeline for approval

Please note that to be considered 'approved', at either Stage, programme teams will need to have responded to any conditions and recommendations, and have had these approved by the Chair of the UPAC meeting. Please be aware that PSRB requirements may alter the timeline for approval, information should be sought from the School Quality Team in liaison with Student and Academic Services.

Following Stage 1 approval, programmes may advertise with the caveat '*This programme is currently under development and is subject to final approval. For further information, please contact the [name of School/Department]*'.

Following Stage 2 approval, this caveat may be removed and offers to the programme may be made.

Please ensure that any new programmes adhere to the Prospectus Publication deadlines.

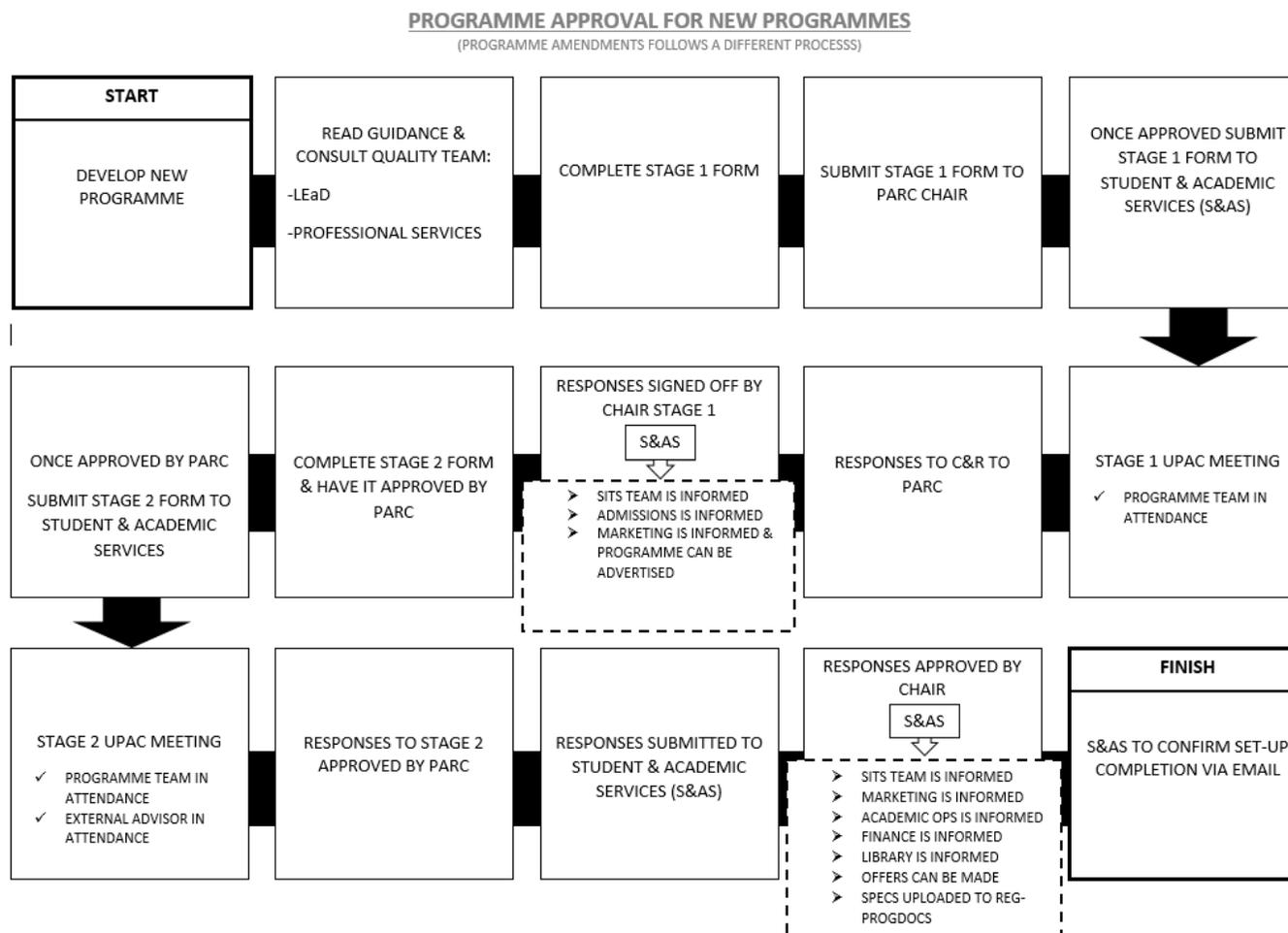
Programmes which do not have Stage 2 approval, confirmed by the deadline, will not be included in the prospectus.

Approval	Timeline for consideration	Key Contact
UG Prospectus publication deadline (at least 18 month lead-in time for prospectus)	November	--
PG Prospectus publication deadline (at least 12 month lead-in time for prospectus)	May	--
Stage One proposal		
	Submitted to S&AS at least 2 weeks before UPAC meeting	Quality & Standards Officer
<i>Finance</i>	Need at least 4 weeks, in advance of submission to UPAC, to consider proposals and approve.	Hafiza Patel
<i>Marketing</i>	Need at least 4 weeks, in advance of submission to UPAC, to consider proposals and approve.	Raffaella Cuccia
LEaD	Need at least 2 weeks, in advance of submission to UPAC, to consider proposals.	Pam Parker
Stage Two proposal		
	Submitted to S&AS at least 3 weeks before UPAC meeting	Quality & Standards Officer
<i>PARC (should be <u>at least</u> 3 weeks before UPAC)</i>	Amendments from PARC will need to be completed (and signed off by the Chair) before submission to Stage 2 UPAC	Quality Team in School
<i>Timetabling</i>	Need at least 3 weeks to consider. This will need to be completed before Stage 2 submission	

<i>Library</i>	Need at least 3 weeks, before submission to PARC, for consideration and approval of proposals.	Claire Packham
<i>LEaD</i>	Need at least 3 weeks, before submission to PARC, for consideration of proposals.	School LEaD liaison
<i>IT Services</i>	Need at least 4 weeks, in advance of submission to UPAC, to consider proposals and approve.	Keith Wood

Appendix 2 – Programme Approval for New Programmes Flow Chart

Please note that this flow chart (<https://www.city.ac.uk/about/education/quality-manual/3-programme-development-approval-and-amendment#tab=tab-2>) represents the process for the approval of new programmes through UPAC, the process for programme amendments differs.



City, University of London – External Advisors and Panel Members Rights to Work in the UK - UKVI Compliance Guidance for Appointments

Introduction

City, University of London is committed to the equality of opportunity in its recruitment, selection and employment practices and must verify that those who work for them are eligible to work in the UK, in accordance with the Immigration, Asylum and Nationality Act 2006. City, University of London is a Tier 4 Sponsor and required to comply with the Sponsor Guidance published by the UK Visa & Immigration Office (UKVI)¹ which states that as employers so must ensure that employees are entitled to work for them to avoid potential legal action or penalties imposed by the UKVI.

- https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/725667/Tier_4_Sponsor_Guidance_-_Doc_3_-_Compliance_2018-07-16_FINAL.pdf
- https://www.city.ac.uk/_media/intranet-site/documents/hr/Eligibility-to-work-in-UK-and-the-Points.pdf

Employers must therefore check relevant documents to establish a person's Right to Work in the UK before recruiting a new member of staff. For Universities, this also includes External Advisors and Panel Members. The UKVI state that identity checking of all individuals working on behalf of City is a requirement of an institution's Highly Trusted Sponsor status and failure to do so could breach City's license.

Procedure

1. The External Advisors and Panel Members Payment Forms incorporate guidance and sections to include details relating to the individual's Right to Work in the UK.
2. When individuals for External appointments for City, University of London Panels and Validated Institutions'/ Partners' Course Boards are nominated the individual should be informed that evidence of their Right to Work in the UK will need to be submitted and verified as part of the standard appointment process. (A standard explanatory information note is provided below).
3. Schools are asked to designate a named individual as the key contact for checking the ID documentation of External Advisors/Panel Members. Student and Academic Services will conduct the check for Validated Institutions'/Partners' Course Board Advisors. Training and support is available from HR to ensure that these individuals, and any others they delegate responsibility to for checking documentation are fully briefed. HR publish UKVI guidance on checking ID on the intranet² and the Human Resources Team are available to answer queries by telephone/email should checkers require tailored guidance.
4. The proof of ID documents should be verified on or before the first day the External Advisor/Panel Member works. They can provide a scanned copy ahead of their first visit to the designated School/Institution contact to verify, but the original documents would need to be seen during the first visit. A Right to Work in the UK Coversheet for the copies should be completed and the copies signed (with the name of the signatory printed underneath) and dated.
5. The contact responsible for the ID checks should send the Coversheet and verified copy documents to David Ross (Quality & Standards Officer) in Student and Academic Services, who will provide copies to Payroll with the payment form as evidence of the Right to Work. Payroll will be unable to release payment to the External Advisor/Panel Member until they receive this information.
6. Once Payroll have the required information, the agreed fees/expenses can be paid to the individual on completion of their duties.
7. The Human Resources Department and Student and Academic Services will hold a record of ID verification status of External Advisors/Panel Members

Standard text for pre-appointment communications

City, University of London is committed to equality of opportunity in its recruitment, selection and employment practices and must verify that those who work for them are eligible to work in the UK, in accordance with the Immigration, Asylum and Nationality Act 2006 and as required by the UKVI. Institutions who fail to do so risk substantial financial penalties and removal of their UKVI registered sponsor status.

We must therefore obtain proof of your eligibility to work in the UK before the commencement your role and no later than the first day of employment. Your appointment as an External Advisor and Panel Member for City, University of London is therefore subject to City receiving evidence of your Right to Work in the UK during the appointment process, and we must request that you provide this evidence for our records and to ensure future compliance with the legal requirements. We are unable to pay you any fees or expenses without this information.