

ELICOS STUDENT ATTENDANCE POLICY

Name of Policy:	ELICOS Student Attendance Policy
Applicability:	All Staff and Students
Contact Person:	Administration Manager Admissions Manager
Original Issue date:	May 2018
Current Version approval:	Jan 2020
Next review:	January 2021
Related policies and procedures:	ELICOS Academic (Monitoring Course) Progress Policy Student Support Services Policy Student Monitoring and Intervention Form Procedure for recording and monitoring attendance of overseas students
RTO:	91781
CRICOS Provider Number:	03256G

1. POLICY STATEMENT

- 1.1 This policy applies to all ELICOS students enrolled in an English language course offered by NORTWEST. Attendance of overseas students is monitored for compliance with the student visa conditions and reporting requirements under the Education Services for Overseas Students (ESOS), The National Code 2018.
- 1.2 In compliance with The National Code 2018, Standard 8 – Monitoring Attendance, NORTWEST ensures that overseas students enrolled in registered English language courses abide by, and meet, the student visa conditions relating to attendance.
- 1.3 NORTWEST is required under the ESOS framework to be proactive in notifying and counselling students who are at risk of failing to achieve satisfactory course attendance and to report students who have not achieved satisfactory attendance.
- 1.4 NORTWEST expects English language students to maintain a minimum of 80% attendance of face-to-face classes.
- 1.5 Students whose attendance falls below 80% may be sent an Intention to Report Letter, which may result in the cancellation of their CoE and notification to Department of Home Affairs (DoHA) through PRISMS.
- 1.6 Students are advised of this as follows:
 - The written agreement (Offer Letter) contains the information that English language courses consist of 20 hours per week classroom instruction and that a minimum of 80% attendance for the course is required.
 - Information on attendance is included in the Orientation and in the Student Handbook. It includes:
 - The 80% attendance requirement
 - The consequences of not maintaining satisfactory attendance
 - The requirement to notify the provider if the student is sick, with the requirement of medical certificates to cover any missed classes

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- The information that lateness to class will be recorded in the class attendance roll and that all appointments of a non-urgent kind, e.g. visit to Embassy, job interview etc. must be made outside of class time.

- 1.7 Students are advised again about attendance requirements verbally by their teacher on the first day of classes and throughout the course as required.
- 1.8 The procedures describe how NORTHWEST meets these requirements in relation to informing students, recording, calculating and monitoring attendance.
- 1.9 Northwest may decide not to report a student for breaching the 80% attendance visa condition if:
 - 1.9.1 there is documentary evidence demonstrating that compassionate or compelling circumstances apply
 - 1.9.2 the student is attending at least 70% of the course contact hours for which he or she is enrolled; and
 - 1.9.3 this is consistent with Northwest’s documented attendance policies and procedures which are published on our website.

2. RESPONSIBILITIES

- 2.1 The CEO or nominated officer is responsible for the implementation of this policy and to ensure that staff and students are aware of the requirements and its implications.
- 2.2 Administration Officers are responsible for the ongoing administration of this policy in relation to record keeping and analysing of the attendance records in the student administration system and the subsequent notification actions to students.
- 2.3 The Student Support Officer is responsible for the reports and support for students at risk of not achieving satisfactory attendance and in meeting their obligations;
- 2.4 The Academic manager is responsible counselling students at risk and for monitoring corrective action.

3. DEFINITIONS

- 3.1 **Actual Attendance:** This is actual attendance in class. If a student is absent for any reason including illness or injury, they are marked as not attending.
- 3.2 **Satisfactory attendance:** Attendance by an overseas student at a minimum of 80% of the scheduled course contact hours for the duration of the course they are enrolled in.
- 3.3 **Consecutive days absent:** Refers to five consecutive days of classes missed, or five days missed without approval, whichever comes first.
- 3.4 **Overseas Student:** A person who holds an Australian Student Visa and is an ‘Overseas Student’ as defined by the ESOS Act.
- 3.5 **ESOS Act:** Education Services for Overseas Students Act 2000.
- 3.6 **The National Code:** Means the code of practice for registered providers and their registered courses in relation to overseas students and sets out the national standards required.
- 3.7 **PRISMS:** Provider Registration and International Student Administration System – the Government electronic system that holds CoEs and CRICOS data.
- 3.8 **Intention to Report letter:** Letter advising students that they have breached the attendance requirement and that they have 20 working days commencing the date of the letter before they will be reported for unsatisfactory attendance. Students are provided information on how to access the

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complaints and appeals policy in this letter. Students are provided with information on accessing student support services if they have compassionate or compelling circumstances.

3.9 Student Administration System: In-house student database where attendance is recorded.

3.10 Cancellation by Provider: NORTWEST takes appropriate steps to report a student who has not attended, notified the college of their absence or contacted the college for a period of two weeks or more.

3.12 Compassionate or Compelling circumstances: Circumstances beyond the control of the student and which have an impact upon the student's course progress or wellbeing. NORTWEST will assess, at its discretion, grounds for determination based on supporting evidence, which may include:

- A serious illness or injury, where a medical certificate states that the student was unable to attend classes.
- Bereavement of close family members such as parents or grandparents (documented evidence required.)
- Major political upheaval or natural disaster in the home country requiring emergency travel.
- A traumatic experience which may include: involvement in or witnessing of serious accident or crime and that these cases are supported by a psychologist's report.
- These above are only examples of what may be considered compassionate or compelling circumstances. NORTWEST's staff will use their professional judgment to assess each case on its individual merits. Documentary evidence must be provided to support these claims and copies of these documents must be placed and kept on the student's file.

3.13 Non commencement of studies: the student has not or will not take the offer of education on a particular COE.

3.14 Critical incident: A traumatic event or a threat of such (within or outside Australia) which causes extreme stress, fear, or injury. This could include a student who is deemed as missing.

4. PROCEDURE FOR INFORMING STUDENTS ABOUT ATTENDANCE REQUIREMENTS

4.1 English language students are required to attend Student Orientation, which is usually held in the week prior to the commencement of classes and/ or on the first day of enrolment. This requirement and the date for Orientation is included in the Offer Letter. In addition, students will be sent an email detailing the venue and start time for Orientation prior to their arrival. During Orientation, students may be interviewed and undergo an arrival placement test. Students will receive their student ID cards and be provided with key information about the campus and the support available to them.

4.2 Students who are delayed from arriving for the Orientation and commencement of a teaching session by such factors as a delay in the granting of a visa or illness will attend Orientation on arrival and be allocated to their class as soon as possible. However, a delay of more than one week necessitates deferment to a later study period, the cancellation of the CoE for the current session and the re-issuing of a new CoE for future sessions.

4.3 Letters of warning or other regarding attendance will include information about complaints and appeal processes such as:

You have been assessed as not achieving satisfactory attendance, we are notifying you of our intention to report you the Department of Home Affairs (DoHA). You are able to access Northwest's complaints and appeals process and you have 20 working days in which to do so.

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5. **PROCEDURE FOR RECORDING and CALCULATING ATTENDANCE**

- 5.1** Attendance is recorded for each contact hour of 20 hours per week attended by a student. Attendance is calculated on a percentage basis for each week (20 hours) against an overall percentage for the course duration. Attendance of 20 hours per week is equal to 100% for that week. Hours absent are recorded as zero (0). Example: if the course is 12 weeks in duration, one day absence will result in 98% attendance for the course. A week's absence will result in 91% attendance.
- 5.2** NORTHWEST provides 20 hours face-to-face study per week on campus.
- 5.3** Attendance is recorded by trainers for each hour attended in each face-to-face session. At the end of the session/s, teachers sign-off daily on class rolls.
- 5.4** Attendance records are entered into the Student Administration System on a weekly basis at the end of each week. An attendance monitoring report is generated weekly by an Administration Officer. Administration officers analyse this report on a weekly basis during the study period to inform appropriate action.
- 5.5** Overall attendance is calculated as a percentage for the duration of the course. Students must maintain attendance of 80% or more of the scheduled course contact hours to achieve satisfactory attendance for the course.

6. **PROCEDURE FOR INFORMING STUDENTS ABOUT THEIR ATTENDANCE**

- 6.1** Students who are absent from NORTHWEST for 5 consecutive days or more without approval or communication with NORTHWEST will be contacted by either telephone, SMS and email as a matter of priority by NORTHWEST student services staff. If contact with an overseas student cannot be made directly, NORTHWEST will contact the student's education agent, if applicable.
- 6.2** If contact with a student is made, NORTHWEST will provide counselling in relation to attendance requirements.
- 6.3** If there is no attempt by the student to contact NORTHWEST directly or via an education agent, or improve attendance:
- Administration staff will notify the Student Support Officer. Details of actions to contact an overseas student will be recorded in the student's file and in the NORTHWEST Critical Incident Register if the student is deemed uncontactable. NORTHWEST's Admissions staff may take appropriate steps to make a report to relevant authorities, for example Department of Immigration and Border Protection.
 - Overseas students will be issued an Intention to Report letter where appropriate. Students have 20 working days commencing from the date of the letter to contact NORTHWEST to discuss actions to remedy their attendance and issues. If a student does not contact NORTHWEST within the timeframe, NORTHWEST will report them to the DIBP through PRISMS for non-attendance or non-commencement.
 - Domestic students will be advised in writing of issues that may affect their academic progress where attendance is required.
- 6.4** If there is no attempt by the student to contact NORTHWEST directly or via an education agent, or improve attendance
- 6.5** Students whose attendance falls between 90% to 85% will immediately be advised in writing:
- a reminder letter regarding the need to meet their attendance obligations; and that attendance must improve or evidence for non-attendance must be supplied.

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- they will be monitored on a weekly basis.
- 6.6** Students with attendance between 85% - 80% will receive a warning letter regarding their unsatisfactory attendance and will be informed that they must improve attendance. Students are advised to see the Student Support Officer for support and counselling or to contact NORTWEST if they have further issues.
- 6.7** Students with poor attendance, below 80%, and who have already received a warning letter and/or an SMS notice of attendance risk, will be sent an Intention to Report Letter which states that the student must appeal the College decision to report them to the Department of Home Affairs (DHA) for unsatisfactory attendance.
- Students are advised they have 28 days commencing from the date of the letter to contact NORTWEST and appeal the decision
 - If a student does not contact NORTWEST within the timeframe, NORTWEST will report them for non-attendance to the DoHA via PRISMS
- 6.8** Students with poor attendance are offered counselling by the Student Support Officer and may be placed on an intervention program for the study period to monitor attendance and to support the completion of their course within the expected duration. Evidence of counselling and remedial action is placed on the Student's file. See the Intervention Policy for details. Administration fees may apply for intervention programs. Refer to the Fees and Charges schedule.
- 6.9** If students are not satisfied with NORTWEST's determination on their attendance issues, they have 28 days commencing the date of the Intention to Report letter for overseas students to submit an appeal against the NORTWEST decision. Refer to the NORTWEST Complaints and Appeals Policy.
- 6.10** If the student chooses not to access the Complaints and Appeals Policy and procedure within the stated timeframe; withdraws from the process; or the process is completed and results in a decision which supports NORTWEST:
- the CEO or delegate will notify DoHA via PRISMS that the student has not achieved satisfactory attendance
- 6.11** Students are to attend classes where an Intention to Report letter or warning letters have been sent, and during any period of appeal.

7. REPORTING PROCESS

- 7.1** NORTWEST staff will enter the actual attendance of each student in the Student Administration System recorded on the daily class rolls for face to face sessions, which indicates late arrivals or early departures. Attendance is recorded and certified by trainers for each hour at each session.
- 7.2** Absences due to illness, injury or misadventure are included in the 20% allowable absence for the study period. A student must maintain 80% or more attendance during a study period (one term).
- 7.3** Administration staff will also enter other records of attendance including enrolment changes, special leave approvals, deferments, cancellations and withdrawals.
- 7.4** Administrative staff input attendance records into the Student Administration System weekly, and generate monitoring reports weekly to track attendance. Based on analysis of the reports, notifications to students will be sent electronically with details of the actions required by the student.
- 7.5** If counselling or a support meeting is required, the student is responsible for making contact as indicated in the notification letter.

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7.6 If an intervention program is required to support the student to meet course requirements, administration fees may apply as per the fees and charges schedule.

- Counselling processes may include informing the student that if attendance falls below the required level, the student will be reported and their visa may be cancelled. Any further questions regarding the student visa conditions and possible outcomes of breaches should be referred directly to DoHA.

7.7 When an overseas student has been issued with a warning notice of unsatisfactory attendance or an Intention to Report and evidence is given that supports the absences, NORTWEST may choose not to take further action if the student:

- is maintaining satisfactory course progress; and
- is attending at least 70% of their scheduled contact hours; or
- can provide documented evidence under compassionate and compelling circumstances as defined.

Where action will be taken by NORTWEST, students are advised on the right to appeal as per the complaints and appeals policy. The student will also be advised that they may appeal externally to the Overseas Student Ombudsman and their enrolment maintained.

7.8 After 28 days commencing the date of the Intention to Report or advisory letter has lapsed, or any appeal has been heard and not approved, and if the student's attendance is below 70%:

- the CEO or delegate will complete reporting procedures via PRISMS

7.9 If the student's attendance is between 70% and 80% and the appeal is successful, details are noted and all records saved in the student file and electronically. The student will not be reported.

7.10 All contact with students is documented by NORTWEST staff and notes made in the electronic Student Administration System. Where contact is not established and the student does not reply nor returns to NORTWEST for counselling or classes, reporting procedures will commence. A Critical Incident situation may apply so staff may follow those procedures.

7.11 All records of letters, meetings, intervention actions and related documents will be stored and filed in the Student Administration System.

8. RECORDS AND INFORMATION

All documentation will be kept in the Student Administration System both in the main student file and electronically in the Student Administration System.

9. ASSOCIATED DOCUMENTS

Forms and Record Keeping:

Title	Document Location	Responsible Officer	Minimum Retention Period
Attendance Record Sheet for classes	Fileshare / Attendance	Trainer	2 years after last entry
Attendance Record	Student Administration System	Administration Officer	2 years after last entry
Reminder or Warning letters	1. Student's File 2. Student Administration System	Student Support Officer/ delegate	2 years after last entry
Monitoring and Intervention Form	1. Student's File 2. Student Administration	Student Support Officer	2 years after last entry

	System		
Letter of Intention to Report	1. Student's File 2. Student Administration System	Student Support Office/ delegate	2 years after last entry

10. REFERENCES

- Education Services for Overseas Students (ESOS) Act 2000
- Standard 8 of the National Code 2018.

11. IMPLEMENTATION

The Attendance Policy and Procedure will be implemented throughout NORTWEST via:

1. Written agreement, ie, Letter of Offer
2. Orientation and Student Handbook
3. Inclusion on the NORTWEST website
4. An announcement notice emailed to all students and staff when changes are made
5. Verbal reminders from trainers and staff

12. REVISION HISTORY

Revision	Date	Description of modifications
1	May 2018	Original
2	Jan 2019	Update version number
3	Jan 2020	Annual review