

## Attendance Monitoring and Reporting Policy and Procedure - ELICOS

### Purpose

This policy is in place to monitor and report the attendance of international students studying ELICOS courses at Northwest Pty Ltd. It allows Northwest Pty Ltd as the registered provider to meet its obligations under ESOS National Code 2018.

### Scope

This policy applies to all international students who are studying an ELICOS course at Northwest Pty Ltd and all staff with responsibilities for teaching and supporting students enrolled in ELICOS at Northwest Pty Ltd.

### Policy

- Northwest Pty Ltd will systematically monitor students' compliance with visa conditions relating to attendance.
- Northwest Pty Ltd will be proactive in notifying and counselling students who are at risk of failing to meet attendance requirements.
- Northwest Pty Ltd will report students (under *section 19 of the Education Services for Overseas Student Act 2000 (ESOS)*) who have breached attendance requirements.
- Northwest Pty Ltd must record the attendance of each ELICOS student visa holder students for the scheduled course contact hours which are 20 hours per week; and
- ELICOS students must meet their visa requirements for achieving satisfactory attendance, which at a minimum of 80% of the scheduled course contact hours.

### Procedure

ELICOS have one study periods each level. Each level of course is 10 weeks (plus 2 weeks of break). Students' duration of their Confirmation of Enrolment (CoE) vary between 1 week and 12 (10-weeks of study) weeks for each level of General English (GE). As such, student individual attendance is recorded and calculated over the period of the enrolment as stated on the CoE.

In the cases that a CoE duration is greater than 5 weeks, the student attendance is monitored over two periods: the first period is for the 5 weeks; the second period is calculated on the remaining part as stated on the total duration of the CoE.

This is exemplified below:

Student 1 – CoE of 5 weeks

Attendance is calculated according to timetabled course contact hours over a period of 5 weeks.

### Student 2 – CoE of 12 weeks

Attendance is calculated according to timetabled course contact hours over two separate periods

Attendance period 1: 5 weeks

Attendance period 2: 5 weeks. Attendance is monitored by CoE.

### **Process for assessing satisfactory attendance**

Administrative staff review student attendance regularly to identify students who are at risk of not maintaining satisfactory attendance requirements. Regular assessments will be undertaken at intervals which will ensure that the administrative staff will be able to make an accurate assessment of whether the student:

- Is absent for more than 5 consecutive days without approval,
- Is maintaining satisfactory attendance,
- Is at risk of not attending at the required level for the relevant attendance calculation period,
- Has actually fallen below the required attendance level within an attendance calculation period.

### **Regular assessment/calculation of attendance**

A review of weekly attendance assessment is conducted by Northwest Pty Ltd.

### **Process for calculating a student's projected maximum possible attendance and for monitoring attendance**

Student attendance data is taken from the rolls and is entered into an excel spreadsheet and the student management system (axcelerate) weekly by the administrative staff. Reports showing a student's projected maximum possible attendance are generated from axcelerate. Students at risk of not satisfying attendance requirements are identified on these reports. The attendance reports show the student number and the projected maximum possible attendance for each student for data entered onto axcelerate from the hard-copy rolls at the date of the generation of the report.

### **Calculation of Attendance**

The projected maximum possible attendance figure for a student is calculated by a formula set within excel spreadsheet. The formula will include the maximum potential timetabled hours for the period for which the attendance is being recorded and monitored.

Attendance is calculated from the start date of the attendance-monitoring period to the end date of the attendance-monitoring period and incorporates the absences from attendance data that has been entered on the class rolls. This data is also entered into individual student records on axcelerate.

The projected maximum possible attendance figure, which is expressed as a percentage, incorporates the actual number of hours absent together with a figure to incorporate the assumption that the student will not be absent for any timetabled class for the remainder of the attendance calculation period.

Every fortnight, ELICOS Director of Studies will check the attendance percentage of all students and monitor the individual attendance of each student. Where an individual student attendance falls into any of the following categories the associated action shall be taken:

Attendance Status	Classes Missed	Action Taken by Northwest Pty Ltd
When a student has missed 5 or more consecutive days of classes without prior approval	<b>5</b>	<p>The Student Support Officer will immediately contact the student by phone/email to gain an explanation and inform them of the need to attend classes and the effect on their projected attendance if they do not attend. If contact by phone is not successful, the Administration Manager is to be informed and shall attempt to identify the student's current contact details. Where the student is not able to be contacted by phone/email, appropriate 'Warning Letter' is to be sent to their last known address.</p> <p>It must be noted that students have been informed via the 'Enrolment Agreement' to notify the Northwest Pty Ltd immediately of changing their address or contact details.</p>
When a student's projected attendance falls below 90%	<b>21 hours</b>	<p>The student is to be sent a 'Student Attendance 1st Warning Letter' informing them of their projected attendance and the need to ensure they maintain a minimum of 80% attendance for the course duration (total contact hours). This letter is to also contain the consequences of not achieving a projected attendance of 80%. This communication will also indicate the student is required to organise an appointment with the ELICOS Director of Studies to discuss their poor attendance record and any intervention strategies to ensure they stay above 80% for course duration (total scheduled contact hours).</p> <p>If the student does not respond within 5 business days, Student Administration will attempt to contact</p>

		the student and action the student enrolment status as required.
When a student's projected attendance falls below 80%	<b>41 hours</b>	The student shall be sent a 'Student Attendance Breach Recorded Letter' letter indicating the student has breached the attendance requirements. This letter will also identify the student is going to be reported to the appropriate government agency(s) for unsatisfactory attendance of their course of study. They will also be informed of their ability to access the 'Complaints and Appeals Policy and Procedure' and that they have 20 business days to access this process. If the student does not access the complaints and appeals process within 20 business days, the student's enrolment status is to be updated on PRISMS. The student is also to be sent a 'Student Attendance Breach Reported Letter' notifying the student of the action taken.
Reporting 'Breach of Student Attendance'		As identified above, when a student's attendance falls below 80%, and has no supporting reasons, the student must be reported to the appropriate government agency(s) via PRISMS for a breach of their Visa condition.  This process of reporting breaches into PRISMS is the responsibility of the Administration Manager who will monitor the recorded breach and report the breach as required. A copy of all letters, details of phone calls made, and reports are to be maintained in the individual student file.

Northwest Pty Ltd may decide not to report the overseas student for breaching the attendance requirements if the overseas student is still attending at least 70 per cent of the scheduled course contact hours and:

- The overseas student provides genuine evidence demonstrating that compassionate or compelling circumstances apply; OR
- The overseas student is maintaining satisfactory course progress

A student may present at a Complaints and Appeals hearing a medical certificate or other suitable documentation as evidence of a compelling or compassionate circumstance which may have prevented the student from maintaining the 80% attendance requirement.

**\*\*Practice will be to consider public holidays as attended classes.**

**Procedure to outline how a student is contacted and counselled when absent for more than 5 consecutive days without approval:**

- (i) Administrative Staff conduct a manual check of every class roll once per teaching week. Those students who have been absent more than 5 consecutive days are identified.
- (ii) Academic staff members are required to also check their students' attendance every day. They will email ELICOS Director of Studies the details of any who have missed 5 or more consecutive days.
- (iii) A list of students in items (i) and (ii) is created manually by the administrative staff.
- (iv) An attempt to contact each student is made via telephone.
- (v) Contact is also made both via email and via SMS to the students' email account and registered mobile accounts respectively.
- (vi) This contact is used to understand the students' reasons for continued absences, to decide if they might be experiencing transition issues, need welfare counselling or are encountering any issues otherwise relating to their personal or academic welfare.
- (vii) If the above in item (vi) is the case, the students are immediately offered an appointment for academic and/or welfare counselling (intervention).
- (viii) For those who do not appear to have such issues, a reminder is given of the importance of attendance in their ELICOS program. They are also reminded of the importance of adhering to the stipulations required on the holders of an International Student visa in Australia, in that attendance is compulsory (as per standard 8 of the ESOS National Code 2018).
- (ix) For those students for whom contact is unsuccessful, attempts are made to contact and counsel them through Northwest Pty Ltd Marketing or Admissions Department staff in coordination with the students' migration/education agent.
- (x) A full log of all successful or unsuccessful attempts to contact the students is kept on axcelerate.

**Reporting breach of student attendance**

Students are advised during Orientation of their obligations to maintain at least 80% of the attendance throughout their course. The attendance reports will identify when students are at risk of not meeting attendance requirements. Students are also informed as to how they can make an appointment to seek advice or counselling about Student Visa attendance requirements.

ELICOS students who fall below the minimum of 80% attendance and have no supporting reasons shall be reported via PRISMS to the appropriate government agency(s) for a breach of their Visa condition. This process of reporting breaches of Attendance requirements into PRISMS is the responsibility of the Administration

Manager who monitors the attendance records weekly. All warning letters, breach recorded letter, and breach reported letter are to be maintained on the student's file.

Students will have 20 business days from the date the 'Breach Recorded' letter is processed, to appeal the decision via Complaints and Appeal Form or by accessing the Complaints and Appeals Policy and Procedure. If they do not choose to internally or externally, then they shall be reported as indicated. It is the responsibility of the Administration Manager to report the student's breach within 5 business days of the student's appeal period expiring.

Where a student accesses the appeals process (by following the processes outlined in the Complaints and Appeals Policy and Procedure) and is able to provide evidence of extenuating circumstances that prevented them from attending classes, the supporting evidence must be maintained on the student's file and the attendance records adjusted accordingly. (i.e. the attendance records will be adjusted for the period that the student is able to provide a valid reason for non-attendance and the student's projected attendance will account for the time period that has been deemed approved non-attendance.)

Where a student is able to provide evidence that the attendance records are incorrect they will also be adjusted accordingly, and action taken to prevent such errors re-occurring. The student's projected attendance will be adjusted and re-calculated so that it can be determined whether any further action needs to be implemented in line with this policy and procedure. The student shall be notified in writing of the outcome of the appeal and their revised projected attendance, along with any letters corresponding to their projected attendance rate.

Where a student's appeal is not successful they will be notified in writing of the outcome and informed that the breach of attendance requirements will be reported. A copy of all letters, details of phone calls made, any reports from meetings with the student in relation to the appeal are to be maintained in the individual student file.

Nortwest Pty Ltd will report unsatisfactory course attendance in PRISMS in accordance with section 19(2) of the ESOS Act if:

- The Internal and External complaints processes have been completed and the decision/outcome is against the overseas student, OR
- The overseas student has chosen not to access the internal complaints and appeals process within the 20-working day period, OR
- The overseas student has chosen not to access the external complaints (after unsuccessful outcome of internal complaint) and appeals process, OR
- The overseas student withdraws from the internal or external appeals processes by notifying the registered provider in writing.

### **Absence - Medical certificates/other acceptable documentation**

Medical certificates or other documentation may be considered acceptable during a Complaints and Appeals Committee Hearing to substantiate compelling or compassionate circumstances which may have prevented a student from maintaining the 80% attendance requirement.

### **Public holidays**

Practice will be to consider public holiday absences as attended classes.