ANC STUDENT ATTENDANCE POLICY & PROCEDURE & FORMS

Monitoring Attendance

1.0 Underpinning Standard

The National Code 2007

Standard 11 - Monitoring Attendance

2.0 Element/Definition

11.1 The registered provider must record the attendance of each student for the scheduled course contact hours for each CRICOS registered course in which the student is enrolled which is:

a. an accredited vocational education and training course (unless Standard 11.2 applies);
b. an accredited school course;
c. an accredited or non-award ELICOS course; or
d. another non-award course

11.3 For the courses identified in 11.1, the registered provider must have and implement appropriate documented attendance policies and procedures for each course which must be provided to staff and students that specify the:

a. requirements for achieving satisfactory attendance, which at a minimum, requires overseas students to attend at least 80 percent of the scheduled course contact hours;
b. manner in which attendance and absences are recorded and calculated;
c. process for assessing satisfactory attendance;
d. process for determining the point at which the student has failed to meet satisfactory attendance; and
e. procedure for notifying students that they have failed to meet satisfactory attendance requirements.

11.4 For the courses identified in 11.1, the registered provider’s attendance policies and procedures must identify the process for contacting and counselling students who have been absent for more than five consecutive days without approval or where the student is at risk of not attending for at least 80 percent of the scheduled course contact hours for the course in which he or she is enrolled (before the student’s attendance drops below 80 percent).
11.5 For the courses identified in 11.1, the registered provider must regularly assess the attendance of the student in accordance with the registered provider’s attendance policies and procedures.

11.6 Where the registered provider has assessed the student as not achieving satisfactory attendance for the courses identified in 11.1, the registered provider must notify the student in writing of its intention to report the student for not achieving satisfactory attendance. The written notice must inform the student that he or she is able to access the registered provider’s complaints and appeals process as per Standard 8 (Complaints and Appeals) and that the student has 20 working days in which to do so.

11.7 Where the student has chosen not to access the complaints and appeals processes within the 20 working day period, withdraws from the process, or the process is completed and results in a decision supporting the registered provider, the registered provider must notify the Secretary of DEST through PRISMS that the student is not achieving satisfactory attendance as soon as practicable.

11.8 For the vocational education and training and non-award courses identified in 11.1 a. and 11.1 d. the registered provider may only decide not to report the student for breaching the 80 percent attendance requirement where:

a. that decision is consistent with its documented attendance policies and procedures; and
b. the student records clearly indicate that the student is maintaining satisfactory course progress; and
c. the registered provider confirms that the student is attending at least 70 percent of the scheduled course contact hours for the course in which he or she is enrolled.

3.0 Context and Intent

Registered providers systematically monitor students’ compliance with student visa conditions relating to attendance. Registered providers are proactive in notifying and counselling students who are at risk of failing to meet attendance requirements. Registered providers report students under Section 19 of the ESOS Act who have breached the attendance requirements.

For all courses (VET, accredited or non-award ELICOS, accredited Schools, foundation) requiring attendance-monitoring:

Providers who monitor attendance must have and implement appropriate documented policies and procedures for monitoring attendance for each course.
Where a student has been assessed as not achieving satisfactory attendance, the provider must notify the student of its intention to report the student. The written notice must inform the student that he or she is able to access the registered provider’s complaints and appeals process and that the student has 20 working days in which to do so.

If the student accesses the provider’s complaints and appeals process and the process results in a decision that supports the registered provider, the registered provider must report through PRISMS that the student is not achieving satisfactory attendance as soon as practicable. The provider does not report until the process is completed and it supports the provider or the student has not accessed the provider’s complaints and appeals process within 20 days of being notified of the provider’s intention to report.

For VET courses only

If providers implement the DEST-DIAC approved course progress policy and procedures, they do not need to monitor attendance. The policy and procedures may be downloaded.

If a provider chooses to implement the DEST-DIAC course progress policy, it must implement it for all of its VET courses and indicate this choice through PRISMS.

If providers choose not to implement the DEST-DIAC course progress policy and procedures, they record attendance for each student. The students must attend at least 80 percent of the scheduled course contact hours for each CRICOS registered course in which they are enrolled.

If a student’s attendance is less than 80 percent, a provider may choose to not report a breach if:

- the student’s attendance is at least 70 percent;
- the student is maintaining satisfactory academic performance; and
- this is consistent with the provider’s documented attendance policies and procedures.

For accredited and non-award ELICOS courses, and accredited schools courses

Providers record attendance and require a minimum attendance of 80 percent, but may decide not to report a student for breaching 80 percent if:
• there is documentary evidence demonstrating that compassionate or compelling circumstances apply;
• the decision is consistent with its documented attendance policies and procedures;
• the student is attending at least 70 percent of the course contact hours for which he or she is enrolled; and

• this is consistent with the provider’s documented attendance policies and procedures.

For higher education courses (including higher education non-award and Study Abroad courses)

For higher education courses, providers are not required to monitor attendance but they must monitor course progress according to their policies and procedures (see Standard 10).

For the above courses, where there are structured study periods (for example a term or a semester), providers must monitor attendance over the length of each study period for a course.

Where there are no structured periods of study, attendance is recorded and calculated over the period of the Confirmation of Enrolment (CoE) if this period is six months or less. If the length of the CoE is more than six months, each monitoring period must not exceed six months.

For ELICOS courses, if a student changes course and gets a new CoE, or extends his or her enrolment in the current course, thereby getting a new CoE, the student's attendance is monitored over each of the CoEs separately, rather than over the entire period of the student’s enrolment with a provider.

The complete period of study must be separated into its distinctive components where there are separate CoEs. If the student falls below the 80 percent requirement for the length of a CoE, the provider needs to report on the CoE via PRISMS unless the provider chooses not to report a student for attending less than the 80 percent attendance requirement as outlined in 11.9 of the revised National Code.

The footnote at 11.1 d. means that, for higher education courses that are non-award courses, including Study Abroad, providers are not required to monitor attendance. Therefore, providers do not have to monitor non award higher education courses. However, higher education providers who offer ELICOS courses and non-award courses of non-higher education level (for example foundation
programmes) must monitor attendance for these courses.

Q1. When do providers who monitor attendance need to contact and counsel students for non-attendance?

A. Providers who monitor attendance must contact and counsel students who:

- have been absent for more than five consecutive days without approval; or
- are at risk of not attending for at least 80 percent of the scheduled course contact hours.

Q2. Does a provider who monitors attendance have to report a student if the student’s attendance has fallen below 80 percent?

A provider does not have to report a student who is studying a VET, ELICOS, non-award* or school course for breaching the 80 percent attendance requirement, if:

- the decision not to report is consistent with the provider’s attendance policies and procedures;
- the student is attending at least 70 percent of the scheduled course contact hours for the course; and the student’s course progress is satisfactory (VET and non-award courses) or compassionate or
- compelling circumstances apply (ELICOS and school courses).

Once the student’s attendance has fallen below 70 percent, the provider must report the student for unsatisfactory attendance.

Q3. As described in Question 2 above, providers of VET, non-award*, school and ELICOS courses have the flexibility not to report the student for non-attendance if the student is attending at least 70 percent of the scheduled course contact hours. Can a provider choose not to make use of this flexibility?

A. Yes. If a provider wishes to maintain 80 percent as the absolute threshold for reporting for non-attendance (and not consider compassionate or compelling circumstances or satisfactory attendance as circumstances in which they will allow attendance of 70 percent and above) the provider may do so, as long as this policy is applied to all cases equally and is clearly stated in the provider’s attendance policies and procedures.
For the purposes of the National Code, non-award courses do not include higher education courses or units including Study Abroad courses.

Q4. At what point is the provider required to report a student for unsatisfactory attendance?

A The provider must report a student for non-attendance once the student can no longer meet the attendance requirement for that study period. This means providers must monitor attendance throughout the study period, not just work out the total attendance at the end.

Providers may find it helpful to consider their course hours for a study period, then work out the number of hours a student would have to miss in the study period in order to fall below the reporting threshold. For example, in a course with 200 contact hours per term, the student would need to miss over 40 hours (20 percent of 200) in order to fall below the 80% reporting threshold. In this case, the student should be reported for unsatisfactory attendance once the student missed more than 40 hours of the course (if the provider’s policies did not allow for the flexibility provided under Standard 11.8 and 11.9).

Following on from the example above (for a course of 200 contact hours per term), if the provider allowed for 70 percent as a minimum attendance threshold under the circumstances listed in Standards 11.8 and 11.9, the provider would need to report the student once the student had missed more than 60 hours (30 percent of 200) of the course.

Q5. What does a provider of VET courses have to do to implement the DEST-DIAC course progress policy and procedure?

A The provider of VET courses can download the DEST-DIAC course progress policy and procedures and implement it to cover all of its VET courses. The document provides the policy which must be applied, and providers are required to document the procedures they will follow in order to implement the policy.

To indicate the decision to implement the DEST-DIAC course progress policy, the provider must do so through PRISMS. The provider does this by clicking the ‘Yes’ button for the field ‘DEST-DIAC Course’
Progress Policy & Procedure implemented?’ The provider’s level of access to PRISMS will determine where this field will appear.

Providers with CoE Create or CoE Agent access will find the field on the ‘Provider Information’ tab of the ‘Organisation Details’ screen.

Providers with CoE Administrator access will find the field on the ‘Summary’ tab of the ‘View/Edit Provider’ screen.

For further details, please see the DEST-DIAC course progress policy and procedures.

Q6. Can providers who monitor attendance set higher attendance requirements than 80 percent?

A. Providers wishing to set higher attendance requirements than 80 percent must do so through their course progress policies and procedures, rather than through their attendance policies and procedures.

There are no legislative grounds for reporting against higher attendance requirements under Standard 11.

The provider must monitor each student’s attendance regularly. Attendance should be assessed each study period. While the length of a study period is determined by the provider, study periods are usually terms or semesters. For the purposes of the provider’s attendance policy, DEST would accept a study period for up to six months.

Providers should keep records of all contact and counselling made with students who have been absent for more than five consecutive days or where the student is at risk of not attending at least 80 percent of the course contact hours. The intent of contacting these students is to find out why the students have been absent and to see what support the provider may be able to offer the student. For example, the student’s absence may not be due to medical reasons, but rather to homesickness or social issues - matters which may be addressed through the provider’s student support services (see Standard 6).

When counselling the student about the absence, the provider should also remind the student of the provider’s attendance policies. It would also be good practice to inform the student that
maintaining satisfactory attendance is a student visa requirement. The student should be informed that if his or her attendance falls below the required level, the student will be reported, and the student’s visa may be cancelled. If the student has questions about the student visa condition and the possible outcome of breaching the condition, the provider should refer the student to DIAC.

Under Standard 13, a provider may temporarily suspend the enrolment of the student on the grounds of compassionate or compelling circumstances.

If a student’s attendance drops below the level identified in the provider’s documented attendance policy and procedures and there is no possibility of the student reaching that level by the end of the study period (for example term/semester or in the case of courses that are not divided into other study periods, the end of the CoE), the provider must notify the student in writing of its intention to report the student. The written notification must also inform the student that he/she is able to access the registered provider’s internal and external complaints and appeals process as per Standard 8 and that the student has 20 days in which to do so.

The provider uses PRISMS to report the student. PRISMS generates a Section 20 breach notice which is sent to the student. A copy should be kept on the student’s file.

DIAC may cancel a student’s visa based on the provider’s dissatisfaction with a student’s attendance. DIAC does not to assess whether a breach has occurred. However, DIAC will retain the ability to consider exceptional circumstances as to why the visa should not be cancelled and to refer the matter back to the education provider if the provider has not given the student access to an appropriate appeals process and/or considered compelling and compassionate circumstances, where relevant. However, these circumstances will be limited.

4.0 Evidence Guide

Nil Specified or Not Applicable

5.0 Policy

Student attendance is monitored regularly and DIAC is notified of student’s failure to meet their attendance obligations through the PRISMS system. This policy applies to all courses listed on CRICOS for ANC as outlined at http://cricos.deewr.gov.au/institution/institutiondetails.aspx?providerID=3009
6.0 Procedures/Process/Implementation

1. A class list is produced on a weekly basis using the electronic record keeping system administrative system. The class lists are used as class rolls and each list refers to a single session. The class lists are produced by Administration and distributed to the Trainers/Assessors.

2. Trainers/Assessors record student attendances and absences on the class lists. Students who are in attendance are required to sign the class list for each session they attend.

3. The class lists are returned to the Training Co-ordinators once complete. Each class list is to be signed by the respective Trainer/Assessor.

4. Each recorded absence is entered into the electronic record keeping system administrative system by administrative staff.

5. Absences are calculated as percentages and listed as a report. A fortnightly student review meeting is conducted. The report is reviewed and all student's attendance performance is discussed. The discussions, required actions and outcomes are all recorded through minutes.

6. The student review meeting group will address attendance as follows:

(a) Students who have a final projected and current attendance over 80% are deemed to be attending satisfactorily.

(b) Students who have a current attendance below 80% are sent an informal warning letter advising them that they are at risk of not meeting their attendance requirements. A counselling meeting is scheduled between the student and the Training Coordinator.

(c) Students who have a final attendance between 70% and 80% are sent an official warning letter and a counselling meeting is scheduled. Item 9 then applies.

(d) For students with a final projected attendance below 70%, item 10 below applies.

Note: Final projected attendance is calculated over a 6 month period.

7. During attendance counselling sessions, the student is reminded of their obligations under their visa and the possible outcome should the student's attendance not improve. Students
are also asked to sign a document stating that they understand their obligations under the student visa. Students are given the opportunity to outline any relevant issues and compassionate or extenuating circumstances. The counselling session is recorded and the student signs the record. This record is then maintained in the student's administrative file.

8. DIAC may request a copy of the counselling session record where a student has been reported for non-attendance. This record provides evidence of counselling sessions and agreed intervention and forms part of the intervention strategy.

9. Students at risk of not meeting attendance requirements are closely monitored. Students who are sent a warning letter where their final projected attendance is between 70% and 80% and are required to attend a scheduled counselling session.

The following sub-process applies for at risk students:

(a) If this is the student’s first formal warning, they are required to attend 100% of all their classes over the next 2 weeks. Additional classes may also be scheduled at this time.

(b) If the student failed to attend 100% of the classes allocated to them over the previous 2 weeks as outlined in (a) above, or the final projected attendance percentage does not exceed 80%, a second warning letter is sent and the student is required to attend another counselling session. At this time, the student must attend additional sessions scheduled out to 5 days per week.

(c) If after 2 weeks, there has not been an improvement in the attendance of the student, (s)he will be issued with an intention to report letter.

10. Students who have a projected final attendance for any given semester which is below 70%, are reported to DIAC for unsatisfactory attendance through the PRISMS system, in accordance with item 11 below.

11. Where it has been decided that a student is to be reported for unsatisfactory attendance, they are advised in writing that it is ANC’s intention to report them for the breach of their visa conditions and that they have 20 working days to access the appeals process. They are also advised that they must continue to attend during the 20 days. If a student chooses to appeal, subsequent steps are determined by the outcome of the appeal. If the student does not appeal, (s)he is reported through the PRISMS system after 20 days of notification, or 23 days where the Intention to Report letter was sent by mail.
12. Where the student's course duration is more than one semester, attendance is reset on a semester basis. That is, attendance is recorded and calculated over a semester. A semester is deemed to be a period of 6 months commencing from the student's date of commencement. Where the course length is less than one semester, attendance is recorded and calculated over the period of the Confirmation of Enrolment (CoE).

13. Student counselling is performed by the Training Coordinator and booked through Administration.

14. Where a student fails to attend a scheduled counselling session without informing either the Student Training Coordinator or Administration prior to the scheduled date, that student is flagged by the Student Training Coordinator on the following week's class roll. Trainers/Assessors will then send the student to the Training Coordinator to reschedule the appointment. If the student misses the rescheduled date, the student is advising in writing of ANC’s intention to report for unsatisfactory attendance.

15. ANC student's current attendance percentage is calculated based on a minimum attendance requirement to 20 hours per week over 29 week terms. Given 9 week intakes, the electronic record keeping system calculates the number of possible sessions which could have been attended then divides this by the number attended (based on the number of recorded absences). The final projected attendance assumes that the student will attend 100% of their allocated sessions. In calculation of the number of possible sessions, extra sessions attended by the student are added and the number possible is reduced where there is a recorded deferment.

16. A student is marked absent for a session where they are late or leave early for a session by more than 10% of the sessions allocated time unless previously arranged with the Trainer/Assessor of that session.

17. A student is marked absent irrespective of provision of subsequent Medical Certificates. Medical Certificates are maintained on file within the student's administrative file and may be used in consideration of a student's circumstances during counselling and/or appeal. These may also be requested by DIAC where a student has been reported for unsatisfactory attendance.
18. All records of counselling, Medical Certificates and individual attendance reports are to be physically attached within the student's file. Arnos style fasteners are used for this purpose secured within a manilla folder. Documents should be placed into the file in chronological order such that the oldest documents are at the bottom and newest on top showing the communication with the student in the order it occurs.

Loosely stored documents or wallets which do not secure the documents in place are not suitable for these records.

19. Individual attendance reports are provided to students at their request. Any such requests should be made at Reception and they will be made available for collection from Reception within 3 working days.

The Training Coordinator produces the report using electronic record keeping system and signs it. If (s)he is not available, this role is performed by the Academic Director. A copy of the report is filed in the student's administrative file. This documentation may be requested by DIAC where a student has been reported for unsatisfactory attendance.


21. All reporting though the PRISMS system is conducted by the Campus officer.
7.0 Environmental Requirements

Documents:

documented attendance policies and procedures that: specifies the requirements for achieving satisfactory attendance progress with a minimum attendance requirement of 80 per cent of scheduled contact hours specifies how attendance and absences are recorded and calculated specifies the process for assessing satisfactory attendance determines the point at which the student has failed to meet satisfactory attendance requirements, and enables notification to students that they have failed to meet satisfactory attendance requirement.

written notification to students where the intention is to report them to DEST via PRISMS as not achieving satisfactory attendance progress. The students also need to be informed that they have 20 working days in which to access the provider’s complaints and appeals process before that report will be made.

where a student breaches the 80 per cent attendance requirement, a provider need not report a student here the:

- documents indicate that the decision not to report is consistent with the documented attendance policies and procedures for vocational and education and non-award courses (see section 11.1)
  1. Student records clearly show attendance for each enrolled unit and confirm that a student is attending at least 70 per cent of the enrolled scheduled course hours. for ELICOS and school courses (see section 11.1)
  2. Documentary evidence from a student clearly shows compassionate or compelling circumstances when applicable
  3. Records confirm that a student is attending at least 70 per cent of the enrolled scheduled course hours

Knowledge:

- Section 19 of the ESOS Act
- Standard 8 (Complaints and appeals)
- Student visa conditions relating to attendance – Condition 8202
- Students and staff must have knowledge of appropriate attendance progress policies and
procedures for each course

- Students and staff need to understand that students due to be reported for failing to achieve satisfactory attendance have 20 days to access the provider's complaints and appeals process
- Institution's complaints and appeals processes.

Procedures:

Attendance procedures and policies for each course:

- specifies requirements, that are communicated to staff and students, for achieving satisfactory attendance progress where there is a minimum attendance requirement of 80 per cent of scheduled contact hours establishes how attendances and absences are recorded and calculated specifies assessment of satisfactory attendance indicates the process for determining the point at which the student has failed to meet satisfactory attendance requirements, and specifies the process for notifying of students that they have failed to meet satisfactory attendance requirements.

Intervention procedure for students at risk of failing to achieve satisfactory attendance to be activated before the student's attendance falls below 80% of the scheduled contact hours and which includes:

- procedures for contacting and counselling identified students who have been absent for more than five consecutive days without approval.

Procedure for 1) tracking those students assessed as not meeting attendance requirements and who have not chosen to access the complaints and appeals process, withdrawn from that process or where the decision supports the provider and consequently, 2) reporting those students to DEST via PRISMS as soon as practicable.

8.0 Primary Responsibility

Training Coordinator
WARNING LETTER TEMPLATES
INFORMAL WARNING ON CURRENT ATTENDANCE (CURRENT ATTENDANCE BELOW 80%)

<Date>

<Student Name>
<Student Number>
<Address>

Dear <Student Name>

RE: Unsatisfactory current attendance in <Course Name>

Your current attendance percentage is <Current Attendance %> which is below the 80% average we would consider the minimum requirement to develop your academic performance at a satisfactory rate.

I would like to remind you of your obligation to attend a minimum of 80% of all scheduled classes over each 6 month period (semester). Your current attendance will affect your overall attendance and if your overall attendance is unsatisfactory, you may be reported to the Department of Immigration and Citizenship (DIAC). Further, unsatisfactory attendance may affect your academic performance and likewise, you may be reported to DIAC for unsatisfactory academic performance.

If your attendance does not improve, you will be required to make an appointment with the Training Co-ordinator to address any barriers you may have to attending at a satisfactory rate. During this meeting, an intervention strategy, such as additional scheduled classes, may be applied to ensure your satisfactory progress through the program.
Please do not hesitate to contact me should you have any enquiries relating to this notification or any other issues or requirements.

Training Co-ordinator
FORMAL ATTENDANCE WARNING (FINAL PROJECTED ATTENDANCE BELOW 80%)

<Date>

<Student Name>
<Student Number>
<Address>

Dear <Student Name>

RE: Unsatisfactory attendance in <Course Name>

Your maximum achievable attendance over a semester period is <Attendance %>. You are required to schedule a meeting with either the Training Co-ordinator to discuss your attendance and a possible intervention strategy. The meeting may be scheduled at Reception and you are required to schedule this meeting within 5 days of receipt of this notification.

I would like to remind you of your obligation to attend a minimum of 80% of all scheduled classes over each 6 month period (Semester). Your current attendance effects your overall attendance and if your overall attendance is unsatisfactory, you may be reported to the Department of Immigration and Citizenship (DIAC). Further, unsatisfactory attendance may affect your academic performance and likewise, you may be reported to DIAC for unsatisfactory academic performance.

Should you fail to schedule a meeting or fail to attend the scheduled meeting, you may be issued with an Intention to Report for Unsatisfactory Attendance as required under section 20 of the Educational Services for Overseas Students Act 2000 (ESOS Act).
Please do not hesitate to contact me should you have any enquiries relating to this notification or any other issues or requirements.

Training Coordinator
INTENTION TO REPORT

<Date>

<Student Name>
<Student Number>
<Address>

Dear <Student Name>

RE: Written notice of intention to report for unsatisfactory progress or attendance in <Course Name>

Under section 20 of the Education Services for Overseas Students Act 2000 (ESOS Act), if we believe that a student is not meeting the attendance or satisfactory academic performance requirements of condition 8202, we are obliged to notify the student and the Department of Immigration Citizenship (DIAC).

You have been counselled regarding either your academic performance or attendance. ANC has given you every fair and reasonable opportunity to improve your academic performance and/or attendance. These opportunities have been documented through counselling session notes and various letters and warnings sent to you. These documents outline our application of the ANC Intervention strategy and the processes were designed to assist you in a satisfactory course outcome. You have failed to embrace these opportunities and as a result we are obliged to report you to DIAC for unsatisfactory academic performance and/or performance.

If you think there are reasons why you should not be reported, you are able to access the ANC complaints and appeals process under Standard 8 of The National Code 2007 and have 20 working days from the date of this letter in which to do so. You may appeal on the following grounds:

i. ANC’s failure to record or calculate a student’s marks accurately,

ii. compassionate or compelling circumstances, or

iii. ANC has not implemented its intervention strategy and other policies according to its documented policies and procedures that have been made available to you.

A copy of the complaints and appeals process is available from Administration and was provided to you during orientation. During the 20 days in which you have time to lodge the appeal (and if you
choose to make an appeal, while your appeal is being considered) you must continue to attend classes and work towards completing course requirements.

Where your appeal is successful, the outcomes may vary according to the findings of the appeals process.

i. If the appeal shows that there was an error in calculation, and you actually made satisfactory course progress, ANC will not report you, and there is no requirement for intervention.

ii. If the appeals process shows that you have not made satisfactory progress, but there are compassionate or compelling reasons for the lack of progress, ongoing support will be provided to you through our intervention, and ANC will not report you.

If you wish to discuss this matter further, please make an appointment with Chief Executive Officer. You can bring a friend with you if you wish.

Training Co-ordinator