



Monitoring and Reporting Attendance Policy & Procedure

Purpose

Institute of Intellect Blending (IIB) safeguards the integrity of Australia's migration laws by supporting overseas students to complete their course within the required duration and fulfil their student visa requirements for satisfactory attendance.

Policy Statement

To address the requirements of Standard 8 of *National Code of Practice 2018*, IIB monitors overseas student's attendance for each course which the student is enrolled to ensure that the expected duration of study specified in the student's CoE does not exceed the CRICOS registered duration through effective recording, monitoring and reporting attendance processes.

IIB is responsible for monitoring students' attendance records. Students whose attendance falls below 80% and it is clear that the student will not be able to reach 80% by the end of a study period must be reported on PRISMS, except in circumstances defined in this policy.

To ensure that students and staff understand their responsibilities in relation to these requirements and the consequences of poor attendance, the following procedures outline the steps the College will take to identify students at risk and provide counselling support, monitor and report attendance, and indicate the appeals process available to students whose attendance has been identified as unsatisfactory.

This policy outlines IIB requirements for the following:

- a) Requirements for achieving satisfactory attendance for VET courses under Standard 8
- b) Informing students of attendance requirements
- c) Verbal and written notification to students of attendance requirements
- d) Attendance Recording
- e) Calculation of attendance record
- f) Leave of absence
- g) Identifying students at risk
- h) Intervention strategy to identify and offer support to those students at risk of not meeting attendance Requirements
- i) Notification to Students of Attendance Requirements
- j) Reporting unsatisfactory attendance including student right to appeal
- k) Notification of breach of attendance requirements
- l) Reporting and Appeals procedure
- m) Outcomes of the appeals procedure
- n) Complaints and external appeals
- o) Allowable extensions of course duration



Procedures

Requirements for achieving satisfactory attendance under Standard 8

IIB monitors and records the attendance of overseas students specifying:

- Students are required to achieve satisfactory attendance for a course(s) which is set at a minimum of 80% of scheduled contact hours or higher if specified in state or territory legislation or other regulatory requirements.
- There are systematic methods in place for working out minimum attendance under Standard 8.
- There are clearly documented processes for recording attendance.
- Intervention strategies are in place to identify, notify and assist overseas students who have been absent for five (5) consecutive days or above without approval, or who are at risk of not meeting attendance requirements before the overseas students' attendance drops below 80%.
- Processes for determining the point at which the overseas student has failed to meet satisfactory course attendance.

Informing students of attendance requirements

IIB clearly outlines and informs overseas students details of the requirements to achieve satisfactory attendance for each study period through the following means:

- Pre-enrolment guide which includes but not limited to attendance information from the website, flyers, prospectus etc
- Inclusion of the policies and procedures in the Student Handbook
- Induction during Student Orientation programs
- Thorough training of all Trainers to implement this policy and recording of sessions

Attendance recording (VET)

The College offers 15 hours of face-to-face delivery and 5 hours of online study per week. Attendance is kept daily and sent to Student Services Officer at the end of each week.

Face to face delivery

- The trainer will record the student attendance every class on the attendance roll.
- The trainer will record students' arrival and departure times on attendance sheet and students will sign in for their both arrival and departure times.
- If a student is absent from classes or lessons for any reason, the student will be marked absent on the roll.
- If a student is sick, the student must notify the College. A Doctor's certificate must be submitted when the student resumes the class if absent for two or more days. Absent days with doctor certificates will not be deducted from the attendance. However, assessment late submission fees might be waived if a doctor certificate covering assessment days is presented.



Online learning attendance

- IIB allows 5 hours per week of online study in line with the National Code requirements. Online study may take place in the form of readings, quizzes, forum discussions, individual projects and other methods. The instructions for each week will be clearly described within the e-learning platform and one trainer/assessor will be assigned to oversee each Unit of Competency (UOC).
- Online classes are delivered on Microsoft Teams with a trainer allocated for the class.
- Trainers record students' attendance in online classes based on their login and logout times.
- Attendance in online class forms a part of weekly attendance and merged into weekly attendance.

Calculation of attendance record (VET)

- At the end of each week on a Friday, each trainer submits the completed attendance roll for that week to Student Services.
- Student Services finish inputting attendance records for the previous week on student management system on Monday next week.
- Students Service keep and store attendance rolls in designated SharePoint folder and safe storage room.
- Student management system (RTOM) calculates attendance based on students' attendance in both face-to-face delivery and online learning.
- Student management system calculates student's attendance in two different formats: current and projected attendance. While the current attendance represents the students' percentage based on their attendance from the commencement of the term to the current date, the projected attendance represents the maximum percentage, which a student can reach throughout the term.
For example, when a student has 200 contact hours in a study period (10 weeks) at IIB, and is absent for 20 hours in the first week, then their projected attendance is recorded at 90%, i.e., if the student maintains full attendance until the end of the term, their projected attendance will be 90%.
- IIB implements intervention strategies and reports students based on their projected attendance over a study period.

Identifying and Notifying Students at Risk (VET)

Identifying students at risk

- Student Services provides generated weekly report from student management system to monitor students' attendance and to send notification letters accordingly.
- Student Services sends notification/reminder letters to students who are at risk of meeting requirements weekly.

The process of notification/reminder letters and intervention strategy is detailed below:



1st Reminder Letter for Attendance

- When students' projected attendance in a study period falls below **85%**, '1st *Reminder Letter for Attendance*' will be emailed to their registered email address informing them of their current level of attendance and reminding them their visa conditions, and the need to see the Student Services Officer for possible intervention.
- In this letter, the student is advised to schedule a meeting with the Student Services Officer to discuss the situation and possible outcomes.
- The student and the officer will address the reasons for non-attendance and put in place an intervention strategy to improve the student's attendance. The student needs to explain any extenuating circumstances and provide any supporting documents for absences.
- The meeting will be conducted in a constructive and positive manner, which will allow the student to describe their circumstances. The Student Services Officer will advise, if necessary, further available support, i.e., an appointment with counsellor.
- If required, future meetings will be discussed and confirmed in the meeting.
- The Student Services Officer will fill the *Intervention Plan for Attendance* and note the details of the interview, negotiated intervention strategy and possible future meetings. The student and the officer will sign the form.
- The copies of the reminder letter and intervention plan will be maintained in student files and on student management system.

2nd Reminder Letter for Attendance

- When projected attendance is below to **80%** and they have already received '1st *Reminder Letter for Attendance*', '2nd *Reminder Letter for Attendance*' will be emailed to students' registered email address informing them of their current level of attendance, reminding them their visa conditions and they are at risk of meeting attendance requirements of their visa.
- In this letter, the student is advised to schedule a meeting with the Student Services Officer to discuss the situation and possible outcomes.
- The student and the officer will address the reasons for non-attendance and put in place an intervention strategy to improve the student's attendance. The student needs to explain any extenuating circumstances and provide any supporting documents for absences.
- The meeting will be conducted in a constructive and positive manner, which will allow the student to describe their circumstances. The Student Services Officer will advise, if necessary, further available support, i.e., an appointment with counsellor.
- If required, future meetings will be discussed and confirmed in the meeting.
- The Student Services Officer will fill the intervention plan and note the details of the interview and negotiated intervention strategy. The student and the officer will sign the record.
- The copies of the reminder letter and intervention strategy record will be maintained in student files and on student management system.

Final Reminder Letter for Attendance



- Students with a projected attendance rate below **75%** in a study period and they have already received '1st Reminder Letter for Attendance' & '2nd Reminder Letter for Attendance', will be sent the 'Final Reminder Letter for Attendance' for breaching their visa conditions in accordance with the procedures in this policy.
- In this letter, the student is advised to schedule a meeting with the Academic Manager or Academic Coordinator to discuss the situation and possible outcomes.
- The student needs to explain any extenuating circumstances and provide any supporting documents for absences.
- The Academic Manager or Academic Coordinator will make decision if the student's unsatisfactory attendance will affect the academic progress, and put in place an intervention strategy to improve the student's attendance.
- The Academic Manager or Academic Coordinator will fill the intervention plan and note the details of the interview and negotiated intervention strategy. The student and the Academic Manager or Academic Coordinator will sign the record.
- The copies of the reminder letter and intervention strategy record will be maintained in student files and on student management system.

Attendance recording (ELICOS)

The College offers 20 hours of face-to-face ELICOS delivery per week. Attendance is kept daily and sent to Student Services Officer at the end of each week.

Face to face delivery

- The ELICOS teacher will record the student attendance every class on the attendance roll.
- The ELICOS teacher will record students' arrival and departure times on attendance sheet and students will sign in for their both arrival and departure times.
- If a student is absent from classes or lessons for any reason, the student will be marked absent on the roll.
- If a student is sick, the student must notify the College. A Doctor's certificate must be submitted when the student resumes the class if absent for two or more days. Absent days with doctor certificates will not be deducted from the attendance.

Calculation of attendance record (ELICOS)

- At the end of each week on a Friday, each ELICOS teacher submits the completed attendance roll for that week to Student Services.
- Student Services finish inputting attendance records for the previous week on student management system on Monday next week.
- Student Services keep and store attendance rolls in designated and safe storage room.
- Student management system (RTOM) calculates attendance based on students' attendance in both face-to-face delivery and online learning.
- Student management system calculates student's attendance in two different formats: current and projected attendance. While the current attendance represents the students' percentage based on their attendance from the commencement of the



term to the current date, the projected attendance represents the maximum percentage, which a student can reach throughout the term.

For example, when a student has 200 contact hours in a study period (10 weeks) at IIB, and is absent for 20 hours in the first week, then their projected attendance is recorded at 90%, i.e., if the student maintains full attendance until the end of the term, their projected attendance will be 90%.

- IIB implements intervention strategies based on their current attendance, and reports students based on their projected attendance over study period in their CoE.

Identifying and Notifying Students at Risk (ELICOS)

Identifying students at risk

- At risk students are initially identified as having failed to meet satisfactory attendance requirements if they have been absent from class for **5** consecutive days or above without approval.
- Student Services provides generated weekly report from student management system to monitor students' attendance and to send notification letters accordingly.
- Student Services sends notification/reminder letters to students who are at risk of meeting requirements weekly.

The process of notification/warning letters and intervention strategy is detailed below:

Consecutive Absence Warning Letter

- When a student is absent for more than **5 consecutive days**, he/she will be sent 'Consecutive Absence Reminder Letter'.
- In this letter, students will be reminded attendance requirements and advised to attend a meeting with the Student Services Officer to discuss possible reasons and actions for their absence.
- The meeting with the Student Services Officer will be conducted in a constructive and positive manner, which will allow the student to describe their circumstances. The Student Services Officer will advise, if necessary, further available support, i.e., an appointment with counsellor.
- If students do not contact the college regarding the absence, further action might be taken to contact the student.

1st Warning Letter for Attendance

- When students' current attendance in a study period falls below **90%**, '1st Warning Letter for Attendance' will be emailed to their registered email address informing them of their current level of attendance and reminding them their visa conditions, and the need to see the Student Services Officer for possible intervention.
- In this letter, the student is advised to schedule a meeting with the Student Services Officer to discuss the situation and possible outcomes.
- The student and the officer will address the reasons for non-attendance and put in place an intervention strategy to improve the student's attendance. The student needs to explain any extenuating circumstances and provide any supporting documents for absences.



- The meeting will be conducted in a constructive and positive manner, which will allow the student to describe their circumstances. The Student Services Officer will advise, if necessary, further available support, i.e., an appointment with counsellor.
- If required, future meetings will be discussed and confirmed in the meeting.
- The Student Services Officer will fill the *Intervention Plan for Attendance* and note the details of the interview, negotiated intervention strategy and possible future meetings. The student and the officer will sign the form.
- The copies of the warning letter and intervention plan will be maintained in student files and on student management system.

2nd Warning Letter for Attendance

- When current attendance is below to **85%** and they have already received '1st Warning Letter for Attendance', '2nd Warning Letter for Attendance' will be emailed to students' registered email address informing them of their current level of attendance, reminding them their visa conditions and they are at risk of meeting attendance requirements of their visa.
- In this letter, the student is advised to schedule a meeting with the Student Services Officer to discuss the situation and possible outcomes.
- The student and the officer will address the reasons for non-attendance and put in place an intervention strategy to improve the student's attendance. The student needs to explain any extenuating circumstances and provide any supporting documents for absences.
- The Student Services Officer will also schedule an appointment with counsellor for the student. The Counsellor will fill the intervention plan and note the details of the interview and negotiated intervention strategy. The student and the officer will sign the record.
- If required, future meetings will be discussed and confirmed in the meeting.
- The copies of the warning letter and intervention strategy record will be maintained in student files and on student management system.

Notification of Intention to Report

- Students with a projected attendance rate below **80%** in their study period and they have already received '1st Warning Letter for Attendance' & '2nd Warning Letter for Attendance', will be sent the 'Notification of Intention to Report' for breaching their visa conditions in accordance with the procedures in this policy.
- In the 'Notification of Intention to Report', students are informed about their right to start internal appeal process within 20 working days. Students also have the right to appeal externally for 20 days following the lapse of the internal appeal process.
- The notification will also include advice:
 - As to whom to contact if the student wishes to discuss the implications of their breach of the attendance requirements and the appeals process, for example, the Academic Manager or Student Services Officer.
 - That if lodging an appeal, it is the student's responsibility to clearly identify at that time all the information they hold or are aware of in support of their appeal.



- Note – The Academic Manager may use their discretion to not issue ‘*Notification of Intention to Report*’ to students with attendance above 70% as long as they can clearly demonstrate that compassionate or compelling circumstances (for example illness where a medical certificate states that the student is unable to attend classes) apply and they are maintaining satisfactory course progress as per National Code (Standard 8.15.1).
- All warnings will be sent in writing to the student’s nominated email account and via SMS to their nominated mobile phone numbers. All ‘*Notification of Intention to Report*’ will be sent to nominated residential address as well.
- A copy of Letter of Intention to Report is to be retained in the student file and sent to the Student Services Department.

Intervention Strategy to identify and offer support to those students at risk of not meeting attendance requirements

The Intervention Strategy is an action plan adapted in an attempt to determine and reduce the causes of academic failure. It has been developed to offer students with additional assistance to promoting future success in their studies.

Students identified with, or ‘at risk’ of, academic failure through the Course Completion within Duration, Monitoring Course Progress procedures and Monitoring Attendance procedures, or are experiencing difficulties are eligible for an intervention strategy.

IIB is committed to providing Students with access to the right support which can be both academic and non-academic.

Students who have been advised that the Intervention Strategy has been implemented or are experiencing difficulties are able to see the Students Services Officers to seek advice on what steps can be taken to increase the likelihood of academic success. For non-academic issues the Student Services Officers can assist and make arrangements for additional services such as professional counselling. IIB have a qualified counsellor to deal with these cases.

Intervention Strategy Procedure

- Student Services Officer identifies students at risk and notifies students via e-mail.
- An appointment must be made with the Student Services Officer once the intervention strategy has been implemented or for a student to discuss the problems they are experiencing.
- Assisting students: Intervention meetings will be handled by Student Services staff. The student might be referred to the Academic Manager or other personnel for counselling if required. The intervention plan might consist of the following:
 - Identifying the reason underlying poor attendance including but not limited to:
 - why have the students been absent and what support may be offered
 - compelling and compassionate circumstances (refer to Appendix 1 Compassionate and Compelling Circumstances Definition)
 - illness
 - issues with adjusting to Australian life
 - part time work in Australia is impacting on the student’s attendance



- any other reason including social issues
- Possible support actions include but are not limited to:
 - developing an individual learning contract with the class teacher in order to assist the student with attendance
 - arranging individual sessions with the class teacher for the student to catch up on missed work at an additional cost to the student
 - assigning additional study for the student to undertake to study missed class work
 - identify required support services as per issues raised
 - booking an appointment with counsellor
- Monitoring students:
 - The attendance will be monitored in line with attendance monitoring procedure.
 - When an intervention student's attendance falls below thresholds mentioned previously, he/she will receive warning letters and/or notification of intention to report.
 - If required, Student Services might schedule regular meetings with the students.
- Recording intervention:
 - IIB maintains records of all contact and counselling undertaken with overseas students who have been absent for 5 consecutive days or at risk of not attending at least 80% of the course contact hours to monitor and report unsatisfactory attendance on the student file and SMMS
 - Documentation includes but is not limited to
 - Formal notifications
 - Interview notes
 - Emails

Appeals Procedure

Internal appeals

A student has **20** working days from the date of receipt of the Notification of Intention to Report to lodge an appeal to IIB:

- Appeals must be made in writing to the College using an *Internal Appeal Form* available from Student Services and must include:
 - The reasons for non-attendance (supported by documentary evidence)
 - Any additional information in support of their case.
- Students who are lodging an appeal can request to appear before the Appeals Review Committee
- Students may bring a support person with them to appeals meetings
- The Appeals Review Committee might meet within 10 working days after the end of the appeal period. All reasonable measures will be taken to finalise the process as soon as practicable.
- The Committee will consider:
 - Whether the decision to report the student for unsatisfactory attendance was based on the correct procedures
 - Any mitigating circumstances advanced by or on behalf of the student; and



- Whether the appeal should be upheld or dismissed.
- During the internal appeals process the student will remain enrolled in all courses and is required to continue to attend classes.
- Where the student has chosen not to access the appeals processes within the 20-working day period, or withdraws from the process, the Student Service Department will be notified and student's CoE will be cancelled on PRISMS.

Outcomes of the Appeals Procedures

- The student will be notified of the outcome of the internal appeals process within 10 working days of hearing the appeal.
- If the Appeals Review Committee determines that processes have not been appropriately followed, or that circumstances (e.g., extended illness) have prevented the student from attending, and if attendance has not fallen below the discretionary minimum allowed under Standard 8 of the National Code and the ESOS Act, it may uphold the appeal and not report the student's non-attendance on PRISMS. The student will be notified in writing that the appeal has been upheld.
- If the Appeals Review Committee determines that due process has been followed and that there are no mitigating circumstances, it will dismiss the appeal and advise the Student Services Department to issue the student with 'Unsuccessful Appeal' letter.
- This final letter will outline the options to access the College's Complaints & Appeals procedures and the External Student Appeals agent, the Commonwealth Ombudsman, to lodge an external appeal.

Complaints and External Appeals

- If the student is dissatisfied with the outcome of the Appeals Review Committee, the student has the right to refer his/her complaint and access external complaints processes such as the **Commonwealth Ombudsman** within 10 working days from the date advised in the 'Unsuccessful Appeal Letter' letter and must advise the Student Services Department in writing that the student has lodged an appeal.
- The use of the **Commonwealth Ombudsman is a free service for overseas students.**
- Students may choose their own external Student Appeals agent if they wish. Students should inquire about current fees when they contact the agent.
- After 10 working days, if the student has not lodged an external appeal or if the Student Services Department has not been notified of an external appeal, the student will then be reported through PRISMS.
- If the external complaint handling and/or appeal process results in a decision that supports the student, IIB will immediately implement any decision and/or corrective and preventative action required and advise the student of the outcome in writing.

Reporting and Appeals Procedure

IIB complies with the requirements to report unsatisfactory attendance as follows:



- Where IIB has assessed an overseas student as not meeting satisfactory attendance requirements, the student is provided with a written notice within 5 days which:
 - Notifies the overseas student that IIB intends to report the overseas student for unsatisfactory attendance
 - Informs the overseas student of the reasons for the intention to report
 - Advises the student of their right to access IIB's complaints and appeals process, in accordance with Standard 10 (Complaints and Appeals) within 20 working days
- If, at the end of the 20-working day period, the appeals process has not been accessed the College will proceed with the reporting process through PRISMS.
- IIB will make further attempts, within reason, to contact students and instigate the appeal two to three working days prior to reporting.
- If, at the end of the 20 working days period, the appeals process has been accessed and the student's appeal has been denied, the Academic Manager will notify the student in writing of the unsuccessful appeal stating the reasons why the appeal was unsuccessful.
- Students whose appeal is denied are informed of their right to an external appeal with Overseas Students Ombudsman (OSO).
- Students wishing to access an external appeal must do so within 10 working days of the accessing the internal appeal.
- If, at the end of the 20-working day period, the appeals process has been accessed and the student's appeal has been successful, the Academic Manager will notify the student in writing of the successful appeal stating the reasons why the appeal was successful.

IIB will only report unsatisfactory 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 or the recommendation supports IIB, **&/or**
- The overseas student has chosen not to access the internal complaints and appeals processes within the 20-working day period, **&/or**
- The overseas student has chosen not to access the external complaints and appeals process, **&/or**
- The overseas student withdraws from the internal or external appeals processes by notifying IIB in writing, **&/or**
- The appeals process results in a decision in favour of the College.

Students will not be reported for failing to meet the 80% threshold where:

- The student engages the appeals process within 20 working days of receiving a *Notification of Intention to Report* letter **and**
- The student produces documentary evidence clearly demonstrating compassionate or compelling circumstances as per *Appendix 1 Compassionate and Compelling Circumstances Definition* (e.g. Medical illness supported by a medical certificate, major family events or problems, traumatic events or personal problems seriously affecting the student's ability to focus on study) **and**



- The student is making satisfactory course progress **and**
- The student is attending at least 70% of the scheduled course contact hours for the course in which they are enrolled, and the student is maintaining satisfactory course progress.

Allowable extensions of course duration

IIB will not extend the duration of the overseas student's enrolment if the overseas student is unable to complete the course within expected duration, unless:

- There are compassionate or compelling circumstances, as assessed by IIB on the basis of demonstrable evidence (refer to Appendix 1), or
- IIB has implemented, or is in the process of implementing, an intervention strategy for the overseas student because the overseas student is at risk of not meeting attendance requirements, or
- An approved deferral or suspension of the overseas student enrolment has occurred under Standard 9 (deferring, suspending or cancelling a student's enrolment)

If IIB extends the duration of the student's enrolment, IIB advises the student to contact immigration to seek advice on any potential impacts to their visa, including the need to obtain a new visa.

Pro-forma and supporting documents

- VET 1st Reminder Letter for Attendance template
- VET 2nd Reminder Letter for Attendance template
- VET Final Reminder Letter for Attendance template
- ELICOS Absent for 5 consecutive days letter template
- ELICOS 1st Warning Letter for Attendance template
- ELICOS 2nd Warning Letter for Attendance template
- ELICOS Notification of Intention to report for Attendance template
- ELICOS Unsuccessful Appeal Letter
- IIB Internal Appeal Form
- IIB Intervention Plan for Attendance
- Student Wellbeing Support and Counselling Services Policy and Procedure
- Complaints and Appeals Policy



Appendix 1 Compassionate and Compelling Circumstances Definition

'Compassionate or compelling' circumstances are generally those beyond the control of the overseas student and which have an impact upon the overseas student's course progress or wellbeing. These could include, but are not limited to:

- serious illness or injury, where a medical certificate states that the overseas student was unable to attend classes
- bereavement of close family members such as parents or grandparents (where possible a death certificate should be provided)
- major political upheaval or natural disaster in the home country requiring emergency travel and this has impacted on the overseas student's studies; or
- a traumatic experience, which could include:
 - involvement in, or witnessing of a serious accident; or
 - witnessing or being the victim of a serious crime, and this has impacted on the overseas student (these cases should be supported by police or psychologists' reports)
- where the registered provider was unable to offer a pre-requisite unit, or the overseas student has failed a prerequisite unit and therefore faces a shortage of relevant units for which they are eligible to enrol; or
- inability to begin studying on the course commencement date due to delay in receiving a student visa

These are only some examples of what may be considered compassionate or compelling circumstances.

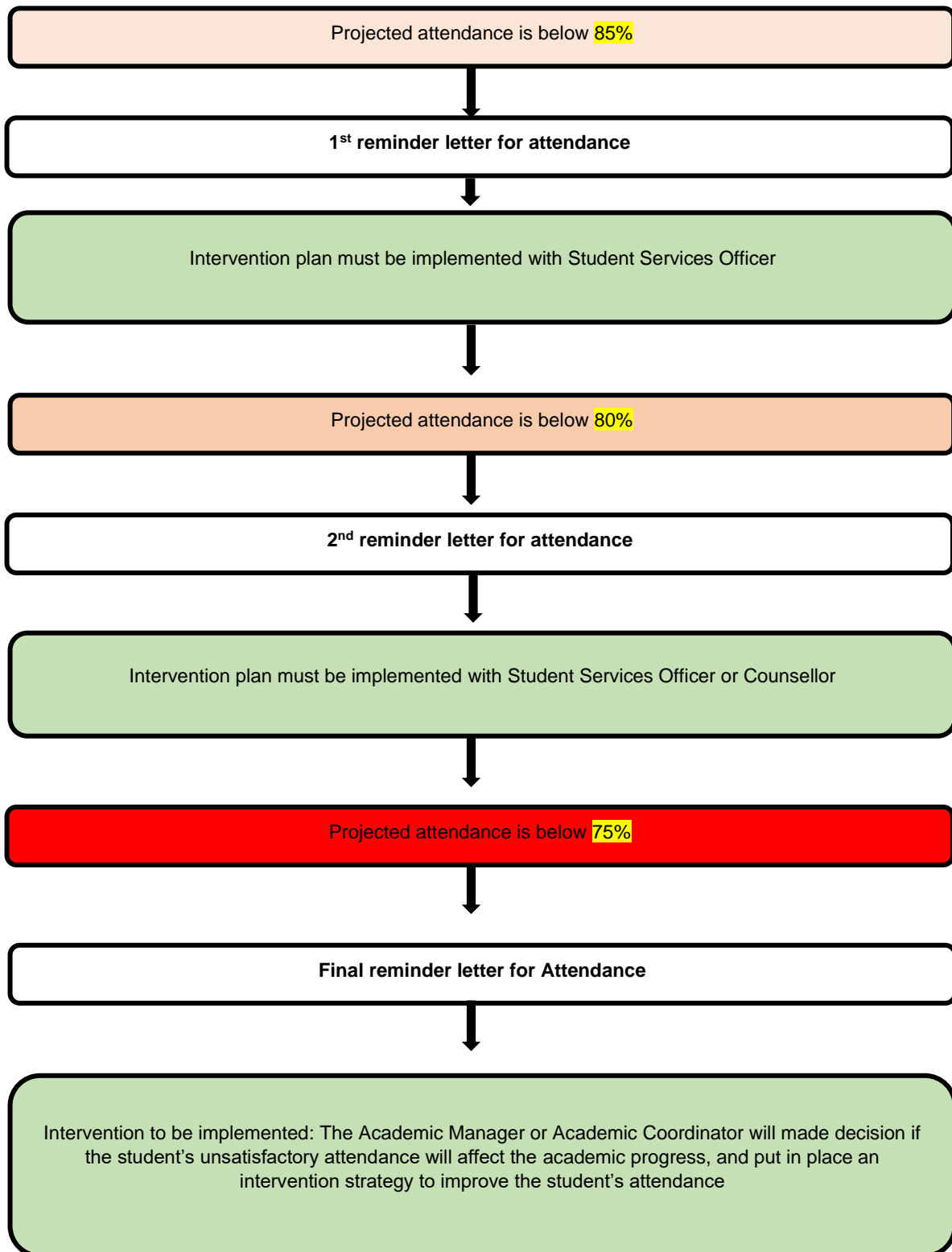
Registered providers should outline what is considered compassionate or compelling circumstances in their own policies and use their professional judgement to assess each case on its individual merits. When determining whether compassionate or compelling circumstances exist, registered providers should consider documentary evidence provided to support the claim, and should keep copies of these documents in the overseas student's file.

(Excerpt from Standard 8 Overseas Student Visa Requirements Guidance Note p.4)



Appendix 2

VET ATTENDANCE MONITORING FLOW CHART





Appendix 3

ELICOS ATTENDANCE MONITORING FLOW CHART

