

CRICOS Attendance Monitoring Policy

Purpose

ECA College systematically monitors student's compliance with student visa conditions relating to attendance and proactively notifies and counsels students who are at risk of failing to meet attendance requirements. ECA College reports students, under section 19 of the ESOS Act, who have breached attendance requirements.

Compliance with National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2007 (7 March 2007):

ECA College complies with the conditions for monitoring attendance as follows:

- Records attendance for each student enrolled in a vocational education and training course for 20 hours per week
- Implements appropriate documented attendance policies and procedures for staff and students that specify:
 - Requirements for achieving satisfactory attendance which at a minimum is 80% scheduled course contact hours
 - Manner in which attendances and absences are recorded and calculated
 - Process for assessing satisfactory attendance
 - Process for determining the point at which the student has failed to meet satisfactory attendance requirements
 - Procedure for notifying students that have failed to meet satisfactory attendance requirements
- Contacts and counsels students who have:
 - Been absent five (5) or more consecutive days without approval, or
 - At risk of not attending at least 80% of the scheduled course hours prior to the attendance falling below 80%
- Regularly assess student attendance in accordance with this attendance policy and procedures
- Where a student has been assessed as not meeting satisfactory attendance, notify the student in writing of intention to report for not achieving satisfactory.
- The written notice informs the student that he/she is able to access ECA College complaints and appeals process and the student has 20 working days in which to do so
- In cases where a student has chosen not to access the complaints and appeals process within the 20 day working period, withdraws from the process, or the process is completed and results in a decision, the student is reported on PRISMS for not achieving satisfactory attendance as soon as practicable
- ECA College may decide not to report the student for breaching the 80% attendance requirement where the:

- decision is consistent with documented attendance policies and procedures; and
- student records clearly indicate that the student is maintaining satisfactory course progress; and
- student records confirm that the student is attending at least 70% of the scheduled course contact hours for the course in which they are enrolled

Attendance Recording Process:

Student attendance is recorded to ensure that students attend 80% of required scheduled hours as follows:

- Trainer goes to the Daily Attendance Roll on RTO Manager and prints off the Attendance Checklist System for their class prior to commencement
- The RTO Manager generated class roll contains the following information:
 - Student ID
 - Student name
 - Status
 - Time
- The trainer must manually include the following information against each student name on the class roll
 - Arrival time
 - Departure time
 - In cases where a student has arrived late, left early or taken a longer break, the actual time(s)
 - Student signature at the end of the day
 - Trainer signature to verify the accuracy of the information
- The trainer enters the attendance details from the Daily Attendance Roll onto RTO Manager
- Trainer gives the completed signed copy of the Daily Attendance to the Attendance Intervention Officer to maintain in the attendance files

Monitoring Attendance:

The Student Services Attendance Intervention Officer is responsible for monitoring students' attendance and managing the attendance intervention system for students who fail to maintain satisfactory attendance.

If any student misses more than 5 classes (20+ continuous hours) without contact and explanation, the Student Services/Attendance Intervention Officer runs a weekly RTO Manager generated report that identifies these students. The Student Services/ Attendance Intervention Officer will send these students an **Extended Absence Warning** Email requiring them to contact the Student Services/ Attendance Intervention Officer within two (2) days for an appointment, counselling and additional support if needed.

Student attendance at each class is recorded in RTO Manager Courses and monitored by the Student Services/ Attendance Intervention Officer fortnightly in addition to the weekly monitoring above. The Student Services/Attendance Intervention officer will produce an RTO Manager generated report which identifies students who are at risk of not attending at least

84% of the class hours for the study period and those whose attendance is approaching unsatisfactory (under 80%).

The Student Services / Attendance Intervention Officer will send a warning to all students identified in the report. There are three different warnings:

1. **Attendance At Risk Warning** email if student projected attendance falls to between 80 to 84 per cent. Students will be advised of attendance requirements and informed of counselling assistance if it is required.
2. **Unsatisfactory Attendance Warning** letter via email if projected attendance is likely to be between 70 and 80%, and the student is making satisfactory academic progress. The Warning will remind the student of attendance requirements, to meet the Attendance Intervention Officer and agree to an Attendance Agreement, and student will be counselled and offered professional assistance.
3. **Unsatisfactory Attendance Intention to Report** letter by email if projected attendance is likely to be below 70% and student is not making satisfactory academic progress; This letter will advise students of ECA College intention to report to DET and DIBP via PRISMS, that being reported could affect student visa status, and the student's right to appeal against being reported within 20 working days of being sent the letter.

If the student has Compassionate and Compelling Circumstances which have affected their attendance, these may be taken into consideration during any appeal they make if a Leave of Absence Application and supporting documents are submitted

Contacting 'At Risk' Students:

Any student deemed at risk of not meeting satisfactory attendance requirements through monitoring processes will be contacted by the Student Services/Attendance Intervention Officer who commences the intervention process to identify the problem and if additional support or referral to other services is required.

The Director of Studies or Assistant Director of Studies will consult with students who have had prior intervention to identify why intervention has not resulted in improvements. These at risk students will be reminded that a condition of their student visa is that they must maintain satisfactory attendance.

Students that have a documented history of non-attendance and/or who do not respond to requests to meet will receive an intention to report the breach of student visa conditions on PRISMS.

Intention to Report and Appeal:

A student that receives an Intention to Report has 20 working days to submit an appeal during which time ECA College will continue to deliver the course and related services to the student. The student may appeal against the Intention to Report by providing grounds that clearly state:

- reason for the absence
- duration of absence
- supporting evidence that can be verified

The process of dealing with an appeal commences within 20 working days of receiving the appeal with outcomes likely to be as follows:

- **Successful appeal:**

the student is formally notified by the Director of Studies or Assistant Director of Studies that the appeal was successful including any conditions that must be met and maintained by the student

- **Unsuccessful appeal:** the student is formally notified by the National Principal that the appeal was unsuccessful including the reasons for the decision and:

- giving the student a further 20 working days to make an external appeal as published for external organisations including the NSW Ombudsman and Overseas Students Ombudsman
- ECA College will maintain the student's enrolment during the external appeals process
- If the external appeals process supports the student, their enrolment will be maintained as per formal notification
- If the external appeal does not support the student, the student will be reported on PRISMS and RTO Manager

- Where the student withdraws from an appeal, neglects or chooses not to appeal within the twenty (20) working days, the student will be reported on PRISMS (see below)

- In cases where ECA College requires 30 days or more to process an appeal, the student will receive formal notification including the reasons why the time frame will exceed 30 days. During this time the student will maintain their enrolment and notification on PRISMS will be put on hold until an appeals outcome has been reached.

Reporting 'At Risk' Students:

ECA College uses PRISMS to report any student that has not met attendance requirements and ensures that:

- The student has been contacted and counselled; and
- Issued a formal Intention to Report; and
- Allowed students 20 days to avail themselves of the complaints and appeals process

An 'At Risk Student' will be reported on PRISMS as soon as practicable as follows:

- Student has chosen not to access the complaints and appeals process within the 20 days
- Student withdraws from the process; or
- process is completed and results in a decision that supports ECA College to report on PRISMS for not achieving satisfactory attendance

ECA College may decide not to report the student for breaching the 80% attendance requirement where the:

- decision is consistent with documented attendance policies and procedures; and

- student records clearly indicate that the student is maintaining satisfactory course progress; and
- student records confirm that the student is attending at least 70% of the scheduled course contact hours for the course in which they are enrolled

Final approval to report a student on PRISMS for unsuccessful attendance progress can only be authorised by the National Principal to ensure that all evidence and the timeframes for reporting have adhered to the Standards.

Maintaining Records:

Documented appropriate, formal records used to monitor attendance must be maintained and include but are not limited to:

- records of all contact with students:
 - warning letter(s)
 - Student Interview Form(s) (signed and dated for every interview)
- notices of intention to report
- complaints and appeals outcomes
- PRISMS Reporting Form
- other relevant records