

MONITORING STUDENT ATTENDANCE

1. PURPOSE

This policy and set of associated procedures documents the monitoring of each student's attendance, where the absence of such procedures could adversely affect compliance with the requirements of the *National Code of Practice for Providers of Education and Training to Overseas Students 2018* (National Code 2018) – Standard 8.

2. SCOPE

This policy applies to all trading divisions of the Study Group Australia – University Partnerships (SGA-UP) in accordance with Standard 8 of the National Code 2018.

3. POLICY

SGA-UP will systematically monitor students' compliance with student visa conditions and requirements relating to attendance over the length of each study period. It will be proactive in notifying and counselling students who are at risk of failing to meet the attendance requirements of at least 80 per cent of the scheduled course contact hours.

The SGA-UP attendance policy is in support of the SGA-UP monitoring course progress policy. Tutors will discuss assessments in almost every class. Assessment activities will take place during many classes and weekly. Because of this, it is essential that students attend and participate in the activities of every class. Accurate records will be kept of each student's attendance of scheduled classes. SGA-UP will monitor attendance for all students irrespective of course. The expected duration of study specified in the students CoE will not exceed the CRICOS registered duration of courses. SGA-UP will ensure that students adhere to class timetables and action intervention strategies where a student's attendance is at risk of falling below the desired 80 percent.

In certain cases, SGA-UP will decide not to report an overseas student for breaching attendance requirements, if the overseas student is still attending at least 70 percent of the scheduled course contact hours. Or there are exceptional compassionate or compelling circumstances wherein the student has provided evidence for his dropping attendance

The notification and counselling will commence before the student's attendance falls below the 80 per cent level for the designated study period. The student will be informed that if his or her attendance falls below the required level and compelling and compassionate circumstances do not apply, 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, SGA-UP will refer the student to the Department of Home Affairs (DHA).

Attendance is monitored and reported according to the requirements of the National Code 2018 for the following SGA-UP programs:

- Taylors English Language Program
- Taylors High School programs
- Taylors Foundation programs
- ANU College foundation programs
- Flinders International Study Centre foundation programs
- Academic English Preparation

SGA-UP believes that monitoring of attendance constitutes best practice. Attendance monitoring is only a facet of the academic progress procedures for the following programs:

- CSU programs
- Flinders International Study Centre diploma programs
- Taylors College diploma programs

All monitoring for reporting purposes will be in accordance with the requirements of the National Code 2018 Explanatory Guide for Standard 8, which is located at:

<https://internationaleducation.gov.au/Regulatory-Information/Pages/National-Code-2018-Factsheets-.aspx>

4. RESPONSIBILITIES

It is the responsibility of the classroom teacher to keep accurate records of student attendance by correctly marking the class roll in every lesson. Teachers who are concerned about the attendance of a particular student should notify relevant student support services or student welfare staff. According to the procedures implemented at the campus level, student support staff and/or student welfare staff are responsible for monitoring and reporting on student attendance.

5. PROCEDURES FOR DETERMINING, RECORDING AND REPORTING UPON ATTENDANCE

Procedures for reporting upon students who are at risk due to poor attendance are implemented at the campus level. There may be a number of reporting phases. At each reporting phase, a student identified as being at risk will be subject to an intervention strategy.

Intervention strategies include:

- referral for counselling relating to study skills/motivation/personal issues
- referral to Student Support Services or Student Welfare Services with regard to living arrangements
- assistance to the student in developing a tutorial programme to complement their standard classes
- alerting all teaching staff to students at risk
- development of an agreement with the student detailing the intervention strategy and expectations, to be signed by the student
- addition to the participant list of the staff member who will oversee the at risk student's participation in the intervention strategy
- a letter to the student and parents/sponsors, if the student is under 18, explaining the consequences of continued non-attendance and the assistance offered by the SGA-UP
- telephone communication with parents, if the student is under 18, detailing the contents of the letter

If a student is undertaking a course leading to another course at a partner university, the partner university is informed of any variation in the student's study programme (unit withdrawals).

6. SPECIAL CONSIDERATION

It is understood that from time to time, a student may not be able to attend classes due to circumstances beyond his/her control. Where this occurs, special consideration will be given if the circumstances are compassionate or compelling, and sufficient valid evidence is provided by the student to justify this consideration.

In such cases, SGA-UP may agree to continue the enrolment of a student whose attendance has fallen below 80 per cent within any study period the student:

- the student was previously maintaining satisfactory course progress; and
- the student was previously maintaining satisfactory attendance; and
- the student attended at least 70 per cent of the scheduled course contact hours.

6.1 COMPASSIONATE OR COMPELLING CIRCUMSTANCES

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

- a. serious illness or injury, where a medical certificate states that the student was unable to attend classes;
- b. bereavement of a close family member such as a parent or grandparent (where possible a death certificate should be provided);
- c. major political upheaval or natural disaster in the student's region of origin requiring emergency travel and this has impacted on the student's studies; or
- d. 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 student (these cases should be supported by police or psychologists' reports)

Please note that the above are only some examples of what may be considered compassionate or compelling circumstances. The designated manager will use his/her professional judgement to assess each case on its individual merits.

When determining whether compassionate or compelling circumstances exist, the designated manager will consider documentary evidence provided to support the claim, and will keep copies of these documents in the student's file.

7 REPORTING OF INTERNATIONAL STUDENTS

7.1 Letter of Intention to Report

The relevant Student Support Services or Student Welfare Manager, in consultation with the Academic Manager, is responsible for the process of notifying students during each study period who have not met the attendance requirements. These students will be handed a letter notifying them of SGA's intention to report to DHA for unsatisfactory attendance. A copy of the letter is mailed to the student's parents (and sponsor, if applicable), if the student is under 18. The student has 20 working days from a date specified in the letter to invoke the SGA complaints and appeals process to appeal the decision to report.

SGA-UP will maintain the student's enrolment in the course while the Complaints and Appeals process, including the External Case Review process, is underway.

Appeal by the means of engaging an External Review – Overseas Student Ombudsman (The Office of Training Advocate in South Australia)

In the event of the complainant remaining dissatisfied with the result or conduct of SGA-UP's internal procedures for handling of the complaint, the complainant in relation to being reported to DHA, has the right to access an external appeals process. The College recommends the student contact the International Ombudsman who provides an External Students Appeals Service. This service is free of charge. The form is available from the website: <http://www.oso.gov.au/making-a-complaint>

SGA-UP will not report the student to the DHA until the external case review process is complete and the findings have supported SGA-UP's decision

7.2 Reporting to DHA

Once a decision to report to DHA is made, the student may or may not choose to access SGA's complaints and appeals process. If an international student who has not met the mandatory attendance conditions, accesses the Complaints and Appeals Process within the required 20 working days, and the process results in a decision that supports SGA, SGA must report to the Department of Education and Training (DET) and DHA as soon as possible that the student is not achieving satisfactory attendance. The College will keep a copy of the document in the student's file.

Where an international student who has not met the mandatory attendance condition chooses not to access the Complaints and Appeals Process within the required 20 working days, SGA must report to DET and DHA as soon as possible that the student is not achieving satisfactory attendance.

This provision applies to both current accepted students and former accepted students (e.g. A student cannot avoid being reported for failure to satisfactory attendance by cancelling his/her CoE with a SGA-UP provider).

DHA may cancel a student's visa based on the SGA's assessment of a student's attendance. DHA does not assess whether a breach has occurred, that is done by SGA. However, DHA does retain the ability to consider exceptional circumstances as to why the visa should not be cancelled and to refer the matter back to SGA if it has not given the student access to an appropriate appeals process or considered compelling and compassionate circumstances, where relevant. It is expected that these circumstances will be limited.

Approval and Review

Monitoring Student Attendance	
ELT Custodian	Executive Directors, HE, VET and UP
Policy owner	Head of Compliance
Version Number	5.1 December 2017
Approval Authority 1	Executive Directors
Approval Authority 2	Head of Compliance
Approval Date	December 2017
Implementation Date	01 January 2018
Next Review Date	2021

APPENDIX A – SAMPLE LETTERS**SAMPLE LETTER ABOUT ABSENCE**

[DATE]

[STUDENT NAME1] [STUDENT NAME2]

[ADDRESS1]

ADDRESS2]

Dear [STUDENT NAME1]

Through my regular checks of the College Attendance Rolls, it has come to my attention that your recent attendance has been less than satisfactory.

As an international student, your student visa conditions state that you **must** attend at least 80% of the contact hours scheduled for each term. The College is required to report any students who do not maintain satisfy attendance in their course to the Secretary of the Department of Education and Training (DET) through PRISMS. This action automatically alerts DHA.

Currently, your attendance is rated at [ENTER ATTENDANCE%].

Please report to the Student Support Services Manager or Dean within seven (7) days to discuss the situation.

Yours sincerely

[NAME OF SENDER]

[TITLE]

SAMPLE NOTIFICATION OF INTENTION TO REPORT**- ATTENDANCE**

[DATE]

[STUDENT NAME1] [STUDENT NAME2]

[ADDRESS1]

[ADDRESS2]

Dear [STUDENT NAME1]

On [ENTER DATE] we sent you a letter in regard to your attendance at Taylors College.

If a student's attendance falls below 80% of the scheduled contact hours for the term and he/she is unable to achieve 80% attendance for the remainder of the term, the College is required to report that student to the Secretary of the Department of Education and Training (DET) through PRISMS. This action automatically alerts DHA.

Currently, your attendance is rated at [ENTER ATTENDANCE%].

I must now inform you of the College's intention to report you to the Secretary of the DET through PRISMS for unsatisfactory attendance. If you think there are reasons why you should not be reported, you may appeal against the College's decision. You may appeal if you believe one or more of the following have happened:

- the College has not recorded or calculated your attendance outcomes correctly;
- there are compassionate or compelling reasons which have contributed to your unsatisfactory attendance;
- the College has not implemented its intervention strategy in accordance with its documented policies and procedures;
- the College has not made relevant policies available to you.

The procedure for making an appeal is located within your Handbook and on the College website. You have 20 working days beginning on [include start date of period, allowing time for delivery] to make your appeal. During this time (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.

If you wish to discuss this matter further, please make an appointment with [contact person]. You can bring a friend with you if you wish.

Yours sincerely

[NAME]

[POSITION]