

## ATTENDANCE POLICY

<b>Policy Number:</b>	CIPO-15
<b>Name of Policy:</b>	Attendance Policy v16.2
<b>Applicability:</b>	All Staff and Students
<b>Policy Owner:</b>	CEO
<b>Contact Person:</b>	Administration Manager Admissions Manager
<b>Original Issue date:</b>	April 2010
<b>Current Version approval:</b>	March 2017
<b>Next review:</b>	January 2018
<b>Related policies and procedures:</b>	Academic (Monitoring Course) Progress Policy Complaints and Appeals Policy Student Support Services Policy Student Monitoring and Intervention Form Procedure for recording and monitoring attendance of overseas students
<b>RTO:</b>	91781
<b>CRICOS Provider Number:</b>	03256G

### 1. POLICY STATEMENT

- 1.1 This policy applies to all students enrolled in all courses offered by NORTWEST. Attendance of overseas students is monitored for compliance with the student visa conditions and reporting requirements under the Education Services for Overseas Students (ESOS) framework. Domestic students not on a student visa may have attendance conditions that are set out in their agreements. Domestic students however are not monitored under the ESOS Act 2000 and The National Code 2007.
- 1.2 In compliance with The National Code 2007, Standard 11 – Monitoring Attendance, NORTWEST shall ensure that overseas students enrolled in registered courses abide by, and meet, the requirements of the student visa conditions relating to attendance.
- 1.3 NORTWEST is required under the ESOS framework to be proactive in notifying and counselling students who are at risk of failing to achieve satisfactory course attendance and to report students who have not achieved satisfactory attendance.
- 1.4 NORTWEST expects students to maintain 100% attendance. Student visa holders are required to attend at least 80% of the scheduled course contact hours in accordance with their visa conditions.
- 1.5 The procedures describe how NORTWEST meets these requirements in relation to recording, calculating and monitoring attendance.

### 2. RESPONSIBILITIES

- 2.1 The CEO or nominated officer is responsible for the implementation of this policy and to ensure that staff and students are aware of the requirements and its implications.
- 2.2 Administration Officers are responsible for the ongoing administration of this policy in relation to record keeping and analysing of the attendance records in the student administration system and the subsequent notification actions to students.

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**2.3** The Student Support Officer is responsible for the support and counselling processes for students at risk of not achieving satisfactory attendance and in meeting their obligations; and for monitoring corrective action.

### 3. DEFINITIONS

**3.1 Actual Attendance:** This is actual physical attendance in class. If a student is absent for any reason including illness or injury, they are marked as not attending.

**3.2 Satisfactory attendance:** Attendance by an overseas student at a minimum of 80% of the scheduled course contact hours for the study period (one Term).

**3.3 Projected attendance:** Current actual attendance plus maximum remaining attendance divided by the total scheduled hours for the study period (one Term).

**3.4 Consecutive days absent:** Refers to five consecutive days of classes missed, or five days missed without approval over two weeks of classes, whichever comes first.

**3.5 Overseas Student:** A person who holds an Australian Student Visa and is an 'Overseas Student' as defined by the ESOS Act.

**3.6 ESOS Act:** Education Services for Overseas Students Act 2000.

**3.7 The National Code:** Means the code of practice for registered providers and their registered courses in relation to overseas students and sets out the national standards required.

**3.8 PRISMS:** Provider Registration and International Student Administration System – the Government electronic system that holds CoEs and CRICOS data.

**3.9 Intention to Report letter:** Letter advising students that they have breached the attendance requirement and that they have 20 working days commencing three working days from the date of the letter before they will be reported for unsatisfactory attendance. Students are provided information on how to access the complaints and appeals policy in this letter. Students are provided with information on accessing student support services if they have compassionate or compelling circumstances.

**3.10 Satisfactory course progress:** Passing more than 50% of units in a study period (Term).

**3.11 Student Administration System:** In-house student database where attendance is recorded.

**3.12 Cancellation by Provider:** NORTWEST takes appropriate steps to report a student who has not attended, notified the college of their absence or contacted the college for a period of two weeks or more.

**3.12 Compassionate or Compelling circumstances:** Circumstances beyond the control of the student and which have an impact upon the student's course progress or wellbeing. NORTWEST will assess, at its

discretion, grounds for determination based on supporting evidence, which may include:

- A serious illness or injury, where a medical certificate states that the student was unable to attend classes.
- Bereavement of close family members such as parents or grandparents (documented evidence required.)
- Major political upheaval or natural disaster in the home country requiring emergency travel.
- A traumatic experience which may include: involvement in or witnessing of serious accident or crime and that these cases are supported by a psychologist's report.

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- These above are only examples of what may be considered compassionate or compelling circumstances. NORTWEST's staff will use their professional judgment to assess each case on its individual merits. Documentary evidence must be provided to support these claims and copies of these documents must be placed and kept on the student's file.

**3.13 Non commencement of studies:** the student has not or will not take the offer of education on a particular COE.

**3.14 Critical incident:** A traumatic event or a threat of such (within or outside Australia) which causes extreme stress, fear, or injury. This could include a student who is deemed as missing.

#### **4. PROCEDURE FOR RECORDING ATTENDANCE**

- 4.1** Attendance is recorded for each actual contact hour of 20 hours per week attended and studied by a student during a study period (one term). Attendance is calculated on a percentage basis for each daily session against an overall percentage for the study period. Attendance of 20 hours per week is equal to 100% for that week. Hours absent are recorded as zero (0).
- 4.2** NORTWEST provides 15 face to face course work hours per week on campus, and five hours of prescribed distance learning activity online per week.
- 4.3** Attendance is recorded by trainers for each hour attended in each face-to-face session. At the end of the session/s, trainers sign-off daily on class rolls. Trainers also record a weekly distance learning attendance roll to a maximum of five hours per week following the completion of online learning activities. This is submitted to Reception during the week after its due date for entry into the Student Administration System by Friday of that week.
- 4.4** Attendance records are entered into the Student Administration System on a weekly basis at the end of each week. An attendance tracking report is generated weekly by an Administration Officer and used for monitoring purposes. Administration officers analyse this monitoring report on a weekly basis during the study period to inform appropriate action.
- 4.5** Overall attendance is calculated as a percentage for the duration of the study period. Students must maintain attendance of 80% or more of the scheduled course contact hours to achieve satisfactory attendance for a study period.

#### **5. PROCEDURE FOR MONITORING ATTENDANCE**

- 5.1** Student attendance is tracked and recorded weekly and monitored weekly.
- 5.2** Students who are absent from NORTWEST for 5 consecutive days or more without approval or communication with NORTWEST will be contacted by either telephone, SMS and email as a matter of priority by NORTWEST student services staff. If contact with an overseas student cannot be made directly, NORTWEST will contact the student's education agent, if applicable.
- 5.3** If contact with a student is made, NORTWEST will provide counselling in relation to attendance requirements.
- 5.4** If there is no attempt by the student to contact NORTWEST directly or via an education agent, or improve attendance:
- Administration staff will notify the Student Support Officer. Details of actions to contact an overseas student will be recorded in the student's file and in the NORTWEST Critical Incident Register if the student is deemed uncontactable. NORTWEST's Admissions staff

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may take appropriate steps to make a report to relevant authorities, for example Department of Immigration and Border Protection.

- Overseas students will be issued an Intention to Report letter where appropriate. Students have 20 working days commencing from the date of the letter to contact NORTWEST to discuss actions to remedy their attendance and issues. If a student does not contact NORTWEST within the timeframe, NORTWEST will report them to the DIBP through PRISMS for non-attendance or non-commencement.
- Domestic students will be advised in writing of issues that may affect their academic progress where attendance is required.

**5.5** Students whose attendance falls between 85% to 81% within a study period (one term) will immediately be advised in writing of the following:

- Overseas students will be issued with a reminder letter regarding the need to meet their attendance obligations; and must improve their attendance. The students are advised to meet with the Student Support Officer.
- Overseas students will be monitored on a fortnightly basis.
- If there is no immediate improvement in attendance or response to the warning letter, the students will be sent an Intention to Report letter.
- Students are advised they have 20 working days commencing from the date of the letter to contact NORTWEST to remedy their attendance and issues
- If a student does not contact NORTWEST within the timeframe, NORTWEST will report them for non-attendance to the DIBP via PRISMS
- Domestic students will be advised on issues that may affect their academic progress where attendance is a requirement.

**5.6** Students with attendance falling to between 70% - 80% scheduled contact hours with good academic progress (submitting and passing required work, activities, or assessments) who receive a warning letter regarding their unsatisfactory attendance will be informed that they must improve attendance to the required level. Students are advised to see the Student Support Officer for support and counselling or to contact NORTWEST if they have further issues, however may not issued an Intention to Report if academic progress is satisfactory.

**5.7** Students with poor attendance, below 70%, and who have already received a warning letter or an SMS notice of attendance risk, will be sent an Intention to Report Letter which states that the student must appeal the College decision to report them to the Department of Immigration for unsatisfactory attendance.

- Students are advised they have 20 working days commencing from the date of the letter to contact NORTWEST and appeal the decision
- If a student does not contact NORTWEST within the timeframe, NORTWEST will report them for non-attendance to the DIBP via PRISMS
- Domestic students will be advised on issues that may affect their academic progress where attendance is a requirement.

**5.8** Students with poor attendance are provided counselling by the Student Support Officer and may be placed on an intervention program for the study period to monitor attendance and to support the completion of their course within the expected duration. Evidence of counselling and remedial

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action is placed on the Student’s file. See the Intervention Policy for details. Administration fees may apply for intervention programs. Refer to the Fees and Charges schedule.

**5.9** If students are not satisfied with NORTWEST’s determination on their attendance issues, they have 20 working days commencing the date of the Intention to Report letter for overseas students, or the advisory letter for domestic students, to submit an appeal against the NORTWEST decision. Refer to the NORTWEST Complaints and Appeals Policy.

**5.10** If the student chooses not to access the Complaints and Appeals Policy and procedure within the stated timeframe; withdraws from the process; or the process is completed and results in a decision which supports NORTWEST:

- For overseas students, the CEO or delegate will notify DIBP via PRISMS that the student has not achieved satisfactory attendance.
- For domestic students, the actions advised by NORTWEST to the student will be implemented.

**5.11** Students are to attend classes where an Intention to Report letter or warning letters have been sent, and during the period of appeal.

## **6. PROCESS**

**6.1** NORTWEST staff will enter the actual attendance of each student in the Student Administration System recorded on the daily class rolls for face to face sessions, which indicates late arrivals or early departures, and on the online distance learning weekly rolls. Attendance is recorded and certified by trainers for each hour at each session. Online distance learning, of up to five hours per week, is recorded as outlined in clause 4.3.

**6.2** Absences due to illness, injury or misadventure are included in the 20% allowable absence for the study period. A student must maintain 80% or more attendance during a study period (one term).

**6.3** Administration staff will also enter other records of attendance including enrolment changes, special leave approvals, deferrals, cancellations and withdrawals.

**6.4** Administrative staff input attendance records into the Student Administration System weekly, and generate monitoring reports weekly to track attendance. Based on fortnightly analysis and review of the reports, warning notifications to students will be sent electronically at scheduled intervals per term with details of the required actions needed by the student; or sent when a student becomes at risk of not meeting satisfactory attendance for the study period.

**6.5** If counselling regarding attendance or support meetings is required, the student is responsible for making contact as indicated in the notification letter and will be reminded of NORTWEST attendance policies, and that satisfactory attendance is a course requirement.

**6.6** If an intervention program is required to support the student to meet course requirements, administration fees may apply as per the fees and charges schedule.

- Overseas students will be reminded that satisfactory attendance and course progress is a visa requirement.

Counselling processes will include informing the student that if attendance falls below the required level, the student will be reported and their visa may be cancelled. Any further questions regarding the student visa conditions and possible outcomes of breaches should be referred directly to DIBP.

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- Domestic students will be made aware of the impact attendance has on their course progress.

**6.7** When an overseas student has been issued with a warning notice of unsatisfactory attendance or an Intention to Report, and subsequently responds to the requirements or appeals the decision to report, NORTWEST may choose not to take further action if the student:

- is maintaining satisfactory course progress; and
- is attending at least 70% of their scheduled contact hours; or
- can provide documented evidence under compassionate and compelling circumstances as defined.

Where actions will be taken by NORTWEST, students are to be advised on the right to appeal as per the complaints and appeals policy. The student will also be advised that they may appeal externally to the Overseas Student Ombudsman and their enrolment maintained.

**6.8** After 20 working days commencing the date of the Intention to Report or advisory letter has lapsed, or any appeal has been heard and not approved, and if the student's attendance is below 70%:

- For overseas students – the CEO or delegate will complete reporting procedures via PRISMS
- For domestic students - administration staff prepares a notification to the student advising the impact of attendance on their studies where relevant for sign off by the CEO or delegate.

**6.9** If the student's attendance is between 70% and 80% and the appeal is successful, details are noted and all records saved in the student file and electronically. The student will not be reported. For domestic students any proposed action by NORTWEST will not proceed.

**6.10** All contact with students are documented by NORTWEST staff and notes made in the electronic Student Administration System. Where contact is not established and the student does not reply nor returns to NORTWEST for counselling or classes, reporting procedures will commence.

**6.11** All records of letters, meetings, intervention actions and related documents will be stored and filed in the Student Administration System. Letters are recorded in the Correspondence register.

## **7 RECORDS AND INFORMATION**

All documentation will be kept in the Student Administration System both in the main student file and electronically in the Student Administration System.

## **8 ASSOCIATED DOCUMENTS**

Forms and Record Keeping:

Title	Document Location	Responsible Officer	Minimum Retention Period
Attendance Record Sheet for classes	Fileshare / Attendance	Trainer	2 years after last entry
Attendance Record Sheet for online distance learning	Fileshare / Attendance	Trainer	2 years after last entry
Attendance Record	Student Administration	Administration Officer	2 years after last entry



	System		
Warning letter – notice of unsatisfactory attendance	1. Student’s File 2. Student Administration System	Student Support Officer/ delegate	2 years after last entry
Monitoring and Intervention Form	1. Student’s File 2. Student Administration System	Student Support Officer	2 years after last entry
Letter of Intention to Report	1. Student’s File 2. Student Administration System	Student Support Office/ delegate	2 years after last entry

## 9 REFERENCES

- Education Services for Overseas Students (ESOS) Act 2000
- The National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2007
- Standard 11 of the National Code 2007.

## 10 IMPLEMENTATION

The Attendance Policy and Procedure will be implemented throughout NORTWEST via:

1. An announcement notice emailed to all students and staff
2. Inclusion on the NORTWEST website

## 11 REVISION HISTORY

Revision	Date	Description of modifications
1	April 2010	Original
2	April 2012	Revised and simplified terminology
3.1	May 2012	Revising copy
3.2	July 2012	Updated the 5 day absence to report
14.0	July 2014	Revised terminology for currency
14.1	October 2014	Revised terminology for better clarification
15.0	February 2015	Revised terminology in CL 4.1, 4.3 and 6.1 for clarification
15.1	August 2015	Revised terminology for attendance %
15.2	Sept 2015	Revised terminology for attendance > 70%
16	Feb 2016	Review, no change
17.0	March 2017	Update company name, logo and footer