

## Attendance Monitoring Policy and Procedure

|                                 |  |
|---------------------------------|--|
| <b>Category</b>                 | Overseas Student Visa Requirements   |
| <b>Document Number and Name</b> | UEC_S8_1   |
| <b>Author</b>                   | Universal English College  |
| <b>Approved By</b>              | General Manager  |
| <b>Approval Date</b>            | 7 June 2019  |
| <b>Last Reviewed</b>            | 31 May 2019  |
| <b>Next Review Date</b>         | 31 May 2022  |
| <b>Policy Base</b>              | <ul style="list-style-type: none"> <li>• ESOS Act 2000</li> <li>• National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code), Standard 8</li> <li>• ELICOS Standard P1</li> </ul> |
| <b>Related Documents</b>        | <ol style="list-style-type: none"> <li>1. Attendance Sheet</li> <li>2. Notice of Intention to Report</li> <li>3. Attendance Warning Letter</li> <li>4. Complaints and Appeals Policy and Procedure</li> </ol>                      |

## Table of Contents

|   |    |
|---|----|
| Purpose.....  | 2  |
| Scope .....   | 2  |
| Definitions .....   | 2  |
| Policy.....   | 3  |
| 1. Overview.....  | 3  |
| 2. The Method for Working Out Minimum Attendance .....          | 4  |
| 3. Reporting Overseas Student Visa Holders.....                 | 5  |
| Procedure .....   | 7  |
| Recording Attendance, Intervention Strategy and Reporting ..... | 7  |
| (Annexure A) Attendance Warning Letter (Sample).....            | 8  |
| (Annexure B) Notice of Intention to Report (Sample) .....       | 9  |
| Document Control.....   | 10 |

### Purpose

These policies and procedures are in place to ensure the attendance monitoring for overseas students at Universal English College (“UEC”) comply with the ESOS Act 2000, the National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code) and ELICOS Standards 2018.

### Scope

This document applies to all staff involved in the overseas student attendance monitoring at UEC.

### Definitions

- **Unsatisfactory attendance** refers to the failure of a student to achieve more than 80% attendance for any study period/course duration.
- **Satisfactory attendance** refers to a student who achieves more than 80% for any study period/course duration.
- **The course and the study period** both refer to any period of study covered by a single CoE.
- **CoE** refers to as an electronic Confirmation of Enrolment which is issued via PRISMS for a CRICOS registered course.
- **PRISMS** refers to Provider Registration and International Students Management System.
- **CRICOS** refers to the Commonwealth Register of Institutions and Courses for Overseas Students.
- **ELICOS** refers to English Language Intensive Course for Overseas Students

- **International students** refer to Overseas students holding a student visa issued by the Australian Department of Home Affairs
- **Compassionate or compelling circumstances** refers to those situations beyond the control of the overseas student and which have an impact upon the overseas student's course progress or wellbeing.
- **Scheduled contact hours** refer to face-to-face study mode made up of a minimum of 20 hours a week.
- **A class** refers to a 90 minute lesson, which consists of two 45 minutes lessons with no breaks in between.
- **Late for class** refers to being late for a lesson, 15 minutes or more.
- **Absent** refers to non-attendance or being late for 15 minutes or more and as a result, marked as absent for the whole 45 minute lesson.
- **Overall attendance** refers to the final attendance result.
- **Current attendance** refers to the attendance result calculated up until and including the date the student has been informed of their rate of attendance.

## Policy

### 1. Overview

UEC will monitor and record the attendance of all overseas students enrolled in an English Language CRICOS course. Students must maintain a minimum of 80% attendance for the length of their CoE and not be absent without approval for more than 5 consecutive days. Students are made aware of the attendance requirements in the Student Handbook and during the Orientation Program.

Attendance is recorded daily and is entered weekly in the Student Management System. A list of students at risk of not meeting their attendance requirements is generated.

- a. UEC will monitor overseas students' attendance for each course in which the overseas student is enrolled.
- b. UEC will not issue a CoE to overseas students that exceeds the CRICOS registered course duration.
- c. UEC's *Attendance Monitoring Policy and Procedure* is in place to identify, notify and assist an overseas student at risk of not meeting attendance requirements.
- d. UEC will clearly outline and inform the overseas student before they commence the course of the requirements to achieve satisfactory attendance in each study period. This information will be provided to overseas students in the Student Handbook and during the Orientation Program (prior to the commencement of studies).
- e. The minimum attendance requirement for UEC overseas students is 80%.

## 2. The Method for Working Out Minimum Attendance

- a. There will be a minimum of 20 hours of face-to-face class attendance required for all ELICOS programs offered at UEC.
- b. Attendance will be marked, and is based on a minimum of 20 hours of face-to-face delivery.
- c. Teachers will mark attendance for every lesson, daily.
- d. No attendance will be marked for 'Optional' classes.
- e. When a student is more than 15 minutes late for a lesson, the student will be marked as absent for that lesson. A lesson is made up of 45 minutes.
- f. UEC will contact the overseas student who has been absent for more than five consecutive days without approval to check on their welfare and to notify them that they may be at risk of breaching their visa conditions.
- g. Overseas students will be informed of their current attendance rate.
- h. An overseas student will receive a warning letter when the student's current attendance falls below 85%.
- i. The *Warning Letter* will be provided to the student in person by the Team Leader Student Support. On receipt of the letter, the student will:
  - i. have a face-to-face meeting with the *Team Leader Student Support*
  - ii. have an opportunity to explain their current situation
  - iii. be informed of their overall attendance
  - iv. be informed of their current attendance
  - v. be informed of the consequences of not meeting the attendance requirement
  - vi. be informed of the consequences and implications of not meeting their visa requirements.
- j. The *Notice of Intention to Report* will be provided to an overseas student when the student's current and overall attendance falls below 80%.
- k. The *Daily Attendance Monitoring Calculation* in the table below is based for example on an overseas student who is 15 minutes late to the first lesson, 10 minutes late for the third lesson and absent for the last lesson. This example illustrates how daily attendance is recorded and how absenteeism contributes to the current and overall student's attendance rate. The method for working out minimum attendance for a course duration is reflected in Table 2 and Table 3.

| Table 1: Daily Attendance Monitoring Calculation |                 |                          |                           |
|--|-----------------|--------------------------|---------------------------|
| Class Time                                       | Status          | Marked As                | Attendance in Minutes     |
| <b>Morning Class</b>                             |                 |                          |                           |
| 8:45 ~ 9:30                                      | 15 minutes late | Marked as absent         | 0                         |
| 9:30 ~ 10:15                                     | Fully attended  | Marked as fully attended | 45 minutes                |
| <b>Morning Break</b>                             |                 |                          |                           |
| 10:30 ~ 11:15                                    | 10 minutes late | Marked as fully attended | 45 minutes                |
| 11:15 ~ 12:00                                    | Fully attended  | Marked as fully attended | 45 minutes                |
| <b>Lunch</b>                                     |                 |                          |                           |
| 12:45 ~ 13:45                                    | Absent          | Marked as absent         | 0                         |
| <b>Total Attendance</b>                          |                 |                          | <b>2 hours 15 minutes</b> |

Attendance calculation will be based on the course duration as stated in the CoE. The potential impact of attendance for a student with a course duration of 5 weeks is greater than for a student with a course duration of 10 weeks. The example is reflected in the Table 2 and Table 3.

| Table 2: The Course Attendance Calculation – 10 Weeks Course |                      |                     |          |  |
|--|----------------------|---------------------|----------|--|
| Week   | Current Attendance % | Weekly Attendance % | Attended | Intervention Strategy                                    |
| 1  | 90                   | 0                   | 0 hours  | UEC contacts the student – absent for 5 consecutive days |
| 2  | 90                   | 100                 | 20 hours |  |
| 3  | 85                   | 50                  | 10 hours |  |
| 4  | 85                   | 100                 | 20 hours |  |
| 5  | 82.50                | 75                  | 15 hours | A warning letter + Consultation given                    |
| 6  | 80                   | 75                  | 15 hours |  |
| 7  | <b>77.5</b>          | 75                  | 15 hours | Notice of Intention to Report                            |
| 8  |                      |                     |          |  |
| 9  |                      |                     |          |  |
| 10   |                      |                     |          |  |
| <b>Overall Attendance in %</b>                               |                      | <b>77.5</b>         |          |  |

| Table 3: The Course Attendance Calculation – 5 Weeks Course |                      |                     |          |   |
|---|----------------------|---------------------|----------|---|
| Week  | Current Attendance % | Weekly Attendance % | Attended | Intervention Strategy                                   |
| 1   | 90                   | 50                  | 10 hours | UEC contacts the student –absent for 5 consecutive days |
| 2   | 90                   | 100                 | 20 hours |   |
| 3   | 80                   | 50                  | 10 hours | A warning letter + Consultation given                   |
| 4   | 80                   | 100                 | 20 hours |   |
| 5   | <b>75</b>            | 75                  | 15 hours | Notice of Intention to Report                           |
| <b>Overall Attendance in %</b>                              |                      | <b>75</b>           |          |   |

### 3. Reporting Overseas Student Visa Holders

- a. As a CRICOS provider, under the National Code, UEC is obliged to report an overseas student via PRISMS if the student does not meet attendance requirements and has unsatisfactory attendance, as soon as practical.
- b. If an overseas student receives a *Notice of Intention to Report*, the student will have 20 working days in which to make an appeal. Refer to the *Complaints and Appeals Policy and Procedure*.
- c. The *Notice of Intention to Report* will inform the overseas student:
  - i. of the reasons for the intention to report;
  - ii. that the student has unsatisfactory course attendance; and
  - iii. of the overseas student’s right to access UEC’s *Complaints and Appeals* process, in line with the National Code Standard 10 within 20 working days.

- d. UEC will choose not to report an overseas student with unsatisfactory attendance when an overseas student's:
  - i. attendance is at least 70% overall; and they have
  - ii. provided genuine evidence of compassionate or compelling circumstances.
  
- e. UEC will only report the student on the basis of unsatisfactory attendance in PRISMS if:
  - i. the internal and external complaints process is completed and the decision to report the student on the basis of attendance default is upheld by UEC;
  - ii. an overseas student has decided not to access the internal *Complaints and Appeals* process within the 20 working days;
  - iii. the overseas student has chosen not to access the external Complaints and Appeals process; or
  - iv. the overseas student withdraws from the internal or external appeals process by notifying UEC in writing.

## Procedure

### Recording Attendance, Intervention Strategy and Reporting

| STEPS  | PROCEDURE   | RESPONSIBILITY          |
|--|---|-------------------------|
| 1  | <ul style="list-style-type: none"> <li>Mark attendance during the week as per the <i>Daily Attendance Sheet</i> with Monitoring Calculation provided.</li> <li>Submits the completed attendance sheet to reception every Friday.</li> </ul>   | Teachers                |
| 2  | <ul style="list-style-type: none"> <li>Enters the attendance data into the <i>Student Management System</i>.</li> <li>The <i>Student Management System</i> generates a list of students at risk of not meeting their attendance.</li> </ul>   | Student Support Advisor |
| <b>Attendance Intervention Strategy</b>  |   |                         |
| 3  | Contacts an overseas student who is absent for more than 5 consecutive days.  | Student Support Advisor |
| 4  | <ul style="list-style-type: none"> <li>Issues a warning letter to an overseas student whose current attendance falls between 85 ~ 82%.</li> <li>Discusses with the student their attendance based on the <i>Attendance Policy</i>.</li> </ul>   | Student Support Advisor |
| 5  | Informs the Academic Director and student's teacher that the student has received a warning letter.   | Student Support Advisor |
| 6  | Keeps the signed copy of the warning letter in the student's file, on the <i>Student Management System</i> .  | Student Support Advisor |
| <b>The Point at Which the Overseas Student has Failed to Meet Satisfactory Course Attendance</b> |   |                         |
| 7  | Issues the <i>Notice of Intention to Report</i> to an overseas student whose current and overall attendance falls below 80%.  | Student Support Advisor |
| 8  | Informs the Academic Director and the student's teacher that the student has received a <i>Notice of Intention to Report</i> .  | Student Support Advisor |
| 9  | Keeps the signed copy of the warning letter in the student's file, on the <i>Student Management System</i> .  | Student Support Advisor |
| 10   | Makes an appeal within 20 working days from receiving the <i>Notice of Intention to Report</i> as in line with UEC's <i>Complaints and Appeals Policy and Procedure</i> .   | Student                 |
| <b>The Appeals Process</b>   |   |                         |
| 11   | <b>Internal Appeal Rejected:</b> Disputes the decision and accesses the external appeals process.   | Student                 |
| 12A  | <b>Internal Appeal Rejected:</b> Reports the student via PRISMS if the student withdraws or does not access the internal and external appeals process.  | Registrar               |
| 12B  | <b>Internal Appeal Accepted:</b> Student presents compassionate and compelling reasons for his/her absence with supporting evidence. Evidence provided is acceptable to UEC. UEC allows the student to continue his or her studies until the course enrolment is completed.                           | Student and Registrar   |
| <b>Reporting</b>   |   |                         |
| 13A  | <b>External Appeal Rejected:</b> Reports the student via PRISMS.  | Registrar               |
| 13B  | <b>External Appeal Accepted:</b> The student is not reported via PRISMS. Makes changes to UEC's attendance monitoring policy and procedure if any amendment is required as a result of the external appeals process. Informs the student of the changes and results in writing within 5 working days. | Registrar               |

## (Annexure A) Attendance Warning Letter (Sample)

<Date>

**Private and confidential**

<Insert student's full name>

<Insert student's residential address>

<Insert student's ID>

<Insert current course class>

Dear <insert name>

### Attendance Warning Letter

This is to confirm that you were counselled today regarding your attendance. In this meeting you were:

- informed of your current attendance.
- informed that immediate improvement of your attendance is required.
- informed of the consequences and implications of not meeting the visa requirements.
- given the opportunity to respond.

When you started your course, you were advised of the necessity to maintain an attendance of at least 80%, as required by Australian law for holders of student visas (the *Education Services for Overseas Students Act of 2000*). This means you must attend a minimum of 80% of your timetabled classes for each of your CoE's.

A review of the attendance records on 7 June 2019 showed that your current attendance as at last Friday was 79%. If this rate of attendance does not improve to at least 80% by the end of your course, we are required to report you to the Australian government. This is very important, because unsatisfactory attendance may lead to the cancellation of your student visa.

If you are experiencing any personal or health problems that are affecting your attendance, please advise us immediately so that we can provide you with appropriate advice. If you are able to prove that your circumstances are very serious, it may be possible for us to arrange temporary suspension of your studies.

Yours sincerely,

<Authorised Person's Name>

<Authorised Person's Position>

---

I confirm receipt of this letter and understand the requirements of my student visa and implications should my attendance not improve.

Signature \_\_\_\_\_ Date: \_\_\_\_/\_\_\_\_/\_\_\_\_



## (Annexure B) Notice of Intention to Report (Sample)

<Date>

**Private and confidential**

<Insert student's full name>

<Insert student's residential address>

<Insert student's ID>

<Insert current course class>

Dear <insert name>

### Notice of Intention to Report you for Unsatisfactory Attendance

Your enrolment in the Academic English Preparation 2 (22.5 hours/week) course at Universal English College is from 6 May 2019 to 7 June 2019.

When you commenced your course, you were advised of the requirement to maintain an attendance of at least 80%, as required by Australian law for holders of student visas (the *Education Services for Overseas Students Act of 2000*).

We gave you a warning letter advising you of your low attendance. We also warned you that we would be obliged to report you to the Australian Government if your attendance did not improve. Unfortunately, you have not taken the necessary action to improve your attendance, which is currently at 53.44%. At this stage of your course you will be unable to meet the 80% attendance requirements, your final attendance can only reach a maximum of 54.83%. It is therefore, our intention to report you to the Australian Government for unsatisfactory course attendance in accordance with the National Code Standard 8 and UEC's *Attendance Monitoring Policy*.

You now have 20 working days from the date of this letter to access UEC's Complaints and Appeals process in accordance with the National Code 2018, Standard 10. If you wish to appeal this decision, you must do so in writing on or before <<date>>. During this time, and while your appeal is being considered, you must attend all classes. The appeal meeting will be held at the College at an agreed time and you may bring someone with you, if you wish.

In accordance with the National Code, Standard 10, the College can only decide not to report you if:

1. your attendance is between 70% and 80% and you can produce documentary evidence clearly demonstrating that compassionate or compelling circumstances prevented you from attending your classes, or;
2. you can demonstrate that the College has not correctly followed its documented attendance policies and procedures or;
3. you can demonstrate that your attendance has been incorrectly calculated.

In the event of an unsatisfactory appeal, you will be reported to the Department of Home Affairs for unsatisfactory course attendance.

Yours sincerely,

<Authorised Person's Name>

<Authorised Person's Position>

---

I \_\_\_\_\_ acknowledge that I have received this letter. I understand the process of appeal and that I have 20 working days as of the date of this letter to make an appeal.

Signature \_\_\_\_\_ Date: \_\_\_\_/\_\_\_\_/\_\_\_\_

## Document Control

The policies and procedures, and the form included in this document are approved and implemented by UEC. This document will be electronically available to UEC staff in protected format (PDF file) in the designated folder (in G drive). Any ongoing changes made to this document will be documented as per below.

| Version          | Authorised By          | Description of the change                                     | Approved Date      | Effective Date     |
|------------------|------------------------|---|--------------------|--------------------|
| <i>Version 1</i> | <i>General Manager</i> | <i>Updated the Monitoring Attendance Policy and Procedure</i> | <i>7 June 2019</i> | <i>7 June 2019</i> |
|                  |                        |   |                    |                    |
|                  |                        |   |                    |                    |
|                  |                        |   |                    |                    |