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# **Monitoring Attendance Policy & Procedure**

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## Introduction

Australian Technical College Western Australia (ATCWA) ensures that as part of a comprehensive course progress policy and where relevant, regulatory requirements, ATCWA can systematically monitor attendance.

## Purpose

To ensure that ATCWA can systematically monitor the course progress of international students through monitoring international student attendance as part of a wider ATCWA strategy to monitor course progress and completion within the expected duration. ATCWA is proactive in notifying and counselling students who are at risk of failing to meet attendance requirements. ATCWA reports students under Section 19 of the ESOS Act who have not maintained satisfactory course progress.

## Scope

This policy and procedure applies to all international students at ATCWA.

## Responsibilities

Training and Assessment, Administration, Management.

## Definitions

**International student** means international students or intending international students on a student visa under the Migration Act 1958.

**Intervention strategy** means an intervention strategy as per the Course Progress Policy and Procedure.

**Satisfactory attendance** means a minimum of eighty per cent (80%) real (in class) attendance projected over the reporting period.

**Study period** means one (1) term (10 weeks) of scheduled classes.



## Alignment

### National Code of Practice for Providers of Education and Training to Overseas Students 2018

Part B (Standard)	8.1, 8.3, 8.4, 8.5, 8.6.1, 8.6.2, 8.6.3, 8.6.4, 8.6.5, 8.7.1, 8.7.2, 8.7.3, 8.7.4, 8.8.1, 8.8.2, 8.8.3, 8.8.4, 8.8.5, 8.9.1, 8.9.2, 8.9.3, 8.9.4, 8.9.5, 8.10, 8.11, 8.12.1, 8.12.2, 8.12.3, 8.12.4, 8.13.1, 8.13.2, 8.13.3, 8.14.1, 8.14.2, 8.14.3, 8.14.4, 8.15.1, 8.15.2
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## Document Control

Version	Date	Author	Change Description
001	6 June 2019	ATCWA	Creation of policy
002	<Select date>		
003	<Select date>		
004	<Select date>		

## Policy Statement

Australian Technical College Western Australia (ATCWA) will ensure that they record the attendance of each international student for the scheduled course contact hours for each CRICOS registered course in which the international student is enrolled which is:

- a) An accredited vocational education and training course;
- b) An accredited school course;
- c) An accredited or non-award ELICOS course; or
- d) Another non-award course.

The systematic approach to monitoring course attendance is part of a comprehensive approach to monitoring course progress at ATCWA.

For the courses identified above, ATCWA has and implements appropriate documented attendance policies and procedures for each course which is provided to staff as part of a mandatory staff induction and international students both pre-enrolment and at the mandatory orientation session that specify the:

- a) Requirements for achieving satisfactory attendance, which at a minimum, requires international students to attend at least eighty per cent (80%) of the scheduled course contact hours;
- b) Manner in which attendance and absences are recorded and calculated;
- c) Process for assessing satisfactory attendance;
- d) Process for determining the point at which the international student has failed to meet satisfactory attendance; and
- e) Procedure for notifying international students that they have failed to meet satisfactory attendance requirements.

Where international students are identified as having been absent for more than five (5) consecutive days without approval, Student Administration will make attempts to contact the international student via phone and email using the most current contact details the international student has provided to ATCWA. Similarly, where the student is at risk of not attending for at least eighty per cent (80%) of the scheduled course contact hours for the course in which he or she is enrolled (before the student's attendance drops below eighty per cent [80%]), ATCWA identifies and attempts to make contact with the international student using the current contact details that the international student has provided ATCWA.

Where ATCWA has assessed the student as not achieving satisfactory attendance, ATCWA will implement its intervention strategy as part of ATCWA's wider course progress monitoring program. Where the international student's attendance is unsatisfactory despite ATCWA's intervention strategy for a second consecutive time, ATCWA must notify the student in writing of its intention to report the student for not achieving satisfactory attendance. The written notice must inform the student that he or she is able to access ATCWA's complaints and appeals process as per Standard 10 (Complaints and Appeals) of the National Code 2018 and that the student has twenty (20) working days in which to do so.

Where the student has chosen not to access the complaints and appeals processes within the twenty (20) working day period, withdraws from the process, or the process is completed and results in a decision supporting ATCWA, ATCWA must notify the Secretary of DET through PRISMS that the student is not achieving satisfactory attendance as soon as practicable.

For the vocational education and training and non-award courses identified under a) and d) above, ATCWA may only decide not to report the student for breaching the eighty per cent (80%) attendance requirement where:

- a) That decision is consistent with its documented attendance policies and procedures;
- b) For School, ELICOS and Foundation Program courses, the international student provides evidence demonstrating that compassionate and compelling circumstances apply;
- c) The international student's record clearly indicates that the student is maintaining satisfactory course progress; and
- d) ATCWA confirms that the student is attending at least seventy per cent (70%) of the scheduled course contact hours for the course in which he or she is enrolled.

Where ATCWA identifies that an international student has been absent for five (5) days or more and is not able to be contacted using the most current contact details that the international student has provided ATCWA, ATCWA management will:

- a) Contact any known friends, relatives or housemates where ATCWA has an awareness of these contacts and their details; and
- b) To report in the next business day to meet with the Chief Executive Officer of ATCWA and the Student Support Officer.
  - i. Where the international student can be located, the international student will be advised that they have breached the *Attendance Policy and Procedure* and will be issued with a Notice of Intention to Report for unsatisfactory attendance as part of ATCWA's *Course Progress Policy*; and
  - ii. They should respond or lodge an appeal if they believe that there are any special circumstances that apply and that they have twenty (20) working days to do so.
- c) Where ATCWA cannot locate the international student and the international student has been absent for five (5) days or more, ATCWA's CEO will implement ATCWA's *Critical Incident Policy* and notify police.

## Procedure

1. ATCWA will establish and maintain an official timetable of contact hours for each program in accordance with program requirements.
2. Prior to the commencement of teaching a program, the Admin Officer or Student Support Officer will establish a formal roll of classes, contact hours and students.
3. A class attendance roll for the nominated program will be provided to the nominated class trainers and assessors prior to the commencement of each class for the duration of the program.
4. Class trainers and assessors will ensure that the attendance roll is completed accurately for each study session as specified in the official timetable.
5. The attendance roll will be updated by the class trainers and assessors and monitored by administration staff to ensure students are attending class for the required contact hours.

6. Class trainers and assessors will email the following staff with the details of international students who are absent for five (5) consecutive days without prior notice (or approval).

An email is sent to the Student Support Officer, [support@atc.wa.edu.au](mailto:support@atc.wa.edu.au) with a copy to:

- The DOO; and
- DOS, [dos@atc.wa.edu.au](mailto:dos@atc.wa.edu.au)

These international students will then be contacted by the Admin Officer or Student Support Officer.

7. The Student Support officer will note the reason for the absence and any action taken will be updated on the RTO Manager ATCWA database. (Confidential information will be recorded separately in student's folder. Any serious issues will be advised to the above staff.
8. ATCWA is required to counsel international students who are habitually late or regularly absent and appointments will be made with the Admin Officer or Student Support Officer to meet with relevant international students to discuss reasons for the absences and to remind international students of their attendance requirements.
9. International students who are identified as not meeting the minimum requirements will receive formal warning letters from Student Administration as follows and these will be kept on file:

Step 1 - Attendance Level 1 Warning Letter 1	Real (in class) Attendance 95% - 91%
Step 2 - Attendance Level 2 Warning Letter 2	Real (in class) Attendance 90% - 86%
Step 3 - Attendance Level 3 Warning Letter 3	Real (in class) Attendance 85% - 81%
Step 4 - Notice of Intention to Report to DHA	Real (in class) Attendance 80% and below

10. Student will be advised in:
- a) **Warning Letter 1** to make an appointment with Admin Officer or Student Support Officer if they wish to discuss their attendance. This letter is sent to international students via post;
  - b) **Warning Letter 2** to meet with Student Support Officer to discuss their attendance. The Student Support Officer will follow up with the international student to ensure that this meeting is arranged. At the meeting, the international student is reminded of the student visa condition to maintain satisfactory course progress and attendance and a plan is discussed as part of an Intervention Strategy to ensure the overall attendance is above the required percentage at the completion of the reporting period. The Director of Studies and/or Operations Manager will request that the international student sign the Intervention Strategy, give the student a copy of the Intervention Strategy and update the Student folder with a summary of the meeting. This letter is sent to international students via post and email;

- c) **Warning Letter 3** to meet with Director of Studies and/or Operations Manager to discuss their attendance. The Student Support Officer will follow up with the international student to ensure that this meeting is arranged. At the meeting the international student is reminded of the student visa condition to maintain satisfactory course progress and attendance and advised of the procedure if their attendance falls below the required percentage before or at the completion of the reporting period. The Director of Studies and/or Operations Manager will request that the international student sign the Intervention Strategy, provide the international student with a copy of the Intervention Strategy and update the student folder with a summary of the meeting. This letter is sent to international students via post and email.
11. Should an international student be unable to meet the required real (in class) attendance of eighty per cent (80%) projected over the reporting period, the Admin Officer or Student Support Officer will issue the international student with a Notice of Intention to Report. This letter notifies the international student in writing of ATCWA's intention to report them to the Department of Home Affairs (DHA) through PRISMS to DET for unsatisfactory course progress.
  12. International students will be advised in their formal Notice of Intention to Report of the procedure for accessing both the internal and external appeals process.
  13. After receiving a Notice of Intention to Report, an international student has twenty (20) working days to submit an appeal to ATCWA's CEO (or delegate), through the Complaints and Appeals process.
  14. ATCWA is required to report the student through the PRISMS website for breaching course progress requirements if the international student has been issued with a Notice of Intention to Report and the international student has chosen not to access the appeal process.
  15. Should an international student appeal to the CEO and the appeal is unsuccessful, the international student must be advised of the availability of the external appeal process, i.e. via the Overseas Students Ombudsman. The international student must advise ATCWA by providing evidence that he or she has submitted such an appeal within twenty (20) working days from the original decision by ATCWA.
  16. ATCWA is required to report the international student through the PRISMS website for breaching course progress requirements if they do not submit evidence of lodging an external appeal within twenty (20) working days from the original decision by ATCWA.
  17. ATCWA is required to report the international student through the PRISMS website for breaching course progress requirements if the Overseas Student Ombudsman's Office advises that the international student's external appeal is unsuccessful.
  18. If the international student is a Government sponsored student or under the age of 18 years, all documentation issued by ATCWA to international students in relation to their attendance and course progress will be sent to the international student's Sponsor or legal parent or guardian.



## Compassionate or Compelling Circumstances

1. An international student may claim that they were unable to maintain satisfactory attendance because of compassionate and compelling circumstances. These circumstances are generally those beyond the control of the international student and which have an impact upon the international student's program progress or wellbeing. These could include, but are not limited to:
  - a) Serious illness or injury where a medical certificate states that an international student was unable to attend class for the period defined;
  - b) Bereavement of close family members such as parents or grandparents, accompanied by approved documentation;
  - c) Major political upheaval or natural disaster in the home country requiring emergency travel and this has impacted on the international student's studies; or
  - d) A traumatic experience which includes:
    - i. Involvement in or witnessing of a serious accident that is supported by police or psychological reports; and
    - ii. Witnessing or being the victim of a serious crime that is supported by police or psychological report.

# Appendix A

## Notice to Students | How Attendance Is Monitored

1. It is a ATCWA requirement that as part of maintaining satisfactory course progress, and in our attempt to support you to maintain satisfactory course progress, ATCWA monitors your attendance. ATCWA may send a report to DHA if your attendance falls below eighty per cent (80%).
2. This policy is available to international students pre-enrolment, through the orientation program, the International Student Handbook and on the ATCWA website and noticeboards.
3. The recorded attendance percentage is your real (in-class) attendance and includes all absences.
4. ATCWA classes are an average of twenty (20) hours per week however you should consult your timetable at the beginning of each study period as this may differ depending on your course.
5. Attendance is recorded by the class trainers and assessors for each session (twice per class).
6. If you are late for any class or leave the classroom, you will have the number of minutes recorded on the class roll as follows (with the exception of acceptable bathroom breaks):

Absent from Class (Minutes)	Marked Absent for the Session (Minutes)
1-15 minutes	15 minutes
16-30 minutes	30 minutes
31-45 minutes	45 minutes
45-60 minutes	60 minutes
61-75 minutes	75 minutes
76-90 minutes	90 minutes
91-105 minutes	105 minutes
106-120 minutes	120 minutes

7. If you are absent from class due to illness, you should see a doctor as soon as possible and request a *Medical Certificate*. The Medical Certificate/s should clearly state the date/s of the absence. Medical Certificates should not be backdated for more than three (3) days prior to your absence.

8. If you have a Medical Certificate that covers a period of absence, you must give the Medical Certificate to ATCWA administration staff as soon as you return to class after the period of absence. Staff will date stamp the Medical Certificate and return a copy to you.
9. ATCWA calculates student attendance on a daily and weekly basis.
10. You can check your attendance at Student Administration at any time. The attendance shown is up to the previous Friday and is the **best** percentage that you can achieve from the previous Friday to the end of your enrolment reporting/study period (ten (10) weeks or the length of your eCoE if your enrolment is less than ten (10) weeks). Satisfactory attendance is a **minimum of eighty per cent (80%)** real (in class) attendance projected over the reporting period.
11. You can make appointments with the Student Support Officer or the Admin Officer to discuss absences from class. Meetings are confidential.
12. If you receive Warning Letter 1, you can make an appointment with Student support officer to discuss your attendance.
13. If you receive Warning Letter 2, you are required to meet with the Director of Studies and/or Operations Manager.
14. If you receive Warning Letter 3, you are required to meet with the Director of Studies and/or Operations Manager.
15. If your attendance falls below eighty per cent (80%) and you have been issued with a Notification of Intention to Report, you have twenty (20) working days to access the ATCWA appeal process.
16. If you receive a Notice of Intention to Report and wish to appeal, this process is outlined on the Notice of Intention to Report.
17. If you receive a Notice of Intention to Report, ATCWA will maintain your enrolment until the internal and external appeals process has finished.
18. If you receive a Notice of Intention to Report and lodge an appeal and your program has not finished, it is very important that you continue to attend classes.
19. If you have appealed to ATCWA and your appeal is not successful, you have the right of an external appeal process and this is shown on the Notice of Intention to Report.
20. ATCWA is required to report you to the DHA for breaching course progress requirements if at the conclusion of the appeal process your appeal is unsuccessful or if you do not lodge an appeal within twenty (20) working days of the original decision being notified to you by ATCWA.
21. ATCWA will correspond with all international students via their residential address as provided to ATCWA. It is essential (and a student visa condition) that international students update their contact details with ATCWA Student Administration within seven (7) days of the change occurring.

## Appendix B

# Notice for Class Trainers and Assessors | How Attendance Is Monitored

1. ATCWA trainers and assessors are required to record each international student's attendance for each session (twice per class), as per the instructions on the class roll.
2. ATCWA staff are required to record the absence or late periods from the class roll on the RTO Manager and student folder student database that calculates the international student's attendance.
3. Class trainers and assessors will email the following staff with the details of international students who are absent for **five (5) consecutive days** without prior notice (or approval).
4. An email is sent to the Student Support Officer, [support@atc.wa.edu.au](mailto:support@atc.wa.edu.au) with a copy to:
  - DOO; and
  - DOS, [dos@atc.wa.edu.au](mailto:dos@atc.wa.edu.au)
5. These international students will be contacted by Student Administration.
6. Class trainers and assessors should advise international students who have Medical Certificates to take them to Student Administration where they will be date stamped, copied and the copy returned to international student.
7. International students who are identified as not meeting the minimum requirements of eighty per cent (80%) will receive formal warning letters as follows, copies of which will be kept on the international student's file:

Step 1 - Attendance Level 1 Warning Letter 1	Real (in class) Attendance 95% - 91%
Step 2 - Attendance Level 2 Warning Letter 2	Real (in class) Attendance 90% - 86%
Step 3 - Attendance Level 3 Warning Letter 3	Real (in class) Attendance 85% - 81%
Step 4 - Notice of Intention to Report to DHA	Real (in class) Attendance 80% and below

8. ATCWA is required to issue international students for whom there is no possibility of reaching the required real (in class) attendance of eighty per cent (80%) by the end of their enrolment period a letter that notifies the international student in writing of its intention to report them for unsatisfactory course progress and this may result in the international student's visa being cancelled.

9. If international students wish to appeal this decision and provide acceptable reasons and documentation, they may access the appeal process free of charge as outlined in the *Complaints & Appeals Policy & Procedure*.

**Note:** ATCWA will correspond with all international students via their residential and email address. Trainers and assessors should check that international students confirm their contact details listed with Student Administration are current at all times. It is a condition of their student visa that where international students change their contact details, they must notify ATCWA within seven (7) days of the change occurring.

10. Marking the Roll:
- Attendance is recorded for each teaching session (twice per session).
  - Mark the roll with a “P” for present, “A” for absent or “L” for Late or “Att” for an attachment – Do not use any other symbols or comments.
  - If an international student is late, or leaves the class during class time, mark the international student present with the number of minutes late or missing from class. e.g.: P -10. (*This does not include normal bathroom breaks*).
  - Ensure the attendance roll is accurate. It is a legal document used to determine whether an international student’s attendance meets student visa requirements and may be used as evidence in legal proceedings.
  - Class trainers and assessors must submit the completed and signed attendance roll to Student Administration at the end of their teaching session.

Absent from Class (Minutes)	Marked Absent for the Session (Minutes)
1-15 minutes	15 minutes
16-30 minutes	30 minutes
31-45 minutes	45 minutes
45-60 minutes	60 minutes
61-75 minutes	75 minutes
76-90 minutes	90 minutes
91-105 minutes	105 minutes
106-120 minutes	120 minutes

The method for calculating the percentage of attendance is to calculate the total number of hours possible if the international student was to attend all classes with no absences for the relevant study period and where international students have an absence recorded on the class attendance roll, this number of minutes or hours is deducted from the overall total. So for example:

1. The study period is ten (10) weeks duration;
2. The timetable shows twenty (20) hours per week;
3. This totals a maximum possible attendance of 200 hours;
4. The international student has missed a total of ~ 50 hours (~2½ weeks);
5. 200 hours – 50 hours = 150 hours;
6. 150 hours = 75% of 200 hours, calculated as follows:
  - = 10 weeks duration x 20 hours per week = 200 hours;
  - = 200 hours maximum possible attendance less 50 hours absent = 150 hours;
  - = 150 hours attendance out of a possible 200 hours = 75%
  - = Therefore, in this example, the international student has only achieved a 75% attendance rate and would receive Warning Letters 1, 2 and 3 (at the appropriate times) followed by a *Notice of Intention to Report to DHA* letter, which was calculated as follows:
    - =  $10 \times 20 = 200 - 50 = 150 \div 200 \times 100 = 75\%$

In the above example, international students who are identified as not meeting the minimum requirements of 80% of 200 hours would have an attendance of only 160 hours (or less).