

## Attendance monitoring

The National Code of Practice applies to all providers of education and training to international students. Standard 8 of the National Code refers to overseas student visa requirements. ELICOS providers are required to comply with the following in relation to attendance monitoring:

### Excerpts from National Code of Practice, Standard 8 relevant to ELICOS providers

#### **Monitoring overseas student attendance**

- 8.1 The registered provider must monitor overseas students' .... attendance for each course in which the overseas student is enrolled.
- 8.4 The registered provider must have and implement documented policies and processes to identify, notify and assist an overseas student at risk of not meeting ... attendance requirements where there is evidence ... that the overseas student is at risk of not meeting those requirements.
- 8.5 The registered provider must clearly outline and inform the overseas student before they commence the course of the requirements to achieve satisfactory ... attendance in each study period.
- 8.6 The registered provider ... must have and implement a documented policy and process for monitoring and recording attendance of the overseas student, specifying:
  - 8.6.1 requirements for achieving satisfactory attendance for the course which at a minimum must be 80 per cent ... of the scheduled contact hours
  - 8.6.2 the method for working out minimum attendance under this standard
  - 8.6.3 processes for recording course attendance
  - 8.6.4 details of the registered provider's intervention strategy to identify, notify and assist overseas students who have been absent for more than five consecutive days without approval, or who are at risk of not meeting attendance requirements before the overseas student's attendance drops below 80 per cent
  - 8.6.5 processes for determining the point at which the overseas student has failed to meet satisfactory course attendance.

#### **Reporting unsatisfactory course attendance**

- 8.13 Where the registered provider has assessed the overseas student as not meeting ... attendance requirements, the registered provider must give the overseas student a written notice as soon as practicable which:
  - 8.13.1 Notifies the overseas student that the registered provider intends to report the overseas student for ... unsatisfactory course attendance
  - 8.13.2 informs the overseas student of the reasons for the intention to report
  - 8.13.3 advises the overseas student of their right to access the registered provider's complaints and appeals process, in accordance with Standard 10 (Complaints and appeals), within 20 working days.
- 8.14 The registered provider must only report ... unsatisfactory course attendance in PRISMS in accordance with section 19(2) of the ESOS Act if:
  - 8.14.1 the internal and external complaints processes have been completed and the decision or recommendation supports the registered provider, or
  - 8.14.2 the overseas student has chosen not to access the internal complaints and appeals process within the 20 working day period, or
  - 8.14.3 the overseas student has chosen not to access the external complaints and appeals process, or

8.14.4 the overseas student withdraws from the internal or external appeals processes by notifying the registered provider in writing.

8.15 The registered provider may decide not to report the overseas student for breaching the attendance requirements if the overseas student is still attending at least 70 per cent of the scheduled course contact hours and:

8.15.1 ... the overseas student provides genuine evidence demonstrating that compassionate or compelling circumstances apply

**See also:**

- *Standard 9 - Deferring, suspending or cancelling the overseas student's enrolment*
- *Standard 5 - Younger Overseas Students.*

## Developing an attendance monitoring policy and procedures document

In developing an attendance monitoring policy, an ELT Centre should address the following aspects, identifying time frames and person(s) responsible for all aspects of attendance monitoring.

Details of an individual Centre's attendance monitoring policy will depend on its particular circumstances. The *examples of possible attendance monitoring procedures* below should be read as examples only and may well need to be changed or expanded to suit the Centre's circumstances.

**Note:** "Compliance officer" is used generically to refer to the staff member(s) responsible for attendance monitoring at any point. Depending on the ELT centre's organisation, this could be the Academic Manager, Student Services Officer, Principal Administrator or an officer with a specific compliance function.

Policy considerations	Examples of possible attendance monitoring procedures
The class roll is marked for each class period.	Teachers mark attendance for each hour, using only the symbols indicated in the roll document. Where a student arrives late or leaves early, a half attendance should be shown for that hour, unless teachers are informed otherwise by the Academic Manager, e.g. in case of general disruption to public transport.
Rolls are legal documents which must be kept secure and accurate.	The class roll is a legal document and must be completed accurately each day. Teachers are required to sign at the foot of the roll for each day, and to initial any amendments. Rolls must be returned to the office at the end of each shift.
Attendance is assessed regularly. How regularly will vary from one ELT centre to another depending on factors such as the average length of enrolment and whether a culture of compliance exists among students and staff. It is worth bearing in mind that teachers tend to focus on teaching, and processes need to be in place to support attendance monitoring.	The Academic Manager is responsible for checking rolls at least every week and sufficiently regularly to ensure that teachers are completing them accurately and in accordance with instructions. The Compliance Manager enters attendance in the Student Management System each Friday and identifies any problem attendances.

Policy considerations	Examples of possible attendance monitoring procedures
<p>Students who have been absent for more than five consecutive days are identified promptly.</p> <p>To achieve this, rolls must be checked more than once a week. (A weekly check may result in a student being absent for nine days before being identified.)</p>	<p>Students are required to contact Reception if they are unable to attend class. The class teacher will be notified and a “notified absence” recorded in the roll.</p> <p>If a student is absent for two consecutive days, the class teacher should notify the office at the end of class. The Compliance Manager will contact the student to check on his/her welfare and offer support if required.</p> <p>If a student cannot be contacted and is absent for five consecutive days, the Compliance Manager will issue a formal warning letter in the case of a student visa holder. A student’s parents and/or agent will be contacted if the student has given permission for this at the time of enrolment.</p>
<p>Strategies are in place to ensure the welfare of students aged under 18.</p>	<p>Any student aged under 18 is clearly identified in the class roll with the annotation “&lt;18”.</p> <p>If a student aged under 18 does not arrive within the first 30 minutes of the day, or is subsequently absent from class, the teacher must notify the office.</p> <p>The Compliance Officer will contact the student’s guardian-carer via phone and/or text message.</p>
<p>Quality attendance monitoring procedures are designed to support student welfare and well-being.</p> <p>Some students will be living away from the support of friends and family for the first time and may need support if they become ill, homesick or depressed. It is important to prevent a habit of absence from developing.</p> <p>Attendance monitoring procedures should also communicate the fact that the centre takes attendance seriously, e.g. by ensuring that students receive warnings before they become used to being absent but not so frequently that they come to ignore them. A process of escalation can be useful.</p>	<p>If a student is absent for two consecutive days, the class teacher should notify the office at the end of class. The Compliance Manager will contact the student to check on his/her welfare and offer support if required.</p> <p>The Compliance Manager checks attendance weekly and identifies any students who may be developing a pattern of absence. S/he refers such students to the Academic Manager for initial follow-up and/or counselling.</p> <p>A student whose attendance is problematic is required to attend a counselling session following receipt of a warning:</p> <ul style="list-style-type: none"> <li>• First warning – Academic Manager</li> <li>• Second warning – Compliance Manager</li> <li>• Third warning – Principal Administrator</li> </ul>
<p>There is a system in place for warning and counselling students well before attendance drops to 80%.</p>	<p>Attendance percentages are calculated every two weeks. Where attendance to date (or, in the case of a student enrolled for 10 or fewer weeks, overall attendance) is below 90% the Compliance Officer issues a warning letter reminding the student of the obligation to achieve an overall attendance of at least 80%.</p> <p>The student is notified by email and text message to attend counselling with the Academic Manager. A study plan will be established if relevant.</p> <p>The Compliance Manager monitors attendance patterns and issues a further warning letter. Timing will depend on the length of enrolment, with the latter warning at around 85% overall attendance. The student must attend counselling with the Academic Manager following each warning letter.</p>

Policy considerations	Examples of possible attendance monitoring procedures
A Notice of Intention to Report is sent when a student's attendance drops below 80%.	The Compliance Manager sends a Notice of Intention to Report as soon as a student's attendance drops below 80%. The student has 20 working days in which to access the Complaints and Appeals process. If no appeal is received, the Compliance Manager reports the student via PRISMS.
Where attendance drops below 80%, there must be documentary evidence of compelling or compassionate circumstances.	If the student provides documentary evidence of compelling or compassionate circumstances, the Compliance Manager advises the student of the need to maintain at least 70% overall attendance. If the student's circumstances make this unlikely, the student is offered the option of suspending studies in accordance with Immigration policy. The Compliance Manager continues to monitor the student's attendance and ensures counselling is provided if relevant.
Compelling or compassionate circumstances should be defined in the ELT centre's "documented process for assessing, approving and recording ... a suspension of study". (National Code 2018, 9.1)	Compelling and compassionate circumstances include: <ul style="list-style-type: none"> <li>• serious illness or injury, where a medical certificate states that the student was unable to attend classes (i.e. an illness requiring at least three days consecutive absence and not including conditions which can be treated by over the counter medicine, such as colds, menstruation)</li> <li>• bereavement of close family members such as parents or grandparents</li> <li>• major political upheaval or natural disaster in the home country requiring emergency travel and this has impacted on the student's studies</li> <li>• a traumatic experience (e.g. involvement in, or witnessing of a serious accident, witnessing or being the victim of a serious crime) which has impacted on the student and is supported by police or psychologists' reports</li> </ul>
A student whose attendance drops to 70% is immediately reported.	If the student's attendance drops to 70% the Compliance Manager immediately reports the student via PRISMS.
Copies of medical certificates are retained by the ELT centre as evidence of compassionate circumstances and in case the student mislays the originals.	When a student returns from absence, the class teacher should remind him/her to take any medical certificate to Reception at break time to be photocopied. The Reception officer copies the medical certificate and returns the original to the student. Copies are kept on the student's file.
There is an effective process in place to ensure that student contact details are up to date. Given the importance of being able to contact students, and the likelihood that they may forget to update them with the provider, it is strongly recommended that updates be sought regularly.	In the scheduled computer class in week 1 of each five week term, teachers ask students to check their contact details on the Student Portal and update if relevant.