



## Policy & Procedure

# Student Attendance & Progression

### Purpose

The purpose of this Policy & Procedure is to ensure students complete their courses within the required duration and that overseas students fulfil their visa requirements for course attendance and course progress.

### Inputs

#### National Code 2018 Standard

##### Standard 8 - Overseas student visa requirements

##### Monitoring overseas student progress, attendance, and course duration

- 8.1 The registered provider must monitor overseas students' course progress and, where applicable, attendance for each course in which the overseas student is enrolled.
- 8.2 The expected duration of study specified in the overseas student's CoE must not exceed the CRICOS registered duration.
- 8.3 The registered provider must monitor the progress of each overseas student to ensure the overseas student is in a position to complete the course within the expected duration specified on the overseas student's CoE.
- 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 course progress or attendance requirements where there is evidence from the overseas student's assessment tasks, participation in tuition activities or other indicators of academic progress 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 course progress and, where applicable, attendance in each study period.

#### VET course progress and attendance requirements

- 8.9 The registered provider of a VET course as defined in the NVETR Act must have and implement a documented policy and process for assessing course progress that includes:
  - 8.9.1 requirements for achieving satisfactory course progress, including policies that promote and uphold the academic integrity of the registered course and meet the training package or accredited course requirements where applicable, and processes to address misconduct and allegations of misconduct.
  - 8.9.2 processes for recording and assessing course progress requirements.
  - 8.9.3 processes to identify overseas students at risk of unsatisfactory course progress.
  - 8.9.4 details of the registered provider's intervention strategy to assist overseas students at risk of not meeting course progress requirements in sufficient time for those overseas students to achieve satisfactory course progress.
  - 8.9.5 processes for determining the point at which the overseas student has failed to meet satisfactory course progress.
- 8.10 The registered provider must have and implement a documented policy and process for monitoring the attendance of overseas students if the requirement to implement and maintain minimum attendance requirements for overseas students is set as a condition of the provider's registration by an ESOS agency.



- 8.11 If an ESOS agency requires a VET provider to monitor overseas student attendance as a condition of registration, the minimum requirement for attendance is 80 per cent of the scheduled contact hours for the course.
- 8.12 If an ESOS agency requires a VET provider to monitor overseas student attendance, the registered provider must have and implement a documented policy and process for monitoring and recording attendance of the overseas student, specifying:
  - 8.12.1 the method for working out minimum attendance under this standard.
  - 8.12.2 processes for recording course attendance
  - 8.12.3 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.
  - 8.12.4 processes for determining the point at which the overseas student has failed to meet satisfactory course attendance.

#### **Reporting unsatisfactory course progress or unsatisfactory course attendance**

- 8.13 Where the registered provider has assessed the overseas student as not meeting course progress or 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 progress or 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 progress or 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 for school, ELICOS and Foundation Program courses, the overseas student provides genuine evidence demonstrating that compassionate or compelling circumstances apply; or
  - 8.15.2 for VET courses, the student is maintaining satisfactory course progress.

#### **Allowable extensions of course duration**

- 8.16 The registered provider must not extend the duration of the overseas student's enrolment if the overseas student is unable to complete the course within the expected duration, unless:
  - 8.16.1 there are compassionate or compelling circumstances, as assessed by the registered provider on the basis of demonstrable evidence, or
  - 8.16.2 the registered provider has implemented, or is in the process of implementing, an intervention strategy for the overseas student because the overseas student is at risk of not meeting course progress requirements, or
  - 8.16.3 an approved deferral or suspension of the overseas student's enrolment has occurred under Standard 9 (Deferring, suspending or cancelling the overseas student's enrolment).
- 8.17 If the registered provider extends the duration of the student's enrolment, the provider must advise the student to contact Immigration to seek advice on any potential impacts on their visa, including the need to obtain a new visa.

#### **Modes of delivery**

- 8.18 A registered provider must not deliver a course exclusively by online or distance learning to an overseas student.
- 8.19 A registered provider must not deliver more than one-third of the units (or equivalent) of a higher education or VET course by online or distance learning to an overseas student.

#### **Requirement**



The RTO is required to safeguard the integrity of Australia's migration laws by supporting overseas students to complete their course within the required duration and fulfil their visa requirements for course attendance and course progress.

### Reference Documentation

Other reference documentation which relates to this P&P includes:

- ASQA Fact Sheet - Overseas student attendance

### Tools & Templates

This P&P is supported by the Tools & Templates identified at each stage in the process.

### Policy

#### Completion within expected duration

IIA will support both domestic and overseas students to complete their course within the required duration and assist overseas students to fulfil their visa requirements for course attendance and course progress. For overseas students, the duration of the course as specified on the student's Confirmation of Enrolment (CoE) will never exceed that registered on the CRICOS register. The college will also clearly outline and inform students before they commence the course of the requirements to achieve satisfactory course progress and, where applicable, attendance in each study period.

The college will monitor student progress and attendance in order to identify, notify and assist any student at risk, of not meeting course progress or attendance requirements.

#### Determining if a student has met course progress requirements

Students must have demonstrated satisfactory course progress requirements by the end of each study period. To do so, they must have attended at least 80% of the scheduled contact hours for the course for each monitoring period and have successfully completed and achieved satisfactory outcome on all assessment tasks they were required to submit in the ending study period.

#### Determining at risk students

Students will be deemed at risk of not meeting course progression requirements if they:

- do not participate in regular classroom workshop attendance of at least 80% for each monitoring period.
- do not participate in a summative assessment task.
- do not submit an assessment task within 2 weeks of the due date.
- have received an assessment outcome of Not Yet Competent for one or more assessment tasks.

#### Progress Monitoring

The college will record and assess student progress in order to identify any students at risk of unsatisfactory course progress and implement the IIA intervention strategy to assist at risk students in sufficient time for them to achieve a satisfactory course outcome. The college will also determine the point at which the student has failed to meet satisfactory course progress.



### **Intervention Strategy**

IIA will ensure that it identifies, notifies, and assists students where there is evidence that the student is at risk of not meeting course progress requirements.

For students at risk of not meeting course progress requirements, an individual intervention plan will be developed that documents the support that will be provided.

### **Extension to an expected course duration**

Extensions to the course duration specified on the CoE for overseas students are only allowed where:

- A student is complying with an intervention strategy implemented for students identified at risk of not making satisfactory course progress.
- An approved deferral or suspension of studies has been granted in accordance with IIA's Deferral, Suspension and Cancellation Policy and Procedures.
- Compassionate or compelling circumstances apply (suitable evidence must be provided).
- When the student can only account for the variations by extending his or her expected duration of study, this will be reported to the Department of Home Affairs (DHA) via PRISMS.

All variations in the student's study load, including the reasons for the variation are to be recorded on student's file.

Where the duration of the student's enrolment is extended, IIA will advise the student to contact the Department of Human Affairs (DHA) to seek advice on any potential impacts on their visa, including the need to obtain a new visa.

IIA does not deliver any of their nationally recognised training exclusively by online or distance learning.

### **Reporting students**

Where a student has demonstrated unsatisfactory course progress despite interventions implemented, IIA will be required to report the student to DHA via PRISMS and the student will receive a written notice informing them of the intention to report for non-satisfactory course progress and the reasons for the intention to report. Student will have received first and second warning letters before the notice of intention to report is issued.

Students have the right to appeal against a decision to report as per IIA's *Complaints and Appeals Policy & Procedures*. If the student chooses to access this process, the student will not be reported until this process is complete.

IIA will only report unsatisfactory course progress in PRISMS if:

- the internal and external complaints processes have been completed and the decision or recommendation supports the registered provider.
- the overseas student has chosen not to access the internal complaints and appeals process within the 20-working day period.
- the student has chosen not to access the external complaints and appeals process.
- the overseas student withdraws from the internal or external appeals processes by notifying the registered provider in writing.

All records will be kept on the student's file including warning letters and the notice of intention to report.

### **Recording Attendance**

Record attendance in each training session using *IIA - Attendance Sheet* ensuring the following is captured for each student:

- Student Signatures
- Times of attendance - Time-in and Time-out must be accurately recorded for any partial attendances.
- Update attendance for each session on SMS attendance page for the relevant class at the end of each session
- Forward hard copies of the attendance sheets to Administrator for filing.

**Tools & Templates:** IIA - Students Attendance Record Sheet

**Output:** Student attendance recorded

**Responsibility:** Trainers & Assessors / Administrator

### **Saving Records of Attendance**



- File attendance sheets forwarded by the trainers in attendance folders.
- The hard copy records must be kept for 6 months after the completion of a Study Period.
- Printed attendance records will be used to verify if the attendance is correctly recorded on SMS.
- Students have 20 days after the study period finishes to appeal any concerns regarding their attendance.

**Tools & Templates:** IIA Template - Student Attendance Record Sheet

**Output:** Student attendance recorded

**Responsibility:** Administrator

### Monitoring course progress

- Monitor students course progress to determine if students are at risk of not meeting course progress requirements.
- Use class activities, learning and class participation to informally monitor students in class.
- IIA will monitor student progress every term.
- Trainers & Assessors are responsible for the implementation of any informal strategies and note any issues which will go into the student file.

**Output:** Student course progression is monitored

**Responsibility:** Administrator

### Risk of Unsatisfactory course progress - Stage 1

- Where a student's course progress is at risk of being unsatisfactory, send a *First Warning Letter Risk of Unsatisfactory Course Progress* and invite the student to attend a meeting to develop an *Intervention Plan*.
- This notice must be sent within the first 2 weeks of the following study period. However, if a student is identified as at risk before the study period end the notice and *Intervention Plan* can be implemented sooner.
- Inform students of the implications of amending their CoE, if applicable.
- Record outcomes of the meeting in the *Intervention Plan*.
- Ensure *Intervention Plan* is signed by the student to state that they agree to the intervention strategy.
- Immediately implement intervention strategy as documented in the *Intervention Plan*.
- The student will be reminded that if they continue not to meet course progress requirements, they will be reported to DHA via PRISMS and that this will affect their visa.
- Place all documentation on the student's file.

### Tools & Templates

- IIA - *First Warning Letter Risk of Unsatisfactory Course Progress*

**Output:** Intervention Plan implemented

**Responsibility:** Administrator

### Monitor student's progress following first warning

- Monitor student's progress according to the *Intervention Plan*.
- In collaboration with the student, adjust *the Intervention Plan* as required.
- Record outcomes of meetings in the *Intervention Plan*.
- Include the form in the student's file.

**Output:** Student course progression is monitored

**Responsibility:** Administrator / Trainers & Assessors

### Risk of Unsatisfactory course progress - Stage 2

- Where the student continues to indicate that there is a risk of demonstrating satisfactory course progress as evidence through course progress monitoring, send *Second Warning Letter of Risk of Unsatisfactory Course Progress* to the student inviting them to a meeting.
- At the meeting, discuss the reasons for continuing unsatisfactory course progress and discuss further intervention required. Amend the *Intervention Plan* as required.

- Advise the student that if they continue to demonstrate unsatisfactory course progress, they will receive a *Notice of Intention to Cancel and Report to DHA via PRISMS for Unsatisfactory Course Progress*

**Tools & Templates:** IIA - Second Warning Letter of Risk of Unsatisfactory Course Progress

**Output:** Second Warning Letter of Risk of Unsatisfactory Course Progress issued

**Responsibility:** Administrator

#### Inform student of intention to report following continuing unsatisfactory course progress

- Where a student has failed to meet course progress requirements at the end of a term, despite interventions implemented, send the student a *Notification of Intention to Report for Unsatisfactory Course Progress* using the *IIA - Notification of Intention to Report*
- This notice must be sent as soon as practicable by post to the student's registered address, as well as by email.
- Inform student in the same letter of their right to access *IIA Policy & Procedure - Complaints and Appeals* and that they have 20 working days in which to do this from the date specified on the letter.
- Students who choose to access this process will not be reported if they appeal within 20 working days indicating IIA's intention to notify. Students must continue to attend classes during the appeals process as specified in *IIA Policy & Procedure - Complaints and Appeals*.
- Place a copy of the Letter and any other relevant documentation on the student file.

#### Tools & Templates

- *IIA - Notification of Intention to Report*
- *IIA - Complaints and Appeals*

**Output:** *Notification of Intention to Report for Unsatisfactory Course Progress* issued.

**Responsibility:** Administrator

#### Reporting a student

- After 20 working days, report the student via PRISMS if:
  - the student does not appeal against the decision to report them, or
  - their appeal is unsuccessful or withdrawn.
- Submit Student Course Variation via PRISMS as failure to meet visa conditions with reason either:
  - Student Failed to Meet Course Requirements
  - Unsatisfactory attendance.

**Tools & Templates:** PRISMS

**Output:** Student enrolment will be cancelled and reported to DHA via PRISMS on course progress

**Responsibility:** Administrator

#### Key Performance Indicator:

Students enrolled with IIA complete their courses within the required duration and that overseas students fulfil their visa requirements for course attendance and course progress.

#### Version history

Version	Date	Description of modifications
1.0	January 2024	Initial Draft
2.0	August 2024	Final