



ICQA Policy P014

CQA Attendance Monitoring Policy

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References:
National Code 2018 Standard 8.6 & 8.13-15
PO09Complaints and Appeals Policy

1.0 Purpose

This policy has been defined primarily as a requirement to meet the National Code Standard 8 – Overseas Student Visa Requirements.

It will be made available to and followed by all ICQA (International College of Queensland Australia) staff members involved on the ELICOS delivery and course development.

International students who are Student Visa holders are required to attend a minimum of 80% of tuition time, and as a provider, ICQA is responsible for maintaining and monitoring attendance records. Students whose attendance falls below 80% must be reported to DHA through PRISMS, under section 19 of the ESOS Act.

The Academic Manager, acting through the teachers and welfare counsellor, has the responsibility to ensure that students complete all course requirements within the expected duration of their CoE. To this end, ICQA views the maintenance of accurate student records as being critical to the success of the college and an essential part of fulfilling ICQA's statutory obligations.

In instances where the records indicate that students are deemed at risk of not meeting course requirements, ICQA's academic intervention strategy will be triggered.

2.0 Background

Monitoring student's attendance is referenced in the National Code Standards 8. National Code Standard 9 also refers to the student's completion within the expected duration of study.

[National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2018](#)

Schools, ELICOS and Foundation Programs: course progress and attendance requirements

- 8.6 The registered provider of a school, ELICOS or Foundation Program course must have and implement a documented policy and process for monitoring and recording attendance of the overseas student, specifying:

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- 8.6.1 requirements for achieving satisfactory attendance for the course which at a minimum must be 80 per cent—or higher if specified under state or territory legislation or other regulatory requirements—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 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

3.0 Definitions

ELICOS – English Language Intensive Courses for Overseas Students

DHA – Department of Home Affairs

PRISMS – Provider Registration and international Students Management System

ESOS – Education Services for Overseas Students Act 2000

Compassionate or compelling circumstances – are generally those beyond the control of the student and which have an impact upon the student's course progress or wellbeing, as defined in ICQA's policy on Deferment, Suspension, and Cancellation.



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4.0 Policy

4.1 Context

Monitoring the student's attendance allows ICQA to identify and offer support to those at risk of not completing their studies within the expected duration of study and who are at risk of failing to meet attendance requirements.

After intervention and the appeals process, ICQA will report students who are not meeting satisfactory course attendance to DHA, under Section 19 of the ESOS Act.

4.2 Notification

At the time of enrolment, students are advised of the course attendance requirements as part of their written agreement with ICQA and are also advised of the possible consequences of poor attendance. All students at the time of enrolment are asked to sign an agreement which includes an undertaking to maintain at least an 80% attendance rate.

Information on course attendance requirements is included in the international student handbook, the orientation presentation, and posted on the notice boards in each classroom, including information on:

- The 80% attendance requirement
- The consequence of not maintaining satisfactory attendance
- The requirement to notify the provider if they change their contact details
- The requirement to notify the provider if the student is sick
- The requirement to provide a medical certificate for absence due to illness
- Students are advised again verbally during the first day's orientation session

Information on study period durations is communicated to the student via the ICQA Written Agreement.

5.0 Procedures

5.1 Contacting students

All attempted communication with students must be registered and saved against the students file on TEAMS and a hard copy placed on their file.

- Attempts to contact students shall be made via:
 - ICQA Student Email address
 - Telephone number and sms.

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- Face to face
- Via the student's private email
- Via the student's agent (last resort)

5.2 Recording Student Attendance

ICQA ELICOS teachers, in conjunction with student administration staff, will record each student's attendance in class, on the class roll, hourly during the class. Attendance records will be maintained in the student management system (STARS).

At their induction, teachers are clearly instructed as to accurate roll keeping practices and also as to the significance of marking and initialling the rolls accurately.

Medical certificates provided by students are received by the class teacher, attached to the roll, and kept on the student's file for reference.

5.3 Student Attendance Monitoring , Counselling and Reporting to DHA via PRISMS

ICQA staff will ensure that accurate attendance records are kept for all students, and that they maintain a satisfactory attendance level while studying at ICQA. At all times the aim is to ensure that the student is not suffering from any problems that may be causing the unsatisfactory attendance. The student's welfare is always the main concern.

A four step process is undertaken to ensure that the student is given every opportunity to maintain their required course attendance.

1. A first notice of warning is sent out to students when their **overall** attendance has fallen to **between 85% and 90%** of scheduled course contact hours. This initial warning is communicated via the student's ICQA student email account, advising them of current attendance and suggesting that the student make an appointment with the Attendance Administrator/Student Counsellor to discuss any issues which may be impacting on their ability to maintain a satisfactory rate of attendance. A copy of the warning is saved and any communication logged.
2. If the student's attendance issues persist and their **overall** rate falls to **between 80% and 85%** of scheduled course contact hours, a second notice of warning is sent out. This warning stresses the urgency of the situation and is communicated via the student's personal and student email accounts, advising them of current attendance and suggesting that the student make an appointment with the Attendance Administrator/Student Counsellor to discuss any issues which may be impacting on their ability to maintain a satisfactory rate of attendance. A copy of the warning is saved and any communication logged.

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3. If the student's **overall** attendance falls **below 80%** of the overall course attendance requirement, and there is no documented compelling or compassionate evidence which can explain the absence in question, and the situation cannot be rectified within the scheduled course duration, a letter informing the student that ICQA intends to report them to DHA, along with a copy of ICQA's Complaints and Appeals Process, is sent to the student. The student will also be told that this may affect their student visa.
 4. If the student fails to respond within 20 working days, or if the student's appeal is not upheld and any subsequent external appeal is rejected, or if the student gives ICQA a written notice of withdrawal from the Appeals process, under Section 19 of the ESOS Act, ICQA will notify DHA via PRISMS. ICQA will only uphold an appeal where the student's attendance is at least 70%, and where evidence is provided of compelling or compassionate grounds.
- NB:** Either or both of Steps 1 and 2 may be omitted, depending on the length of a student's enrolment. Once a student has fallen below 80% of the overall course attendance and the situation cannot be rectified or explained by documented compelling or compassionate evidence, an **immediate** notice of intention to report the student to DHA will be issued.
5. To assist in monitoring the reporting timelines, the Attendance Monitoring officer completes the Attendance Tracker in order to ascertain when a student should be reported to DHA.
 6. If no response is received from the student within the appeals period, or if the student withdraws from the appeals process, or the external appeal has a negative outcome, or no result is received within the 20 day external appeals period, the Attendance Monitoring officer notifies the student and their agent of the outcome, then refers the case to the Prisms Officer and the Executive Director.
 7. The PEO reviews the case, then, within a reasonable period, in the context of this policy, authorise the Prisms Officer to report the student to DHA for poor attendance.
 8. The Attendance Monitoring officer must notify the PEO if any case remains outstanding for longer than 20 days after the internal appeal decision.

5.4 Student Absence for a consecutive period of five days

If a student is absent without approval (e.g. without approved holidays) for more than five consecutive days, the student is sent a warning letter advising them of the potential ramifications of continued absence. The student is advised to make an appointment to discuss any problems with the Attendance Administrator/Student Counsellor.

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Students' attendance records are stated on their end of course Statement of Attainment as either Satisfactory or Unsatisfactory. Students who receive a satisfactory attendance comment must have attended more than 80% of classes.

Students who request an Attendance Certificate at any time are issued with one. The certificate shows the actual attendance of students as a percentage of the total required attendance to that date. A note will be taken of the students who take approved holidays and these periods will not be recorded as absences.

5.6 Monitoring Student Attendance

All ELICOS Teachers are responsible for marking the hard copy roll for each teaching session. Student Administration is responsible for entering the attendance data into the student management system STARS.

5.7 Monitoring Periods

Attendance is monitored over the entire enrolment period, up to a maximum of 24 weeks.

6.0 Forms

- Attendance Warning Letter 1
- Attendance Warning Letter 2
- Attendance Warning Letter Final
- Attendance Warning Letter 5-Day Absence
- Intervention Strategy Record Form

7.0 References

[National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2018](#)

[PO09ICQA Complaints and Appeals policy](#)

ICQA Student Handbook



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Version history

Date	Version	Author	Status	Reviewers