

ELICOS Attendance Policy and Procedure

1. Policy

- 1.1 This policy and procedure applies to international students on a student visa who are enrolled in an ELICOS course at Joan Lawman College (JLC).
- 1.2 It is a student visa requirement for all international students to attend at least 80% of scheduled course contact hours at JLC while undertaking the ELICOS course in which they are enrolled.
- 1.3 To comply with legislative requirements JLC must report students who fail to achieve satisfactory attendance requirements to the Department of Education/ Department of Home Affairs. (unless compelling and compassionate circumstances apply, and the student is maintaining at least 70% attendance of scheduled course contact hours).
- 1.4 Students who are reported to the Department of Education/ Department of Home Affairs for failing to achieve satisfactory attendance requirements may have their enrolment and student visa cancelled.
- 1.5 The purpose of this policy and procedure is to ensure that student attendance at scheduled classes is monitored, reviewed, and intervention action is taken when a student is in danger of not achieving satisfactory attendance and/ or completing their course within the scheduled timeframe.
- 1.6 Students who are “at risk” or “at high risk” of not meeting satisfactory attendance requirements are identified through the procedures in this document, provided the opportunity to discuss underlying issues, counselled and placed on an intervention strategy.
- 1.7 All causes of unsatisfactory attendance or being “at risk” or “high risk” are considered including academic/ study causes and personal/ welfare issues.
- 1.8 JLC considers the following information when implementing this policy and procedure:

The General English course includes three levels. Pre-intermediate, Intermediate and Upper intermediate. The IELTS Foundation course has one level.

Student attendance is monitored during and at the end of each study period. ELICOS classes are scheduled for 20 hours per week during term time.

A study period is defined as one term. A term for ELICOS Courses is defined as:

- IELTS Foundation course – 12 weeks
- General English course – enrolments in any levels/ s – 12 weeks.

It is a JLC policy requirement for all international students to attend all scheduled course contact hours.

Student attendance is calculated using the following formula:

- Total student attendance at scheduled course contact hours as a percentage of the total possible attendance for the course in which the student is enrolled.

Total possible attendance at scheduled classes for each course/ course level:

- IELTS Foundation course: 12 weeks x 20 hrs/ week = 240 hrs
- General English Pre Intermediate level: 12 weeks x 20 hrs/ week = 240 hrs
- General English Intermediate level: 12 weeks x 20 hrs/ week = 240 hrs
- General English Upper Intermediate level: 12 weeks x 20 hrs/ week = 240 hrs
- General English – all three levels: 36 weeks x 20 hrs/ week = 720 hrs

Minimum attendance requirement to achieve satisfactory attendance for the IELTS Foundation course:
 $20 \text{ hours} \times 12 \text{ weeks} \times 80\% = 192 \text{ hours}$.

Minimum attendance requirement to achieve satisfactory attendance for each level of the General English course: 20 hours x 12 weeks x 80% = 192 hours.

Minimum attendance requirement to achieve satisfactory attendance for students undertaking all three levels of the General English course is: 20 hours x 36 weeks x 80% = 576 hours

- 1.9 Where the College has assessed the student as not meeting satisfactory attendance requirements the College will inform the student in writing of its intention to report the student to DHA/ DoE, and that he or she is able to access the College complaints and appeals process within 22 working days from the date on the college communication to the student.
- 1.10 This policy and procedure is implemented in accordance with the requirements of the National Code of Practice 2018 Standards 8 and 9.
- 1.11 The CEO is responsible for the implementation of this policy and procedure.

Definitions

International students undertaking an ELICOS course at Joan Lawman College must attend a minimum of 80% of scheduled course contact hours to comply with student visa requirements.

Students who fail to attend 80% of scheduled course contact hours are reported to Department of Home Affairs (DHA)/ Department of Education (DoE) unless the conditions outlined below apply:

If a student's attendance is less than 80% of the possible total scheduled contact hours for the course, then Joan Lawman College, reports them to DHA/ DoE unless the following applies:

- the student produces documentary evidence clearly demonstrating that compassionate or compelling circumstances (for example illness where a medical certificate states that the student is unable to attend classes) apply and,
- the student is attending at least 70 per cent of the scheduled course contact hours for the course in which he or she is enrolled.

Compassionate and compelling circumstances are identified and assessed in accordance with the Defer, suspend and cancel enrolment policy and procedure.

Any student who fails to achieve 70% attendance at scheduled classes are reported to DHA/ DoE.

Students who are "at risk" or "at high risk" of not achieving satisfactory attendance are identified through the procedures in this document, provided the opportunity to discuss underlying issues, counselled and placed on an intervention strategy.

Being "at risk" of not achieving satisfactory attendance occurs when a student:

- fails to achieve 90% attendance of total scheduled course hours. Students will receive a 1st warning letter and invited to intervention meeting.
- Is absent from scheduled classes for 5 consecutive days or more
- has an attendance pattern that may lead to them being unable to complete the course within the scheduled duration.

Being "at high risk" of not achieving satisfactory attendance occurs when a student:

- fails to achieve 85% attendance of total scheduled course hours. Students will receive a 2nd warning letter and invited to intervention meeting.

Receiving an 'Intention to report' letter occurs when a student:

- fails to achieve 80% attendance of total scheduled course contact hours. Students will receive an 'Intention to report letter' unless the following applies:
 - the student produces documentary evidence clearly demonstrating that compassionate or compelling circumstances (for example illness where a medical certificate states that the student is unable to attend classes) and
 - the student is attending at least 70 per cent of the scheduled course contact hours for the course in which he or she is enrolled

Being identified as failing to achieve satisfactory attendance for 70% of scheduled course contact hours.

- Students will receive an 'Intention to report letter'.

Receiving a 'Report' letter occurs when a student:

- falls into the categories identified above for reporting students to DHA/ DoE, and the period to appeal the Intention to report decision has lapsed or their appeal was not upheld or there were no compassionate or compelling circumstances. Students are then reported to DHA/ DoE and their enrolment is cancelled. This may impact a student's visa.

Procedure

2. Monitoring attendance

- 2.1 If an international student is absent from a scheduled class, it is his or her responsibility to:
- inform Joan Lawman College of the absence in advance if known
 - present evidence to support the reason for the absence if requested
 - contact their teacher and obtain any materials/ work from the session missed
 - follow-up on work missed as a result of being absent
 - obtain assessment information presented in sessions in his/her absence
 - inform his/her employer (if undertaking workplace delivery or work placement) of the absence
- 2.2 If an international student is going to be absent from a scheduled class they must notify the college as soon as possible via e-mail at info@jlc.edu.au.
- 2.3 All international students are informed of course attendance requirements, pre-enrolment, at orientation and during enrolment. The International student handbook, orientation document, attendance warning letters and trainers provide this information.

Recording and monitoring attendance

- 2.4 Attendance is recorded by teachers for each and every session of scheduled class time using the attendance register.
- 2.5 Teachers sign the attendance record daily and submit attendance registers each week for input into the Student Management System (SMS).
- 2.6 Student attendance is recorded in the Student management system. The SMS calculates students attendance as a percentage of total possible attendance. The result is indicated in the student file on

the SMS. Teachers monitor student attendance daily/ weekly. The Director of Studies monitors attendance records weekly in the SMS.

- 2.7 If a teacher identifies that a student has met the 'at risk' or 'at high risk' criteria from reviewing the attendance register/s or the Director of Studies identifies a student has met the 'at risk criteria from reviewing the SMS, then action is implmneted in accordance with this policy and procedure.
- 2.8 International students who supply medical certificates for absences are recorded as being absent for the period with a medical certificate and a copy of the certificate is placed in the international students file. Teachers/ Assessors collect certificates for absences and forward to the Director of Studies. The Director of Studies will place certificates and/ or other documentary evidence in the international student file.
- 2.9 International students with an irregular attendance pattern that affects their ability to successfully complete their course within the expected duration (deemed 'at risk') will also have an intervention strategy initiated by their teacher.
- 2.10 Students who are absent for 5 consecutive days of scheduled classes or have a pattern of non-attendance will be considered 'at risk' or 'at high risk' of not achieving satisfactory attendance.
- 2.11 If a student's attendance pattern is leading them to be 'at risk' or 'at high risk' of not being able to complete the course within the expected duration they will be invited to an intervention meeting.

3. Intervention strategies

- 3.1 The Director of Studies liaises with teachers and letters are sent to international students identified as being 'at risk' or 'at high risk'. The letter invites them to a meeting with the Director of Studies.
- 3.2 The underlying issues for the nonattendance are identified at this meeting. Students are provided access to study/ English language support and/ or personal welfare support. Further information on the types of support that can be provided are identified in the Student support policy and procedure.
- 3.3 An intervention strategy is negotiated with the international student at the meeting. The Intervention strategy is provided to the international student in writing.
- 3.4 The effectiveness of the strategy is reviewed every two weeks with amendments implemented where appropriate.
- 3.5 A revised course schedule, study and/ or attendance arrangements, delivery and assessment arrangements may be negotiated with the international student (where appropriate).
- 3.6 The international student attends a review meeting every two weeks. The effectiveness of this intervention strategy is monitored and adjusted if necessary.
- 3.7 Appropriate staff contribute to international student's intervention strategies. Intervention strategies may include the following support:
 - Arrange access to the external welfare counsellor where strategies and support mechanisms may be developed and implemented
 - Study support,
 - Managing study load,
 - Helping students adjust to the learning and assessment system
 - Homework support

- Reviewing learner materials with the student
 - Liaising with teachers to arrange the provision of support e.g. extra tuition, materials, exercises, amendments to timetables
 - Arranging access to supplementary reference materials
 - Arranging for supplementary exercises to develop understanding
 - Arranging access to computers
 - Arranging access to modified resources
 - Liaising with assessors to provide opportunities to re-attempt assessments
 - Providing guidance with organisation/ time management skills
 - Referral to external support services
 - Other English/ study skills support
- 3.8 The international student is required to abide by the new arrangements negotiated or Joan Lawman College may cease provision of the services/ arrangements.
- 3.9 The Director of Studies will review the international student's progress and commitment to the arrangements every two weeks.
- 3.10 There is no defined period of time for an intervention strategy. Appropriate internal and external personnel contribute to the process where required.
- 3.11 Each meeting, agreement, adjustment and communication in this process is documented and placed in the international students file.
- 3.12 Intervention meetings are initiated as soon as possible after the international student being identified as 'at risk' or 'at high risk' and within 10 working days of students being identified 'at risk' or 'at high risk'.

4. Intervention – completion

- 4.1 The intervention strategy will last for as long as appropriate.
- 4.2 The student is required to commit to the agreed intervention strategy negotiated.
- 4.3 Students who do not commit and/ or fail to abide by the terms of the intervention strategy or after intervention do not achieve satisfactory attendance are invited to a meeting with the Director of Studies.
- 4.4 At the meeting the reasons/ circumstances for the lack of attendance are identified and the Director of Studies (with input from appropriate internal/ external stakeholders) will decide whether to implement another intervention strategy and inform the student of Joan Lawman College's intention in writing.
- 4.5 All students regardless of whether on an intervention and who fail to achieve satisfactory attendance, are notified of the Joan Lawman College's intention to cancel their enrolment and report them to the Department of Home Affairs.
- 4.6 The student is notified in the Joan Lawman College's intention to report letter that they have 22 working days from the date of the letter to access the appeals process if they think they have grounds for an appeal.

- 4.7 If a student does not access the appeals process within 22 working days from the date on the intention to report letter, or the student's appeal is not upheld, or the student withdraws from the process Joan Lawman College will cancel the student's enrolment and report them to the Department of Home Affairs.
- 4.8 Students who access the appeals process will have their enrolment maintained, must attend all scheduled classes and meet all course requirements during the appeals process.

5. Warning letters

Being "at risk" of not achieving satisfactory attendance occurs when a student:

- fails to achieve 90% attendance of total scheduled course hours. Students will receive a 1st warning letter and invited to intervention meeting.
- Is absent from scheduled classes for 5 consecutive days or more

Being "at high risk" of not achieving satisfactory attendance occurs when a student:

- fails to achieve 85% attendance of total scheduled course hours. Students will receive a 2nd warning letter and invited to intervention meeting.

Receiving an 'Intention to report' letter occurs when a student:

- fails to achieve 80% attendance of total scheduled course contact hours. Students will receive an 'Intention to report letter' unless the following applies:
 - the student produces documentary evidence clearly demonstrating that compassionate or compelling circumstances (for example illness where a medical certificate states that the student is unable to attend classes) and
 - the student is attending at least 70 per cent of the scheduled course contact hours for the course in which he or she is enrolled

Being identified as failing to achieve satisfactory attendance for 70% of scheduled course contact hours.

- Students will receive an 'Intention to report letter'.

Receiving a 'Report' letter occurs when a student:

- falls into the categories identified above for reporting students to DHA/ DoE, and the period to appeal the Intention to report decision has lapsed or their appeal was not upheld or there were no compassionate or compelling circumstances. Students are then reported to DHA/ DoE and their enrolment is cancelled. This may impact a student's visa.

The attendance warning letters will also:

- remind students of the requirement to maintain satisfactory attendance,
- remind students of the impact of not maintaining satisfactory attendance on their enrolment at Joan Lawman College and student visa
- request students to contact the Joan Lawman College and access support/ initiate intervention
- if students are already on an intervention strategy inform them of the increased risk of being reported to Department of Home Affairs
- remind students of their right to appeal Joan Lawman College decisions,
- remind students of Joan Lawman College's requirements for reporting international students to Department of Home Affairs

Students who fail to achieve satisfactory attendance are sent “intention to report letters’. The letters provide the following information:

- inform the student they have failed to achieve satisfactory attendance
- outline the support Joan Lawman College has provided and outcomes of this support
- remind the student that under the requirements of the ESOS Act Joan Lawman College is required to report international students for failing to achieve satisfactory attendance
- remind students of their right to appeal Joan Lawman College decisions and provide timelines for appealing and the process.
- provide information on options for what to do next and contact details

5.6 The Attendance warning letters will be sent regardless if the student is undertaking and committed to a current intervention strategy.

6. Reporting international students for unsatisfactory attendance to DHA

6.1 If a student’s attendance is less than 80% of scheduled course contact hours for the study period Joan Lawman College reports them to DHA/ DoE unless the following applies:

- the student produces documentary evidence clearly demonstrating that compassionate or compelling circumstances (for example illness where a medical certificate states that the student is unable to attend classes) apply and,
- the student is attending at least 70 per cent of the scheduled course contact hours for the course in which he or she is enrolled.

6.2 Compassionate and compelling circumstances are identified and assessed in accordance with the Defer, suspend and cancel enrolment policy and procedure.

6.3 Any student who fails to achieve 70% of total possible attendance at schedule classes are reported to DHA/ DoE.

6.4 Attendance results are recorded in the Student Management System (SMS). Each week the Director of Studies will review the attendance of all students in the SMS and identify students who have failed to achieve satisfactory attendance.

6.5 Within 5 days of identifying the student has failed to achieve satisfactory attendance. the Director of Studies notifies the student in writing of the College’s intention to report the student to Department of Home Affairs for not achieving satisfactory attendance. The intention to report letter is used.

6.6 The student is informed they have 22 working days from the date on the ‘Intention to report’ letter to appeal (includes internal and external appeals) the decision to Joan Lawman College and asked if there are circumstances that are preventing the student from appealing e.g. sickness or ill-health).

6.7 If an internal or external appeal is not lodged or lodged but not upheld or the student withdraws from the internal or external appeal process then Joan Lawman College will report the student to Department of Home Affairs.

6.8 Joan Lawman College reports the student with 10 working days of the completion of the processes/ time periods identified in item 6.3.

6.9 If a student is reported to the Department of Home Affairs for unsatisfactory attendance a breach notice will be generated through PRISMS, sent to the student’s current address held by Joan Lawman College and a copy placed on the students file.

6.10 The letter also advises students to contact Department of Home Affairs immediately.

6.11 A copy of all communication is stored in the student file.

6.12 International student enrolments are cancelled in accordance with the Defer, suspend and cancel enrolment policy and procedure.

Documents to be employed when implementing this policy and procedure:

- Attendance monitoring record
- Intervention meeting records
- International student handbook
- Attendance register
- Attendance letters
- Student support policy and procedure
- International student orientation form
- Complaints and appeals policy and form
- SMS
- Defer, suspend or cancel enrolment policy and procedure
- Completion within expected duration policy and procedure
- Student file and assessment records

Revision history

| Revision Date | Comment | Revised by |
|---------------|------------------------------|------------|
| 1/1/18 | Policy and procedure created | CEO |
| 1/2/18 | Amended | CEO |