

## International Student Monitoring Attendance Policy

The purpose of this procedure is to address Standard 8 of the National Code 2018.

**Please note:** Under the requirements of the National Code 2018, attendance monitoring is no longer a requirement to be complied with. VET providers will only need to monitor attendance of students if this is set as a condition of registration by the national regulator. This policy has been included to allow the RTO the option of monitoring attendance.

UMA Education Solutions has selected to implement the Department of Education–Department of Home Affairs approved course progress policy and procedures. Noting this, UMA Education Solutions apply the following policy to monitor student attendance.

UMA Education Solutions monitors the attendance of all students in all courses. Attendance is calculated as the percentage of the course scheduled contact hours for which a student is present and recorded as present in the attendance roll. The face-to-face contact hours for attendance for each week at UMA Education Solutions is twenty (20) hours.

### Method of monitoring and recording attendance

The trainer of each class will record the attendance of each student on the Attendance register within fifteen (15) minutes of class commencing. Students will sign in and the trainer will counter sign the attendance register.

Trainers will enter the attendance data into the student management system 30 minutes after class commencement. This will allow the Office Manager to contact absent students within the next ninety (90) minutes to confirm their welfare and if they are simply running late.

### Identifying students at risk of unsatisfactory attendance

At the end of each fortnight, attendance reports will be run through the student management system by the Office Manager to identify any student who fails to attend for five consecutive days without approval or who has been marked absent for 15% or more of the scheduled contact hours for the course. Student who exceed these benchmarks are contacted to arrange a time to attend counselling. These students are identified at risk of not meeting satisfactory attendance requirements. The 15% monitoring threshold is intended to identify the student and establish corrective arrangements before mandatory report obligations are required.

As an example, over a two-week period of scheduled contact hours (40 hours), 15% is equal to six (6) hours. This is calculated by simply calculating as the percentage of the course scheduled contact hours the student's hours attended. In the example above, if the student was absent six (6) or more hours over the two weeks, this will trigger the counselling process. The student will be contacted in writing via a formal letter (*Unsatisfactory Attendance Warning*) asking the student to contact the Senior Trainer and

to attend a counselling session aimed at improving the student's attendance. This session is to discuss the possible reasons for non-attendance and to work out what support is required to assist the students to improve their attendance pattern.

During the counselling session, the Senior Trainer is to:

- Enquire about the cause of the low attendance
- Enquire about the student's general welfare arrangements
- Enquire about the student's current work commitments, if any
- Establish strategies to improve the student's attendance. These may include:
  - Addressing individual student needs that emerge during counselling
  - Seeking the student to engage in employment on alternate days, if applicable
  - Establishing a "buddy" arrangement for the student
  - Establishing carpooling or shared travel arrangements
  - Implementing an alarm clock at the student's home
  - Providing the student with counselling about establishing good sleep / Work / Rest pattern
  - Enrolling the student in a study support skills program

Strategies to improve the student's attendance are to be recorded within the Student Intervention Strategy Agreement. This is to be signed by the student and the Senior Trainer and retained on the students file.

### **Identifying unsatisfactory attendance**

Students are identified as having unsatisfactory attendance where the student's attendance falls below 80% attendance of the scheduled course contact hours.

A student who has missed more than 20% of the scheduled course contact hours will be issued an Intention to Report for Unsatisfactory Attendance Letter advising them that they have missed more than 20% of the scheduled course contact hours and notifying them of UMA Education Solutions's intention to report them to the Department of Education for unsatisfactory attendance. This letter will also inform them they have twenty (20) working days in which to access UMA Education Solutions's appeals process should they wish to appeal any decision to be made.

A student will not be reported until the outcome of any appeal has been finalised and the appeal judged unsuccessful. The student will maintain their enrolment throughout the appeals process.

### **Reporting unsatisfactory attendance**

There are a number of steps to follow in the process of making an unsatisfactory attendance report about a student to the Department of Education. There are:

- The student will be assessed as making unsatisfactory attendance as outlined above.
- UMA Education Solutions must notify the student in writing of the intention to report the student to the Department of Education and DHA for Unsatisfactory Attendance and advise the student they have twenty (20) working days to access UMA Education Solutions appeals process prior to being reported. Letters of the intention to report the student to the Department of Education and DHA are to be issued by the CEO. During any such period the student's enrolment is kept current.
- The written notice (of Intention to Report for Unsatisfactory Attendance) must inform the student that he or she is able to access the complaints and appeals process. The student may appeal on the following grounds:
  - UMA Education Solutions's failure to record or calculate a student's attendance accurately, compassionate or compelling circumstances.
  - Appeals will be handled in accordance with the Appeals Policy.
  - Where the student's appeal is successful, due to an error in the attendance calculation, and the student actually made satisfactory course attendance, UMA Education Solutions does not report the student.
  - Where the student's appeals process shows that the student has not made satisfactory course attendance, but there are compassionate or compelling reasons for the lack of attendance, ongoing support must be provided to the student through UMA Education Solutions's intervention strategy, and does not report the student.
  - Where the student has chosen not to access the complaints and appeals processes within the twenty (20) working day period, the student withdraws from the process, or the process is completed or the student's appeal was unsuccessful, UMA Education Solutions must report the student to the Department of Education and DHA for unsatisfactory attendance. A student will not be reported until the outcome of any appeal has been finalised and the appeal has been unsuccessful, or the student does not access the appeals process during the 20-day period.

- Where a student is assessed as having made unsatisfactory course attendance, UMA Education Solutions will report the student to the Department of Education via PRISMS within five (5) days of the twenty (20) day period for appeals being lodged or lapsing. The Office Manager is responsible for all transactions on PRISMS as directed by the CEO. Reporting in PRISMS must be completed as soon as practicable.

### **Submitting Student Course Variations report on PRISMS**

The ESOS Act and National Code 2018 requires that UMA Education Solutions make mandatory report to the secure online Commonwealth database, the Provider Registration and International Student Management System (PRISMS). This includes submitting a Student Course Variations reports (SCV) where a student is not complying with their visa conditions. UMA Education Solutions is required to use this SCV reason (**Non-Compliance with visa conditions**) when reporting for unsatisfactory attendance and unsatisfactory course progress. The reporting of non-compliance with visa conditions must be reported on PRISMS in accordance with the PRISMS Provider User Guide, Feb 2022 ([click](#)). This SCV must be made as soon as practicable after the time has passed for the student to appeal the decision to report or any appeal made by the student has been finalised.

### **Record keeping**

The following records must be retained for at least two years from the date the student's enrolment ends:

- Attendance records retained in student management systems
- student contact and counselling records (for example, warning letters)
- notices of intention to report
- complaints and appeals outcomes, and
- other relevant attendance records

### **Student Holidays**

Students are expected to take breaks only during the designated term breaks. These dates are provided on the student timetable, website and student handbook. Any other breaks are to be negotiated with the Senior Trainer.