



## Attendance and Progression Policy

### Overview

In line with legislation from the National Code 2018 standard 8 Overseas Students VISA Requirements, IH Sydney Training Services Pty Ltd (referred to as IH Sydney) is required to have a documented policy and procedure for monitor student attendance and course progression.

This policy outlines the requirements for students to meet the attendance and course progression requirements of their VISA as well outlines how IH Sydney will monitor attendance and progression to support to students who may experience difficulties.

International House Sydney is responsible for its administration systems to ensure attendance monitoring, course progress and compliance.

### Attendance

#### Attendance records

All student absences are marked daily on the weekly attendance roll by the class teacher. No exceptions are made to this rule regardless of any documents the student may provide. Absence may be as a result of illness, lateness, non-attendance or leaving class early. A numerical system of 0.5 per 30 minutes is used to indicate the number of hours absent.

Non-attendance due to illness evidenced by a medical certificate is recorded but is marked as explained. (Certificates must be provided by a Doctor. Sickness certificates purchased from a chemist are not acceptable).

Other exceptional personal leave and incidents outside of a student's control must also be recorded, monitored and reported weekly.

#### Attendance requirements

Whilst the Standard and VISA requirements expect 100% attendance, due medical or other acceptable reason, the minimum standard set by IH Sydney to achieve satisfactory attendance is:

1. Attend a minimum of 80% of all structured training hours, and
2. Complete 100% of all assessment tasks satisfactorily.

#### Attendance hours to 80% minimum

##### ELICOS

Due to the short duration of each course 100% attendance is 20 hours per week. Therefore IH Sydney Training Services calculates the minimum attendance as 16 hours per week.

##### VET

Due to the terms being 6 weeks duration, 100% attendance is 60 hours in each 3 week period. Therefore IH Sydney Training Services will calculate the minimum hours of attendance is 48 hours in each 3 week period.



### **Non – commencement**

Non – commencement is determined as:

1. Not attending orientation without explanation or contact; and/or
2. Not attending the first day of a course or term without explanation or contact,
3. Not attending any day of training without explanation or contact; or
4. Attending paid employment instead of training on a scheduled training day.

This is an Intention to Report for non-commencement.

### **Monitoring attendance**

To monitor attendance:

1. Attendance records must be accurate and detailed maintained for students in all courses; and
2. Trainers/Teachers are required to conduct attendance polls 3 times per class at different times throughout the session to ensure students have not just logged in but have fully engaged.

**Please Note:** Attendance for virtual classes is also captured by ensuring all students signed in have their camera activated and can be seen by their trainer.

**Note:** Teachers/Trainers are the first line of enquiry and it is their responsibility to discover why a student is absent, late or leaves early.

### **Actions**

Monitoring attendance is one of the methodologies we use to support each student to achieve their training and assessment goals and to meet their VISA requirements.

### **Collecting attendance records**

After class on Mondays, teachers are required to leave the rolls in the yellow folder in the staff room for entry into RTO Manager. On Tuesday morning, they are collected from the yellow folder in the staff room. Any issues that cannot be dealt with by a teacher/Trainer are to be passed on to the Director of Studies, State Manager Student Services Officer or Administration manager, who are available at any time to teachers/students who wish to discuss their attendance.

As such, administration/student support is to review attendance records:

#### **ELICOS**

Every Monday after the completion of week 1.

#### **VET**

1. by Tuesday of week 4 for weeks 1 to 3 and
2. by the Tuesday of week 1 of the term break for weeks 4 to 6

For students failing to meet attendance requirements the following will occur:

1. Achieving 90-85% attendance, the student will be sent a Warning Letter; or
2. Achieving 85 - 80% attendance, the student will receive Warning Letter 2.

Warning letters 1 and 2 will be sent by:

1. Wednesday of week 4 and/or
2. Wednesday of week 1 of the term break.

Students receiving warning letter 1 or 2 will be required to meet with the Head trainer to discuss any issues and obtain the necessary support to meet attendance requirements.

When a student is:

1. Achieving below 80% attendance, the student will be sent a notice of intention to report the student via PRISMS for unsatisfactory attendance. The visa issue date and arrival in Australia date must be considered as well as the finalisation of application processing date for studies with us when calculating attendance; and/or
2. Failing to take corrective action, the student is to be cancelled and reported in PRISMS.

When a student has not attended orientation or the first day of a course or term without explanation or contact, they will be sent a notice of intention to report – Non-commencement.

We may decide not to report the student for breaching the 80 per cent attendance requirements where:

- a) the student produces documentary evidence clearly demonstrating that compassionate or compelling circumstances apply,
- b) that the decision is consistent with our documented attendance policies and procedures,
- c) course progression is above the minimum standard; or
- d) we have confirmed that the student has attended at least 80 per cent of the scheduled course contact hours for the course in which the student is enrolled.

**Note:** Although student visa holders are told that they will be reported if their attendance falls below 80%, it is at the discretion of International House Sydney whether to report a student whose attendance is 70%-80% and who is making progress in the course. Where discretion is necessary, a committee of various key college staff will meet to discuss the individual case.

Where attendance has not been achieved for assessment, students who receive a Warning letter will be required to undertake the Assessment support with the Head Trainer/Director of Studies as per the agreed schedule.

### **Notification to Dept. of education - attendance**

Administration/Student Support will notify the Secretary of Dept. Education through PRISMS as soon as practicable of the student not maintaining satisfactory attendance where:

- i. the student has chosen not to access the appeals processes within the 20 - working day period,
- ii. the student withdraws from the process, or
- i. the process is completed and results in a decision supporting the RTO (i.e., the student's appeal was unsuccessful)

### **Appeals**

A student may appeal on the following grounds:

- Our failure to record or calculate a student's attendance accurately; or
- Compassionate or compelling circumstances.



### **Compassionate and compelling circumstances**

Compassionate and compelling circumstances could include but is not limited to:

- A. serious illness or injury, where a medical certificate states that the student was unable to attend classes,
- B. bereavement of close family members such as parents or grandparents (Where possible a death certificate should be provided),
- C. major political upheaval or natural disaster in the home country requiring emergency travel and this has impacted on the student's studies, or
- D. a traumatic experience which could include:
  - i. involvement in, or witnessing of a serious accident, or
  - ii. witnessing or being the victim of a serious crime and this has impacted on the student (these cases should be supported by police or psychologists' reports),
- E. inability to begin studying on the course commencement date due to delay in receiving a student visa, or
- F. inability to study for a portion of a study period due to cultural reasons e.g. Arranged marriage.

Where the Student's internal appeal is unsuccessful, they are sent a letter stating they have the right to apply for an external appeal. The student has 20 working days to provide evidence that they have lodged an external appeal with the Overseas Student Ombudsman.

Where the student's appeal is successful, the outcomes may vary according to the findings of the appeals process.

- ii. If the internal appeal shows that there was an error in calculation, and the student actually had satisfactory attendance (attended at least 80 per cent for the Term), we will not report the student; and
- iii. If the appeals process shows that the student has not had satisfactory attendance, but there are compassionate or compelling reasons for the lack of attendance, we will not report the student.

## **Course progress**

### **Course calendars**

Course calendars for each intake to ensure each course can commence and complete with sufficient time for each student to meet the Volume of Learning and amount of training requirements.

Each calendar shall demonstrate:

- 1. Number of weeks per term; and
- 2. Holiday periods.

Each calendar shall consider the declared public holidays for the campus each student enrolls in.

### **Progress**

#### **Satisfactory progress**

Satisfactory course progress in ELICOS is defined as showing improvement over two consecutive terms.



Satisfactory course progress in VET is defined as a student successfully achieving competency in 50% or greater of the course requirements in a study period (Term) after one of the following has occurred:

- Successful completion of the assessment/s on first attempt,
- At successful completion of the no charge re-attempt, and/or
- At successful completion of one or both of chargeable re-attempts as per the assessment policy.

### **Unsatisfactory progress**

Unsatisfactory course is any instance of failing to meet the requirements for satisfactory course progress.

### **Monitoring, Recording and Assessing the Course Progress**

Marketing is responsible for communicating these expectations and requirements to all prospective and enrolled students prior to their enrolment and prior to their arrival.

Student Support is responsible for communicating these expectations and requirements to all enrolled students during their Day One induction, and consistently through their enrolment

### **Monitoring student progress**

Trainers are responsible for:

- a) identifying any student who may, need support or intervention achieve satisfactory progress,
- b) identifying any student who may need support to complete the course in the time as specified on their e-CoE,
- c) identifying students who have not made satisfactory progress in two (2) consecutive study periods,
- d) working with the student, Head Trainer and State Manager to provide appropriate intervention, and
- e) continuing to monitor and record student's academic progress on completion of each further study period.

Any agreed intervention strategy is recorded in student file.

### **Engaging with students needing support**

When dealing with a student who is not progressing effectively in their course we will:

1. Ensure all students are treated fairly and openly,
2. Aim to maintain student confidentiality and privacy except as required by law,
3. Ensure appropriate information will be made available to students identified as at risk of not achieving satisfactory course progress,
4. Ensure ease of access to learning and other support to students at risk of not achieving satisfactory course progress,
5. Ensure equity, consistency, transparency, and natural justice principles are observed, and
6. Ensure privacy laws are respected.

### **Intervention strategy**

The first step in our intervention strategy is the Assessment Intervention Program (AIP).

The AIP will be used as a proactive process to assist all students enrolled in a term to address any concerns the student has about an assessment task prior to submission.

The AIP is implemented in weeks 3 and 6 of each term on the Friday immediately prior to the submission date for each assessment.

It is a requirement under the terms of the National Code 2018 that we must undertake an intervention strategy to attempt to resolve the problem.

### **Use of intervention strategies**

Intervention strategies are to be used by Head Trainers and the strategies we may use to address issues, include:

1. Move the student to a class behind,
2. Counsel the student to identify any personal issues affecting course progress,
3. Develop a learning contract in cooperation with the student,
4. Withdraw the student from the class, so that we can provide 1:1 session with a Trainer,
5. Set additional tasks for the student to work on a particular area, of weakness, or
6. Extend the students enrol to provide an opportunity to re-enrol in the unit/s to achieve satisfactory

Intervention strategies we may use to address course progress is Academic Support

In cases whereby a student is struggling with the learning materials, the trainer, is to recommend to Head trainer a strategy or range of strategies which will benefit the student/s.

A course progress report including:

1. Strategy or range of strategies used,
2. Progress of the student/s,
3. Outcomes being achieved,
4. Strategy/s not successful, and
5. Students reported,

is to be presented at IH meeting.

### **Reporting course progress**

#### **ELICOS**

For students failing to progress the following will occur:

1. non-progression in 2 consecutive terms, the student will be sent Warning Letter, or
2. non-progression in 3<sup>rd</sup> term, the student will receive, a notice of intention to report.

#### **VET**

1. Assessment Intervention Program will be sent to all students required to participate in the Assessment Intervention plan. This will be sent on the Wednesday of weeks 3 and 6 of each term with sessions being held on Friday in the same week as:
  - 1<sup>st</sup> hour – Certificate IV students,



- 2<sup>nd</sup> hour – Diploma students, and
  - 3<sup>rd</sup> hour – Advanced Diploma students.
2. Warning letter is sent to students who do not satisfactorily complete the assessment.
  3. Intention to Report will be sent when a student in 2 consecutive terms has not progressed satisfactorily as per:
    - Whereby the consecutive term has 2 units of competency:
      - Wednesday of week 4, and/or
      - Wednesday of week 1 of the term break
    - Whereby the unit has 1 unit of competency
      - Wednesday of week 1 of the term break

**Note:**

Warning Letters are after 1 term.

ITR Letter are after 2 consecutive terms have passed.

Students receiving Warning letter will be required to meet with the Head Trainer to discuss any issues and obtain the necessary support to meet progress requirements including an intervention plan.

After the application of the AIP and intervention strategy if a student is still not satisfactorily progressing, or student has made no effort to attend AIP or participate in intervention, we will notify the student in writing of our intent to report them for not achieving satisfactory course progress and at this point they must meet with the State manager and must lodge an appeal of our decision if they wish to appeal.

If they fail to lodge an appeal at the meeting, they will have a maximum of 2 days from the meeting date to lodge their appeal.

**Allowable extensions of course duration**

We must not extend the duration of the overseas student's enrolment if the student is unable to complete the course within the expected duration, unless:

1. there are compassionate or compelling circumstances, as assessed by the registered provider on the basis of demonstrable evidence, or
2. we have implemented, or are in the process of implementing, an intervention strategy for the student because the student is at risk of not meeting course progress requirements, or
3. an approved deferral or suspension of the student's enrolment has occurred under Standard 9 (Deferring, suspending or cancelling the overseas student's enrolment).

If we extend the duration of the student's enrolment, we 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.

**Notification to Dept. of Education – course progress**

Administration/Student Support will notify the Secretary of Dept. Education through PRISMS as soon as practicable of the student not maintaining satisfactory progress where:

1. the student has chosen not to access the appeals processes within the 20 - working day period,



2. the student withdraws from the process, or
3. the process is completed and results in a decision supporting the RTO (i.e., the student's appeal was unsuccessful)

### **Completion of training**

Where we have received a request for a letter of completion from a student who has, completed their full course and gained a qualification; or completed a minimum of one unit of competency and are completing their enrolment, we will furnish such letter.

### **Appeals**

Where a student is issued with a 'notice of intent to report', the ITR meeting will include confirming the student's understanding of the right to lodge an appeal within 20 working days of the notice being issued as per the IH Sydney Complaints and Appeals Policy.

Where a student appeals a 'notice of intent to report' and is not satisfied with the outcome of the appeals process, they will be informed of their right to make an external appeal within 5 working days to the Overseas Student Ombudsman.

Such advice will include:

1. the contact details of the Overseas Students Ombudsman (OSO).
2. advice of our intent to still report course progress with the Dept,
3. enrolment with IH Sydney is maintained, and
4. support is still being provided.

### **Continuing students**

Whereby a student makes an appeal under this policy, the student shall not be excluded from any training or training related activities during the investigation and subsequent reviews.

This does not apply to an appeal which is determined to be a non-complying appeal as per our complaints and appeals policy.

### **Intervention/Reporting Process**

1. All students attend AIP.
2. Students fail 1 unit (50%) or greater in term receive a warning letter (includes the intervention strategy and the option to meet with HT),
3. Students that fail 1 unit (50%) or greater in 2 consecutive terms receive an ITR,
4. 20 days after the issue of the ITR, if appeal is unsuccessful, student is reported, and
5. Students can approach the ombudsman on rejection of the appeal.





**International House**  
Sydney City | Bondi | Byron Bay  
Gold Coast | Darwin | Melbourne



**AIP Message**

Date

Dear **name**

**Re: Course progress.**

To ensure you are able to meet the progression requirements of your student Visa, you are to participate in the Assessment Intervention Program, so that we can provide additional support to assist you to successfully complete your assessments and gain your qualification.

The Assessment Intervention Program is on **Friday xx/xx/xxxx** starting at **xx.xx am or p.m.** and is accessible through the link: **www.**

We look forward to working with you to resolve any issues you may have.

**Please note:** Failure to attend the session or being more than 15 minutes late may jeopardise your progression requirements of your student visa, if you are not successful in passing the unit/s.

Regards

Tony Currie  
Academic Support Manager

**Warning Letter message**  
**Course Progress Warning Letter**

Further to the notice to attend the Assessment Intervention Program issued to you on: **xx/xx/xxxx**, your academic progress in **Certificate IV in Project Management Practice** for the term **May 2020** has been assessed as unsatisfactory.

**Please note:** If your course progress continues to be unsatisfactory it will lead you to fail two consecutive terms. The school will then be required to send you an Intention to Report letter. This may lead to the College having to report you to immigration for failure to meet your visa obligations.

You must now ensure you pass your current and future terms. Please follow the intervention plan provided below, to help ensure that you successfully progress in your studies.

As noted in the plan below, you can also contact your campus Head Trainer should you wish to discuss your course progression or the contents of the intervention plan.



### Intervention Plan

To ensure that you progress in your studies, please follow the guidelines provided below:

- a) Attend all your core lectures and participate in class. Please note that the school records the class attendance of international students, as required by the Australian government.
- b) Read through your training material and assessments before attending class and ask your trainer for clarification if needed.
- c) If you need assistance with your assessments, attend the online or on campus assessment support sessions that are available to you. Please see your timetable for the venue and times for these sessions.
- d) Make sure that you submit your future assessments by the due date and to regularly check for any feedback from your trainer. If your assignment has been graded as Not Yet Satisfactory, please follow the instructions from your trainer and resubmit your assignment within 3 days.
- e) With regards to the previous term, please note that you have the option to resit the unit(s) you failed (resit fee of \$100 per unit will apply). Please contact your campus Head Trainer via Canvas inbox for more information.

#### **Head Trainers:**

**Sydney and Bondi – Greg Money**

**Melbourne – Alfred Cheah**

**Gold Coast and Byron Bay – Jeff de Jager**

**Darwin – Leana Barbacel**

- f) If you have any difficulties accessing your learner portal or your training material, please contact [enquiries@IH.edu.au](mailto:enquiries@IH.edu.au)
- g) If you are experiencing stress or anxiety and wish to speak to our school counsellor, please contact [ihear@ih.edu.au](mailto:ihear@ih.edu.au)

At Business College at IH, we have our student's best interests at heart. We want to ensure that you succeed in your studies.

Yours sincerely,  
IH Sydney Training Services

#### **ITR Message**

**Date**

Dear **name**

#### **Re: Unsatisfactory course progress – Intention to Report**

Further to the warning letter you received on xx xx xxxx, your academic performance and participation in your course (**Code/Title**) is still unsatisfactory.

Your academic progress has now been assessed as unsatisfactory for a second consecutive term.



**International  
House**

Sydney City | Bondi | Byron Bay  
Gold Coast | Darwin | Melbourne



As such we are now required under the ESOS Framework to report this to the relevant Australian government departments, including Immigration. If you need information on how this may affect your visa, you can contact Australian immigration officials directly for further assistance.

If you wish to appeal this decision, you need to meet with the State manager (**Name**) to lodge your completed appeal form (as attached to this notice) with supporting evidence to show why we should not report you for failing to satisfactorily progress.

A meeting with (**State Manager** name) has been scheduled for:

Date:

Time:

Location:

### **Actions**

If you fail to meet with your State Manager within 20 working days from the date of this letter, and fail to lodge your appeal at this meeting, we will notify the Secretary of Education of your failure to maintain satisfactory course progression.

If you appeal our decision within the 20 working days, we will suspend the reporting until you get an outcome.

If your appeal is unsuccessful, you may seek external mediation within 5 working days of the outcome of your appeal by lodging a complaint with the Overseas Student Ombudsman.

While the appeals process is underway, please ensure you attend all your lessons and submit all assessment tasks that may be due. IH Sydney Training Services Pty Ltd will maintain your enrolment and your access to all related services and support.

Regards



**APPEAL DETAILS**

Student name: \_\_\_\_\_

Qualification: \_\_\_\_\_

Unit(s) of Competency: \_\_\_\_\_

Assessment tasks: \_\_\_\_\_

Reason for appeal: \_\_\_\_\_

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**OUTCOME BEING SOUGHT**

State the outcome you are seeking for your appeal: \_\_\_\_\_

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**OFFICE USE ONLY**

Date appeal received: \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_

Appeal file sent to State manager: \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_

Date appeal outcome determined: \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_

**Appeal outcome**

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Date student notified of outcome: \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_

Completed file sent to director of business for review: **Yes/No**

Date matter completed: \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_