Monitoring Attendance and Course Progress Policy and Procedures – International Students

1. Purpose

This document describes the policies, procedures and management of monitoring attendance and course progress of international students.

2. Scope

This policy and procedure apply to all onshore international students on a student VISA who are enrolled at The Gordon in a Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) registered accredited training programs.

3. Policy overview and principles

The *National Code of Practice for Providers of Education and Training to Overseas Students (National Code)* sets nationally consistent standards that govern the protection of international students and delivery of courses to those students by providers registered on CRICOS. The National Code is a legislative instrument of the ESOS Act and is legally enforceable under Part 4. Detailed information on The ESOS Legislative Framework can be found on the *International staff portal page*

Under *Standard 8 Overseas student visa requirements*, overseas students must make satisfactory course progress and, where applicable, attendance as a condition of their student visa.

As the registered provider The Gordon must:

- Monitor overseas students' course progress and, where applicable, attendance for each course in which the overseas student is enrolled
- The expected duration of study period specified in the student's CoE must not exceed the CRICOS registered duration (consideration will be given for compelling or compassionate circumstances)
- 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
- Have an implemented policy and process to identify, notify and assist a student at risk of not (or is at risk) of meeting course progress or attendance requirements
- 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.

3.1 ELICOS Programs: course progress and attendance requirements

ELICOS programs must have a document policy and procedure for monitoring and recording attendance of international student, refer *ELICOS Progress and Attendance Monitoring Policy and Procedure INT PR 08.*
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3.2 VET Programs: course progress and attendance requirements

Students are advised of course progress and attendance requirements:

- Letter of Offer (Terms and Conditions)
- Compulsory Student Orientation
- From the Program Area as part of the unit commencement information
- The International Student Portal and student communications

3.2.1 Assessing Course Progress

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- Requirements for achieving satisfactory course progress, policies that promote and uphold the academic integrity of the course requirements and the process to address misconduct and allegations of misconduct
- Process for recording and assessing course progress requirements
- Process to identify students at risk of unsatisfactory course progress
- Intervention strategy to assist students at risk of not meeting course progress requirements in sufficient time for students to achieve satisfactory course progress
- Determination point in which a student has failed to meet satisfactory course progress.

Assessing course progress is also managed in accordance with the *Assessment Policy TED PO 10* and the *Student Conduct Policy RISK PO 08.*

3.2.2 Monitoring of attendance

- The Gordon 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 international students is set as a condition of registration by ESOS Agency.
- If required to monitor international students' attendance as a condition of registration, the minimum requirement for attendance is 80 per cent of the scheduled contact hours for the course.
- The policy shall include:
  - Method for working out minimum attendance
  - Process for recoding attendance
  - Details of intervention strategy to identify, notify and assist international 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 student's attendance drops below 80 per cent
  - Process for determining the point at which the student has failed to meet satisfactory course attendance

Currently not required by ASQA as a condition of registration, the Gordon will however record and monitor international students' attendance as a key indicator in determining international student course progress. International students are expected to maintain a minimum attendance of 80%. This is recorded and monitored in Student Management system by the Program Area.

Students who are absent for class for five or more consecutive days and/or have a pattern of absence without legit image of substantiate reasons will be considered "at risk" or unsatisfactory course attendance and will be issued an at risk warning.

3.2.3 Managing students with unsatisfactory course and / or attendance requirements

The International Office and Program Area use a variety of indicators and assessments to monitor international student progress, these may include but are not limited to:

- Attendance
- Results of assessments and units
- Late submissions or number of resubmissions
- Completing competency-based assessments and recording results
- Withdrawn Students Report
- Discussing any concerns directly with the student
- Feedback from teaching staff

Identifying students 'at risk' and intervention strategy

Teaching staff shall notify "at risk" students as early as possible and notify the Portfolio Manager, Course Lead and International Office for early intervention.

A student will be considered 'at risk' of achieving satisfactory course progress if:

- Failing to submit a key piece of assessment that may result in failure of the unit
- Failing to attend an assessment or sit an examination (first attempt)
- Being withdrawn from a unit due to poor attendance or no submissions
- Failing a unit
- Failing core unit(s) which prevent the student from continuing studies in the current semester
- At risk of failing a unit due to being deemed incompetent for a number of assessments and tasks
- Being absent from class for five consecutive days or more and/or has a consistent pattern of absence without legitimate and substantiated reasons

A student will be considered 'at risk' of achieving satisfactory attendance if the student's attendance is below 80%, or have a pattern of absence without legit image of substantiate reasons.

The International Office and Program office will meet with the student to discuss action required. International Office will issue a warning letter with intervention strategy.

If there are evident compassionate or compelling circumstances, the International Office may implement an intervention strategy without issuing a warning letter

The Intervention strategy will be discussed between program area, International Office and the student.

The Program area may use *Work Plan for International Students INT FO 01.01* to propose intervention strategy.

It is the student's responsibility to follow through on any assistance offered in the intervention strategy.

Reporting unsatisfactory course progress and unsatisfactory course attendance

A student will be identified as "Unsatisfactory Progress" when

- Failing unit(s) in the second enrolment
- Failing 50% of enrolled units in two consecutive study semesters
- Failing in completing actions in intervention strategy

A student will be identified as "Unsatisfactory Attendance" where the student fails to meet attendance requirements outlined in the final warning letter issued.

Where a student has been assessed as not meeting the course progress or attendance requirements and continues with inaction as per actions in intervention strategies, the student will be advised with written notice:

- The Gordon intends to cancel their enrolment and report the student of unsatisfactory course progress and/or unsatisfactory course attendance
- The reasons for the intention to report
- The students' rights and access to the *Complaints and Appeals Policy RISK PO 09* within 20 working days

PRISMS

Unsatisfactory course progress or unsatisfactory course attendance must only be recorded in PRISMS:

- Once the internal and external complaints processes have been completed and the decision or recommendation supports The Gordon

- The 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 student withdraws from the internal or external appeals processes and notifies The Gordon in writing

Decision not to report student for breaching attendance requirements

The Gordon may decide to not report the student, if the student is still attending at least 70 per cent of the scheduled course contact hours and:

- The student has provided evidence demonstrating compassionate and compelling circumstances
- The student is maintaining satisfactory course progress and remains on track to complete within the expected course duration on their Confirmation of Enrolment.

3.2.4 Allowable extensions of course duration

Where the student is unable to complete the course within the expected duration, a student's enrolment will only be extended when

- There are compassionate and compelling circumstances as assessed by the international office. Student must provide demonstrable evidence.
- An intervention strategy has been implemented, or in the process of implementing, because the student is at risk of not meeting course progress requirements
- A student has been approved for a Leave of Absence *Refer Deferring, Suspending or Cancelling Enrolment Policy – International Students INT PR 02*

The Gordon may not approve extension of enrolment if a student is identified as "at risk" of unsatisfactory attendance or course progress and fails to complete actions in intervention strategies.

Where the duration of the student's enrolment has been extended the student is advised in writing of the outcome and advised to contact the Department of Home Affairs to seek advice on potential impacts on their visa (including the need to obtain a new visa)

Where the extension of course duration is rejected, the student will be advised in writing with the reasons why and the rights and access to the *Complaints and Appeals Policy RISK PO 09* within 20 working days

3.2.5 Modes of delivery

Modes of delivery are discussed at regular scheduled meetings between the International Office and Program Area. The modes of delivery available for international students are defined as part of the course registration process.

- The Gordon must not deliver a course exclusively online or distance learning to an international student
- The Gordon must not deliver more than one-third of the units (or equivalent) by online or distance learning to an international student
- In each compulsory study period for a course, the student must be studying at least one unit that is not online or distance learning, unless the student is completing the last unit of their course
- For ELICOS programs and online or distance learning must be in addition to minimum face-to-face teaching requirements approved by ASQA or the ESOS Agency as part of the registration of the course (If applicable)
- The Gordon will take all reasonable steps to support international students disadvantaged by:
    - Additional costs of other requirements, including students with special needs, undertaking online or distance learning

- Inability to access the resources and student services or opportunities to engage with other international students while undertaking online or distance learning

4. Procedure

Action	Responsibility	Guidance
Assessing course progress		
Monitor and review course progress VET Programs	**Program Area / International Office**	Monitor course progress with program areas. Regular meetings each Semester to discuss international student list. Identify students 'at risk' of or are making unsatisfactory course progress and report to International Office. • Discuss intervention actions and decide on best outcome for the student to continue with course progress.
Implement Intervention Strategy	International Office / Program Area / Student	Meet with the student to discuss concerns with course progress. Student advised of risks with continued progress issues and issued a reminder/warning in writing. • The student shall follow through with actions to improve course progress.
Unsatisfactory course progress and intention to report	International Office / Student	Where the student is identified unsatisfactory Course Progress, or fails to complete actions required to improve course progress, an intention to report correspondence will be issued.
Complaints and Appeals process	Student	Where an Intention to Report letter is issued, the student is advised of the right to appeal the decision within 20 working days.
Recording unsatisfactory course progress in PRISMS	International Officer	If the student chooses not to appeal, or the appeal outcome supports The Gordon, International Office will report in PRISMS and save records in Student Management system.
Update student record	International Officer	Update student records in Student Management system.
Monitoring attendance		
Record and Monitor attendance VET Programs	International Office / Program Area	Monitor student attendance with program areas. Regular meetings each Semester to discuss international student list. Identify students 'at risk' of or unsatisfactory course attendance and report to International Office.
Review attendance and Implement intervention strategy	International Officer / Program Area / Student	Meet with the student to discuss attendance. Decide on best outcome for the student to continue with course progress. Student advised of risks with continued attendance issues. The student shall follow through intervention strategy to improve attendance.

Action	Responsibility	Guidance
Review attendance	International Office	Where the student fails to improve attendance, an Intention to Report may be issued.
Complaints and appeals process	Student	The student is advised of the right to appeal the decision within 20 working days.
Decision not to report student for breaching attendance requirements	International Officer / Manager Commercial Operations / Program Area	Considered when: • The student is making course progress • Compelling or compassionate circumstances Student will be advised of reasons why and actions required.
Recording unsatisfactory course attendance in PRISMS	International Officer	If the student chooses not to appeal, or the appeal outcome supports The Gordon, International Office will report in PRISMS and save records in Student Management system.
Update student record	International Officer	Update student records in Student Management system.
Extending course duration		
Review CoE and course completion	International Officer	Review course completion and CoE at the end of each term. Identify students who are not able to complete the course within CoE duration. Discuss with Program Areas at scheduled meetings. Meet with Program area and students as required with action plan.
Request CoE extension	Student/Program Area	Student or Program Area requests for CoE extension in order to complete the course.
Assess CoE Extension	International Officer / Manager Commercial Operations	Review the student's progress and circumstances with program area. Determine the student's eligibility for CoE extension.
CoE Extension Outcome	International Officer	Advise outcome of CoE extension. If approved, extend CoE in PRISMS and advise the student seek visa advice from the Department of Home Affairs.

5. Responsibilities

Position	Responsibility / Governance
Executive Director Growth and Student Experience	Unless otherwise stated in this procedure the Executive Director Commercial Business is responsible for the issue, revision, re-issue and authorisation of this document.
International Office	For the monitoring of student progress and attendance and working with the program area to ensure the best outcome of the student.
Teaching Staff	For recording attendance for each session they teach, and for entering participation and results for each Unit of Competency they deliver into the Student Management system within ten working days so that attendance and progress can be monitored for all students.

Program Area	For monitoring progress on a weekly basis for each enrolled international student and for establishing a study support *'Work Plan for International Students' INT FO 01.01* for any student who is falling behind progress milestones.
English Language Centre Manager (or delegate)	For reporting attendance of each student enrolled in an ELICOS course to International Office on a weekly basis.

6.   Definitions

The following terms and abbreviations are specific to this policy and procedure:

Name	Description
Compassionate or compelling circumstances	Circumstances should be beyond the control of the student and the grounds are supported by substantiating documentation. Examples of compelling or compassionate circumstances are: • Illness of the student or immediate family member evidenced by a medical certificate. • Death of a student's immediate family member evidenced by a death certificate. Other compassionate grounds where adequate evidence can be provided to show cause for release: • Significant natural disaster in home country • Political instability in home country • Mental health illness or significant personal issues, evidenced by a psychological or medical report of a nature that would warrant release
Intention to Report letter	a formal notification to the student that the Gordon intends to report unsatisfactory attendance or course progress to the Department of Home Affairs.
Intervention strategy	an individual plan to assist students who are 'at risk' of or making unsatisfactory course progress, may include but not limited to: • Meeting regularly with a designated teaching staff • Attending extra learning support with teaching staff or study support • Extension or additional opportunities of submission • Attending The Gordon's counselling and support services • Reassessment or re-enrolment • Being withdrawn and re-enrolling in the "at risk" units • Suspension of enrolment (Leave of Absence) • Changing to an alternative course where appropriate
PRISMS	The Provider Registration and International Student Management System (PRISMS) is an Australian Government secure online system that allows providers to issue confirmations of enrolment (CoEs). Australian Government agencies use PRISMS to monitor student compliance with visa conditions and provider compliance.
Confirmation of Enrolment (CoE)	Confirmation of Enrolment is a document provided electronically and issued by The Gordon (the registered provider) to intending overseas students. The COE must accompany the application for a student visa and confirms the student's eligibility to enrol in the particular course of the registered provider.
ELICOS	English Language Intensive Courses for Overseas Students.
ASQA	The Australian Skills Quality Authority (ASQA) is the national regulator for the vocational education and training sector and registered training organisations (RTOs). Under the ESOS Act, ASQA is the ESOS agency for providers or registered providers of vocational education courses and standalone ELICOS providers.

7.   Key Aligned Internal Documents

Refer to the *Operational Management System (OMS)* for copies of all policies, procedures and supporting documents.

Work Plan for International Students INT FO 01.01

Deferring, Suspending or Cancelling Enrolment Policy and Procedure – International Students INT PR 02

Admission and Selection Policy and Procedure – International Students INT PR 03

International Education Agent Procedure INT PR 04

Genuine Temporary Entrant and Genuine Student Assessment Policy and Procedure – International

Students INT PR 07

ELICOS Progress and Attendance Monitoring Policy and Procedure INT PR 08

Students Transfer Policy and Procedure – International Students INT PR 09

Assessment Policy TED PO 10

Student Conduct Policy RISK PO 08

Complaints and Appeals Policy RISK PO 09

8.   Key Aligned Legislation / Documents

ELICOS Standards 2018

Education Services for Overseas Students Act 2000

National Code of Practice for Providers of Education and Training to Overseas Students 2018

9.   Review and Approval

Business Process Owner	Executive Director, Growth and Student Experience		
Endorsed by (if applicable)	Not applicable	Endorsed Date	
Approved by (if applicable)	Not applicable	Approved Date	03 September 2024
Review schedule	This procedure will be reviewed every 3 years (or earlier as required)		
Date of next review	03 September 2027		

Minor Structure changes outside of Review schedule		

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