

Navitas English Policy and Procedure: Student Attendance

Amendment history IP 9.01 and EL 9.01

| Issue date | Summary of changes | Review date |
|------------|--|-------------|
| 29/03/2011 | Updated to align NE and NES policy | 29/03/2013 |
| 23/09/2011 | Inclusion of Standard 11.9 of the National Code 2007. Updated to include definition of Grouped courses and current and overall attendance. | 23/09/2013 |
| 20/11/2014 | Updated with new monitoring stages, medical certificates and course changes procedures | 20/11/2016 |
| 26/02/2016 | Updated with recording attendances/absences (including lateness), class rolls and appeals | 26/02/2018 |
| 01/01/2018 | Updated in accordance with National Code 2018 | 01/01/2020 |
| 30/08/2019 | Updated to reflect key stakeholder title changes | 30/08/2021 |
| 10/10/2021 | Updated to reflect online course aspects due to Pandemic | 10/10/2023 |

Purpose and scope

The purpose of this policy and procedure is to outline Navitas English's practice for recording and monitoring student attendance. This applies to students who are enrolled with Navitas English on a student visa and studying onshore in Australia. Navitas English's requirements for achieving satisfactory course attendance is a **minimum of 80%** of the scheduled contact class hours as per 8.6.1 of the National Code 2018.

Policy

Navitas English recognises the importance of monitoring student attendance to help ensure student achieve their learning goals and to maintain regulatory compliance.

National Code 2018 Standard 8.6 states:

"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.."

National Code 2018 Standard 8.15 states:

"The registered provider may decide not to report the overseas students for breaching the attendance requirements if the overseas student is still attending at least 70% of the scheduled course contact hours and:

18.15.1 for school, ELICOS and Foundation Program courses, the overseas student provides genuine evidence demonstrating that compassionate or compelling circumstances apply."

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If the student's attendance is under 70% overall at any time for any reason then they must be reported to the Department of Home Affairs (DHA) as per this policy.

The Australian government requires that student attendance be checked, monitored and reported for all courses. If a student has one course and one CoE, their attendance is calculated for that one course. If a student has more than one course under one CoE, their courses will be grouped and attendance calculated across those courses.

Attendance Monitoring

Navitas English calculates a student's attendance in two ways:

1. **Current attendance (CA)** - A student's actual attendance up to the last time this is reported (on a weekly basis)
2. **Overall attendance (OA)** - Is the best possible attendance a student can achieve if they do not miss any more classes for all the courses under their CoE

Overall Attendance will be monitored for each student using a five stage model:

| Stage | When | Navitas English will: | What the student can do |
|-------|---------------------------------|--|---|
| 1 | Overall Attendance is under 94% | Send the student an Attendance Under 94% letter with information and your teacher will explain it to you | Come to school more often and talk to their teacher if they have questions |
| 2 | Overall Attendance is under 89% | Send the students an Attendance Under 89% letter with information and your teacher will explain it to you | Come to school more often and talk to their teacher if they have questions |
| 3 | Overall Attendance is under 84% | Send the student an Attendance Under 84% letter and ask you to speak with the Centre Manager and Director of Studies or a Senior Teacher | Meet with the Centre Manager and Director of Studies or a Senior Teacher to talk about their attendance |
| 4 | Overall Attendance is under 80% | Send the students an Attendance Under 80% letter explaining our plan to report them to Immigration for failure to maintain attendance (visa condition 8202) and explain what you can do | Meet with the Centre Manager and Director of Studies or a Senior Teacher Bring evidence why they shouldn't report you e.g. medical certificates They might have to write a formal appeal letter |
| 5 | Overall Attendance is under 70% | Immediately report the student to immigration for not attending | Speak to immigration about their visa |

Procedure

The maintenance of accurate attendance includes the following procedures:

- Information to Students
- Recording Attendance/Absences (including lateness)
- Recording Medical Certificates
- Monitoring Attendance

- Course Changes

Information to Students

Students are made aware of attendance requirements, attendance recording, lateness, and non-compliance consequences in a number of ways by Navitas English:

- Student Orientation (either pre-arrival or on Day One)
- The Navitas English Student Handbook provided to all students (either pre-arrival or on Day One)
- Centre Signage
- Attendance Letters

Recording Attendance/Absences (including lateness)

A student's attendance/absence (including lateness) will be recorded using the below criteria which applies for both students arriving late for classes and students leaving early.

- Students will be marked absent for each full 15-minute period which they have been absent

For example:

1. If a student enters class 40 minutes after the scheduled start time they will be marked absent for 30 minutes
2. If the student enters class 60 minutes after the scheduled start time they will be marked absent for 60 minutes
3. If a student leaves class 30 minutes early they will be marked absent for 30 minutes

Navitas English will give students the 10 minutes 'leeway' at the start of each day class and 20 minutes leeway at the start of each evening class. If students arrive for class before the end of the leeway/cut off time they will not be marked absent for the period missed.

(Timetables are subject to change and students will receive an updated timetable pre-arrival but that the leeway periods remain the same in duration).

However, if students arrive for class later than the above leeway/cut off times they will be marked absent for each full 15-minute period missed from the scheduled class start time to the point they are allowed to enter the class.

If students arrive later than the above leeway/cut off periods, they can enter class 1 hour after the class start time but they will be marked absent for 60 minutes.

Example:

| Day class start time | The leeway 10-minute period (no attendance deducted) | Time allowed into class if after the leeway (60-minute deducted) |
|--------------------------|--|--|
| 9am | 9am to 9:10am | 10am |
| Evening class start time | The leeway 10-minute period (no attendance deducted) | Time allowed into class after the leeway (60-minute deducted) |
| 4:40pm | 4:40pm to 5pm | 5:40pm |

(This is described to students in the Student Handbook and in Day One orientation. The above is an example as class timetables are subject to change and may differ between campuses)

Class Rolls and Recording Absences

1. The nominated staff member generates class rolls from the SMS which are made accessible to teaching staff for the following Monday to Friday week of lessons

2. Teaching staff record student absences daily on the class roll
 - Absences are recorded in decimals e.g.
 - 15 minutes = 0.25
 - 30 minutes = 0.5
 - 45 minutes = 0.75
 - 1 hour = 1
 - 1 hour & 15 minutes = 1.25
 - 1 hour & 30 minutes = 1.5
 - 1 hour & 45 minutes = 1.75
 - 2 hours = 2
3. Teaching staff complete the class role and the SSO (or equivalent) enters student absences into the SMS once the week's lessons are complete and all student attendance is accounted for as evidenced on the class roll for each class

If during the recording of attendance the class teacher identifies the below situations then they must follow the stated procedure:

| Situation | Procedure |
|--|--|
| Over 18 students absent for 3 consecutive days | <ol style="list-style-type: none"> 1. ST/Teacher phones or emails the student 2. ST records date of that communication in the SMS 3. ST notifies the CM-DoS the student does not respond within 24 hours 4. CM-DoS phones the student and records correspondence in SMS 5. If required, the CM-DoS contacts the students agent/emergency contact and if no resolution, contacts their line manager |
| Under 18 students absent for 1 day | <ol style="list-style-type: none"> 1. ST/Teacher phones the student 2. ST records date of phone call in SMS 3. ST notifies the CM-DoS and SSM (or equivalent) if unable to make contact 4. CM-DoS contacts the student's carer and/or homestay family to discuss absence and records correspondence in SMS 5. If required the CM-DoS will contact the students' parents, carer, agent and emergency contact if no resolution, contacts their line manager |

Recording Medical Certificates

The weekly monitoring of absences may be supported by medical certificates:

1. Students provide medical certificates to reception or by email to student services (or equivalent) if unable to visit physically e.g., for online students studying remotely
2. SSO (or equivalent) will take a copy (electronic or hard) and saves it in the relevant weekly folder
3. SSO (or equivalent) submits the medical certificates (or equivalent document) to the CM-DoS for checking and approval
4. CM-DoS confirms the students whose absences can be un-counted back to the SSO (or equivalent)
5. SSO (or equivalent) un-counts the absences in the SMS and notes that medical documentation was provided as way of record

Monitoring Attendance

The weekly monitoring of attendance through the SMS is to be completed after the recording of attendance and recording of medical certificates. The monitoring which occurs at each centre is calculated using the student's overall attendance (OA) at the time of running the report.

Attendance Monitoring Report

1. The SSO (or equivalent) extracts the attendance monitoring report from the SMS and identifies the students who have moved into a new stage. Letters are sent to students

Stage 1: Overall Attendance Under 94%

1. SSO (or equivalent) enters a diary note on the SMS including the student's overall attendance and date the letter is issued
2. SSO (or equivalent) sends the 'Attendance Under 94%' letter and:
 - Emails to the student:
 - **Attendance Under 94% Letter**
 - Emails (or gives) the class teacher/senior teacher:
 - **Attendance Under 94% Letter** (unless student is studying online)
 - **Attendance Under 94% Counselling Sheet** (including if student is studying online)
3. Teacher/senior teacher distributes the attendance letter (unless studying online) to the student and counsels the student. Details of the counselling session are recorded on the counselling sheet. For circumstances such as students studying online remotely, the Teacher emails the student the counselling sheet and asks students to reply by email, to inform of any reasons for their absences and to inform they have understood the information provided or whether they need a translator. This email reply by the students is in lieu of a signature unless the student is able to print, sign and scan the counselling sheet back to Navitas English
4. Teacher and student sign the counselling sheet (refer to the above for online students)
5. Teacher returns the counselling sheet to the ST/SSO (or equivalent)
6. ST/SSO (or equivalent) records all Attendance Counselling Sheets returned and notifies CM-DoS of any Counselling Sheets not returned within 1 week
7. CM-DoS contacts relevant teaching staff to follow up on Counselling Sheets not returned
8. Completed counselling sheets are scanned and filed by relevant staff

Stage 2: Overall Attendance Under 89%

1. SSO (or equivalent) enters a diary note on the SMS including the student's overall attendance and date the letter is issued
2. SSO (or equivalent) sends the 'Attendance Under 94%' letter and:
 - Emails to the student:
 - **Attendance Under 89% Letter**
 - Emails (or gives) the class teacher/senior teacher:
 - **Attendance Under 89% Letter** (unless student is studying online)
 - **Attendance Under 89% Counselling Sheet** (including if student is studying online)
3. Teacher/senior teacher distributes the attendance letter (unless studying online) to the student and counsels the student. Details of the counselling session are recorded on the counselling sheet. For circumstances such as students studying online remotely, the Teacher emails the student the counselling sheet and asks students to reply by email, to inform of any reasons for their absences and to inform they have understood the information provided or whether they need a translator. This email reply by the students is in lieu of a signature unless the student is able to print, sign and scan the counselling sheet back to Navitas English
4. Teacher and student sign the counselling sheet (refer to the above for online students)
5. Teacher returns the counselling sheet to the ST/SSO (or equivalent)
6. ST/SSO (or equivalent) records all Attendance Counselling Sheets returned and notifies CM-DoS of any Counselling Sheets not returned within 1 week
7. CM-DoS contacts relevant teaching staff to follow up on Counselling Sheets not returned
8. Completed counselling sheets are scanned and filed by relevant staff

Stage 3: Overall Attendance Under 84% - Meet with Senior Teacher

1. SSO (or equivalent) enters a diary note on the SMS including the student's overall attendance, date the letter is issued and date of meeting
2. SSO (or equivalent) sends the 'Attendance Under 84%' letter and:
 - Emails to the student:
 - **Attendance Under 84% Letter**
 - Emails (or gives) the class teacher:
 - **Attendance Under 84% Letter** (unless student is studying online)
 - **Attendance Under 84% Counselling Sheet** (including if student is studying online)
3. SSO (or equivalent) advises CM-DoS/ST of all attendance meeting dates and times. In the absence of student services staff or equivalent, the ST will contact the student to arrange meeting dates and times
4. Teacher/senior teacher distributes the attendance letter (unless studying online) to the student and advises the student of their scheduled meeting with ST/CM-DoS
5. CM-DoS/ST counsels student at the scheduled meeting time (physically onsite or online). Details of counselling sessions are recorded on the Attendance Under 84% Counselling Sheet by CM-DoS/ST
6. Student and CM-DoS/ST sign the Attendance Under 84% Counselling Sheet. If online, the CM-DoS/ST must email the student the completed Attendance Under 84% Counselling Sheet and ask that the student reply that they have understood the contents in lieu of a date and signature
7. CM-DoS places a diary note in the student's file in SMS outlining the date and details of counselling sessions. If the student didn't attend the meeting, CM-DoS enters this in diary notes and notifies SSO (or equivalent) or a ST to re-schedule a new appointment time
8. Completed counselling sheets are scanned and filed by relevant staff

Stage 4: Overall Attendance Under 80% - Report to Immigration

1. SSO (or equivalent) enters a diary note on the SMS including the student's overall attendance, date the letter is issued and date and time of meeting with CM-DoS or ST
2. SSO (or equivalent) sends the 'Attendance Under 80%' Letter and:
 - Emails a copy of the letter to the student
 - **Attendance Under 80% Letter**
 - Emails (or gives) to class teacher
 - **Attendance Under 80% Letter** (unless student is studying online)
 - **Attendance Under 80% Counselling Sheet** (including if student is studying online)
3. SSO (or equivalent) advises the CM-DoS of all intent to report meeting dates and times. In the absence of student services staff or equivalent, the CM-DoS/ST will contact the student to arrange meeting dates and times
4. SSO (or equivalent) enters 20 working day period for appeal in SMS and advises the CM-DoS by outlook calendar request (or equivalent)
5. The CM-DoS and student will meet as per the below (if student chooses to attend the meetings)

Intent to Report Information Meeting

1. The CM-DoS or ST will meet (physically onsite or online) with the student to:
 - Explain the Navitas English Policy & Procedure – Complaints Handling and Appeals
 - Advise the student of why we intend to report them
 - Explain the internal and external appeals process
 - If the student's enrolment is ongoing, instruct the student to continue attending their course as normal during the appeal period and ensure the student understands that their attendance will continue to be monitored as per the Navitas English attendance monitoring policy and procedure
2. The CM-DoS or ST and the student will both sign the initial meeting section of the Attendance Under 80% Counselling Sheet. If online, the CM-DoS/ST must email the

student the Attendance Under 80% Counselling Sheet and ask that the student to reply stating they have understood the *A. Information Meeting* section in lieu of a date and signature

Intent to Report Internal Appeal Meeting(s)

(Note: This meeting can take place at the same time as the Intent to Report Information Meeting if the student would like to appeal at that time)

1. CM-DoS/ST meets with the student to:
 - Counsel the student and determines the reasons for absence and take copies of evidence e.g. medical certificates, compelling and compassionate circumstances, appeal letters
 - Complete an Adjustment of Attendance Form and “uncounts” the student absences in the SMS (if required)
2. CM-DoS decision making process as to whether the internal appeal is successful or unsuccessful uses the below approach:

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. These could include, but are not limited to:

- serious illness or injury, where a medical certificate states that the student was unable to attend classes
- bereavement of close family members such as parents or grandparents
- major political upheaval or natural disaster in the home country requiring emergency travel and this has impacted on the student’s studies;

OR

- a traumatic experience which could include:
 - involvement in, or witnessing of a serious accident; and
 - 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)

OR

- where the registered provider was unable to offer a pre-requisite unit.

Please note that the above are only some examples of what may be considered compassionate or compelling circumstances. Providers are asked to use their professional judgment and to assess each case on its individual merits. When determining whether compassionate or compelling circumstances exist, providers should consider documentary evidence provided to support the claim and should keep copies of these documents in the student’s file.

3. The CM-DoS makes a decision of successful or unsuccessful:

Successful Appeal

If the students’ overall attendance on the day of appeal is 70% or higher and the student presents sufficient evidence or reasons to return their overall attendance to 80% or higher:

- a) CM-DoS/ST and student will sign the relevant section of the Attendance Under 80% Counselling Sheet (again, the student may provide an email reply in lieu of a signature and date)
- b) CM-DoS/ST issues the student with Appeal Successful Letter (hard copy and email) and records the information in the SMS and keeps copies of the student’s evidence on file
- c) The appeal process is now complete and the student will re-enter the system and be issued with the appropriate warning letters as per the stages in this policy. CM-DoS/ST will advise the student of which stage they have re-entered the system

Unsuccessful Appeal

If the students overall attendance is under 70% on the day(s) of internal appeal or if the student does not provide enough evidence e.g. medical certificates or compassionate and compelling circumstances to raise their overall attendance to 80% or above:

- a) If the internal appeal is unsuccessful then the CM-DoS/ST and student will sign the relevant section of the Attendance Under 80% Counselling Sheet (again, the student may provide an email reply in lieu of a signature and date)
- b) CM-DoS/ST issues the student with an Appeal Unsuccessful Letter (hard copy and email) and records the information in the SMS and keeps copies of the student's evidence on file
- c) CM-DoS/ST advises the student of their right to access the external appeals process*¥

* The student has 5 working days from the date of the Appeal Unsuccessful Letter to access the external appeals system and must provide the CM-DoS/ST with evidence (case number or email evidence) of the external appeal immediately.

¥ The student is permitted to attend class during appeals process

Other Situations

If the below are experienced during stage 4 of the monitoring process the CM-DoS/ST will follow the below procedures.

No Appeal Received

If the student does not appeal or chooses to not attend the intent to report meetings the students appeal will be automatically deemed unsuccessful at the end of the internal appeals period:

1. CM-DoS/ST completes the relevant section of the Attendance Under 80% Counselling Sheet
2. CM-DoS/ST issues the student with a No Appeal Received – Automatic Appeal Unsuccessful Letter (hard copy and email) and updates the SMS with no appeal received information
3. CM-DoS/ST advises the student of their right to access the external appeals process *¥

* The student has 5 working days from the date of the No Appeal Received – Automatic Appeal Unsuccessful Letter to access the external appeals system and must provide the CM-DoS with evidence (case number or email evidence) of the external appeal immediately.

¥ The student is permitted to attend class during appeals process

Un-Contactable Students

If the student is absent from class and the CM-DoS is unable to meet with the student to deliver the **Attendance Under 80%** the CM-DoS/ST will:

- Contact the student to advise them of Navitas English's intention to report them for poor attendance and organise an intent to report meeting
- Email a copy of the intent to report letter to the student's agent
- Record details of attempt to contact in the SMS

Stage 5: Overall Attendance Under 70%

If the student's overall attendance falls below 70% at any point during the monitoring process the student must be reported immediately to DHA.

Reporting Students to the Department of Home Affairs (DHA)

If the student chose not to access or withdrew from the complaints and appeals processes (internal and external) or if their internal and/or external appeal was unsuccessful or if the students overall attendance is below 70% then:

1. CM-DoS/ST completes **Reporting students for non-compliance with visa conditions form** and sends the form to Senior Admissions Officer
2. The SAO reports the student to DHA through PRISMS
3. CM-DoS/ST issues the student with the appropriate **Notification of Report to DHA letter**

Note: The student is permitted to attend class until the cessation of their visa.

Course Changes

Navitas English students can be enrolled in courses where they transfer between the different courses/levels which can result in their course being shortened which subsequently impacts overall attendance.

Course Change Form

If a student wishes to change their course the CM-DoS/ST will:

1. Counsel the student on the impact the course change will have on the student's attendance
2. Complete the Navitas English Course Change Form
3. CM-DoS assesses the list to determine the appropriate course of action as per the above stages

Responsibility / Authority

Centre Managers & Directors of Studies (CM-DoSs)* are responsible for:

- monitoring and proper application of these procedures

*Note a senior teacher(s) may from time to time assume CM-DoS responsibilities

Senior Teachers and Coordinators are responsible for:

- proper application of these procedures
- ensuring teaching staff comply with monitoring and record keeping requirements as outlined in the ESOS Act 2000
- ensuring students receive academic and welfare counselling as required
- ensuring attendance counselling and intervention processes are conducted with students

Senior Admissions Officers (or equivalent) are responsible for:

- proper application of these procedures
- reporting students to DHA via PRISMS

Student Services Managers (or equivalent) are responsible for:

- proper application of these procedures
- filing of all documentation relating to these procedures
- ensuring students receive a copy of the Navitas English Student Handbook/Orientation Guide

Student Services Officers (or equivalent) are responsible for:

- proper application of these procedures
- filing of all documentation relating to these procedures
- ensuring students receive a copy of the Navitas English Student Handbook/Orientation Guide

Teaching staff are responsible for:

- proper application of these procedures
- monitoring and recording attendance of individual students in class
- signing the class roll at the end of each week

- giving the class roll to the SSO (or equivalent) in a timely manner on the designated day each week
- providing students with basic counselling and support if they are not achieving their learning goals
- referring students to academic and welfare counselling as appropriate
- keeping accurate records relating to student attendance
- delivering Attendance letters to students and conducting counselling where required

References

Attendance Under 94% Letter (NES 9.01 F01)
 Attendance Under 94% Counselling Sheet (NES 9.01 F02)
 Attendance Under 89% Letter (NES 9.01 F03)
 Attendance Under 89% Counselling Sheet (NES 9.01 F04)
 Attendance Under 84% Letter (NES 9.01 F05)
 Attendance Under 84% Counselling Sheet (NES 9.01 F06)
 Attendance Under 80% Letter (NES 9.01 F07)
 Attendance Under 80% Counselling Sheet (NES 9.01 F08)
 Attendance Internal Appeal Successful Letter (NES 9.01 F09)
 Attendance Internal Appeal Unsuccessful Letter (NES 9.01 F10)
 Attendance Report to DHA Letter (NES 9.01 F11)
 Attendance Report to DHA Course Change Letter (NES 9.01 F12)
 Reporting Students for non-compliance (NES 9.01 F13)
 Attendance Procedure Flowcharts (NES 9.01 F14)
 Attendance Medical Certificates Records Sheet (NES 9.01 F15)
 Attendance Student Contact Record (NES 9.01 F16)
 Adjustment of Attendance Form (NES 9.01 F17)
 Attendance Calculator (NES 9.01 F18)
 Attendance Internal Appeal Unsuccessful Letter – No Appeal (NES 9.01 F19)
 Policy and Procedure Class Roll (NES 9.02)
 PEO Delegated Authority (NES 9.03)
 Complaints and Appeals for International Students (ETP 3.07)

Definitions

*Reference to Student Services Officers includes Administrative Assistants; reference to Senior Teachers includes Teacher Coordinators. Centre Manager & Director of Studies is used to refer to the CM-DoS **or** their nominated delegate.*

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|---------------|--|
| CM-DoS | Centre Manager & Director of Studies |
| NES | Navitas English Services Pty Ltd |
| PEO | Principal Executive Officer |
| SAO | Senior Admissions Officer |
| SMS | Student Management System (currently eBecas) |

SSO Student Services Officer (or equivalent)
SSM Student Services Manager (or equivalent)
ST Senior Teacher(s)