Future Academy
Monitoring Attendance Policies and Procedures
National Code Standard 11

Approved by the CEO

Registered providers systematically monitor students’ compliance with student visa conditions relating to attendance. Registered providers are proactive in notifying and counselling students who are at risk of failing to meet attendance requirements. Registered providers report students under Section 19 of the ESOS Act who have breached the attendance requirements.
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11.1 Purpose and Scope

11.1.1 These policies and procedures for monitoring student attendance, initiating Future Academy's intervention strategy and for reporting students who fail to meet minimum requirements are designed to ensure compliance with all legislative and regulatory requirements established under the:

- ESOS ACT;
- ESOS Regulations;
- National Code;
- Migration Act; and
- Migration Regulations.

11.1.2 These requirements are effectively summarised under 'Standard 11 – Monitoring Attendance' of the National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students, which states the requirements as:

For all courses (VET, accredited or non-award ELICOS, accredited schools, foundation) requiring attendance-monitoring:

Providers, which monitor attendance, must have and implement appropriate documented policies and procedures for monitoring attendance for each course.

Where a student has been assessed as not achieving satisfactory attendance, the provider must notify the student of its intention to report the student. The written notice must inform the student that he or she is able to access the registered provider's complaints and appeals process and that the student has 20 working days in which to do so.

If the student accesses the provider's complaints and appeals process and the process results in a decision that supports the registered provider, the registered provider must report through PRISMS that the student is not achieving satisfactory attendance as soon as practicable. The provider does not report until the process is completed and it supports the provider or the student has not accessed the provider's complaints and appeals process within 20 working days of being notified of the provider's intention to report.

For VET courses only

If providers choose not to implement the DOE–DIBP course progress policy and procedures, they record attendance for each student. The students must attend at least 80 per cent of the scheduled course contact hours for each CRICOS registered course in which they are enrolled.

If a student's attendance is less than 80 per cent, a provider may choose to not report a breach if:

- the student's attendance is at least 70 per cent
- the student is maintaining satisfactory academic performance; and
- this is consistent with the provider's documented attendance policies and procedures.
11.1.3 These policies and procedures should be read in relation to policies and procedures relating to:

- monitoring and reporting students’ course progress;
- international student services;
- critical incident response management;
- complaints and appeals; and
- the completion of courses within expected time.

11.2 Policy

11.2.1 Future Academy’s attendance policy and procedures comply with Standard 11 of The National Code, *Monitoring Attendance*, and apply to all of its courses.

11.2.2 Future Academy policy and procedures are designed to ensure full compliance with National Standard 9, *Completion within the Expected Duration* and Standard 10, *Monitoring Course Progress*, and its attendance monitoring, intervention and reporting policy and procedures are key elements in a broader strategy designed to ensure the early identification of all Future Academy students who are at risk of failure to meet either or both attendance and course progress requirements.

a. The registered provider must record the attendance of each student for the scheduled course contact hours for each CRICOS registered course in which the student is enrolled which is:

- an accredited vocational education and training course
- an accredited school course

b. the registered provider must have and implement appropriate documented attendance policies and procedures for each course which must be provided to staff and students that specify the:

- requirements for achieving satisfactory attendance, which at a minimum, requires overseas students to attend at least 80 per cent of the scheduled course contact hours
- manner in which attendance and absences are recorded and calculated
- process for assessing satisfactory attendance
- process for determining the point at which the student has failed to meet satisfactory attendance; and
- procedure for notifying students that they have failed to meet satisfactory attendance requirements.

c. the registered provider must regularly assess the attendance of the student in accordance with the registered provider’s attendance policy and procedures.

11.2.3 Future Academy has adopted criteria based attendance monitoring and intervention policy and procedures. Specific interventions will be triggered by student attendance benchmarks, with the nature of specific interventions depending on the attendance rate benchmark.

11.2.4 Students are expected to attend 100 per cent, and must attend at least 80% of the scheduled course contact hours for each study period of their courses.
11.2.5 Attendance monitoring and intervention is based on individual study periods which vary from 8 to 16 weeks in duration depending on the unit combinations and overall duration of specific courses, with the study periods commencing with individual student's enrolment dates.

11.2.6 A student's attendance rate is based on their raw attendance data as recorded in the Attendance Sheets and entered on Student Management System, with the Attendance Rate being calculated with the total class hours for the study period as the denominator and the number of hours attended as the numerator. Absences related to verified medical certificates are included in the total number of hours absent.

11.2.7 Where a student's enrolment is temporarily suspended, either in advance or retrospectively, in accordance with the provisions on Deferment, Suspension or Cancellation of Study during Enrolment under National Standard 13, the number of class hours expected to be attended during the affected study period will be reduced.

11.2.8 When reporting a student for unsatisfactory attendance in PRISMS any mitigating circumstances such as absences covered by validated medical certificates will be recorded in an appropriate note.

11.2.9 Attendance Monitoring occurs four times in each study period:

- In the fourth week of the study period, based on the attendance out of a total of 80 scheduled class hours, and with regard to their maximum potential attendance rate for the whole study period being one semester or two (2) terms, assuming 100% attendance for the remaining class hours.

- In eighth week of the study period, based on the attendance out of a total of 160 scheduled class hours, and with regard to their maximum potential attendance rate for the whole study period being one semester or two (2) terms, assuming 100% attendance for the remaining class hours.

- In twelfth week of the study period, based on the attendance out of a total of 240 scheduled class hours, and with regard to their maximum potential attendance rate for the whole study period being one semester or two (2) terms, assuming 100% attendance for the remaining class hours.

- In the week following completion of a study period (the sixteenth of the study period), based on attendance for the total number of scheduled class hours for the study period.

11.2.10 Specific interventions are triggered when:

- a student is absent for more than 20 consecutive hours of class time at any stage during a study period without explanation and approval;
- a student's attendance falls in the 'at risk' range of from 80 to 84.5 per cent;
- a student's attendance falls between 70 and 79 per cent; and when
- a student's attendance rate falls below 70 per cent.

11.2.11 Specific interventions will be triggered by current attendance rates for the period being monitored. The nature of those interventions in weeks four, eight and twelfth will be moderated by the students' potential attendance rate for the full study period, assuming 100% attendance for the remaining classes.

11.2.12 The specific triggers and the nature of the strategic interventions are identified in the Future Academy Attendance Monitoring and Intervention Criteria.
11.2.13 **Week Four Intervention Criteria** are based on students’ maximum potential attendance rates, combined with consideration of their academic progress, with an **Attendance At-Risk Warning** SMS and Email, or an **Unsatisfactory Attendance Warning** Letter being triggered when a student’s adjusted attendance rate is demonstrably unsatisfactory and when their maximum potential attendance rate for the study period is simultaneously above the regulated trigger points.

11.2.14 **Week eight Intervention Criteria** similarly are based on students’ maximum potential attendance rates, combined with consideration of their academic progress.

11.2.15 **Week twelfth Intervention Criteria** similarly are based on students’ maximum potential attendance rates, combined with consideration of their academic progress.

11.2.16 The **End of Study Period Intervention Criteria** employed in the fourth and final intervention for a study period are students’ final adjusted attendance rates for the whole period, with consideration of their academic progress.

11.2.17 **Student attendance is recorded** at each class by the class trainer, who is also responsible for entering each week’s attendance data on the Attendance Sheet and on Student Management System (SMS). Overall attendance and attendance records are monitored on a regular basis (as indicated above) by the Attendance Intervention Officer.

11.2.18 Students are expected to submit all **medical certificates** for health-related absences to their trainer, Student Services Officer or directly to the Attendance Intervention Officer, who is responsible for verification and recording the details on the Future Academy Medical Certificate Log, and entering the details, including the number of absent class hours covered, on both the hard copy Attendance sheet and Student Management System (SMS).

11.2.19 Class hours missed due to **late enrolment** (within 14 calendar days of enrolment day) as a result of approved Deferment of Enrolment based on verified and approved Compassionate and/or Compelling Circumstances will not be deducted from the expected class hours for the study period and thereby excluded from the calculation of students’ attendance rates.

11.2.20 Class hours missed due to late enrolment (within 14 calendar days of enrolment day) without approved Deferment of Enrolment will be classed as hours absent and thereby included in the calculation of students’ attendance rates.

11.2.20 If a student fails to enrol within two weeks of the enrolment day and has no approved leave they will have their CoE cancelled for non-commencement.

11.2.21 If a student fails to return to classes within two weeks of a scheduled term break without approved leave, that student will be identified through the attendance monitoring procedures and the Attendance Intervention Officer will initiate the appropriate intervention strategy.

11.2.22 If a student is granted Leave of Absence on grounds of Compassionate and Compelling Circumstances in accordance with Future Academy **Deferment, Suspension and Cancellation of Study During Enrolment Policies** and Procedures and National Code Standard 13, their studies will be temporarily suspended, and the class time covered by that leave of absence will be deducted from the expected class hours of a study period.

11.2.23 The CRICOS Coordinator or Attendance Intervention Officer will visit all classes to:

- **remind students of their visa attendance obligations**;
inform students of the availability of counselling and support services should they be experiencing study and/or personal problems; and to
inform them that further action will be taken if their attendance should fall below the requisite 80%.

11.2.24 The Attendance Intervention Officer may seek the assistance of Trainers in conveying this information.

11.2.25 The registered provider’s attendance policies and procedures must identify the process for contacting and counselling students who have been absent for more than 20 consecutive hours (one week’s) of class time without approval or where the student is at risk of not attending for at least 80 per cent of the scheduled course contact hours for the course in which he or she is enrolled (before the student’s attendance drops below 80 per cent).

11.2.26 The Future Academy Attendance Intervention Officer monitors attendance and prepares an Attendance Monitoring Report for each monitoring phase of each study period. This Report identifies students whose attendance, places them in any of the attendance intervention categories, to Student Services Officer.

11.2.27 Student Services Office will initiate the Future Academy Attendance Intervention Strategy by sending the appropriate attendance SMS, Email or letter, depending on individual student’s attendance and academic profiles.

11.2.28 A student is deemed to be ‘at risk’ if s/he:

- has been absent for more than 20 consecutive hours (one week’s) of class time, without notification and approval; or
- has a maximum potential attendance rate (after week 4) or final attendance rate (after completion of the study period) of from 80 to 84.5 per cent.

11.2.29 Students are sent an Attendance Warning SMS by the Student Services Officer if they are absent for more than 20 consecutive class hours, without explanation and/or leave and are thereby identified as being ‘at risk’.

11.2.30 The Attendance Warning requires the recipient to make an appointment with the Attendance Intervention Officer within five (5) working days to discuss the reasons for their absence, and to be referred for further counselling and advice if required (to either Student Services or the CRICOS Coordinator for personal, social and financial problems, and the Academic Intervention Officer for academic problems).

11.2.31 Students who fail to respond to the SMS within the required time will be telephoned by the attendance Intervention Officer or Student Services Officer and, if need be, further steps will be taken to establish contact with the student.

11.2.32 Students are sent an Attendance at Risk Warning SMS and Email message by the Student Services Officer if:

- their potential attendance after the first four weeks of a Study Period falls to between 80 and 84.5 per cent; or
- has been absent for more than 20 consecutive hours (one week’s) of class time, without explanation and approval.

11.2.33 The SMS requires the recipient to make an appointment with the Attendance Intervention
Officer within five (5) working days to discuss the reasons for their absence, and to be referred for further counselling and advice if required (to either Student Services Officer or the CRICOS Coordinator for personal, social and financial problems, and the Academic Intervention Officer for academic problems).

11.2.34 Students who have made satisfactory academic progress and who meet other requirements are sent an **Unsatisfactory Attendance Warning** Letter, whether or not they had previously been sent an attendance related warning, if:
- their potential attendance after the first eight weeks of a Study Period falls in the range from 70 to under 80 per cent; or
- their actual attendance after the completion of a Study Period falls in the range from 70 to under 80 per cent.

11.2.35 The Attendance Warning Letter will inform the student that:
- their attendance has fallen below the 80% requirement;
- failure to meet the 80% attendance requirement for the full study period could lead to further action and their being reported to the Department of Education (DOE) and the Department of Immigration and Border Protection (DIBP) via the PRISMS reporting system;
- being reported could affect their student visa status; and that
- if they want to avoid being reported, they should attend 100% of classes for the remaining weeks of cycle, and that they have to:
  - contact the Attendance Intervention Officer within five (5) working days from the date of the warning letter to explain the reasons of their absence and, if necessary, arrange counselling or other professional support;
  - sign, and comply with the terms of an Attendance Agreement negotiated with the Attendance Intervention Officer;
  - and ensure that they continue to make satisfactory academic progress (see Future Academy **Policy and Procedure on Monitoring Course Progress** and Future Academy **Policy and Procedure on Completion Within Expected Duration**).

11.2.36 Finally, the letter will be informed the recipients that should they fail to meet the requirements, they will be sent **Unsatisfactory Attendance Intention to Report Letter**.

- Where the registered provider has assessed the student as not achieving satisfactory attendance for the courses identified in 11.2.1, the registered provider must notify the student in writing of its intention to report the student for not achieving satisfactory attendance. The written notice must inform the student that he or she is able to access the registered provider’s complaints and appeals process as per Standard 8 (Complaints and Appeals) and that the student has 20 working days in which to do so.
- The registered provider may only decide not to report the student for breaching the 80 per cent attendance requirement where:
  a. that decision is consistent with its documented attendance policies and procedures; and
  b. the student records clearly indicate that the student is maintaining satisfactory course progress; and
  c. the registered provider confirms that 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.
- Providers may include as a condition of their documented attendance policy and procedures, consideration of compassionate or compelling circumstances. If a
provider includes this consideration and b. and c. above apply, a provider may decide not to report a student.

11.2.37 As indicated above, Future Academy will not report students for unsatisfactory attendance if their actual and potential attendance falls below 80 but not below 70 per cent of total scheduled class hours for study period but if the student:

- is maintaining satisfactory course progress; and
- has responded positively to Attendance Interventions; and/or
- the student has demonstrated (with documentary evidence where appropriate) compassionate and/or compelling circumstances which prevented attendance and which subsequently led to the student applying for and being granted Leave of Absence and, as a consequence, their enrolment being temporarily suspended; and/or
- the student has submitted validated medical certificates relating to a significant loss of class time.

11.2.38 If a student’s potential or final attendance for a study period falls below 80 but not below 70 per cent at any point in the monitoring sequence and if they have failed to make satisfactory academic progress they are sent an Unsatisfactory Attendance Intention to Report Letter.

11.2.39 If a student’s potential or final attendance for a study period falls below 70 per cent that student is sent an Unsatisfactory Attendance Intention to Report Letter. Validated Medical Certificates will not be considered as a basis for not reporting these students, but will inform any explanatory notes made in PRISMS when reporting.

11.2.40 The Unsatisfactory Attendance Intention to Report Letter informs the recipient student that:

- their attendance has fallen below a level required for them to maintain a satisfactory attendance record for the study period (from 70 to 79% or below 70% depending on academic progress);
- they have failed to respond positively to Future Academy Attendance and Academic Intervention initiatives;
- Future Academy intends to report this to the Department of Education and DIBP via PRISMS;
- they have a right to lodge an Internal Appeal, within twenty (20) working days from the day when the CRICOS Office sent the letter;
- they have to maintain satisfactory attendance throughout any period of appeal.

11.2.41 The Letter will also inform the student of the procedure for entering the Internal Appeals process by submitting a completed Future Academy Student Appeal Form, and of the possible grounds for an Appeal, namely, demonstrating that:

1. Future Academy had not made the Attendance and Appeals policies and procedures available to students; and/or
2. Future Academy had not recorded or calculated the students’ attendance correctly; and/or
3. Future Academy had not implemented its intervention and support strategies in accordance with its documented policies and procedures; and/or
4. there existed demonstrable Compassionate and Compelling Circumstances which
contributed significantly to the student’s attendance falling below 80 but not below 70 per cent, and which subsequently lead to the student applying for and being granted Leave of Absence which raises their attendance rate above the required minimum.

11.2.42 The student's enrolment will be maintained throughout any Internal Appeals process and, if that process ends in a decision against the student, any possible subsequent External Appeals process to the Overseas Students Ombudsman.

11.2.43 All student appeals against being reported for unsatisfactory attendance will be registered, investigated and determined in accordance with Future Academy’s Complaints and Appeals Policy and Procedures.

11.2.44 Students will be informed that they are expected to meet all course attendance and progress requirements throughout the appeals process. If a student’s attendance subsequently falls to below the required minimum again, they will be sent a further Unsatisfactory Attendance Intention to Report Letter.

11.2.45 Where the student has chosen not to access the complaints and appeals processes within the 20 working day period, withdraws from the process, or the process is completed and results in a decision supporting the registered provider, the registered provider must notify the Secretary of DOE through PRISMS that the student is not achieving satisfactory attendance as soon as practicable.

11.2.46 A student will be reported for unsatisfactory attendance to DOE and DIBP via PRISMS if that student:

- fails to maintain satisfactory attendance as defined above; and
- fails to enter the complaints and appeals process within 20 working days of receiving an Intention to Report letter; or
- if entered, withdraws from the complaints and appeals process before resolution; or
- the complaints and appeals process is completed and results in a decision against the student.

11.2.47 If a student’s attendance falls below 80 but not below 70 per cent and that student has not made satisfactory academic progress, Future Academy’s generally will not report that student if that student:

- has experienced compassionate or compelling circumstances causing significant periods of absence;
- produces documentary evidence verifying those circumstances and their consequences;
- has successfully applied/applies for Leave of Absence leading to their studies being temporarily Suspended (with or without a change in the expected course duration); and

11.2.48 If a student's attendance falls below 70 per cent and that student has made satisfactory academic progress, Future Academy generally will not report that student if that student:

- has experienced compassionate or compelling circumstances causing significant periods of absence;
- has produced documentary evidence verifying those circumstances and their consequences;
- has successfully applied/applies for leave;
- their studies have been temporarily Suspended (with or without a change in the
expected course duration); and

11.2.49 Numerous individual medical certificates covering a range of different absences will not be considered in determinations relating to reporting students for unsatisfactory attendance. Unless they submit a validated medical certificate with the application form stating a long term medical condition (e.g. Cancer, Epilepsy etc.)

11.2.50 Building on definitions in The National Code, Future Academy defines Compassionate and/or Compelling Circumstances as circumstances which are generally beyond the control of the student and which have an adverse impact on the student’s capacity and/or ability to:
- commence their course on the scheduled start date, but within two weeks of that date, or to
- attend scheduled classes for a significant period of time during the enrolment period.

11.2.51 Such circumstances include, but are not limited to:
- the late issue of a student’s visa and consequent delay in travel to Australia;
- serious illness or injury, where a verified medical certificate states that the student was unable to attend on the commencement date and/or for a significant time through the course;
- bereavement of close family members such as parents, siblings or grandparents (where possible a death certificate should be provided);
- the student recently giving birth or a student’s partner recently giving birth, thus preventing commencement on the published start date or attendance for some time through the course (with supporting documentation);
- major political upheaval or natural disaster in the home country preventing their departure for Australia, or requiring their emergency travel to their home country for the time of their absence;
- a traumatic experience which could include but is not limited to:
  a. witnessing or involvement in an accident; or
  b. witnessing or being the victim of a crime
and which has impacted on the student’s ability to commence classes on the start date and/or attend scheduled classes (these cases should be supported by police or psychologists’ reports).

11.2.52 In determining whether or not compassionate and compelling circumstances exist as sufficient grounds to explain a student’s absence, Future Academy accepts that documentary evidence will vary with regard to the specific circumstances, but could include:
- a relevant Death Certificate;
- a police incident report;
- a social worker’s report; and or
- appropriate medical evidence.

11.2.53 In determining whether or not compassionate and compelling medical circumstances exist as sufficient grounds to explain a student’s absence, Future Academy has adopted the
Australian Medical Association’s *Guidelines for Medical Practitioners on Certificates Certifying Illness* – 2011 (http://ama.com.au/node/6505), namely:

- Name and address of the medical practitioner issuing the certificate
- Doctor’s Medicare provider number (where applicable)
- Name of the patient
- Date on which the examination took place
- Date on which the certificate was issued
- Date(s) on which the patient is or was unfit for attendance
- Supplementary information of assistance to the patient in obtaining the appropriate leave especially where there is a discrepancy in the period for which the certificate is issued and the date of the certificate
- Certificates must be dated on the day on which they were written. Under no circumstances can this be breached
- Wherever possible, doctors should avoid issuing sickness certificates to anyone with whom they have a close personal relationship
- The certificate should be written on stationery designed specifically for this purpose
- Future Academy may, in reasonable circumstances, seek further information from the medical practitioner who issued a certificate

The future academy students should fill a medical certificate form given by the academy. The purpose of the document is used for applying for special consideration on medical grounds for assessments, leave of absence or any other compelling and/or compassionate circumstances.

11.2.54 Psychologist certificates must be issued by a registered psychologist, and include a similar range of information to that required for medical certificates.

11.2.55 Certificates not written in English must be translated into English by approved NAATI translators.

11.2.56 When assessing applications for leave on grounds of compassionate and compelling circumstances, copies of supporting documents will be kept, together with a record of the decision and the basis for the decision, in the student’s file, and recorded on SMS and PRISMS.

11.2.57 If a student’s absence has been caused by either a Critical Incident or other Compassionate and Compelling Circumstance, Student Services will initiate the critical incident/compassionate and compelling circumstances responses and support procedures, and any absences thereby created will be deducted from the necessary class hours for the study period.
11.3 Attendance Monitoring Procedures

11.3.1 Enrolment/commencement dates for commencing students are scheduled to coincide with scheduled commencement of classes for specific Units of Competency within the organised sequence of Units for each Course. The class for each Unit of Competency will consist variably of commencing and continuing students, depending on their date of commencement. Similarly, certain students may complete their course enrolment on the completion of a Unit of Competency which may coincide with the commencement date for other students.

11.3.2 The creation of The Attendance Sheets reflects this mix of commencing and continuing students.

11.3.3 Prior to the first scheduled Unit class the Attendance Intervention Officer prepares an Attendance sheet of all continuing and new students based on the previous Attendance sheets.

11.3.4 Students who fail to enrol on the commencement date as specified on their CoE (Orientation day) without an approved Deferral of Enrolment are normally reported to the Secretary and the TPS Director (via PRISMS) for default after fourteen calendar days of that start date.

11.3.5 Students who apply for leave (using the Future Academy Leave of Absence Application Form) prior to the official start date for a Deferral of Enrolment to a date within two weeks of the official start date, and who have their application approved are able to commence their course at the approved later start date without being reported for default.

11.3.6 The Deferral is entered on SMS and the approved leave hours are deducted from the number of class hours for the Study Period; and they are not reported for default. The application and supporting documentary evidence are filed in the student’s hard copy file.

11.3.7 Students who enrol late (within the first two weeks) with or without approved deferral or leave, have their names entered on the attendance sheet by the Attendance intervention Officer, and the number of class hours missed is also entered. Class hours missed as a result of approved Deferral of Enrolment or Leave of Absence are not included in the calculations of students’ attendance rates. Class hours missed without approved Deferral of Enrolment or Leave of Absence are included in the calculations of students’ attendance rates.

11.3.8 Students who have been reported for student default and who do not enrol (within the first two weeks of classes) without approved Leave of Absence have their CoEs cancelled and this is reported to DIBP via PRISMS within 14 days of the official start date.

11.3.9 At the end of the second week of classes the Attendance Intervention Officer produces a list of enrolled students with their allocated class trainer, class days and times. The Records Attendance Intervention Officer uses this list to create Attendance Sheets based on completed, continuing and new enrolments and these sheets are given to the trainers. Each Attendance sheet will state the Course and Unit names, trainer’s name, and class days and times.
11.3.10 If the Trainer identifies a student attending their class but who is not on the attendance sheets, they notify the Attendance Intervention Officer who resolves the inconsistency with the assistance of Student Services Officer.

11.3.11 Trainers repeat these attendance recording and reporting procedures for each class and week of Unit classes, retain their Attendance sheets on the premises at all times, and ensure that they are accessible to the Attendance Intervention Officer.

11.3.12 Students who miss class time due to illness may submit medical certificates to their Trainer, Student Services Officer or the Attendance Intervention Officer. The Attendance Intervention Officer will check the validity of medical certificates, approve (or disallow) and record a number of absent class hours covered by the certificate on SMS. While such ‘approved’ sick hours will be counted as absences in the calculation of students’ Attendance Rates, they may be considered in relation to attendance interventions and Internal and External Appeal processes. For example, when a student with extensive illness related absences is reported for unsatisfactory attendance, a note explaining the number of illness related hours may be added on PRISMS.

11.3.13 **Student attendance rates** are based on their attendance as recorded in the Attendance Sheets and entered on TMDB, and as automatically adjusted for approved Deferred Enrolments, class hours for Units awarded through Credit Transfer procedures and Leave of Absence on Compassionate and Compelling Circumstances as determined by Student Services Officer. The rates are calculated as a percentage using the actual hours attended as the numerator over the actual class hours required to be attended over the same time period as the denominator. The actual class hours required to be attended is automatically calculated by TMDB, subtracting the number of hours granted for approved leave from the total number of Unit class hours for the study period.

11.3.14 As indicated in Paragraph 11.2.10, Future Academy’s Attendance Intervention Strategy is based on attendance rate criteria, with specific interventions being triggered when:

- a student is absent for more than 20 consecutive hours of class time at any stage during a study period without explanation and approval;
- a student's attendance falls in the ‘at risk’ range of from 80 to 84.5 per cent;
- a student’s attendance falls between 70 and 79 per cent; and when
- a student’s attendance rate falls below 70 per cent.

11.3.15 As indicated in Paragraphs 11.2.11 to 15, while specific interventions will be triggered by current attendance rates for the period being monitored, the nature of those interventions in weeks four, eight and twelfth will be moderated by the students’ potential attendance rate for the full cycle, assuming 100% attendance for the remaining period.

11.3.16 As a part of their attendance recording and reporting activities, Trainers identify any student who is absent for more than 20 consecutive class hours (more than one week of classes) without contact and/or approval. The Trainer reports such students’ details to the Attendance Intervention Officer who conveys the information to the Student Services Officer who in turn sends the absent student an Attendance Warning by both SMS and Email.

11.3.17 The warning reminds the student of their attendance requirements, and requires the recipient to make an appointment with the Attendance Intervention Officer within five (5) working days to discuss the reasons for their absence, and to be referred for
further advice, counselling and/or treatment if required (to the Student Services Officer and CRICOS Coordinator for personal, social and financial problems, and the Academic Intervention Officer for academic problems, and/or to professional help for medical and psychological problems).

11.3.18 If a student sent such a warning fails to make the required appointment within the five (5) working days, the Student services Officer will attempt to make contact through the student's Trainer and by phone.

11.3.19 As indicated on paragraphs 11.2.9 and 11.2.13 to 16, Attendance Monitoring and Intervention occur four times per study period:

- In the fourth week of the study period, based on the attendance out of a total of 80 scheduled class hours, and with regard to their maximum potential attendance rate for the whole study period being one semester or two (2) terms, assuming 100% attendance for the remaining class hours.

- In the eighth week of the study period, based on the attendance out of a total of 160 scheduled class hours, and with regard to their maximum potential attendance rate for the whole study period being one semester or two (2) terms, assuming 100% attendance for the remaining class hours.

- In the twelfth week of the study period, based on the attendance out of a total of 240 scheduled class hours, and with regard to their maximum potential attendance rate for the whole study period being one semester or two (2) terms, assuming 100% attendance for the remaining class hours.

- In the week following completion of a study period (the sixteenth of the study period), based on attendance for the total number of scheduled class hours for the study period.

11.3.20 With each intervention the Attendance Intervention Officer prepares an Attendance Report identifying students with either 'at risk' or 'unsatisfactory' attendance and identifying which attendance intervention should be initiated for those students.

11.3.21 The Week 4 Intervention, based on the first 80 of the total study period class hours, uses students' potential attendance rates for the whole period as triggers for the following interventions:

Students with a maximum potential attendance rate of from 80 to 84.5 per cent for the whole study period being one semester or two (2) terms will be sent an Attendance At Risk Warning by SMS and Email. This is the National Code identified 81 to 85 per cent “At Risk” range, suggesting that the ‘at risk’ warning is not required; these students’ actual attendance for the first four weeks will be well below the ‘at risk’ and ‘unacceptable’ levels. Countering this, students have the bulk of the study period in which to improve their overall attendance. Combined, the maximum potential attendance range of 80 to 84.5 per cent provides a strong indicator of potential risk.

- Students with a maximum potential attendance rate of 80 to 84.5 per cent will be sent an Unsatisfactory Attendance Warning Letter. Again this is within the trigger for such intervention for a full study period, as their attendance pattern during the first four weeks provides a basis for significant concern and for early and strong intervention. Such students are required to attend a counselling session with the
Attendance Intervention Officer, and sign and comply with an Attendance Agreement.

- Students with a maximum potential attendance rate of below 80 per cent are sent an **Unsatisfactory Attendance Intention to Report** letter. These students will be unable to achieve the required 80% minimum attendance for the study period **being one semester or two (2) terms**; and there is a demonstrable need for the strongest possible intervention.

11.3.22 The objective of the Week 4 intervention is to identify students experiencing early difficulties with attendance and academic progress, and putting in place procedures and making available academic and personal support assistance and strategies to help resolve the problems through communication with Attendance/ Academic Intervention Officer and Student Services Officer.

11.3.23 **The Week 8 Intervention**, based on the first 8 weeks (160 class hours) of the study period class hours, also uses students' potential attendance rates for the whole period as triggers for the mid-study period interventions:

Students with a maximum potential attendance rate of 80 to 84.5 per cent for the full study period are sent an **Attendance At Risk Warning** SMS and Email. Although these students' current attendance rate of under 75 per cent is well below the 'at risk' level, they are able to attain a full cycle attendance rate of at least 80% without necessarily attending 100 per cent of subsequent classes. Taking both factors into consideration, their actual attendance pattern during the first **eight weeks** provides sufficient basis for concern and early intervention.

- Students with a maximum potential attendance rate from 70 to under 80 per cent for the full study period and who have maintained satisfactory academic progress are sent an **Unsatisfactory Attendance Warning** Letter with Conditions. Although these students' current attendance rate at the end of **week 8 (under 68 per cent)** is well into the 'unsatisfactory' range, they are able to attain a full cycle attendance rate of at least 70% if they attend 100 per cent of subsequent classes.

- Students with a maximum potential attendance rate from 70 to under 80 per cent for the full study period and who have failed to maintain satisfactory academic progress are sent an **Unsatisfactory Attendance Intention to Report** Letter. Although these students' current attendance rate at the end of **week 7 (under 68 per cent)** is well into the 'unsatisfactory' range, they are able to attain a full cycle attendance rate of at least 70% if they attend 100 per cent of subsequent classes.

- Students with a maximum potential attendance rate of less than 70 per cent for the whole study period **being one semester or two (2) terms**; are sent an **Unsatisfactory Attendance Intention to Report** Letter. With **eight weeks** of the cycle completed these students are unable to achieve the minimum allowable attendance rate, signifying a need for the strongest possible intervention, and their only chance of not being reported is to make a successful Appeal against being reported.

11.3.24 In the week following the completion of a study period (depending on the length of study period) the **Attendance Intervention Officer** implements the fourth, End of Study Period Intervention, based on students' attendance rates for the whole study period:

- Students with an attendance rate of 80 to 84.5 per cent are sent an **Attendance At Risk** SMS and Email. While these students have completed the cycle with an acceptable attendance rate, it is desirable to remind them of the need to maintain their attendance record through their remaining studies.
Students with an attendance rate of 70 to 79 per cent and who are making satisfactory academic progress are sent an **Unsatisfactory Attendance Warning** Letter with Conditions. Although these students’ attendance rates for the cycle has been unsatisfactory, they have made satisfactory academic progress and are able to progress to the next study period, it is important to require them to enter into an Attendance Agreement and to provide access to counselling and support if required.

Students with an attendance rate of from 70 to 79 per cent and who have not made satisfactory academic progress but who have entered and are observing both an Attendance Plan and a Study Plan will be sent an **Unsatisfactory Attendance Warning** Letter with Conditions. A any necessary adjustments to the expected course completion time and CoE will be made.

Students with an attendance rate of from 70 to 79 per cent and who are not making satisfactory academic progress and have not agreed to or complied with Attendance and Study Plans are sent an **Unsatisfactory Attendance Intention to Report** Letter.

Students with an attendance rate below 70 per cent are sent an **Unsatisfactory Attendance Intention to Report Letter**. These students have failed to meet the required attendance standards and regardless of their academic progress they are reported if they fail to engage in the internal and external appeal processes and/or they fail to win their appeal/s.
11.4 Intention to Report Letters and Appeals Procedures

11.4.1 The various Warning SMSs and Unsatisfactory Attendance Letters are triggered by attendance rates identified in Section 11.3 above, and are not bound by any set sequence of warning.

11.4.2 As indicated in Paragraphs 11.2.40 and 41, an Unsatisfactory Attendance Intention to Report Letter informs recipients that:

- their attendance has fallen below a level required for them to maintain a satisfactory attendance record for the study period (from 70 to below 80% or below 70% depending on academic progress);
- they have failed to respond positively to Future Academy Attendance and Academic Intervention initiatives;
- Future Academy intends to report this to the Department of Education and DIBP via PRISMS;
- they have a right to lodge an Internal Appeal, within twenty (20) working days from the receipt of the letter, against their enrolment being cancelled; and that
- they have to maintain satisfactory attendance throughout any period of appeal.

11.4.3 The Letter also informs recipients of the procedure for lodging an Internal Appeal with the Student Services Officer, and the possible basis for an Appeal, namely, on the demonstrable grounds that:

- Future Academy failed to make the Attendance, Complaints and Appeals policies and procedures available to the students; and/or
- Future Academy failed to record or calculate students’ attendance correctly; and/or
- Future Academy failed to implement its intervention and support strategies in accordance with its documented policies and procedures; and/or
- that demonstrable compassionate and/or compelling circumstances significantly contributed to the student’s unsatisfactory attendance.

11.4.4 No action on the student’s enrolment is taken during the 20 day period open for the student to lodge an internal appeal, but the student’s attendance and academic progress are recorded by the trainers.

11.4.5 If a student appeals against being reported by completing and lodging a Future Academy Student Appeal Form with the Student Services Officer, the appeal evaluation and determination is undertaken by the Future Academy RTO Manager and the CRICOS Coordinator within 20 days (excluding unforeseen circumstances).

11.4.6 If/when a student appeals, their enrolment is maintained throughout any internal and, if that process ends in a decision against the student, any subsequent external appeals process.

11.4.7 Future Academy does not report students to DOE and DIBP via PRISMS for unsatisfactory attendance until and unless any appeals process is complete and has supported the
provider’s decision to report, or unless the appellant withdraws their appeal.

11.4.8 If a student fails to submit an Appeal within 20 working days of receiving an Intention to Report letter; or withdrawals from an entered Appeals process before its resolution; or if the Appeals process is completed and results in a decision supporting Future Academy, Future Academy notifies DOE and DIBP via PRISMS that the student has failed to maintain satisfactory attendance.

11.4.9 Students who are thus reported are sent a letter notifying them that they have been reported; that this may have implications for their visa status; and advise them to contact the nearest DIBP office as a matter of urgency.

11.4.10 If a student believes there are sufficient grounds to appeal on the basis of compassionate and/or compelling circumstances, the student will complete and submit a Future Academy Leave of Absence Application and supporting documentary evidence along with their Student Appeal Form to Student Services Officer.

11.4.11 The Leave of Absence Application will be assessed by the CRICOS Coordinator with the assistance of the Attendance and the Academic Officers and, if approved, the number of hours approved for Leave of Absence will be entered in SMS which automatically deducts those hours from the number of expected class hours for the study period, thus modifying the applicant student’s attendance rate. If the application is rejected there will be no change in the recorded attendance rate.

11.4.12 All internal appeals are registered, investigated and determined in accordance with Future Academy’s Complaints and Appeals Policies and Procedures and the decision is conveyed to the student within twenty working days (excepting specific circumstances which prevent completion within that time frame).

11.4.13 The student is informed of the Internal Appeal decision by the Future Academy CRICOS Coordinator:

- If the Appeal is successful the student will be sent a Future Academy Appeal Approval Letter indicating that the appeal has been successful and advising the student to maintain satisfactory attendance and academic performance and requiring them to make an appointment with the Intervention Officer to sign a study plan designed to ensure satisfactory academic progress and course completion within the expected time or, if not possible, to arrange for an extension of course duration and CoE.

- If the Appeal is rejected the student will be sent a Future Academy Appeal Rejection Letter advising the student:
  - of the grounds for the rejection;
  - of their right to appeal externally to the Overseas Students Ombudsman within ten working days of the Appeal Rejection Letter being sent;
  - that should they appeal to the OSO they will be expected to maintain full attendance;
  - that they should inform Student Services if they decide to make an external appeal; and indicating
  - that if nothing is heard from the student within the 10 calendar days the student will be reported for unsatisfactory attendance.

11.4.14 If a student's Internal Appeal is approved the reason for the approval will be conveyed by the CRICOS Coordinator to the RTO Manager, the Attendance Intervention Officer and the
Student Services Officer so that any required corrective action/s can be identified and implemented.

11.4.15 If a student submits an External Appeal to the Overseas Student Ombudsman their enrolment will be continued for as long as the external appeal process takes.

11.4.16 At all times through any appeals procedures the student’s file and record will be promptly updated on SMS and PRISMS to include the outcome of any appeals process, and any subsequent actions.

11.4.17 If a student’s external appeal to the OSO is successful the student will be informed and any notified (by the OSO) need for policy and or procedural changes will be implemented.
## DEFINITIONS

<table>
<thead>
<tr>
<th>Attendance At Risk:</th>
<th>A student is deemed to be ‘at risk’ if s/he:</th>
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<tr>
<td></td>
<td>- Has been absent for more than 20 consecutive hours without notification and approval; or</td>
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<td>- Has a maximum potential or final attendance rate of from 80 to 84.5 per cent.</td>
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| Expected Duration: | The duration of the course as registered on The Australian Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS). The expected duration for overseas students should not differ from the expected duration for domestic students. |

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<tr>
<th>Compassionate or Compelling Circumstances:</th>
<th>Circumstances which are generally beyond the control of the student and which have an adverse import on the student’s capacity and/or ability to:</th>
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<td>- Commence their course on the scheduled start date, but within two weeks of that date, or to</td>
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<td></td>
<td>- Attend scheduled classes for a significant period of time during the Term.</td>
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| Compulsory Study Period: | A study period (see below) in which the student must enrol unless granted a deferment or suspension from enrolment or leave of absence under Standard 13. A compulsory study period does not include periods in which the student can elect to undertake additional studies. |

| Course: | A full-time registered program of education or training registered on CRICOS for the attainment of a testamur or certificate. Defined as course in the ESOS Act. |

| Expected Duration: | The duration of the course as registered on The Australian Commonwealth Registered of Institutions and Courses for Overseas Students (CRICOS). The expected duration for overseas students should not differ from the expected duration for domestic students. |

| International Student: | A person who holds Australian Student Visa, and is an ‘overseas students’ as defined by the ESOS Act. |

| Satisfactory Course Progress: | Students receiving ‘Competent’ assessments for at least half of the Units of Competency studied over a period longer than one study period. |

| Study Period/Teaching Cycle: | A period made up by a sequence of Units of Competence taught and assessed (in a full 20 hours of class time per week) over a period depending on the course length. |

| Unsatisfactory Attendance: | A student’s attendance is deemed to be unsatisfactory if their minimum potential or actual Attendance Rate for a Study Period falls to below 80%. |

| Unsatisfactory Course Progress: | Students falling to receive ‘Competent’ assessments for at least half of the units of Competency studied over a period longer than one study period. |
### POLICY AND PROCEDURES RESPONSIBILITIES, REVIEW AND LINKAGES

<table>
<thead>
<tr>
<th>Approved by:</th>
<th>Future Academy Pty Ltd CEO</th>
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<tbody>
<tr>
<td>Date first Created:</td>
<td>11 Jun 2014</td>
</tr>
<tr>
<td>Date of Revision:</td>
<td>01 Aug 2014</td>
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<td>Date Effective:</td>
<td>28 Aug 2014</td>
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<td>01 Aug 2015</td>
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<td>Version 1.2</td>
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<td>Custodian:</td>
<td>Future Academy CEO</td>
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<td>Responsible Officers:</td>
<td>Future Academy’s RTO Manager</td>
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<td></td>
<td>Future Academy’s CRICOS Coordinator</td>
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<td>Future Academy’s Attendance Intervention Officer</td>
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<td>Supporting Documents, Procedures &amp; Forms:</td>
<td>Future Academy Website</td>
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<td>Future Academy Students’ Handbook</td>
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<td>Future Academy Student Support Services Policy and Procedures</td>
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<td>Future academy Completion within Expected Duration Policy and Procedures</td>
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<td>Future Academy Monitoring Course Progress Policy and Procedures</td>
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<tr>
<td>References &amp; Legislation:</td>
<td>Education Services for overseas Students Act 2000</td>
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<tr>
<td></td>
<td>Education Services for Overseas Students Legislation Amendment (Tuition Protection and Other Measures) Act 2011</td>
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<tr>
<td></td>
<td>National Code of Practice for Providers of Education and Training to Overseas Students 2007</td>
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