ABN 39 660 638 835

RTO Code: 46175 CRICOS No: 04238A

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International Student Attendance Policy

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

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

Australian Institute of Work-integrated Education and Research has selected to implement the Department of Education—Department of Home Affairs approved course progress policy and procedures. Noting this, Australian Institute of Work-integrated Education and Research apply the following policy to monitor learner attendance.

Australian Institute of Work-integrated Education and Research monitors the attendance of all learners in all courses. Attendance is calculated as the percentage of the course scheduled contact hours for which a learner is present and recorded as present in the attendance roll. The face-to-face contact hours for attendance for each week at Australian Institute of Work-integrated Education and Research is twenty (20) hours.

Monitoring and recording attendance

The trainer of each class will record the attendance of each learner on the attendance register within fifteen (15) minutes of class commencing. Trainers will enter the attendance data into the learner management. This will allow the Office Manager to contact absent learners within the next ninety (90) minutes to confirm their welfare and if they are simply running late. The following attendance rule apply:

- 1. The learner's attendance percentage is calculated by the number of recorded hours absent in all compulsory activities; deducted from the total scheduled contact hours for the enrolment (as indicated in the learners CoE); and converted to a percentage attendance rate.
- 2. Learners who are more than 15 minutes late for a compulsory session will be marked as absent for the entire session.
- 3. Learners who are absent for more than two consecutive study days due to injury or illness must provide a doctor certificate.
- 4. Learners who report at the beginning of the day and leave early without giving prior notice will be marked as absent for the entire day.

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Identifying learners at risk of unsatisfactory attendance

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

As an example, over a two-week period of scheduled contact hours (40 hours), 15% is equal to six (6) hours. This is calculated by simply calculating as the percentage of the course scheduled contact hours the learner's hours attended. In the example above, if the learner was absent six (6) or more hours over the two weeks, this will trigger the counselling process. The learner will be contacted in writing via a formal letter (*Unsatisfactory Attendance Warning*) asking the learner to contact the Senior Trainer and to attend a counselling session aimed at improving the learner's attendance. This session is to discuss the possible reasons for non-attendance and to work out what support is required to assist the learners to improve their attendance pattern.

During the counselling session, the Trainer is to:

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

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

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Identifying unsatisfactory attendance

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

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

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

Reporting unsatisfactory attendance

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

- The learner will be assessed as making unsatisfactory attendance as outlined above.
- Australian Institute of Work-integrated Education and Research must notify the learner in writing of the intention to report the learner to the Department of Education and DHA for Unsatisfactory Attendance and advise the learner they have twenty (20) working days to access Australian Institute of Work-integrated Education and Research appeals process prior to being reported. Letters of the intention to report the learner to the Department of Education and DHA are to be issued by the CEO. During any such period the learner's enrolment is kept current.
- The written notice (of Intention to Report for Unsatisfactory Attendance) must inform the learner that he or she is able to access the complaints and appeals process. The learner may appeal on the following grounds:
 - o Australian Institute of Work-integrated Education and Research's failure to record or calculate a learner's attendance accurately, compassionate or compelling circumstances.
 - Appeals will be handled in accordance with the Appeals Policy.
 - Where the learner's appeal is successful, due to an error in the attendance calculation, and the learner actually made satisfactory course attendance, Australian Institute of Work-integrated Education and Research does not report the learner.

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 Where the learner's appeals process shows that the learner has not made satisfactory course attendance, but there are compassionate or compelling reasons for the lack of attendance, ongoing support must be provided to the learner through Australian Institute of Work-integrated Education and Research's intervention strategy, and does not report the learner.

- Where the learner has chosen not to access the complaints and appeals processes within the twenty (20) working day period, the learner withdraws from the process, or the process is completed or the learner's appeal was unsuccessful, Australian Institute of Work-integrated Education and Research must report the learner to the Department of Education and DHA for unsatisfactory attendance. A learner will not be reported until the outcome of any appeal has been finalised and the appeal has been unsuccessful, or the learner does not access the appeals process during the 20-day period.
- Where a learner is assessed as having made unsatisfactory course attendance, Australian Institute of Work-integrated Education and Research will report the learner to the Department of Education via PRISMS within five (5) days of the twenty (20) day period for appeals being lodged or lapsing. The Office Manager is responsible for all transactions on PRISMS as directed by the CEO. Reporting in PRISMS must be completed as soon as practicable.

Submitting Learner Course Variations report on PRISMS

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

Record keeping

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

- Attendance records retained in learner management systems
- learner contact and counselling records (for example, warning letters)

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- notices of intention to report
- complaints and appeals outcomes, and
- other relevant attendance records

Learner Holidays

Learners are expected to take breaks only during the designated term breaks. These dates are provided on the learner timetable, website and learner handbook. Any other breaks are to be negotiated with the RTO Manager.

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