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**Documents:** Attendance Record  
Attendance Breach Letter (Initial)  
Attendance Breach Letter (Second)  
Attendance Breach Letter (Third & Final)

**References:** Student Support Policy  
Complaints Policy  
Appeals Policy  
Academic Progress Monitoring  
Quality VET framework  
Intervention Strategy

**Relevant Standards:** Standards for Registered Training Organisations (RTOs) 2015  
ELICOS National Standards 2018  
Education Services for Overseas Students (ESOS) Act 2018

**Authorised:**

**Position:** Principal

**Authorisation Date:** 04-Oct-2019



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## PURPOSE

It is the purpose of this document to provide clear direction to students and staff regarding the legal requirements of course attendance for students and the manner in which Blackfriars Priory School (Blackfriars) manages low attendance and reporting to the Australian Government, Department of Home Affairs (DHA).

## POLICY

Blackfriars is committed to a safe and effective learning environment with support mechanisms to ensure the success of all of our students.

Blackfriars is committed to the systematic monitoring of student academic, attendance and overall course progress. Blackfriars is proactive in notifying and mentoring students who are at risk of failing to meet progress requirements. Please refer to Intervention Strategy Policy.

Blackfriars monitors:

- Academic progress – practical and theoretical;
- Attendance levels – refer Attendance Policy.

## SCOPE

This policy and procedure applies to all courses delivered by Blackfriars for International Students.

## DEFINITIONS

Suspension	<p>Suspension means a student will be removed from attending normal classes for a period of time during which they will be provided with external assignments to complete. An academic adviser will be nominated as a support during this period of time.</p> <p>Suspension will occur where a student has evidenced a continued disregard for course minimum requirements or the Student Code of Conduct.</p> <p>Students evidencing active participation in the Blackfriars Intervention Strategy will not be subject to suspension.</p>
Expulsion	<p>Expulsion means the immediate release/removal from all further studies at Blackfriars supported by report to DHA.</p> <p>Expulsion is a 'last resort' consequence that will occur where a student does not evidence active participation in the Blackfriars Intervention Strategy, has been suspended once previously, or their behaviour is of a serious negative or illegal nature.</p>



Students may access the Appeal and Complaint Process if they believe that expulsion was not appropriate. Please refer to the Appeal and Complaint Policies

Withdrawal from a subject	Withdrawal from a subject, due to illness or other compassionate or compelling circumstances, without academic penalty will be negotiated and be dependent upon the level of completion and achievement at the time of withdrawal. It is not Blackfriars policy to penalise a student for circumstances that are out of their control.
Intervention Strategy	<p>The active participation of a student in a negotiated strategy to increase the student's opportunity for satisfactory course progress achievement.</p> <p>Intervention Strategy is negotiated and is compulsory once a student is identified as being at risk of not achieving satisfactory academic progress.</p> <p>Please refer Intervention Strategy Policy.</p>
Intervention & Support Services	<p>Internal or external activities and actions that assist the student to achieve a successful course outcome i.e.:</p> <ul style="list-style-type: none"><li>• Academic Mentor (Internal);</li><li>• Study groups (Internal)</li><li>• Language Literacy &amp; Numeracy additional learning (external);</li><li>• Personal, financial or other counselling (external)</li></ul> <p>Please refer to Student Support Services Policy and/or speak with Blackfriars staff for assistance.</p>
Appeal & Complaint Process	<p>Processes by which students and other Blackfriars stakeholders may appeal decisions or formally register a complaint.</p> <p>Please refer to the Complaints Process or Appeals Process or speak with a Blackfriars staff member for assistance.</p>

## PROCEDURE

Under the terms of a student Visa, the minimum attendance set down by Blackfriars as required to successfully complete the course is 80%.

### Monitoring

Blackfriars will formally monitor attendance via the Student Attendance Record:

- Daily by Teachers;
- Every five (5) weeks by the International Students Program Officer

Teachers' concerns should be communicated to the International Students Program Officer at the earliest possible time:



## Actions

### Attendance at 80% results in:

- an initial ESOS Attendance Warning Letter that includes advice that the student has 20 days to access the Blackfriars Appeal and Complaint process from the date of receipt of the letter;
- the International Students Program Officer is to mentor the student in relation to:
  - attendance level;
  - identifying the reasons for absences and provide support or remedial actions;
  - reinforcing the consequences of continued or lower attendance.

The mentoring process is to be documented and the student is to be made clearly aware that this is a first warning.

### Continuing attendance at 80% results in:

- A second Attendance Warning Letter that includes advice that the:
  - student has 20 days to access the Blackfriars Appeal and Complaint process from the date of receipt of the letter and
  - that the next letter will be advice that the student will be reported to DHA under Section 19 if their attendance falls below 80%.
- The International Students Program Officer is to mentor the student in relation to;
  - their continuing poor attendance level;
  - identifying the reasons and provide support or remedial actions;
  - reinforcing that if attendance drops to or below 80% it will result in a report to DHA under Section 19 of the ESOS Act.
  - reminding the student of Blackfriars Complaints and Appeals Process if they believe they are being unfairly reported or reported in error.
- The International Students Program Officer is to advise the Deputy Principal, Secondary (7-12) of the "Code Orange" situation. The Deputy Principal, Secondary (7-12) will investigate and implement any action(s) they deem appropriate and necessary.

Reasonable effort will be made to mentor the student and identify preventative/intervention measures. Should external support services be required, the Deputy Principal, Secondary (7-12) or is to authorise these prior to services being organised.

### Continued attendance below 80% results in:

- an Intention to Report Breach Letter including advice that the student has 20 days to access the Blackfriars Appeal and Complaint process ; from the date of receipt of the letter;
- International Students Program Officer is to mentor the student in relation to;
  - advising the student of intention to report to DHA under Section 19 of the ESOS Act.
  - reminding the student of Blackfriars Complaints and Appeals Process if they believe they are being unfairly or reported in error and that they have 20 days from receipt of the letter to avail themselves of this process.
- The International Students Program Officer is to advise the Deputy Principal, Secondary (7-12) of the "Code Red" situation. The Deputy Principal, Secondary (7-12) will investigate and implement any action(s) they deem necessary.

Where the student has chosen not to access the Complaints and Appeals Processes within 20 days, withdraws from the process, or the process is completed and results in a decision supporting Blackfriars then Blackfriars must



notify the Registrar through PRISMS that the student is not achieving satisfactory attendance as soon as practicable.

Blackfriars may decide not to report a student for breaching the 80% attendance requirement where:

- That decision is consistent with Blackfriars documented attendance policies and procedures;
- The student records clearly indicate that the student is maintaining satisfactory course progress, and
- Blackfriars confirms that the student is attending at least 70% of the scheduled course contact hours for the program in which they are enrolled.

DHA retains the ability to consider exceptional circumstances as to why the Visa should not be cancelled and to refer the matter back to the education provider if the provider has not given the student access to an appropriate appeals process and/or considered compelling and compassionate circumstances, where relevant. The student then has 28 days from receipt of the breach notice to present to a DHA Office to appeal the decision.

## INTERVENTION PROCESS

For detailed information relating to Blackfriars Intervention Strategy and Student Support Services please refer to relevant policies.

Blackfriars early intervention process for attendance will be as follows:

Each semester is made up of 20 weeks, with formal attendance reviews taking place every five (5) weeks (5 weeks = 20 school days (excluding public holidays))

Attendance Level	Intervention Level
90% attendance equates to 2 days absent Teachers to manage mentoring and intervention process	1 Code Yellow
85 % attendance equates to 3 days absent International Students Program Officer is to be informed and actively participates in the mentoring and Intervention Process	2 Code Orange
80% attendance equates to 4 days absent Deputy Principal, Secondary (7-12) manages the expulsion or retention process Registrar is responsible for DHA reporting	3 Code Red

## COURSE MONITORING

The International Students Program Officer will on a regular basis, but not less than twice during the progress of each school term, conduct ad-hoc monitoring / auditing of student attendance in addition to teacher activities.



## SPECIAL CIRCUMSTANCES

Special circumstances for continued low attendance may include:

- Illness which is supported by a medical certificate;
- Family crisis;
- Traumatic event (e.g. serious accident or injury).

## APPEAL

Students will have 20 working days from date of receipt of written advice to access the Blackfriars Complaints and Appeals Process in response to written advice.

Compassionate and/or compelling reasons will be considered. Please refer Appeals Policy and/or speak with Blackfriars staff for assistance:

## REPORTING

It is a condition of International Students' Visa that they must attend and progress satisfactorily through the qualification.

Where an International Student does not meet this condition after support and participation in the Intervention Strategy or the International Student refuses to participate in an Intervention Strategy and after the Appeal Process period has completed and is found in favour of Blackfriars, Blackfriars may report the student with a view to cancelling the student's CoE.

The International Student will have been sent three (3) warning letters the third being advice of Blackfriars intention to report the breach to DHA after the 20-day Appeal Process timeframe.

The International Student may access the Appeal Process at any time during the delivery of the three (3) letters and as a maximum 20 working days from the date of receipt of the third letter.

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,

OR

If the Complaints and Appeal Process is exhausted and the student is still considered to be in breach of this condition Blackfriars will within:

- Five (5) business days notify the Registrar of the student's breach;
- 14 days report cancellation of the student's enrolment to DHA via PRISMS using a Section 19 report;
- 28 days finalise the student default obligations as set out in the written agreement with the student;
- a further seven (7) days report the outcome of the student default via PRISMS.



## RESPONSIBILITY

### Principal

It is the responsibility of the Principal to ensure that Blackfriars has a current and effective policy and procedure for:

- Monitoring and managing Student Attendance;
- Intervention Strategies;
- Student Support mechanisms;
- Compliance with legislation.

### International Students Program Officer

It is the responsibility of the International Students Program Officer to ensure:

- Create the Intervention Strategy required for rectification
- the Early Attendance Intervention Strategy is effective and activated by all Teachers.
- all employees and students are conversant and correctly action this policy;
- all students are fully informed of the Academic Progress Policy as part of the pre enrolment information and orientation process.
- all employed and contracted Teachers are fully informed and implement the correct processes for Academic Progress;
- appropriate monitoring/auditing of Teachers' activities in relation to Academic Progress Monitoring is conducted effectively and regularly;
- Intervention Strategies and Student Support mechanisms are implemented at the earliest possible opportunity to support successful completion by the student.
- report Code Red to the Deputy Principal, Secondary (7-12) immediately they become apparent
- Fair and equitable decisions are taken in relation to student reporting and expulsion.

### Registrar

The Registrar is responsible for the accurate and timely reporting to DHA of Visa breaches via PRISMS system.

### Teachers

It is the responsibility of Teachers to:

- actively monitor student attendance;
- report Code Orange and Red to the International Students Program Officer immediately they become apparent;
- provide mentoring and intervention to students experiencing supportable issues.

### Students

It is the responsibility of the student to:

- maintain attendance levels above 90% at all times.
- request support and assistance from Blackfriars to maintain those levels.