



FULL FEE-PAYING OVERSEAS STUDENT GUIDELINES FOR MONITORING STUDENT COURSE ATTENDANCE AND PROGRESS

CATEGORY

Guidelines (Operational)

SOURCE OF OBLIGATION

The National Code of Practice for Providers of Education and Training to Overseas Students Standard 8 sets out that registered providers must safeguard the integrity of Australia's migration laws by supporting overseas students to complete their course within the required duration and fulfil their visa requirements for course attendance and course progress. Standard 8 sets flexible provisions to allow online learning while maintaining appropriate standards for overseas students to comply with student visa conditions.

POLICY STATEMENT

The aim of these guidelines is to ensure that Penrhos College monitors each overseas student's course progress and attendance for each course whilst the student is enrolled at Penrhos College. The obligation to monitor allows Penrhos to:

- Ensure the student can complete the course within the expected duration specified on the student's Confirmation of Enrolment (CoE). The expected duration is specified in the student's CoE and does not exceed the CRICOS registered duration.
- Identify, notify, and assist a student at risk of not meeting course progress or attendance requirements.
- Clearly outline and inform the student before they commence the course of the requirements to achieve satisfactory course progress and attendance.

PENRHOS COLLEGE'S COURSE ATTENDANCE AND PROGRESS REQUIREMENTS

Course Attendance

The Enrolment Manager independently monitors compliance for each student's attendance via the College's management software, Compass. Both the student and her parents/guardians are made aware of the requirement to maintain a minimum of 80% attendance and/or no more than five consecutive absent days without approval.

- a) Satisfactory course attendance is attendance of at least 80% of scheduled contact hours.

- b) As per the Penrhos College Student Attendance Policy, a register of the daily attendance of all students at the College in electronic form is kept, showing whether a student attended, or participated in an educational program, or failed to so attend and participate.
- Attendance is checked in Junior School twice a day, at 8.30am and 1.40pm
 - Attendance is checked in Secondary school each period of the day (6 periods + form period)
- c) Course attendance is calculated automatically by the College's student management software, Compass. An attendance dashboard for International Students (illustrated below) is reviewed regularly to allow effective compliance monitoring by the Dean of Academic Administration.
- The method for calculating the minimum attendance is "In Class % (Class %)":
 - For the time allocated to the given class, what percentage was the student doing that actual class/subject (and not something else)
 - Calculation:
(present + late) / sessions run
 - As shown below if a student falls below 85% the Class % is highlighted "amber". If the student falls below 70% the Class % is highlighted "red".

Group: International Students

Session Attendance Summary - includes all Classes, School Activities and Events the student has attendance data for during the date range selected.															
Start	End	Students	Class %	Ac'td %	Schl %										
20/04/2021	01/07/2021	Active	All	All	All										
Student	ID Code	Year Level	Form	Run	Present				Not Present				Percentages		
					Prsnt	Late Appr	Late Un'd	Total	NP Schl	NP Parnt	NP Un'd	Total	Class %	Ac'td %	Schl %
[REDACTED]	[REDACTED]	7	07AC1	361	306	2	0	308	2	49	2	53	85	99	86
[REDACTED]	[REDACTED]	11	11T17	298	213	0	0	213	56	20	9	85	71	97	90
[REDACTED]	[REDACTED]	7	07AC2	365	329	0	0	329	4	23	9	36	90	98	91
[REDACTED]	[REDACTED]	7	07AC7	373	355	2	0	357	4	12	0	16	96	100	97
[REDACTED]	[REDACTED]	6	6W	176	161	0	0	161	0	15	0	15	91	100	91
Total Students: 5															

Intervention for students at risk of failing to achieve satisfactory attendance requirements:

- d) The College's intervention strategy is to identify, notify and assist any student at risk of breaching Penrhos College's attendance requirements. The student will be counselled by their Head of Year in Secondary School or Deputy Head of Junior School and offered any necessary support when their attendance drops to 85% or they are absent for more than five consecutive days without approval.

Notifying students that they have failed to meet satisfactory attendance requirements:

- e) If the student has fallen below the attendance threshold for the study period, Penrhos College will advise the student and her parents/guardian of its intention to report the student for breach of visa condition 8202, and that she has 20 working days in which to access the College's internal complaints and appeals process, except in circumstances outlined below in (g)
- f) The College will notify the Commonwealth Department of Education, Skills and Employment (DESE) of the student not achieving satisfactory course attendance as soon as practicable where:
- The student does not access the complaints and appeals process within 20 days
 - Withdraws from the complaints and appeals process
 - The complaints and appeals process results in a decision for the College

- g) Penrhos College may decide not to report the student for breaching the attendance requirements if the student is still attending at least 70% of the scheduled course contact hours and the student provides genuine evidence demonstrating that compassionate or compelling circumstances apply.
 - i. The method for calculating 70% attendance is the same as that outlined in (c)
- h) If the student does not obtain a suspension of studies under the Penrhos College Deferment, Suspension and Cancellation Policy, and falls below the 70% threshold for attendance, the process for reporting the student for unsatisfactory attendance (breach of visa condition 8202) will occur as outlined in (e) and (f).

Course Progress

Teachers monitor student performance in each of her subjects. An assessment program is issued at the beginning of the academic year and students are provided with an assessment schedule. As assessments are completed, teachers record details of achievement in the electronic database, Compass.

In addition to this, the Dean of Academic Administration, Heads of Departments, Heads of Year and Form Teachers monitor her academic and co-curricular program and inform the Head of Boarding and Enrolment Manager of any concerns raised by a subject teacher.

At the end of each semester the College issues FFPOS parents with a report that gives information about their daughter's performance in each subject. In addition to the semester reports, the College issues an Interim report in Term One and holds a face to face meeting once per year between teacher, student and her parent/guardian. If academic or pastoral issues are identified by staff at the College, a case manager will be appointed from the Learning Enhancement Team and contact with the parents/guardian will be established.

Intervention for students at risk of failing to achieve satisfactory course progress:

- i) If a student does not achieve 50% competency in the majority of her subjects in the assessment period, the Dean of Academic Administration and the Dean of Pastoral Care will meet with her to develop an intervention strategy for academic improvement. This may include:
 - i. Additional supervised study periods
 - ii. Tutorial assistance
 - iii. Other intervention strategies as deemed necessary
- j) A copy of the student's individual strategy and progress reports in achieving improvement will be forwarded to her parents.
- k) The student's individual strategy for academic improvement will be monitored over the following term by the Dean of Academic Administration and Dean of Pastoral Care and records of student response to the strategy will be kept.

Notifying students that they have failed to meet satisfactory course requirements:

- l) If the student does not improve sufficiently academically and achieve satisfactory course progress by the end of the next assessment period, Penrhos College will advise the student in writing of its intention to report the student for breach of visa condition 8202, and that she has 20 working days in which to access the appeals process.
- m) The College will notify DESE of the student not achieving satisfactory course progress as soon as practicable where:
 - i. the student does not access the complaints and appeals process within 20 days, or
 - ii. withdraws from the complaints and appeals process, or
 - iii. the complaints and appeals process results in favour of the school. An interpreter will be arranged if required.

Completion within expected duration of study (course progression)

- n) As noted above, the school will monitor, record and assess the course progress of each student for the course in which she is currently enrolled.
- o) Part of the assessment of course progress at the end of each term will include an assessment of whether the student's progress is such that she is expected to complete her course within the expected duration of the course.
- p) The College will only extend the duration of the student's study where the student will not complete her course within the expected duration due to:
 - i. compassionate or compelling circumstances
 - ii. student participation in an intervention strategy as outlined in (i) above
 - iii. An approved deferment or suspension of study has been granted in accordance with Penrhos College's Deferment, Suspension and Cancellation policy as described in the document Full Fee-Paying Overseas Student Information
- q) Where the College decides to extend the duration of the student's study, the College will report this to DESE and/or issue a new Course of Enrolment if required.

Record keeping

The College maintains student attendance and academic records to ensure that this policy is implemented fairly. These records are filed electronically on the student's record and retained as per our Records Management policy.

IMPLEMENTATION AND REVIEW

This policy is implemented by:

- staff training and making this guideline available to all staff via the College's internal policy portal
- communicating this policy to the College community and making it available on the College's website
- monitoring the effectiveness of the policy
- reviewing and evaluating the policy and its accompanying procedures every 3 years

Associated policies and procedures

Student Attendance Policy and procedure

FFPOS – Student Information Booklet

Complaints Handling Policy and Complaints Handling Guide

Owner

Enrolment Manager in consultation with Dean of Academic Administration

Last review date:

August 2021

Next review date:

August 2024

Ratified by College Council

Version	Date Published	Changes Made	Author of Changes
1	November 2016		Enrolment Manager / Director of Strategic Directions
2	August 2021	Reviewed in line with National Code (2018)	Enrolment Manager / Risk and Compliance Coordinator