KAPLAN

Attendance Policy and Procedure

Scope

This policy applies to all Domestic and International Kaplan Higher Education Pty Ltd (KHE) pathway college (College), Students currently enrolled in College programs as well as the staff responsible for monitoring and reporting on student attendance.

Purpose

This policy explains the framework of principles and procedures that underpin the College's compliance with the ESOS Act 2000, the National Code 2018 (specifically Standard 8), the ESOS Foundation Programs Standards 2021 and the ELICOS Standards 2018. The policy is adopted to ensure that the College is able to comply with its responsibilities regarding monitoring student attendance and that International Students are informed of the requirements for satisfactory course attendance. Attendance monitoring enables the College to identify students who are at risk of failing to meet attendance requirements and allows the College to offer support so that such students are assisted to achieve their educational goals.

Policy Statement

The College is committed to monitoring attendance for all students and monitoring International Student compliance with student visa conditions relating to attendance and will proactively provide assistance and counselling to Students who are at risk of failing to meet attendance requirements.

| Cancellation | means the termination of a student's Enrolment(s) with the College that is initiated by the College | | | |
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| Compassionate or Compelling Circumstances | means circumstances that may negatively impact a student's study, including but not limited to serious illness or injury, bereavement of close family members, major political upheaval or national disaster in their home country, or a traumatic experience such as a serious accident or crime. | | | |
| CAAW | means the Confirmation of Appropriate Accommodation and Welfare letter – a document generated in PRISMS that indicates the College has approved a student visa holder's welfare and accommodation arrangements while Under 18 and enrolled in a CRICOS registered course(s) at the College. | | | |
| Carer | means an employee of a Welfare Provider who offers non-academic supervision and welfare support to international students under the age of 18. | | | |
| Confirmation of Enrolment (CoE) | means a document issued by education providers to verify the international applicant's Enrolment in a specified Program. | | | |
| Course | means a subject of study a student enrols in as part of their Program. | | | |
| Domestic Student | means a student who is an Australian or New Zealand citizen, a permanent resident of Australia or the holder of a permanent Australian humanitarian visa. | | | |
| Enrolment | means acceptance by the provider that the student is now progressing toward the completion of the Program requirements. The period of Enrolment includes scheduled breaks between Study Periods. | | | |
| Intention to Cancel Enrolment | means a written notice which informs a student of the education provider's intention to cancel the student's Enrolment with the provider. | | | |
| Intention to Report | means a written notice which informs an International Student of the provider's intention to report the student to DHA for not achieving satisfacto attendance | | | |

Definitions

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| International Student | means a person who holds or intends to hold a student visa with rights to study in Australia. | | |
|------------------------------------|--|--|--|
| PRISMS | means the Provider Registration International Student Management System (PRISMS) is an Australian Government secure online system that allows providers to issue Confirmations of Enrolment (CoEs), and that government agencies use to monitor student compliance with visa conditions and educator provider compliance with the ESOS Act 2000. | | |
| Program | means a sequence of subjects required to achieve stated learning outcome | | |
| Student Management System (SMS) | • | | |
| Study Period | means a discrete period of study within a Program, namely term, semester, trimester, short Program or similar or lesser duration, or as otherwise defined by the registered provider as long as that period does not exceed six months. | | |
| Welfare Provider | elfare Provider means an individual or organisation that is responsible for providing supp and welfare monitoring to students until they turn 18. | | |

Attendance Requirements

All students are required to attend a minimum of 80% of their scheduled class hours for each Study Period in order to achieve satisfactory academic progress. Failure to achieve the minimum attendance of 80% may result in Enrolment Cancellation. The Study Period for each Program is defined as follows:

- Foundation Studies Program (FSP) one semester
- Degree Transfer Program (DTP) the bridging semester
- Pre-Master's Program (PMP) the bridging semester
- English Language Program:
 - 1. Up to 25 weeks (students 25 weeks or less)
 - 2. 20 weeks + 20 weeks (40 week student)
 - 3. 15 weeks + 15 weeks (30 week students)

All International Students must attend at least 80% of the scheduled class hours for their Program as set out in their CoE. If the student is undertaking multiple Programs with the College (that is, they will have more than one CoE), they must maintain 80% attendance in each of their Programs, as the College will measure attendance for each Program separately.

International Students in the above-mentioned Programs who do not meet the 80% attendance requirement are in breach of their student visa requirements and the College is obliged to notify the Australian Government of their unsatisfactory attendance via PRISMS. The notification in PRISMS will also notify the Department of Home Affairs (DHA).

Domestic Students, Degree Transfer and Pre-Master's Program Students (not in the bridging semester) who fail to meet the 80% attendance requirement are in breach of the College attendance policy and are at risk of Enrolment Cancellation.



Attendance Procedures

Informing Students about the Attendance Policy

The College informs all students of their obligation to attend a minimum of 80% of their classes. Information about attendance requirements is conveyed to students during orientation and throughout their Program(s) in the following ways:

- during Orientation presentations;
- in meetings or discussions with the College Services team when attendance has been of concern; and
- via the Attendance Policy which is available on the College website.

The College monitors student attendance in order to identify students who could potentially fall below the 80% attendance requirement as they may need additional support from the College.

Informal Monitoring of Attendance

Teachers will liaise with relevant College staff which may include the College Services team, College Director, Student Counsellor, Academic Manager or Director, Learning and Teaching if they are concerned about a student who has missed classes.

Formal Monitoring of Attendance

- Teachers record attendance for each class;
- Teachers enter class attendance and absences into the Student Management System (SMS). All data entry of attendance is required to be completed within 72 hours;
- College Services staff generate a report from the SMS, no less than once per fortnight, to monitor all student attendance and to identify students whose current attendance puts them at risk of not meeting the 80% attendance requirement outlined in this Policy;
- Students at risk are then contacted to check their welfare and are advised of the attendance requirements; and
- College staff contact students who have missed two consecutive days of classes and invite them for a meeting to discuss the reasons for low attendance.

Academic Counselling for Non-Attendance

Once a student has been identified as having attendance as a concern, the College:

- classifies the student as being at risk after the first warning letter is issued;
- liaises with other College Services staff to determine if the student is currently experiencing any problems, such as homestay, relationship or other personal challenges;
- requests a meeting with the student if current attendance has fallen below 90%, if they have received an informal warning, and if attendance continues to fall this meeting can be arranged earlier if there is a serious issue; and
- meets with the student to ascertain what is causing them to miss classes. At this meeting, the College staff assists the student in identifying issues which are causing their non-attendance.

If the issues are:

• **Medical** - College staff discuss with the student how their medical condition is affecting their studies and what strategies can be put in place to assist them. The student may be referred to a medical practitioner or medical services for further assistance. The student may also be asked to supply a medical certificate for the College to keep on record. Students should note that any hours of absence for medical reasons (whether supported by evidence or not) are not reinstated, but will be considered in assessing a student's attendance history.



- **Personal** the student is invited to speak with the student counsellor who will assist them to work through the issues that are preventing them from attending classes. Additional fees may apply for external counselling.
- **English proficiency related** strategies to deal with the issue are discussed including the option of making an appointment with learning support staff for additional English tuition at no cost to the student.
- **Academic** strategies to deal with the issue are discussed, including utilising learning lupport services. Students are also encouraged to approach their teacher about the difficulties they are experiencing to identify solutions to the problems.

College staff work together with students to:

- determine if an intervention strategy needs to be put in place;
- determine if special consideration or reasonable adjustment is required;
- keep a formal record of attendance meetings in the student's file;
- remind student about the 80% attendance requirement;
- schedule follow-up meetings if the student continues to miss classes to repeat the procedure above.

Absent for 2 consecutive days

Should the student fail to respond to the College's attempts to contact them, and they have been absent for two consecutive days, the College Services team will attempt confirm the student's safety in the following ways:

- contacting the student on their home or mobile number;
- contacting the ISA Carer (for students under the age of 18)
- contacting the student's teachers and informing them the student needs to see them immediately if they do attend class;
- where the student cannot be contacted, contacting the student's emergency contact(s) and asking them to inform the student of the need to contact the College; and
- where the student cannot be contacted, contacting the parent(s)/legal guardian(s) of students under the age of 18 via the appropriate channel to inform them of the situation.

If the College is still unable to locate the student, then the following steps are taken:

- the parents are contacted by phone to advise that their son or daughter still has not contacted the College using an interpreter, if required;
- if there is concern about the student's safety or welfare, College staff (minimum 2) visit the student's home address; and
- if the student still cannot be located, Police are contacted to report a missing person

Under 18 Year-Old Students

In all cases where intervention/notification processes are instigated for students under the age of 18 years, the Welfare Provider must be informed in order to take any extra steps deemed appropriate. To ensure this occurs, staff need to be aware of which students at the College are under 18 years of age at any particular point of time. The list is distributed to staff after each intake of students and is updated accordingly.

Formal Intervention

Informal Warning

Where a student's current attendance falls below 90%:

- the student is reminded of the <90% attendance rate in writing (via email);
- a diary note is entered in the student file in the SMS regarding the informal warning.



First Warning Letter

Where a student continues to miss classes after the informal warning and/or the student's predicted attendance falls below 85% (whichever comes first):

- the student is informed of their falling attendance in writing via email (First Warning and called for a meeting;
- sponsors (where relevant), parents of students under 18, and Welfare Providers are also informed of the student's falling attendance in writing;
- a copy of the letter is filed in the document section of the student's record in the SMS;
- a diary note is entered in the SMS.

Final Warning Letter

Where a student's current attendance is 80% or less:

- the student is given a Final Warning letter and called for a meeting.
- the student is advised that if their overall attendance reaches less than 80%, their scholarship sponsor (where relevant) and/or parent students under 18 only) are also informed in writing of the Final Warning for unsatisfactory attendance.
- a copy of the letter is filed in the document section of the student's record in the SMS.
- a diary note is entered in the SMS.

Reporting a Student to the Department of Home Affairs

Where a student's overall attendance reaches a level where they are unable to achieve 80% attendance for the Study Period:

- the student is notified in writing that the College intends to report them to DHA for failing to meet attendance requirements and that they have 20 working days to access the College's complaints and appeals process (non-academic grievance);
- scholarship sponsors and parents of students under 18 will also be informed of the College's intention to report the student to the DHA for unsatisfactory attendance;
- a copy of the Intention to Report letter is filed in the student's record and a diary note entered in the SMS.

If the student does not access the complaints and appeals process within 20 working days of the date of the Intent to Report letter being issued, or if the decision to report for unsatisfactory attendance is upheld in a subsequent appeal process, then the student's Enrolment is cancelled and DHA notified of the student's unsatisfactory attendance via PRISMS (where such a notification is made, this may lead to the Cancellation of the student's visa). Notification details and diary notes must be appropriately maintained in the SMS.



Cancellation of Enrolment (Domestic Students)

Where a Domestic Student's overall attendance reaches a level resulting in them being unable to achieve 80% attendance for the duration of the relevant Study Period:

- the student is notified in writing that their Enrolment will be cancelled for failing to meet attendance requirements and the student is called for a meeting;
- the student is informed in this letter that they have 20 working days to access the College's complaints and appeals process, including the opportunity to lodge an external appeal with the Commonwealth Ombudsman or the Office of the Training Advocate;
- scholarship sponsors and parents of students under 18 will also be informed of the Intention to Cancel Enrolment;
- a copy of the Intention to Cancel Enrolment Letter is filed in the student's record, and a diary note is entered in the SMS.

If the student does not access the complaints and appeals process within 20 working days, or if the decision to cancel their Enrolment is upheld in subsequent appeal processes, then:

- the student is notified that their Enrolment is to be cancelled and appropriate steps taken to cancel the student's Enrolment;
- notification details and diary notes must be appropriately maintained in the SMS.

Information for Degree Transfer and Pre-Master's Program Students

For Degree Transfer and Pre-Master's Program students, failure to meet the attendance requirements outlined in this policy may affect their satisfactory course progress. Where a student is not achieving satisfactory course progress, the student will be appropriately counselled and may ultimately be reported to the DHA for unsatisfactory progress in accordance with the College's Course Progress Policy and Procedures. Such notification details will be placed on the student's file.

Compassionate or Compelling Circumstances

Consideration will be given to students if there are Compassionate or Compelling Circumstances, which can be verified, that have resulted in the student not achieving satisfactory attendance. Students in these circumstances must maintain satisfactory course progress and, in these cases, a minimum of 70% attendance may be deemed acceptable at the College's discretion.

Review and Appeal

After an "Intention to Report" letter for unsatisfactory attendance is issued, students have twenty (20) working days to request a formal review in accordance with the College's Grievances, Complaints and Appeals Policy.

After receiving an "Intention to Cancel Enrolment" for unsatisfactory course attendance, students have **ten** (10) working days to request a formal review, in accordance with the College's Grievances, Complaints and Appeals Policy.

If a student is seeking a formal review on basis of Compassionate or Compelling Circumstances, students must also provide enough evidence for the College to consider in accordance with the Compassionate or Compelling Circumstances Policy.

The College will not report an International Student to the DHA for unsatisfactory course attendance until any processes commenced by the student under the Grievances, Complaints and Appeals Policy have been completed.



If a student has commenced a process under the Grievances, Complaints and Appeals Policy, they must continue to attend all scheduled classes for their Program. Any failure by a Domestic or International Student to maintain their attendance level will put them at risk of failing to achieve satisfactory course progress.

Relevant Legislation

As a registered provider, the College operates under strict laws and regulations. Policies and procedures are in place to ensure compliance with the legislative instruments referenced below.

- Education Services for Overseas Students Act 2000 (ESOS Act)
- Education Services for Overseas Students (Foundation Program Standards) Instrument 2021
- Education Services for Overseas Students Regulations 2019
- ELICOS Standards 2018
- Higher Education Standards Framework (Threshold Standards) 2021
- National Code of Practice for Providers of Education and Training to Overseas Students 2018
- Standard 8 of the National Code 2018 Factsheet
- Tertiary Education Quality and Standards Agency Act 2011 (TEQSA Act)

Related Policies

This Policy should be read in conjunction with the following College policies:

- Admissions Policy
- Compassionate or Compelling Circumstances Policy
- Course Progress Policy
- Grievances, Complaints and Appeals Policy
- Under 18 Policy



Version Control and Accountable Officers

It is the joint responsibility of the Implementation Officer and Responsible Officers to ensure compliance with this policy.

| Policy Category | | Academic | | | | | | |
|--|---|--------------------------|---|---------------|----------------|--|--|--|
| Responsible Officers | | Vice President, Academic | | | | | | |
| Implementation Officer | | College Director | | | | | | |
| Review Date | | April 2027 | | | | | | |
| Approved by | | | | | | | | |
| Vice President, Academic under a standing delegation from the KHE Academic Board | | | | | | | | |
| Version | | | Brief Description of the changes | Date Approved | Effective Date | | | |
| 4.0 | Kaplan Australia Quality, Regulations and Standards team | | Reviewed and updated policy to meet criteria of ESOS framework and National Code 2018, ELICOS Standards 2018, National Standards for Foundation Programs. Added the "Version Control" section to provide ongoing information on updates and reviews of the policy. | March 2019 | March 2019 | | | |
| 4.1 | Quality, Regulations and Standards Team | | Policy re-branded for new KHE college. Minor editing and formatting changes. | 10.03.2025 | 11.03.2025 | | | |