



RTO No. 31736 | CRICOS Provider No. 03010G

International Student Course Contact Policy and Procedure

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15 Sep 2019	V1.1	Revision made for procedure	Shashank Vuppala
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1. Purpose

The purpose of this policy is to outline the requirements in accordance with the Standards for RTOs 2015, CRICOS Registration requirements, National Code 2018 and ESOS Act 2000, the minimum course contact requirements for international students to undertake full-time study and uphold their mandated scheduled course contact hours requirement, throughout the duration of their enrolment with Queensford College.

2. Scope

This policy applies to all International Students enrolled at Queensford College and to be followed by relevant Queensford College staff who will implement this policy and procedure for all current VET International Students.

3. Responsibility

The Director of Operations:

- responsible for the establishment and implementation of this policy with the support of the RTO & Compliance Manager, Student Services, Administration and Training Departments.

Student Services Officers:

- generate all required course contact and course progression reports via the SMS and LMS.
- maintain all course contact and course progress monitoring records.
- contact students regarding course contact requirements.
- inform students of the attendance/course contact hour requirements.
- monitor student course contact hours throughout their enrolment.
- communicate with students and trainers regarding absences and/or any issues identified with course contact.
- issue notifications and provide relevant support associated with the process.

Trainers and Assessors:

- record student attendance for all classes accurately and within a timely manner.
- communicate with students and the Student Services Department regarding absences and/or any issues identified.
- remind students of attendance/contact hours requirements.
- provide relevant support associated with the process.

4. Compliance Mapping

Clause/standard	Requirement
Standard 8 of the National Code 2018	Overseas student visa requirements for course attendance and course progress.
ASQA – Condition of CRICOS registration	Overseas students are required to be enrolled in a full-time registered course to undertake study. For VET courses, a full-time course is a minimum of 20 scheduled course contact hours per week, unless otherwise specified by ASQA.
Clause 8.5 of the Standards for RTOs 2015	The RTO complies with Commonwealth, State and Territory legislation and regulatory requirements relevant to its operations.

5. Definition

Australian Skills Quality Authority (ASQA): The Australian Skills Quality Authority (ASQA) is the national regulator for Australia's vocational education and training sector. ASQA regulates courses and training providers to ensure nationally approved quality standards are met.

Absence/s: are generally short term non-attendance which may or may not impact the completion date of the course under current COE.

Compassionate or compelling circumstances are generally the circumstances beyond the control of the overseas student and which have an impact upon the overseas student's course progress, attendance and/or wellbeing. These could include but are not limited to:

- Serious illness or injury, where an Australian medical certificate states that the overseas student was unable to attend classes.
- Bereavement of close family member such as parents or of grandparents (where possible a death certificate should be provided).
- Major political upheaval or natural disaster in their home country requiring emergency travel.
- A traumatic experience which could include:
 - Involvement in, or witnessing a serious accident or
 - Witnessing or being victim of a serious crime and this has impacted on the overseas student (these cases should be supported by police or psychologist's reports)

Course Progress: as defined by the National Code as 'the measure of advancement within a course towards the completion of that course irrespective of whether course completion is identified through academic merit or skill-based competencies'.

CRICOS: the Commonwealth Register of Institutions and Courses for Overseas Students

COE: Confirmation of Enrolment usually generated on PRISMS.

Department of Home Affairs (DoHA): The Department is responsible for immigration and customs border policy.

ESOS: Education Services of Overseas Student

LMS: Current Learning Management System

Leave: Refers to planned leave for up to a week, with permission/approval and that will not have an impact on completion of the course under current COE. For any leave to be approved, students must have more than 90% attendance rate in the respective/corresponding study period.

Non-Genuine Student: A student visa holder who is found to not be a genuine student. Queensford College may assess a student as being non-genuine based upon:

- failure to maintain minimum course progression requirements; or,
- failure to adhere to intervention strategies/plans put in place for student support; or,
- failure to maintain attendance for 5 consecutive scheduled classes without providing evidence of reason for absence and failure to respond to contact attempts by the College regarding current circumstances; or,
- breach of code of conduct (refer to Queensford College Academic and General Code of Conduct Policy)

PRISMS: is the Provider Registration and International Students Management System; the system used to process information given to the Secretary of DET by registered providers.

Scheduled course contact hours – as defined by the National Code as ‘the hours for which students enrolled in the course are scheduled to attend classes, course-related information session, supervised study sessions, mandatory and supervised work-based training, and examinations. Scheduled course contact hours for overseas students allow them to develop the knowledge and skills required by the Training Package. As per ASQA, a VET course delivered to overseas student must be full-time and include a minimum of 20 scheduled contact hours per week.

Satisfactory course contact hours: is defined as student who achieves an attendance rate of 80% or above in each study period.

Study period: Each study period is defined as 12 weeks of study from course start date. Where the remaining duration of the course is less than 12 weeks, the study period will be equal to the remaining duration of the course.

SMS: The College’s current Student Management System

SOLA: Structured Online Learning Activities.

Student Visa Condition: the following condition is attached to the student visa, whereby international students must adhere to, as defined by the Department of Home Affairs

8202 – Meet course requirements. You must:

- remain enrolled in a registered course (if you are a Foreign Affairs or Defence sponsored student or a secondary exchange student you must maintain full-time enrolment in your course of study or training)

- maintain enrolment in a registered course that is the same Australian Qualifications Framework (AQF) level or higher for which we granted your student visa, unless changing from AQF level 10 to level 9. See: Change in study situation.
- maintain satisfactory attendance in your course and course progress for each study period as required by your education provider.

6. Policy

6.1 Course Contact Policy

6.1.1 Queensford College is committed to supporting international students in meeting their Student Visa requirements by delivering full-time registered courses with a minimum of 20 'scheduled course contact hours' (*see definition*) per week, unless otherwise specified by Australian Skills Quality Authority (ASQA). Queensford College meets this requirement by scheduling 14 scheduled contact hours per week. The National Code 2018 Standard 8.18 allows a registered provider to deliver one-third of the units (or equivalent) of a VET course by online learning to an overseas student. Queensford College provides one-third of the course delivery through the provision of structured online learning activities using the Moodle platform. One-third structured online learning equates to 6 hours per week. Engagement and learning through structured online learning are a mandatory component of learning and will be monitored separately through the extraction and review of reports from Queensford College's Learning Management System (LMS).

6.1.2 Queensford College's 'scheduled course contact hours' comprise of:

- a) weekly scheduled face-to-face classes held on campus.
- b) scheduled Vocational Placement hours (for courses requiring the completion of a mandatory work placement).
- c) other course related practical skills workshops or supervised study session.

Note: In addition to the above scheduled course contact hours, Queensford College provides structured online learning delivery for 6 hours per week. Students are informed that attendance and engagement in the structured online learning is mandatory and all learning activities including quizzes must be completed prior to attendance in the subsequent face to face learning class. Student engagement in the structured online learning activities is monitored separately.

6.1.3 Queensford College monitors student course contact hours to:

- a) ensure students are participating in learning activities and undertaking assessment, as per the CRICOS course timetable/s and documented training and assessment strategy, thereby allowing for satisfactory course progression and completion within the nominated duration.
- b) ensure overseas students are meeting the conditions of their visa for class attendance and course progress.
- c) meet its duty of care obligations and ensure the safety and welfare of students.

- d) detect potential student course progression issues.
 - e) measure other requirements such as, student non-commencement requirements.
- 6.1.4** Queensford College expects students to attend all scheduled classes and participate in the scheduled hours of structured online learning activities to support their learning/course progression and completion within the nominated course duration.
- 6.1.5** Queensford College is reasonable in its expectations for course contact and takes into consideration any extenuating, compassionate, or compelling circumstances (e.g., illness, injury, family matters) that may prevent the student attending.
- 6.1.6** Where a student is absent for all or part of their scheduled contact hours (face-to-face and structured online learning), Queensford College requires the student to:
- a) notify their trainer or Student Service, the reason for any absence including non-attendance, lateness, or leaving class early; AND;
 - b) provide a medical certificate or other documentation to support the absences due to compassionate and compelling circumstances – (see *Leave Policy and Procedure* for further information.)
- 6.1.7** Queensford College ensures students are informed of the requirements to maintain their minimum scheduled course contact hours per week and satisfactory course progression. Information is provided to students prior to enrolment, prior to the commencement of their studies, and throughout their course via the following:

International Student Course Contact Policy and Procedure	Available on the Queensford College website www.queensford.edu.au
Student Handbook Enrolment Guide	Available prior to enrolment - includes a summary of the policy
Student Written Agreement/Offer Letter	Issued to Students during enrolment via the College's CRM system - includes a link to the policy
Student Orientation	Conducted prior to the commencement - includes attendance expectations
Course Timetable	Provided to students upon completion of the enrolment process - includes the unit delivery schedule, scheduled contact days and times
Ongoing Reminders via Queensford Staff	Including but not limited to group and individual reminders given by trainers during/after class, reminders from Student Services
Absentee Reminders	Including automated email reminders sent from the SMS and follow up phone and email reminders for consecutive absences

6.2 Student Records and Maintenance

- 6.2.1** Queensford College systematically records and maintains students' course contact hours via attendance records. Student attendance records are maintained by the trainer accurately reflecting attendance – including a student's partial or full day absence, and any instances of leaving class early.

- 6.2.2 Trainers are required to complete a daily attendance roll during class, update the SMS records immediately following class.
- 6.2.3 Student services is the first point of contact for students regarding any absence or leave concerns or enquiries.
- 6.2.4 Queensford College utilises the SMS attendance records in combination with other system reports, including the Structured Online Learning (Sessions) report, for ongoing student monitoring.

6.3 Student Absence and Monitoring

- 6.3.1 Queensford College will contact students who are absent (without notice) from their scheduled classes and/or who fail to complete their allocated weekly SOLA to remind them of their scheduled course contact requirements and offer support where applicable.
- 6.3.2 Absent students will have their LMS (Moodle) accounts suspended until they book and attend a meeting with Student Services to address their course contact requirements.
- 6.3.3 Queensford College will make three (3) attempts to contact students with **5 consecutive class absences** and two weeks of non-completion of structured online learning activities within the same period (without notice to student services) and/or with risk of falling under **satisfactory Course Contact hours**. Where no response is received, Queensford college may contact the student's next of kin/emergency contact. If there is no response from the student or their next of kin/emergency contact, the student will be treated from this point as a Non-Genuine student.
- 6.3.4 Once the student is identified at risk of becoming Non-Genuine Student, a warning letter will be issued to the student. The student needs to meet the student service officer to enter into **Intervention Strategy Agreement** within 10 working days from the date of receipt of the letter.
- 6.3.5 If the student fails to attend the meeting or does not respond to any communication made by Queensford College, it may result in the College issuing the student a Notice of Intention to Report Letter (NOITR).
- 6.3.6 The student will need to respond formally through the Complaints and Appeals Form to NOITR within 20 working days to request for an internal appeal against the College's decision in accordance with Queensford College's Complaints and Appeals Policy and Procedure.
- 6.3.7 If the student does not contact Queensford College to initiate the complaints and appeals policy after 20 working days, the College will report the student for disciplinary reasons via PRISMS and the student's enrolment will be cancelled within 5 working days.
- 6.3.8 If the student is not satisfied with the outcome of the internal appeal, they have 20 working days from the date of written response of the internal appeal to lodge a review externally by an independent external body.
- 6.3.9 Queensford College will not finalise the student's status in PRISMS until the outcome of the appeal is made in favour of Queensford College decision to cancel the student, or the student withdraws from the process. The student must continue to attend

scheduled classes until an outcome to the appeal for not-satisfactory attendance or non-genuine student has been determined.

6.3.10 Exempt Circumstances

Queensford College may choose not to report a student whose attendance is less than 80% if:

6.3.10.1 the student is maintaining satisfactory course progress of more than 50% of the units attempted in each study period; and

6.3.10.2 the student is attending at least 70% of the scheduled course contact hours in the study period and provide evidence of compassionate or compelling circumstances.

6.3.11 A student's ongoing and consistent failure to maintain their mandatory scheduled contact hours, without compassionate and compelling reasons, may also indicate risk leading to potential for unsatisfactory course progression and will be managed in accordance with the Queensford College *Course Progression Monitoring Policy and Procedure*.

7. Procedure

7.1. Scheduled Class Attendance Recording

7.1.1 Students are required to sign in with the time they arrive to class and to sign out when they leave the class. Any student who arrives 30 minutes late or leaves early will be required to indicate the reason on the roll.

7.1.2 The signed attendance is logged into the SMS on daily basis reflecting the signed attendance sheet.

7.1.3 Any notified absences will be recorded as absent in the SMS. Where the absent student requires assistance, the trainer is responsible for assisting or referring to Student Services for further support if required.

7.1.4 Any unnotified absences will not be recorded as absent in SMS and will be counted towards calculating the absences under this policy.

7.2. Contacts to absent students via the following channels:

7.2.1. Absences for 5 consecutive days of scheduled classes

Absences	Notification	Personnel Responsible
Each day of Absence without notification	<p>Email to notify the student that they have been recorded as absent for the class and must report reason for absence to student services</p> <p>The email will contain a link for the student to book an appointment with a Student Services Officer to discuss their missed attendance. The</p>	<p>System generated by the SMS (automatically sent at midnight the day of the missed class)</p>

(from the student's scheduled class)	booking must be made by the student by close of business the following day.	
2 Consecutive scheduled classes of absence and non-completion of structured online learning activities for the same week without notification to student services with supporting evidence of compelling & compassionate reasons	Email contact to student: Non-Genuine Student Warning. Email to notify the student that: <ul style="list-style-type: none"> - they are enrolled in a full-time registered course, requiring a minimum of 20 scheduled course contact hours per week as part of their visa conditions for international students - making a booking with Student Services to develop an student intervention agreement 	Student Services
	Phone contact to student if they fail to make a booking to meet with Student Services within 1 business day of the email notification	Student Services
5 Consecutive scheduled classes of absence and non-attendance of structured online learning activities for 2 consecutive weeks within the same period without notification to student services with supporting evidence of compelling & compassionate reasons	Email contact to student: Notice of Intention to Report repeat unexplained absences (without reason) has resulted in the student being determined a ' <i>Non-Genuine Student</i> ' and issuance of ' <i>Notice of Intention to Report</i> '	Student Services
Incomplete* Weekly Structured Online Learning Activities (SOLA) <i>(*including partially incomplete)</i>	Email to notify the student that they have not completed their allocated weekly Structured Online Learning which form part of the 20 scheduled course hours and to make a meeting booking with Student Services	Reporting Officer
	Phone contact to student if they fail to make a booking to meet with Student Services within 1 business day of the email notification	Student Services

7.2.2. Attendances below satisfactory course contact hours

Attendance under % of study period	Notification	Personnel Responsible
Attendance below 85% of scheduled course contact hours including incomplete* Weekly	Email contact to student: Non-Genuine Student Warning. Email to notify student that:	Student Services

<p>Structured Online Learning Activities (SOLA) in a study period</p> <p>(*including partially incomplete)</p>	<ul style="list-style-type: none"> - they are enrolled in a full-time registered course, requiring a minimum of 20 scheduled course contact hours as part of their visa conditions for international students - repeat unexplained absences has resulted in the student being determined a '<i>Non-Genuine Student</i>' and issuance of '<i>Warning Letter – Non genuine student</i>' - instruct student to arrange a suitable date with Student Services for an intervention strategy agreement meeting 	
	<p>Phone contact to student if they fail to make a booking to meet with Student Services within 1 business day of the email notification</p>	<p>Student Services</p>
<p>Attendance below 80% of scheduled course contact hours including incomplete* Weekly Structured Online Learning Activities (SOLA) without supporting evidence of compelling and compassionate circumstances.</p> <p>(*including partially incomplete)</p>	<p>Email to student: Notice of Intention to Report (NOITR)</p> <p>Email: Warning letter to notify the student as non-genuine as the student's attendance has fallen below 80% for the study period. The student will be issued with a letter stating the College's Notification of Intention to Report the student as a Non-Genuine student. See further details in 7.4</p>	<p>Student Services</p>

7.3. Intervention Strategy Agreement

7.3.1 Once the student is sent a Non-Genuine Student Warning Letter, student needs to book and meet the student service officer to enter into **Intervention Strategy Agreement (ISA)** within 10 working days from the date of receipt of the letter.

7.3.2 Student Services officer will meet with the student at the booked appointment and reach into mutual agreement, including but not limited to:

- requirement to meet their student visa conditions, including their mandatory contact hours,
- their scheduled class attendance including weekly allocated SOLA,
- organising requirements for catch-up work e.g. completing any missed assessments or mandatory catch up classes.
- commitments from the student for improved in-class attendance and SOLAs completion, requiring the student to re-enrol where a significant portion of the delivery of a unit has been missed.

- e) monitoring the student's attendance and adherence to the ***Intervention Strategy Agreement*** for the remainder of the student's enrolment with the College and take further action if required.

7.3.3 The student's access to the LMS (Moodle) remain suspended until the student contacts the College and attends a meeting with Student Services.

7.4. Final Warning – Notice of Intention to Report (NOITR)

7.4.1 If the student fails to attend the meeting or not respond to any communication made by Queensford College within 10 working days or fails to comply with the Intervention Strategy Agreement (ISA), it will result in the College taking further action, including issuing a **Final Warning - Notice of Intention to Report Letter (NOITR)**.

7.4.2 The student will need to appeal to NOITR within 20 working days from the date of issuance of notice against the College's decision using Queensford College's Complaints and Appeals Form ([Queensford e-Forms - Complaints and Feedback Form](#)).

7.4.3 Any appeal received in response to the Notice of Intention to Report within the prescribed timeline of 20 working days, will be managed by Student Services in accordance with the College's Complaints and Appeals process – refer to the *Complaints and Appeals Policy and Procedure*.

7.4.4 Queensford College will issue non-negotiable conditions on the student whose outcome on appeal against the NOITR is in favour of the student. The non-negotiable conditions may include but are not limited to:

7.4.4.1 Commitment to meet the visa requirements by maintaining satisfactory course progress in each study period.

7.4.4.1 Maintenance of satisfactory course contact hours including completion of SOLA.

Failure to adhere to issued conditions may result in cancellation of the student's COE in PRISMS.

7.4.5 If the student does not contact Queensford College to initiate a formal appeal against NOITR using the complaints and appeals form within 20 working days, the College will report the student for disciplinary reasons via PRISMS and the student's enrolment will be cancelled within 5 working days post appeal period.

7.4.6 If the student is not satisfied with the outcome of the internal appeal, they have 20 working days from the date of written response of the internal appeal to lodge a review externally by independent body.

7.4.7 Queensford College will not finalise the student's cancellation status in PRISMS until the appeal, both internal and external, finds in favour of Queensford College decision, or the student withdraws from the process, or the student breaches the non-negotiable conditions under internal appeal. The student must continue to attend scheduled classes until an outcome of the appeal has been determined by Queensford College.

7.4.8 If the outcome of the internal or external appeal is made in favour of the student, the student will be required to enter into a Student Intervention Strategy Agreement. The student's course attendance and progress will be monitored in accordance with the agreed conditions in the Intervention Strategy Agreement. If the student is identified as breaching the conditions of the intervention strategy, the student will be issued with a Non-Genuine Notice of Intention to Report letter. The student will have another opportunity to appeal the College's intention to report. This will be the final opportunity for the student to appeal in relation to non-attendance.

8. Associated Documents

- Student Handbook
- Pre-enrolment Guide
- Written agreement/offer letter
- Confirmation of Enrolment (CoE)
- Student Leave Policy and Procedure
- Course Progression Monitoring Policy and Procedure
- Academic and General Code of Conduct Policy
- Complaints and Appeals Policy and Procedure