



Attendance Intention to Report Policy – Including Appeals

1. Purpose

The purpose of this policy is to ensure that ILSC fulfils its reporting obligations under the Education Services for Overseas Students (ESOS) Act 2000 for student visa holders who fail to meet minimum attendance requirements.

ILSC is committed to implementing this process consistently, fairly, and transparently, while providing every student with the opportunity to appeal any reporting decision they believe to be incorrect, unfair, or unduly harsh.

2. Scope

This policy and procedure apply to all ELICOS students enrolled at ILSC (Brisbane) Pty Ltd across all delivery locations in Australia who hold a student visa.

This document should be read in conjunction with the *Attendance Monitoring and Intervention Policy_ELICOS*, which outlines the monitoring and intervention steps that must be completed before the Intention to Report (ITR) process can be triggered.

3. Definitions

Attendance: The percentage of scheduled course hours a student has attended over the duration of their enrolment, calculated to two decimal places.

Intention to Report (ITR): A formal written notice advising a student that the College intends to report them to the Department of Home Affairs (DHA) for failing to meet minimum attendance requirements.

PRISMS: The Provider Registration and International Student Management System, used by education providers to issue, manage, and report on Confirmation of Enrolment (COE) records.

Confirmation of Enrolment (COE): A document issued through PRISMS confirming a student's enrolment on a registered course.

Internal Appeal: A request submitted by the student for the College to review a decision, in this case relating to an ITR. Students have 20 calendar days from the date of the ITR letter to lodge an appeal.

External Appeal: A further review sought by the students through the Overseas Students Ombudsman (OSO) after an internal appeal outcome has been issued.

ITR Committee: A panel comprising representatives from Academic, Student Services, and Quality Assurance, responsible for reviewing and determining the outcome of student appeals relating to the ITR.

ESAR (ELICOS Student Attendance Records): The central spreadsheet used to track attendance percentages, intervention actions, ITR stages, and reporting outcomes.



Mandatory Reporting Template: The template used to notify students that reporting proceedings have commenced after a below-70% monitoring review.

4. Policy Statement

- The Intention to Report (ITR) process is initiated only after all steps in the *Attendance Monitoring and Intervention Policy* have been fully and correctly implemented and exhausted.
- ILSC ensures that all attendance calculations, communications, and interventions are accurate and well-documented before proceeding to report a student for unsatisfactory attendance.
- Students must be informed of their right to appeal an Intention to Report decision and of the steps and timelines involved in both internal and external appeals.

5. Key Notes

Withdrawal and Attendance Calculation

- Students cannot avoid the consequences of unsatisfactory attendance by withdrawing early.
- Attendance will be calculated over the total duration of enrolment up to the date of withdrawal.
- Students intending to withdraw must be informed that the Intention to Report process may still apply.

Appeals Timeline

- Students have 20 working days from the date of the ITR notification to lodge an appeal.
- If no appeal is submitted within this timeframe, ILSC will proceed with reporting the student via PRISMS.
 - Students who do not submit their appeal will be notified in writing that they are being reported on PRISMS.
- If an appeal is received, the ITR Committee will review it, and students will be notified of the appeal outcome in writing.
- Unsuccessful appeals: students will be notified of their rights to external appeal to the Overseas Students Ombudsman (OSO).

Reporting on PRISMS

- Students are reported, and their Confirmation of Enrolment (COE) is updated in PRISMS within 7 days of reporting proceedings being finalised.

Attendance Calculation

- Attendance percentages are calculated to two (2) decimal places.
- A rounding margin of $\pm 0.5\%$ may be applied, allowing discretion for responsible staff to determine reasonable actions.



6. Appeals and Reporting Outcomes

6.1. Appeal Lodged Within the 20-Working-Day Period

Appeal Successful

- ILSC withdraws the Intention to Report, and the matter is closed.
- If the student's enrolment has already ended, the process concludes.
- If the student remains enrolled:
 - Their attendance continues to be monitored for that enrolment/COE.
 - The student must meet the minimum 70% attendance requirement for the remainder of that enrolment/COE.
 - If attendance subsequently drops below 70%, the student is reported in accordance with Standard 8.15 of the National Code.

Appeal Unsuccessful

- The student is informed in writing of their right to access an external appeal.

6.2. External Appeal

- Within five (5) working days of receiving an unsuccessful appeal outcome, the student must notify ILSC of their intention to lodge an external appeal.
- If the student proceeds with an external appeal:
 - A reference number or confirmation from the external appeals body must be provided within an additional five (5) working days.
 - If the student fails to:
 - notify ILSC within five (5) working days and/or
 - provide the reference number within the following five (5) working days,ILSC will consider that the student is not accessing an external appeal, and reporting proceedings will commence.

6.3. No Response to the ITR Notification

If a student does not respond to the ITR notification within the 20-working-day appeal period, ILSC will initiate reporting proceedings and update PRISMS accordingly.

7. Procedures

The following procedure outlines the operational steps for issuing an Intention to Report (ITR) for unsatisfactory attendance, managing student responses and appeals, and completing all actions related to the reporting and closure of student files.

This procedure is implemented only after the Attendance Monitoring and Intervention Strategy has been completed.



7.1. Preparing and Sending Intention to Report Notifications

The Quality Assurance team:

- Exports the list of students at risk from Power BI – Max Attendance Report.
- Prepares the ITR notifications using the Warning Letter Database and updates the ESAR spreadsheet to reflect the ITR issuance.
- Sends the ITR notifications and informs campus teams.

Agency Notification

Student Advisors notify the students' agency/agent that the student has been placed under ITR and record the date of agency notification in Odyssey.

7.2. Ten-Day Follow-Up for Non-Responding Students

- Ten (10) calendar days after the ITR is issued, the ELICOS Administration Team reviews ESAR to identify any students who have not responded.
- A follow-up notification is sent to these students, reminding them of the appeal process and the remaining timeframe to lodge an appeal.
- The "10-day follow-up status" column in ESAR is updated accordingly.

7.3. Managing Appeals

- Upon receiving an appeal, ELICOS Admin prepares a complete case file, ensuring relevant documentation, attendance records, and communications are included.
- The case file is sent to the ITR Committee (three rotating Directors of Studies).
- The Committee reviews all evidence and decides on the appeal.
- ELICOS Admin then:
 - Updates ESAR with the appeal outcome.
 - Notifies the student using the appropriate Appeal Outcome Template.
 - Saves relevant correspondence in the student's SharePoint folder.

7.4. Authority to Report Notification

After the 20-working-day appeal period closes, and where no appeal has been lodged (or an appeal is unsuccessful), the ELICOS Admin Team issues the Authority to Report notification and saves it in the student's SharePoint file.

7.5. Reporting Proceedings

The Quality Assurance Team:

- Reviews the student file and Odyssey to ensure all documentation is complete.
- Requests Student Advisors or the Admissions teams to review any missing documents.



- Completes the “Student PRISMS Reporting and File Closure Checklist.”
- Reports the student in PRISMS by adding a *Student Course Variation* to the student’s COE.
- Updates Odyssey Registration Status.
- Adds notes in Odyssey detailing:
 - PRISMS reporting details (with dates)
 - Updating ESAR with the final reporting outcome.
 - Informs the campus teams of reporting completion, attaching:
 - The completed checklist for each student
 - Required follow-up actions (if any)

The email notification is sent to:

- Student Advisors
- ELICOS Admin
- National ELICOS Admin Manager
- All Directors of Studies
- National Academic Director
- Finance Team

7.6. Informing Student Agencies of Reporting

- Upon receiving the list of reported students, Student Advisors notify the students’ agency/agent.
- Notes are added in Odyssey with the date of agency notification.

7.7. File Closure and Future Enrolment Management

Student Advisors

- Complete Section 11 of the *Student PRISMS Reporting and File Closure Checklist*.
- Review future enrolments and consult with the Campus DOS, where needed.
- Adjust Odyssey registration and update the COE in PRISMS if required.

ELICOS Admin

- Complete Section 12 of the checklist.
- Notify the student:
 - about End of Studies documentation, where applicable.
 - that their course file is closed and save the notification in SharePoint.
- Add notes in Odyssey.

The final completed *Student PRISMS Reporting and File Closure Checklist* must be saved in the students’ SharePoint file by the last team completing it.



7.8. Monitoring Students After a Successful Appeal (Attendance Below 70%)

Following a successful appeal, students who remain enrolled must continue to meet the minimum attendance requirement of 70%.

The Quality Assurance Team:

- Updates ESAR weekly, until the end of the enrolment, with the maximum attendance percentage for:
 - Students whose ITR process is still active; and
 - Students who had a successful appeal outcome and remain enrolled.

If a student's attendance falls below 70%, the ELICOS Admin team notifies the student using the *Mandatory Reporting* template and updates the *Status* on ESAR to 'Authority to Report'.

The Reporting Proceedings follow (Step 7.5 to 7.7).

8. Related Legislation and Standards

- National Code – Standard 6, 8 and 10
- ELICOS Standards – C1 and P1
- ESOS Act 2000 – Section 20

9. Policy Review

This policy will be reviewed at least every year, or earlier if required, to ensure alignment with changes in legislation, regulatory standards, compliance requirements, or organisational operations. Earlier reviews may be undertaken in response to audits, incidents, or identified opportunities for improvement.

9.1. Details

Policy Title		Attendance Intention to Report – Including Appeals		
Approved by		Vice President Australian Operations / Director Quality Assurance		
Next Review Date		July 2026		
Version	Date	Effective Date	Comment/Note	Author/Reviewed by
6.0	01-Jul-2025	01-Jul-2025	General review to ensure policy reflects current operations, aligns with organisational standards, and improves clarity.	National Director - ELICOS and Pathways, Quality Assurance Manager