

PURPOSE

The purpose of this policy is to ensure that Sapience College (SC) monitors international students to ensure that they can complete their course within the duration specified on their Confirmation of Enrolment (CoE) and that timely intervention strategies are implemented for students who are at risk of failing to meet course progress requirements.

The intention of this policy is to provide all students with the best opportunity to meet their study goals and aspirations and to ensure that students do not breach their visa requirements.

This ensures compliance with Standard 8 of the National Code of Practice for Providers of Education and Training to Overseas Students 2018.

SCOPE

This policy applies to all overseas current and prospective students as well as those continuing study. This policy is relevant to SC as a registered training organisation required by the regulators and Australian Department of Home Affairs to report upon students' academic progress, rather than attendance. Within this policy are policy items (Section Attendance Monitoring) for attendance monitoring requirements should SC be required by ASQA to use attendance-based monitoring now or in the future.

The attendance of each client enrolled with the RTO will be monitored closely to ensure there is full-time study activity, as attendance is necessary for satisfactory course progress. However, this policy does not require the RTO to report unsatisfactory attendance under the conditions of the overseas student visa. However, as part of our academic support and monitoring, our internal policy is that students must attend classes and we record attendance at every class.

All overseas students at SC will be provided the appropriate support from SC Student Support Officers to help them meet their course requirements. Under certain conditions intervention may be required, as detailed in this policy, to help overseas students meet their course requirements. This policy and the corresponding procedure are to be made readily available to all staff and students.

DEFINITIONS

Academic performance Assessment of competency as a student progresses through the qualification

Academic staff includes staff involved in Teaching, Training and/or Assessment to overseas students

CoE means Confirmation of Enrolment

Compassionate or compelling circumstances Extenuating circumstances which are usually beyond the student's control and impact upon the student's progress or wellbeing. This includes but not limited to serious injury or illness, bereavement, being a victim of crime or traumatic experience.

DE means Department of Education

DHA mean Department of Home Affairs

ESOS Act means the Education Services for Overseas Students Act 2000

Exclusion The student cannot enrol in a course at the same or higher level for the period of exclusion.

Exclusion Notice A letter of notification issued to a student informing the student that they are excluded from their course

Intervention Strategy Plan The individual plan to provide academic support and/or assistance to a student identified as being at risk of not achieving satisfactory course progress in the current or previous study period.

National Code means National Code of Practice for Providers of Education and Training to Overseas Students 2018

Overseas/ international student A student of SC who holds an Australian Student Visa and is enrolled in a CRICOS registered course.

PRISMS means Provider Registration and International Student Management System (PRISMS).

Satisfactory course progress Demonstrated competency in more than fifty percent (50%) of the enrolled units of competency within a study period, is deemed to have satisfactory progress.

Study period is defined as a discrete period of study within a course, namely term, semester, trimester, short course of similar or lesser duration, or as otherwise defined by the registered provider as long as that period does not exceed six months. For courses at SC, study periods are typically 10 – 13 weeks.

Training Product means AQF qualification, skill set, unit of competency, accredited short course or module.

POLICY

The monitoring of and awareness of student progress plays an essential role in ensuring that international students experiencing academic difficulties and who are at risk of failing can be identified in sufficient time and provided with appropriate academic support and counselling and access to appropriate student services.

All the students are clearly informed about the requirements to achieve satisfactory course progress and, where applicable, attendance in each study period, prior to their commencement in any course.

The Intervention Strategy Plan is a written plan and agreement to be signed by both the student and an academic or student support staff member. This plan is developed in consultation between the student, student support and the trainer/assessor(s). The Intervention Strategy Plan specifies terms such as which actions and approaches will be used to get the student back on track, as well as the timeframe and targets, so that the student may still complete their course within the period of their CoE.

SC is committed to supporting student success and achievement through monitoring student progression. Where required SC will implement Intervention Strategies for students not meeting the course requirements as soon as progression issues arise. This can be a result of a Critical Incident, failure to complete required assessments or through poor attendance. Every student Intervention Strategy is developed and reviewed separately for that individual student to ensure fairness, equity and access.

1. Attendance forms/sheets

- SC will continue to use attendance forms/sheets in every training session scheduled to be run by the trainers. These attendance forms/sheets are used to determine last point of contact with students and assist in students who don't achieve competency on assessments regarding intervention strategy meetings.

2. Completion within expected duration

- International students must complete their studies within the expected duration specified on their Confirmation of Enrolment (CoE). The duration of the course as specified on the student's CoE will never exceed that registered on the CRICOS register.
- SC monitors student progress to ensure that students to complete their studies within the expected duration specified on their Confirmation of Enrolment.

3. Course progress requirements

- SC maintains and tracks academic progress via the Student Management System.
- Each course is setup within the Student Management System, with the required units, qualification rules, timeframes, delivery methods and sessions for delivery.
- Students are then enrolled into the course according to Class Schedule / Timetable, also provided to the student which includes all term breaks and each term is a study period.
- The Class Schedule / Timetable will be provided to the student on their orientation day.
- The class schedules for each study period are then monitored to ensure that students are meeting the minimum 50% competency requirement and is achieving satisfactory academic progress.
- Four (4) weeks prior to end of each study period a SC will complete an End of Study Period Report. This report will enable SC's staff to send out letters via the SMS to students at risk and advise them hand in any outstanding assessments for processing.
- This process enables SC to identify any students at risk of not completing within the expected duration on their CoE, and promptly reminds them to hand in assessments, helping to minimise any adverse effects to the student.
- At the immediate end of each study period, this process is repeated and students who are failing to achieve better than 50% completion rate are sent a warning letter. The warning letter notifies the student about options for connecting with an official to plan an effective intervention strategy for the student to progress to a positive academic progress that enables the student to complete their studies as per the duration stated on their CoE.
- Every student that receives a warning letter will be recorded on a register to ensure all students have an effective follow up plan. This register also enables SC staff to manage the response from students in an appropriate and unbiased procedure.
- Students who fail to achieve satisfactory academic progress after two warning letters and fail to engage in an intervention strategy will be issued with an intention to report letter as soon as practicable, notifying them of:
 - our intention to report the overseas student to Australian Department of Home Affairs for unsatisfactory course progress.
 - their right to access our complaints and appeals process, in accordance with Standard 10 (Complaints and appeals), within 20 working days.

4. Attendance Monitoring

The policy items and processes given here are for attendance monitoring requirements should SC be required by ASQA to use attendance-based monitoring now or in the future. (Please note this is relevant only if ASQA have the monitoring of minimum attendance requirements set as a condition of RTO registration. Where this is not the case at the present time, disregard this section, and only consider the day to day operations).

- Whereby directed by ASQA as the ESOS Agency, it is a student visa requirement for overseas students to attend campus for a minimum of 80% of the scheduled course contact hours
- If required by ASQA to monitor overseas student attendance, monitoring and recording attendance of the overseas student, will be conducted.
- Each students' attendance is recorded and calculated over the period of a term/study period using information from class attendance sheets which are input to the student management system (SMS) and sheets are discarded accordingly.
- Using this information in the SMS the weekly attendance records are reviewed and a report is generated to identify Students at risk of not satisfying attendance requirements.
- The student identified as being at risk are notified by email and their current attendance percentage is given in the form of an Attendance Warning Letter.
- Students with falling attendance percentages will be notified by email a minimum of two times before their attendance level reaches the 80% minimum. In each contact the Attendance Warning Letters issued will include:
 - a request that the student contact student support staff for assistance in getting back on track with the options for intervention processes and any other assistance that may be viable
 - a statement explaining that SC is obligated to monitor attendance and notify the Australian Department of Home Affairs of students with attendance below 80%, which may ultimately result in the cancellation of the student's visa.
- Should the student be absent for four consecutive days absent without prior approval, they will be contacted by email and may also be phoned to initiate an intervention process and book an intervention interview.
- Should the attendance rate of a student fall to 80% a Final Attendance Warning Letter is sent to the student requesting an immediate intervention interview with student support staff and further warning the student of the imminent risk of reaching attendance percentages under the 80% minimum rate.
- At five consecutive days absent without our prior approval, or having reached attendance levels below 80% the student is sent a Notification to Report letter outlining our intention to report the student to Australian Department of Home Affairs, the reasons and their right to access the appeals and complaints process within 20 days.
- Australian Department of Home Affairs will be notified only after the student has received an Intention to Report Letter and has been afforded the opportunity to internally appeal within 20 days.
- If the student uses the 20 day period after receiving an Intention to Report Letter to appeal and is successful, Australian Department of Home Affairs will not be notified at this time, however the attendance breach, all correspondence and appeal process will be recorded and retained. Future appeal processes for unsatisfactory attendance will review this information to make decisions on whether or not to report the student to Australian Department of Home Affairs.
- SC may decide not to report the overseas student for breaching the attendance requirements if the overseas student is still attending at least 70 per cent of the scheduled course contact hours and is maintaining satisfactory course progress.

5. Intervention Strategy

- SC ensures that it identifies, notifies and assist students where there is evidence that the student is at risk of not meeting course progress requirements.
- For students at risk of not meeting course progress requirements, or Individual Intervention Form will be developed based on the appropriate intervention strategy identified.
- An Intervention Form will include an interview with the CEO/authorised staff member may include one or more of the following strategies:
 - Advising students on the suitability of the course in which they are enrolled and possible alternatives.
 - Advising students of opportunities for reassessment; and

- Advising students of assistance that SC can provide including and not limited to:
 - receiving English language support.
 - reviewing learning materials with the student and providing information to students and in a context that they can understand.
 - providing extra time to complete tasks.
 - providing access to supplementary or modified materials
 - providing supplementary exercises to assist understanding
 - attending academic skills programs.
 - attending counselling.
 - receiving assistance with personal issues which are influencing progress.
 - receiving mentoring.
 - referral to external organizations where SC is unable to address the identified learning or academic issues:
 - being placed in a suitable alternative subject within a course or a suitable alternative course;
 - or
 - a combination of the above and a reduction in course load.

6. Extension to an expected course duration

- Extensions to the course duration specified on the CoE are only allowed where:
 - compassionate or compelling circumstances apply, and demonstrable evidence is provided, which may include but is not limited to:
 - serious illness or injury, where a medical certificate states that the student was unable to attend classes.
 - bereavement of close family members such as parents or grandparents.
 - major political upheaval or natural disaster in the home country requiring emergency travel and this has impacted on the student's studies.
 - a traumatic experience which has impacted on the student and which could include involvement in or witnessing of a serious accident; and witnessing or being the victim of a serious crime. These cases should be supported by police or psychologists' reports); or
 - where SC is unable to offer a pre-requisite unit.
 - where the student is unable to begin studying on the course commencement date due to delay in receiving a student visa.
 - Where a student is complying with an intervention strategy implemented for students identified at risk of not making satisfactory course progress or meeting attendance requirements, or
 - An approved deferral or suspension of studies has been granted in accordance with SC's *Deferral, Suspension and Cancellation Policy and Procedures*.
- When the student is responsible for the student course variation/s by extending his or her expected duration of study, this will be reported to the DHA(Department of Home affairs) via PRISMS.
- All variations in the student's study load, including the reasons for the variation will be recorded on the student's file.
- Where the duration of the student's enrolment is extended, SC will advise the student to contact the Department of Home Affairs (DHA) to seek advice on any potential impacts on their visa, including the need to obtain a new visa.

7. Reporting students

- Where a student has demonstrated unsatisfactory course progress in a study period and/or has failed to meet attendance requirements despite interventions implemented, SC will be required to report the student to authorities via PRISMS and the student will receive a written notice informing them of the

intention to report for non-satisfactory course progress and/or attendance and the reasons for the intention to report.

- Students have the rights to appeal against this decision as per *SC Complaints and Appeals Policy and Procedure*. If the student chooses to access this process, the student will not be reported until this process is complete.
- SC will only report unsatisfactory course progress or unsatisfactory course attendance in PRISMS if:
 - the internal and external complaints processes have been completed and the decision or recommendation supports the registered provider; or
 - the overseas student has chosen not to access the internal complaints and appeals process within the 20 working day period; or
 - the student has chosen not to access the external complaints and appeals process; or
 - the overseas student withdraws from the internal or external appeals processes by notifying the registered provider in writing.
- All records will be kept on the student's file including warning letters and the notice of intention to report.

8. Exclusion

Where necessary a student may be excluded from proceeding units of competency or admission into further studies at the same or higher levels until the intervention actions are carried out and all requirements of the course (or pre-requisite units) have been met. In such instances the student will receive an Exclusion Notice with reasons for and duration of exclusion period as well as conditions for re-inclusion. Conditions are typically the successful completion of a course within the set duration and/or pre-requisition units or industry work placements as required. It should be noted that the student must still complete their course within the set duration of the eCoE, even with exclusion and re-admission built into their intervention plans. If this is not possible, the student must re-enrol.

9. Re-Admission

If a student has been excluded, they may not enrol in a course at the same level or a higher level for the period of exclusion.

Any student applying for re-admission after the exclusion period must apply formally and their application will be considered in relation to the entry requirements and the overall demand for places in that course of study.

10. Publication

- This policy will be published in the *International Student Handbook* to ensure that course progress requirements are clearly communicated to students before they commence their course.
- This policy will also be covered during orientation for international students and induction for all academic staff.