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Course progression monitoring policy

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Table of Contents

1. Scope	3
2. Definitions	3
3. Policy	3
3.1. Course Monitoring	4
3.2. Intervention Strategy	5
3.3. Notice of Intention to Report.....	7
4. Procedure	8
4.1. Stage 1- Identification of Unsatisfactory Course Progress	9
4.2. Stage 2- Issuance of Warning Letter	9
4.3. Stage 3- Intervention Strategy Agreement	10
4.4. Stage 4- Notice of Intention to Report.....	10
4.5. Stage 5- Internal and External Appeal	10
4.6. Stage 6- Report Student to Department of Home Affairs (DHA).....	11
5. Evidence and Record Keeping	11

1. Scope

This scope of this document applies to all International Students enrolled at Queensford College and all Queensford College staff who deal with all matters concerning VET International Students.

2. Definitions

National Code: The National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas students 2018, established pursuant to Part 4 of the ESOS Act 2000, as amended from time to time

ESOS Act: Education Services for Overseas Students Act 2000

Electronic communication: a form of communication sent via email, fax web-based communication or any other form of electronic communication

DHA: Department of Home Affairs

PRISMS: Provider Registration and International Students Management System

Unsatisfactory Course Progress: Where the student has failed to achieve competency in 50% or more of the units required to be completed in any study period based on evidence obtained from student's assessment tasks and activities.

Not competent (NC): failed to perform to the standard expected

"At risk" students: Any student at risk of not progressing satisfactorily in their course.

CoE: Confirmation of Enrolment

SMS: Student Management System

Study Period: a discrete period of study within a course. Queensford College defines the number of study periods, duration of each study period (in weeks) and number of units to be completed in each study period for each course.

Non- Genuine Student: Being a student:

- who does not maintain minimum attendance requirements; or,
- fails to adhere to intervention strategies/plans put in place for support; or,
- fails to attend classes for 5 consecutive days without providing evidence of reason for absence; or,
- fails to respond to contact attempts by the College regarding current circumstances; or,
- is in breach of code of conduct (refer to Queensford College Academic and General Code of Conduct Policy)

3. Policy

This policy is created pursuant to Section 19 of the ESOS Act 2000 and Standard 8 of the National Code of Practice for Providers of Education and Training to Overseas Students 2018.

Students are informed of the requirements regarding course progress at multiple stages prior to enrolment and commencement of studies. These include, but are not limited to:

- Pre-enrolment summary of the Queensford College Course Progression Monitoring Policy, as outlined in the Student Handbook and Pre-Enrolment Guide
- Queensford College Course Progression Monitoring Policy available on the Queensford College website: www.queensford.edu.au
- Link to this policy contained within each overseas student's written agreement/offer letter and issued from Queensford College CRM system
- Specific progression monitoring practices, timeframes and assessment due dates as part of the Student Orientation for each course

For ESOS purposes Queensford College study period is defined as a 'term' of study. The duration of a term varies within different courses.

Students are required to achieve competency in a minimum of 50% of enrolled units in each study period. Individual study periods for each course will be pre-defined and students will be informed about the length of each study period at the enrolment. The number of units trained/assessed in each study period will be indicated in the Timetable. Hence, if a specific study period consists of 12 weeks and requires completion of 4 units, then calculating @ 50% of the units will be 2 units. If a student has completed less than 2 units, then they will be identified as not meeting the minimum completion requirement for satisfactory progression in that study period. For the purpose of this policy, completion of units includes student submission and marking by the assessor until a competent outcome is deemed. Resubmission attempts will not be factored into the monitoring deadline, unless compassionate or compelling circumstances apply.

The Trainers and Student Support Officers will work together to finalise grades, run reports, and communicate with students if they have not met the requirements at the end of a given term of study.

3.1. Course Monitoring

- Queensford College systematically monitors, records and assesses students' course progress. Queensford College proactively notifies students identified as being at risk of failing to meet their course progress requirements, implementing appropriate intervention strategies in order to support students to meet course progress requirements and complete their course within the expected duration specified on the overseas student's CoE.
- All competency results for students are recorded in Queensford College's Student Management System – Dynamics.
- Unsatisfactory course progress is defined as not successfully completing or demonstrating competency in at least 50% of the course requirements in one compulsory study period.
- Queensford College assesses each student's course progress at the endpoint of each compulsory study period. A 'study period' includes a specific number of contact weeks.
- The number and length of each study period per qualification, will be outlined in a student's course timetable and is provided to the student upon completion of the enrolment process.
- During the orientation process, students are again informed of their course progress requirements and progress review dates.
- At the end of each study period, students will be assessed to determine satisfactory course progress. If a student is identified for the first time as not achieving satisfactory course progress, an Intervention Strategy Agreement Plan will be initiated and implemented.

- Queensford College may choose to intervene at the end of a study period should a student be deemed “at risk” of not achieving satisfactory course progress.
- Students deemed “at risk” will be notified in writing and asked to make an appointment with Student Support Services to discuss their progress.
- Reasons for which students are deemed “at risk” of not achieving satisfactory course progress may include (but not limited to):
 - The student is deemed to have irregular attendance that places satisfactory course progress at risk.
 - The student is deemed to have an identified Language, Literacy and Numeracy (LLN) issue affecting study and completion progress.
 - The student demonstrates a general lack of commitment and does not complete assessment tasks/activities within the timeframes provided or provides assessment.
 - The student has stressful personal circumstances (medical, housing, financial or other) causing an impact on progression.
 - The student did not perform satisfactorily in the previous study period.
 - The student does not response to Queensford College’s attempts to assist the student in achieving satisfactory course progress.

3.2. Intervention Strategy

- Two weeks from the end of the study period is the point in time when a determination of all the students ‘at risk’ of not progressing satisfactorily will be identified. The Student support officer is to prepare and send a warning letter to each student who has been identified as not achieving satisfactory course progress at the end of the study period.
- The warning letter must list the start date and completion date of the study period in question, along with a list of units from that study period deemed not competent including calculation of how 50% competencies has not been met.
- Once complete, a warning letter is emailed to the student by the end of 15 working days of the study period, with a copy sent to the student’s trainer and copy saved on student file.
- Student name is to be added to Unsatisfactory Course Progress and Intervention Strategy Tracking Spreadsheet. This is to enable tracking of student progress in their second consecutive study period. Notes to be added to student account in the Student Database Management System.
- Once issued, the warning letter requires students to contact the College within 10 working days to arrange a time to meet with the Student Support Officer in order to develop/implement an Intervention Strategy Agreement.
- Queensford College will try to make contact with the student using a range of different methods including SMS, phone and contact via the student’s trainer. The first attempt at contact will occur with the issue of the warning letter and the second attempt within 5 working days of the issue of the warning letter. If the student fails to contact Queensford College within 10 working days or if Queensford College is unable to contact the student despite using a range of methods, then the student will be deemed as a ‘Non-Genuine’ student.
- At this stage, Queensford College will issue a second warning letter identifying the student as Non-Genuine at this stage and inform the student they have 10 working days to days to arrange a time to meet with the Student Support Officer in order to develop/implement an Intervention Strategy Agreement.

- Once an Intervention Strategy has been developed and agreed between Queensford College and the student, the student will have to sign to indicate that he or she understands and agrees with the Intervention Strategy.
- The College will re-affirm to the student that unsatisfactory course progress in two consecutive study periods may result in a Notification of Intent to Report the student to the Department of Home Affairs, which may result in cancellation of their student visa (pending the outcome of the internal and/or external appeals process).
- From that point, the student is required to comply with the Intervention Strategy which has been developed for him/her over subsequent study periods.
- Failure to do so will result in a Notice of Intention to Report the student to DHA for not complying with this policy.

An Intervention Strategy is initiated by:

- Notifying students in writing that they have been identified as not achieving satisfactory course progress.
- Requesting that the student contact the College to make an appointment to meet and discuss the activation of an intervention strategy agreement.
- Following discussion with the student, creating a formal intervention strategy agreement, which is then acknowledged, and the terms accepted, by both the student and the nominated Queensford College member of staff.

The Intervention Strategy Agreement is activated as soon as practicable from the commencement of the subsequent study period, or earlier if necessary.

The strategies offered to help students meet course progress requirements may include, but are not limited to:

- Implementation of improved engagement through support from trainers
- Requirement to submit all subsequent assessments by the identified submission due date
- Discuss opportunities for makeup classes designed for intervention
- Academic counselling sessions with the applicable Department Coordinators
- Individual case management
- Opportunity for re-assessment
- Assigning a trainer mentor for ongoing monitoring
- Additional English language or LLN support
- Access to external support services for personal, housing, finance or medical issues
- Invitation for inclusion in support study groups or tutoring
- A change in their enrolment to another subject area
- Consideration of a period of deferment or temporary suspension of studies
- Re-affirming with students that unsatisfactory course progress in two consecutive study periods may result in a Notification of Intent to Report the student to the Department of Home Affairs. which may result in cancellation of their student visa (pending the outcome of the internal and/or external appeals process)

After an Intervention Strategy Agreement has been put in place for a student, all documentation and evidence of the intervention process, including measures used to assist a student, will be saved electronically to the student's file.

The student's adherence to the terms of the Intervention Strategy Agreement will be monitored and appropriate action taken should the student deviate from these terms. These actions may include:

- Meeting with the student to again remind of agreed terms, requirement to achieve satisfactory course progress and possible consequences of continued unsatisfactory progress
- Issuance of another formal warning should agreed terms continue to be disregarded by the student
- Issuance of Notice of Intent to Report

3.3. Notice of Intention to Report

Queensford College may issue a Notice of Intention to Report letter under the following circumstances:

- 1) The student is deemed as 'Non-Genuine' due to their failure to respond/contact Queensford College after receipt of the first and second warning letters within the prescribed timeframes following each warning letter (10 working days).
- 2) The student is identified as not meeting satisfactory course progress requirements in a second consecutive study period, usually after the implementation of the intervention strategy, will be notified in writing (Notice of Intention to Report Letter) as soon as practicable, of the College's intention to report the student to the Department of Home Affairs for unsatisfactory course progress.

This written notice of Notice of Intention to Report under Standard 10.6 will be given by electronic communication that includes, email, fax web-based communication or any other form of electronic communication.

Within the Notice of Intention to Report Letter, students are informed of the following:

- Reason/s the College intends to report them to the Department of Home Affairs
- A statement that the student has breached their visa condition in relation to course progress requirements under the National Code and Queensford College Policy
- Advising the student of their right to access the College's complaints and appeals process in accordance with Standard 10 of the National Code (Complaints and Appeals) and that they have 20 working days in which to do so (please refer to Queensford College Complaints and Appeals Policy)
- A consequence statement if the student fails to respond to the Letter of Intention to Report then:
 - Cancellation of the student's enrollment will take into effect
 - Such cancellation may affect the student's visa and they will need to seek appropriate advice regarding these implications

The student will also be notified that the College will maintain the student's enrolment and cancellation will not take effect, until the appeals process has been completed.

Students failing to make satisfactory course progress will be reported to the Department of Home Affairs only after:

- An outcome of the internal and/or external complaints and appeals processes is obtained and the breach has been upheld
- The student chooses not to access the internal complaints and appeals process within the 20 working days period
- The student chooses not to access the external complaints and appeals process
- The student withdraws, in writing, from the internal or external complaints and appeals process

The decision **not** to report and cancel a student's enrolment should circumstances under the appeal investigations/assessment identify:

- Queensford College's failure to record or calculate a student's completion accurately although the student was in fact achieving satisfactory course progress, Queensford College will not report the student and under the given circumstances, determine whether the intervention strategy agreement will remain in place
- Queensford College had not implemented its intervention strategy effectively and the relevant information and support were not made available to the student, the student will not be reported, and steps will be taken to immediately implement the College's intervention strategy and provision of support options to assist the student to achieve satisfactory course progress
- The student was able to provide genuine evidence demonstrating that compassionate or compelling circumstances apply, ongoing support will be provided to the student through Queensford College's intervention strategy and the student will not be reported:
 - 'Compassionate or compelling' circumstances are generally those beyond the control of the overseas student and which have an impact upon the overseas student's course progress or wellbeing. These could include, but are not limited to:
 - Serious illness or injury, where a medical certificate states that the overseas student was unable to attend classes
 - Bereavement of close family members such as parents or grandparents (where possible a death certificate should be provided)
 - Major political upheaval or natural disaster in the home country requiring emergency travel and this has impacted on the overseas student's studies; or
 - A traumatic experience, which could include:
 - Involvement in, or witnessing of a serious accident; or
 - Witnessing or being the victim of a serious crime, and this has impacted on the overseas student (these cases should be supported by police or psychologists' reports)

Any changes to the student's enrolment will be reported via PRISMS in accordance with Section 19 of the ESOS Act within 31 days.

4. Procedure

The following procedure outlines the stages in the course progress and monitoring process. Students are made aware of the duration of each study period (in weeks), course timetable including units to be completed for each study period and the Course Progress Monitoring Policy during enrolment and at the Student Orientation Session.

4.1. Stage 1- Identification of Unsatisfactory Course Progress

- 4.1.1 Within 10 working days of the completion of each study period, the respective trainer will update student results through the trainer portal of the student management system (SMS)
- 4.1.2 Two (2) weeks after the end of each study period, the data and reporting officer/s generate student progress reports (per qualification) from the SMS and forward a list of students who have been identified as not successfully completing or demonstrating competency in at least 50% of the course requirements in one compulsory study period to the student support staff and relevant trainers/assessors.
- 4.1.3 A determination of poor progression in a study period will be saved against the student's file in the SMS.

4.2. Stage 2- Issuance of Warning Letter

- 4.2.1 Student Support Officer to prepare and send warning letter to all students who have been deemed as not achieving satisfactory course progress for one study period along with an invitation to attend an intervention strategy meeting, by the end of 15 working days of each study period.
- 4.2.2 Queensford College will issue a warning letter and concurrently use a range of methods including telephone, text message and the student's trainer to ensure the student has received the warning letter. If the first attempt of contact is unsuccessful, Queensford College will make a second attempt to contact the student within 5 working days of the date of original issue of the warning letter. Each contact attempt will be noted in the student's account in the Student Database Management System. If after the second attempt the College is still not able to contact the student, then the College will wait for the student to contact the Student Support Officer. The student has a total of 10 working days to contact the College starting from the date of issue of the warning letter.
- 4.2.3 After 10 working days, if the student is not contactable and is also not attending classes, Queensford College will deem the student as a 'non-genuine' student.
- 4.2.4 Once the student is deemed 'non-genuine' they will be issued with a 2nd warning Letter. The 2nd warning letter will inform the student that they have 10 working days to contact Queensford College for an intervention meeting.

4.3. Stage 3- Intervention Strategy Agreement

- 4.3.1 Student support officer meets with the student to discuss the student's unsatisfactory progress, student support options and creates a formal intervention strategy agreement.
- 4.3.2 The Agreement is acknowledged, and the terms accepted, by both the student and the student support officer. The Agreement will outline the point at which the student would be assessed as having failed to meet satisfactory course progress after the intervention strategy has been implemented. The point at which the assessment is made is at the end of the second consecutive study period.
- 4.3.3 The student support officer, in conjunction with the trainer/assessor and Course Coordinator, will monitor the student's adherence to the terms of the Intervention Strategy Agreement and take appropriate action should the student deviate from these terms.

4.4. Stage 4- Notice of Intention to Report

- 4.4.1 Where a student is deemed non-genuine and been issued with a second warning letter, if the student continues to disregard the warning letter and does not contact the College or is not contactable within 10 working days, then Queensford College will issue a Notice of Intent to Report Non-genuine Student via electronic communication, as soon as practicable advising of the College's intention to report the student to the Department of Home Affairs for being a non-genuine student.
- 4.4.2 Where a student is identified as not making satisfactory course progress in two consecutive study periods (achieving 50% or less competencies in each of those study periods), a Notice of Intention to Report letter will be issued via electronic communication, as soon as practicable advising of the College's intention to report the student to the Department of Home Affairs for unsatisfactory course progress.
- 4.4.2 Where a student is identified as not making satisfactory course progress for a second, but not consecutive study period, that student will not be reported, but be required to undergo further intervention and again be subject to an Intervention Strategy Agreement

4.5. Stage 5- Internal and External Appeal

- 4.5.1 The Notice of Intent to Report letter will inform students that they have the right to access the College's complaints and appeals process in accordance with Standard 10 of the National Code (Complaints and Appeals) and that they have 20 working days to do so starting from the date of issue of the Notice of Intent to Report Letter.
- 4.5.2 Queensford College will have 10 working days from the receipt of the internal appeal to make an assessment and provide a written response to the student about the outcome of the internal appeal process.

- 4.5.3 If the student is not satisfied with the result or the conduct of the appeal, Queensford College will advise the student of their right to lodge an external appeal within 20 working days.
- 4.5.4 If the student lodges an external appeal within the College's timeframe, they have to provide evidence to support the external appeal has been lodged within the 20 working days. Queensford College will wait until the process of assessment by the external appeal body is complete and the outcome is available.
- 4.5.4 If the external complaints and appeals body provides a decision in favour of the student, Queensford College will immediately implement any decision and/or corrective and preventative action required and advise the student of the outcome.

4.6. Stage 6- Report Student to Department of Home Affairs (DHA)

- 4.6.1 The decision to report and cancel a student's enrolment will be actioned, under the following circumstances:
 - The internal and external complaints processes have been completed and the outcome is not in favour of the student
 - The student chooses not to access the internal complaints and appeals process within the 20 working days period
 - The student chooses not to access the external complaints and appeals process within the 20 working days of the internal appeal outcome (where the outcome is not in favour of the student).
 - The student withdraws, in writing, from the internal or external complaints and appeals process within the respective timeframe of 20 working days from the date of issue of the Notice of Intent to Report.
 - The student does not act on the opportunity to appeal and 20 working days have elapsed from the date of issue of the Notice of Intent to Report.
- 4.6.2 Any changes to the student's enrolment will be reported via PRISMS in accordance with Section 19 of the ESOS Act within 31 days, after any appeals process has been exercised and exhausted.

5. Evidence and Record Keeping

In line with Queensford College's obligations under the Education Services for Overseas Students (ESOS) Act 2000, all records are to be retained for a minimum period of two (2) years from the date the student completes their final course with Queensford College, or from the date on which the student's internal appeal is finalised if later than the enrolment end date, and where applicable.