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## Monitoring Course Progress Procedure

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### Procedure

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Before and during each Term of study:

1. All trainers receive an induction and updates in respect to the delivery and assessment of the courses.
2. All students are advised at commencement of the course of the assessment processes applicable for their course.
3. For each assessment task undertaken, the students will be supplied with instructions which provide the purpose of assessment and what is required for satisfactory completion of the unit of competency.
4. The student will then complete assessment tasks and submit the outcomes to the trainer for assessment.
5. The trainer will assess the assessment tasks and all assessment results for each unit will be recorded on an Assessment Record by trainers and given to the Administration. All results are entered into the student management system.
6. Trainers are expected to proactively support students regularly if they identify a student as at risk of failing a unit. Students may approach their trainer at any time for informal feedback on their course progress.
7. 1<sup>st</sup> Warning Letter – If a student does not achieve competency on their first attempt at an assessment, they are given an opportunity to be reassessed at a charge of \$100. They will be issued with a Notice of Re-Assessment. The notice will specify the re-assessment unit and due date.
8. 2<sup>nd</sup> Warning Letter – If a student does not achieve competency on their first attempt at an assessment, they are given an opportunity to be reassessed at a charge of \$100. They will be issued with a Notice of Re-Assessment. The notice will specify the re-assessment unit and due date of assessment.
9. Intention To Report – If the student is still unable to achieve competency after their second attempt, they will be issued with a Notice of Failure. This is the point at which a student is officially identified as being at risk of not making satisfactory course progress. Students are advised to attend Academic Counselling to discuss the Intervention Strategy with the Academic Manager.

**At the end of each term:**

1. The academic performance of every enrolled student in each qualification will be provided to and assessed by the Academic Manager.
2. Students who have failed 50% or more of the total scheduled units for the term are identified as being at risk of not making satisfactory course progress.

3. Any such students will be notified in writing that they are at risk of breaching their visa requirements via the issuance of a 'Notice of Warning – Course Progress' and it is required that they attend Academic Counselling to discuss the Intervention Strategy with the Academic Manager.

## **ACADEMIC COUNSELLING**

1. During Academic Counselling, students are counselled on strategies to improve their performance and a range of intervention strategies or other support strategies will be developed as required. Intervention Strategies could include, but are not limited to:
  - a) where appropriate, advising students on the suitability of the course in which they are enrolled;
  - b) assisting students by advising of opportunities for the students to be reassessed for tasks in units or subjects they had previously failed, or demonstrate the necessary competency in areas in which they had not been previously able to demonstrate competency;
  - c) advising students that unsatisfactory course progress in two consecutive study periods for a course could lead to the student being reported to Department of Immigration and Border Protection (DIBP) with the potential cancellation of his or her visa, depending on the outcome of any appeals process.
2. General counselling/support strategies for students could include, but is not limited to:
  - a) Improving Attendance
  - b) Completing and submitting assessments on time
  - c) Asking for more help from Trainer
  - d) Organising a meeting with Trainer
  - e) Reviewing Study skills/techniques
  - f) Reviewing organisational/time management skills
  - g) Providing additional English Language support
  - h) Other strategies negotiated with the student
  - i) Recommending tutoring outside class hours
  - j) Setting up follow up meetings.

If a student is identified as not making satisfactory course progress in a third consecutive study period in a course, Greenwich English College Pty Ltd will notify the student of its intention to report the student to DIBP for unsatisfactory course progress. This will be done through the issuance of a written notice of 'Intention to Report'.

The written notice of 'Intention to Report' is issued to the student for unsatisfactory progress and informs the student that he or she is able to access the Greenwich English College Pty Ltd complaints and appeals process and that they have 20 working days in which to do so. A student may appeal on the following grounds:

- a) the student being incorrectly marked as Not Yet Competent,
- b) compassionate or compelling circumstances, or
- c) the correct steps in this procedure and the intervention strategy as set out herein have not been implemented appropriately to support the student.

Where the student's appeal is successful, the outcomes may vary according to the findings of the appeals process.

- i. If the appeal shows that there was an error in calculation, and the student actually made satisfactory course progress (successfully completed more than 50% of the course requirements for that study period), the student will not be reported, and the intervention strategy will not be implemented. Written confirmation of this outcome will be issued to the student and the records of assessment will be amended to show the correct outcomes and a review of procedures that led to the error will be implemented.
- ii. If the appeals process shows that the student has not made satisfactory progress, but there are compassionate or compelling reasons for the lack of progress, or that the correct steps in this procedure and the intervention strategy as set out herein have not been implemented appropriately to support the student, ongoing support will be provided to the student through the Greenwich English College Pty Ltd intervention strategy, and the student will not be reported. Written confirmation of this outcome will be issued to the student and appropriate records of the decision will be kept on the student's records.

**Where:**

- i. the student chooses not to access the complaints and appeals processes within the 20 working day period; or
- ii. the student withdraws from the process; or
- iii. the process is completed and results in a decision supporting Greenwich English College Pty Ltd (i.e. the student's appeal was unsuccessful);

The student will be notified in writing of the outcome of the appeal. The student will also be notified of their right to an external appeal and will be supplied with contact details for the Overseas Students Ombudsman to pursue such an appeal. The student will be informed that they have 5 working days to submit this external appeal.

**Where:**

- i. the student does not access an external appeal process within the 5 working day period; or
- ii. the student withdraws from the process; or
- iii. the process is completed and results in a decision supporting Greenwich English College Pty Ltd (i.e. the student's appeal was unsuccessful);

Greenwich English College Pty Ltd will notify DET through PRISMS as soon as practicable of the student not achieving satisfactory course progress.

**Procedure for notifying students of unsatisfactory progress in two consecutive study periods**

If a student is identified as failing to meet the required 50% completion rate in three consecutive study periods the following process should be followed.

1. The Administrative Officer Drafts a letter using the template (Letter to Student - Intent to Report.doc)
2. The Director of Studies will review the letter before authorising it to be send using registered post to the student.

3. The Administrative Officer will post the letter to the current address on file.

*Copy of all correspondence must be put on student file for future reference*

4. The Administrative Officer will contact the Student within 4 working days of sending the letter, either by phone and / or email, to ensure they have received the letter.
5. The Administrative Office will note and set a reminder in a calendar when 20 working days has lapsed and check if an Appeal has been lodged.
6. If no appeal has been lodged, they will proceed to report the breach on PRISMS.
7. If an appeal has been lodged, the appeals process will begin.

## PROCEDURE REPORTING STUDENTS FOR UNSATISFACTORY PROGRESS BY NOTIFYING DET/DIBP OF VISA BREACH

The following process should be followed when reporting a student for breach of their visa requirements relating to unsatisfactory course progress.

Refer to the "PRISMS - Provider User Guide" to assist in the following process.

1. If appeal lodged, wait until appeal is heard and finalised before progressing. Once finalised and the intent to report is to proceed continue.
2. If no appeal lodged or it is finalised, Administrative Officer advises the General Manager of intent to advise breach on PRISMS.
3. General Manager checks all the facts and documentation related to the case and if everything is in order, authorises the report to be entered into PRISMS.
4. Follow the PRISMS - Provider User Guide on page 39 for Reporting Requirements

### NOTE:

- *Reporting a student for unsatisfactory course progress occurs only when the student has been identified as not making satisfactory course progress in two consecutive compulsory study periods, and the student has not made a successful appeal against this assessment.*
- *If a student is identified for a second, but not consecutive, study period as not making satisfactory course progress, the provider does not report the student for unsatisfactory course progress.*
- *When a student is reported for unsatisfactory course progress, DIBP will, in all but exceptional circumstances, cancel the student's visa. DIBP will rely on the provider's report of unsatisfactory course progress, as the report cannot be made until the provider has completed the complaints and appeals process. If a student is dissatisfied with the provision of a complaints and appeals process, the student may lodge a complaint with DET.*
- *Section 19(2) of the ESOS Act 2000 requires providers to report the student for unsatisfactory course progress 'as soon as practicable' after the breach occurs. Good practice would be to report the student through PRISMS within 5 days of finalising the decision to report (ie. within 5 days of 3.9 i., ii., or iii. occurring).*

## EXTRACT

### 5.18.2.2 Student Failed to Meet Course Requirements Key requirements for all sectors:

- The progress of each student is monitored, recorded and assessed.
- The provider has documented course progress policies and procedures.
- The provider assesses each student at the end point of each study period according to its course progress policy.
- The provider has an intervention strategy that identifies and assists students who are at risk of not making satisfactory course progress.
- Where a provider has assessed the student as not meeting satisfactory course progress, the provider informs the student in writing of its intention to report the student and that he or she is able to access the provider's complaints and appeals process within 20 working days.

The provider notifies the Secretary of DET through PRISMS of the student not achieving satisfactory progress after the appeals process (if actioned) is finalised and upholds the provider's decision to report.

The CoE must have a status of 'Studying', 'Cancelled', 'Finished', 'Cancelled' or 'Reported On' for you to select this Student Course Variation reason.

You must enter a response to each of the Appeals Processing prompts as well as responding to the other prompts that you will be presented with when processing this SCV option.

On-screen 'Help' is available by clicking on the book icon at the front of each prompt.

In the SCV Comments field, enter any comments that may be appropriate. These comments will NOT appear on the Non compliance letter (the Section 20 notice) – they are for your information only.

This Student Course Variation reason results in the Non-compliance letter being generated for you to send to the Student.

The letter contains particulars of the breach and provides options as to the actions required to be taken by the student.

Generally speaking, the student is required to attend in person before a DIBP officer within 28 days after the date the Non-compliance letter was issued.

Once you have completed the Student Course Variation the CoE status will change to 'Cancelled' and DIBP will be sent the reason code you selected, as well as your responses to the 'Appeals' processing prompts.

You should report using this variation as soon as practicable.

## **PROCEDURE FOR CHANGING AWAY FROM THE DET-DIBP COURSE PROGRESS POLICY AND PROCEDURES**

In the event Greenwich English College Pty Ltd chooses to move away from the DET-DIBP Course Progress Policy the following should be followed.

1. When Greenwich English College Pty Ltd no longer wishes to follow the DET-DIBP Course Progress Policy, it registers the change in PRISMS by changing the answer to the relevant field to 'No'.
2. A record is kept in PRISMS if the provider has chosen to use the DET-DIBP Approved Course Progress Policy and if it changes its mind after indicating it would use the policy.

Do not commence a new course progress policy until the beginning of a study period and only after students have been informed of the intended change.

## Overview of Standard 10

**Registered providers systematically monitor students' course progress. Registered providers are proactive in notifying and counselling students who are at risk of failing to meet course progress requirements. Registered providers report students, who have breached the course progress requirements.**

- 10.1 The registered provider must monitor, record and assess the course progress of each student for each unit of the course for which the student is enrolled in accordance with the registered provider's documented course progress policies and procedures.
- 10.2 The registered provider must have and implement appropriate documented course progress policies and procedures for each course, which must be provided to staff and students, that specify the:
  - a. requirements for achieving satisfactory course progress
  - b. process for assessing satisfactory course progress
  - c. procedure for intervention for students at risk of failing to achieve satisfactory course progress
  - d. process for determining the point at which the student has failed to meet satisfactory course progress, and
  - e. procedure for notifying students that they have failed to meet satisfactory course progress requirements.
- 10.3 The registered provider must assess the course progress of the student in accordance with the registered provider's course progress policies and procedures at the end point of every study period.
- 10.4 The registered provider must have a documented intervention strategy, which must be made available to staff and students, that specifies the procedures for identifying and assisting students at risk of not meeting the course progress requirements. The strategy must specify:
  - a. procedures for contacting and counselling identified students
  - b. strategies to assist identified students to achieve satisfactory course progress, and
  - c. the process by which the intervention strategy is activated.
- 10.5 The registered provider must implement the intervention strategy for any student who is at risk of not meeting satisfactory course progress requirements. At a minimum, the intervention strategy must be activated where the student has failed or is deemed not yet competent in 50% or more of the units attempted in any study period.
- 10.6 Where the registered provider has assessed the student as not achieving satisfactory course progress, the registered provider must notify the student in writing of its intention to report the student for not achieving satisfactory course progress. The written notice must inform the student that he or she is able to access the registered provider's complaints and appeals process as per Standard 8 (Complaints and appeals) and that the student has 20 working days in which to do so.
- 10.7 Where the student has chosen not to access the complaints and appeals processes within the 20 working day period, withdraws from the process, or the process is completed and results in a decision supporting the registered provider, the registered provider must notify the Secretary of DET through PRISMS of the student not achieving satisfactory course progress as soon as practicable.



## FURTHER INFORMATION

Advice on the ESOS Act 2000 and the National Code 2007 contact the ESOS Helpline on: 02 6240 5069 or by email at: [esosmailbox@DET.gov.au](mailto:esosmailbox@DET.gov.au).

Comprehensive information on the ESOS Act 2000 and the National Code 2007 is at: [aei.DET.gov.au/ESOS](http://aei.DET.gov.au/ESOS).

Advice on visa matters at the DIBP website: [www.immi.gov.au](http://www.immi.gov.au) or contact DIBP on 131 881 for the cost of a local call anywhere in Australia.

Advice on PRISMS contact the PRISMS helpline at DET on: 02 6240 7647 or by email at: [prisms@DET.gov.au](mailto:prisms@DET.gov.au)

## DEFINITIONS / EXPLANATORY NOTES

### Compassionate or compelling circumstances

Compassionate or compelling circumstances are generally those beyond the control of the student and they have an impact on the student's capacity and/or ability to progress through a course. These could include:

- 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 (where possible a death certificate should be provided)
- major political upheaval or natural disaster in the home country requiring their emergency travel and this has impacted on their studies
- a traumatic experience which could include but is not limited to:
  - o involvement in or witnessing of an accident or
  - o a crime committed against the student or
  - o the student has been a witness to a crime

and this has impacted on the student (these cases should be supported by police or psychologists' reports).

Please note that the above are only some of examples of what may be considered compassionate or compelling circumstances. **Providers are asked to use their professional judgment and to assess each case on its individual merits.** When determining whether compassionate or compelling circumstances exist, providers should consider documentary evidence provided to support the claim. Providers should keep copies of these documents, together with a record of why the decision was made, in the student's file.

## **Erratic course progress as a potential indication of non-bona fide students**

If the provider suspects that a student is not a bona fide student, the provider may cancel the student's enrolment, as allowed under Standard 13. However, providers must ensure that prior to enrolment students were made aware of the grounds on which cancellation of enrolment may occur, as required under Standard 2.1f. For example, if a provider takes erratic course progress into account in identifying non-bona fide students, erratic progress must be clearly defined and stated prior to enrolment as one of the grounds for cancellation of enrolment. Similarly, if a provider identifies bona fide students on the basis of participation, failure to participate must be clearly stated prior to enrolment as grounds for cancellation of enrolment.

## **Monitoring course progress for reporting purposes and for completion within the duration**

Standard 9.1 requires the registered provider to have and implement documented policies and procedures for monitoring the course progress of each student to ensure that at all times the student is in a position to complete the course within the expected duration as specified on the student's CoE. While monitoring progress against the course duration is a separate requirement to monitoring course progress for reporting purposes, there may be some overlap in procedures. For example, a provider's course progress procedure may require that at the end of each study period, each student's results are checked to determine course progress for that study period. In order to avoid duplication of effort, at the same time the provider may also check each student's progress towards completion of the course within the specified duration.

**Authorising Officer:**\_\_\_\_\_ **Date:**\_\_\_\_\_ **Review Date:**\_\_\_\_\_  
This policy is to be reviewed twelve (12) months from this date.