

## CPP010 COURSE PROGRESS AND INTERVENTION POLICY AND PROCEDURE

### A. PURPOSE

This policy applies to international students only.

Job Training Institute Pty Ltd (JTI) has implemented the Department of Home Affairs–DOHA approved course progress policy and procedures and is not required for ESOS purposes to monitor attendance.

Through this policy and procedure, Job Training Institute will identify, notify and assist an overseas student at risk of not meeting course progress where there is evidence from the overseas student's assessment tasks, participation in tuition activities or other indicators of academic progress that the overseas student is at risk of not meeting those requirements.

In accordance with the National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2018, JTI will proactively monitor, review, assess and contact students who are at risk of failing to meet course progress requirements. JTI will implement an intervention strategy for any students at risk. Students who continue to breach the course progress requirements may be reported to the Secretary of the Department of Education through PRISMS. Students will be advised that unsatisfactory course progress in two consecutive compulsory study periods for a course could lead to the student being reported to DOE and cancellation of his or her visa, depending on the outcome of any appeals process

### SCOPE:

This policy applies to all staff of Job Training Institute Pty Ltd who are responsible for recording, monitoring & reporting student academic progress of international students.

The Course/Training Manager is responsible for implementing this procedure and to ensure that staff and students are aware of its application and implement its requirements.

### POLICY:

In accordance with the National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2018, JTI will proactively monitor, review, assess and contact students who are at risk of failing to meet course progress requirements. The Institute will implement an intervention strategy for any students at risk. Students who continue to breach the course progress requirements may be reported to DOE through PRISMS. Students will be advised that unsatisfactory course progress in two consecutive compulsory study periods for a course could lead to the student being reported to DIBP and cancellation of his or her visa, depending on the outcome of any appeals process.

### PROCEDURES:

1. The Department of Home Affairs–DOHA Course Progress Policy and Procedure will be made available to staff and students in electronic format together with a copy of this Course Progress and Intervention Policy and Procedure. (Refer to the AEI website for the most current version: <https://aei.gov.au/Regulatory-Information/Pages/Regulatoryinformation.aspx> )
2. The International Department Head (IDH) must register the choice through PRISMS via ticking the box selecting the DOE-DIBP Course Progress Policy and Procedures.
3. JTI's marketing materials detail the requirements for achieving satisfactory course progress. This is provided to prospective students in print or through referral to an electronic copy prior to enrolment.

4. The Course Progress and Intervention Policy are detailed at induction session with all students and also detailed at trainers meetings.
5. Unsatisfactory academic course progress performance is defined as failing more than 50% of units studied in two consecutive compulsory study periods(through Term Meeting Report).
6. A 'study period' at JTI is considered as between 10-24 weeks depending on the units being delivered.
7. Trainers will identify and notify students to Course/Training Manager who they believe are not progressing and at risk of breaching course progress policy, they will also report on class attendance levels fortnightly using a tracking document.
8. An assessment of course progress is made by Course/Training Manager at the end point of each study period, but is also monitored on an ongoing weekly basis by the trainers. The reason this is monitored on a weekly basis is to proactively move forward with assessing cases in a timely manner, and if necessary activate the intervention strategy. The intervention strategy must be activated within the first four weeks of the following study period.
9. Student attendance is recorded by trainers on the student management system (SMS), Standard 8 does not require JTI to report students to regulator on attendance, however, under this policy, and students must attend at least 80% of classes for which they are enrolled.
10. The Course/Training Manager is able to quickly identify students at risk via several documents:
  - a. **The training plan** is a working document and details the current study mode which is updated via outcomes of progress (assessments) provided from trainer/assessors on a weekly basis. Any student not following their training plan within a month will be considered as being at risk.
  - b. **The Term Meeting Report** is a working document and details the meeting between trainers and students to keep students' academic progress are updated
11. A student is deemed at risk of breaching course progress requirements when they have failed to achieve competency in at least 50% of the units being studied in a study period and/or if they have failed a prerequisite unit competency in a study period or they have not followed their training plan in a given month. This will lead to implementation of an intervention strategy within 4 weeks of this happening.
12. The Course/Training Manager will contact students at risk formally (Early intervention letter or intervention plan letter) and follow-up with a face to face meeting to discuss the possible activation of intervention strategy, if needed, and agreed terms of intervention strategy will be discussed and formally agreed (the student must acknowledge and accept intervention plan).The Course manager will give a report to the International Department Head (IDH) monthly of any students on risk or on an intervention strategy.
13. In the case that the intervention strategy is needed, the activation of program and agreed terms of intervention strategy will be discussed and formally agreed. Once an intervention strategy has been activated for a student, all documentation must be retained on the students file. Intervention strategy is activated only when a student signs on the intervention strategy plan.
14. The strategies that JTI offers to help students meet course progress requirements would include any of the following but not limited to the following:
  - a. discuss opportunities for special makeup classes designed for intervention students only
  - b. counselling sessions with Course/Training Manager
  - c. individual case management
  - d. additional English support
  - e. receiving counselling with a consulting external counsellor (this would be related to personal issues which are affecting students' progress)
  - f. a reduction in course load – in this case the program would be updated with new training plan and study/assessment mode
  - g. opportunity for re-assessment
  - h. attending tutorials or study groups
  - i. attending study clubs
  - j. receiving mentoring

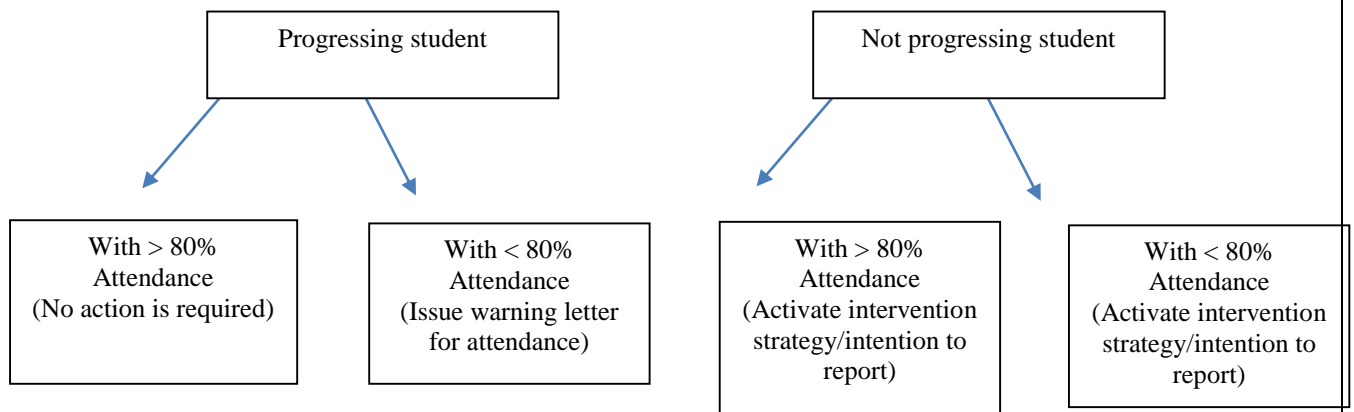
- k. being placed in a suitable alternative subject within a course or a suitable alternative course
  - l. reduction in course load
  - m. re-affirming to students that unsatisfactory course progress in two (2) consecutive study periods which is 2 x 10(13) weeks may result in student being reported to DOE through PRISMS which could result in DIBP making a decision to cancel the students visa (depending on outcome of appeals process)
15. The intervention strategy will be monitored closely by IDH and academic staff involved in the intervention planning process.
  16. Evidence of the intervention strategy and measures used to assist student will be documented and kept on the students file.
  17. Students that do not follow the intervention strategy will be reminded of the possible implications via an intention to report letter from IDH with a statement that student may be reported to DoHA (Department of Home Affairs) through PRISMS for failing to meet satisfactory course progress over two consecutive compulsory study periods and that this could result in DoHA making a decision to cancel the students visa.
  18. The outcomes of intervention strategies will be discussed at management review meetings for analysis and improvement.
  19. During the course of intervention process, the Course/Training Manager must arrange weekly meetings with the student, where parties will discuss the ongoing support and corrective actions, if required.
  20. In the circumstances that a student fails to meet 50% in two consecutive compulsory study periods, the student will be informed via a written letter titled '**intent to report**' of JTI intention to report the student for unsatisfactory progress and their right to access JTI complaints and appeals process as per Standard 10 and that they have 20 working days in which to do so prior to reporting the student to DoHA through PRISMS, this is drafted and sent by the International Department Head.
  21. If the student indicates that they wish to appeal the Institute's decision, the Institute will provide them a *complaints and appeals form* which clearly detail the costs associated if any for referrals to third party and verbally restate the student's rights to access external appeals process.
  22. Appeals must be lodged within 20 working days of the date of the notice- intention to report. The student must notify JTI of the lodgement of an external appeal.
  23. The notification to student will be via registered mail with return signature of student required. In the case that student does not receive the letter, the Institute will exhaust all measures to contact student: phone calls, attending student last known residence, email. These attempts will be documented.
  24. In the event that student is not contactable, JTI will follow process of reporting after 20 working days from the last formal attempt to contact the student.
  25. Appeals: If the decision is to affirm JTI's decision, then JTI will, upon receiving formal documentation of decision, take appropriate actions, this will occur within 5 business days of receiving formal decision. To report a student for not making satisfactory progress, JTI must go into the Student Course Variation (SCV) screen in PRISMS, and from the drop down list under 'Reason for Course Variation', choose *Unsatisfactory Course Progress*. Once JTI has chosen this, PRISMS will ask questions about the appeals processes to which JTI will answer 'Yes' or 'No'. JTI will then be required to fill in comments regarding the situation and check the student's postal address. Once these have been entered, a warning will appear to remind JTI of the implications for cancellation of student visa of a student who is reported as failing to meet course progress requirements.
  26. If the decision is to remit JTI's decision, then JTI will upon receiving formal decision, then take appropriate actions, for example, document a corrective action, correct the issue and provide outcome to student in writing and refund student the cost of appeal process.
  27. In the situation that a student is identified as a potential risk and may not complete the course within the expected duration as specified on the student's CoE, the Institute may under certain circumstances extend the duration of the students course. In this case, a new CoE will

- be issued and student will be informed they need to contact DoHA with regard to their visa requirements.
28. Reasons for (student) appealing JTI decision to report student may include:
- a. compassionate or compelling circumstances (documentary evidence is required and JTI must provide a decision in reflection of circumstances)
    - i. serious injury or illness, where a medical certificate is provided stating student was unable to attend class
    - ii. bereavement of close family member such as, parent or grandparent (a death certificate should be provided where possible)
    - iii. major political upheaval or natural disaster in home country requiring their emergency travel which has impacted their studies
    - iv. a traumatic experience for example:
    - v. a crime committed against student, student witnessed a crime and this has impacted students study and is supported by police report or psychologists report
  - b. JTI has failed to record or calculate the grades accurately
  - c. JTI did not implement the intervention strategy or other policies accordingly in line with stated sections of policies and procedures
29. Standard 8 requires that if a student chooses to access JTI's complaints and appeals process, we must maintain the student's enrolment while the complaints and appeals process is ongoing.
30. Students that do not meet satisfactory course progress after the intervention process has been completed and after all complaints and appeals processes have been finished may be reported to DoHA through PRISMS for failing to meet satisfactory course progress, this could result in DoHA making a decision to cancel the students visa. The IDH is in-charge of reporting the students.
31. Procedural Fairness: Regarding providing the student 20 business days' notice to access JTI complaints and appeals process. When sending registered mail to student, it is important to allow for delivery time and start 20 business days from one day after the student has signed the delivery slip.
32. As part of JTI course progress and intervention policy and procedure, once the 20 working days have passed (allow for procedural fairness), JTI will report the student to the Secretary of the Department of Education through PRISMS. within 5 days of finalising the decision to report where:
- a. The student has chosen not to access the complaints and appeals processes within 20 working day period
  - b. The student withdraws from the process or
  - c. The process is completed and results in a decision supporting JTI.
33. Since JTI is using the Department of Education–DIBP approved course progress policy and procedures, the non-compulsory study period is not counted for the purposes of reporting.
34. Department of Home Affairs will consider all the information available and if they decide to consider cancellation, DoHA will send a Notice of Intention to Consider Cancellation (NOICC) prior to a decision being made to cancel the students' visa. Students will be given an opportunity to respond to the NOICC and explain their situation. The student does not need to attend a DoHA office.
35. If the student has been identified for a second but not consecutive study period as not making satisfactory course progress JTI **will not** report the student.
36. If a student is not attending scheduled classes, in the first instance JTI should:
- a. remind them that enrolment in a **full-time registered course**, which is a course with a minimum of **20 scheduled course contact hours**, is a visa condition for overseas VET students
  - b. remind them of scheduled class times.

If a student fails to make satisfactory course progress (including by not participating in the training outlined in the training and assessment strategy and timetables), you must have and implement a process for reporting unsatisfactory course progress in PRISMS. You must:

- a. have undertaken an intervention strategy to assist the student at risk of not meeting course progress, in sufficient time for the student to achieve satisfactory course progress
- b. tell the student of the intention to report them and the reasons why you are reporting them
- c. tell the student how they can access an internal complaints and appeals process
- d. advise them on their external appeal rights.

#### Academic Progress and Attendance Flow chart



*In regard the complaints handling and appeals process, students have the opportunity to formally present their case at minimal or no cost. The availability of this complaints and appeals process, does not affect the rights of the student to take action under the Australian Consumer Law if the Australian Consumer Law applies.*

*If a student is dissatisfied with the decision made by appeals process, they may lodge a formal complaint with Department of Education.*

#### **Responsibilities & Action**

The Course/Training Manager in liaison with the trainer and the IDH are responsible for monitoring course progress and associated processes in line with this policy.

#### **Accompanying documents:**

- The training plan
- Term Meeting Report Template
- 'Intent to report' letter
- Complaints and appeals form
- Warning Letter
- Intervention letter

