

Document name	Course Progress & Intervention - ELICOS	Author	Compliance Consultant	Approved by	CEO	Reference to SRT0	NC, Std 8,10	RTO Code	41340
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Student progress will be monitored through formative and summative assessment, teacher feedback and teacher/student consultations. Assessments are weekly formative tasks and exams conducted at 6th week (mid-term) and 12th week (final) covering listening, speaking, reading and writing skills. The tasks are clearly listed in the prescribed syllabus and the individual teachers' daily lesson plan. The overall score and corresponding grade will be calculated on the basis: Mid-term exam marks will constitute 40% weightage; Final Exam marks will constitute 50% weightage while that of formative assessments (weekly activities) will constitute 10%. The satisfactory result for passing a course level must be a minimum of overall score of 60%.

Attendance Monitoring

The attendance monitoring and reporting policy of Dalton College follows ESOS National Code 2018 Standard 11 and Section 19 of ESOS ACT. The minimum requirement for attendance is 80 per cent of the scheduled contact hours for the Course but the College may decide not to report a student for breaching 80 per cent if:

- there is documentary evidence demonstrating that compassionate or compelling circumstances apply
- the student is attending at least 70 per cent of the course contact hours for which he or she is enrolled; and
- this is consistent with the College's documented attendance policies and procedures.

1.2 Definitions

'Medical certificate' means a certificate issued by a registered medical provider such as hospitals, doctors, dentists, physiotherapists, chiropractors, optometrists, ophthalmologists, psychiatrists and psychologists. Dalton does not accept certificates from alternative medical practitioners such as herbal practitioners, acupuncturists, Chinese therapists, massage therapists, iridologists, psychics etc.

'Satisfactory course attendance' means attendance of at least 80% of scheduled course contact hours for the study period.

'Study period' means - 12 weeks (1 term).

'Compassionate or compelling circumstances' are generally those beyond the control of the student and which have an impact upon the 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 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;
- or
- a traumatic experience which could include:
 - I. involvement in, or witnessing of a serious accident; and
 - II. Witnessing or being the victim of a serious crime, and this has impacted on the student (these cases should be supported by police or psychologists' reports).

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Example: Chloe was enrolled for a period of 20 weeks and was placed in a GE 2 course following a placement test. However, she failed to meet the requirements by scoring less than 60% during the progress tests and final test. As a result, when she was offered to re-enrol, student agreed to repeat the course followed by strict monitoring of attendance.

4. Unsatisfactory course progress

1) Students will be considered as making unsatisfactory course progress when they:

- fail to participate in the intervention processes
- fail the course levels consecutively
- poor attendance records

At this stage, it is requirement under the terms of the National Code 2018 that the Institution must undertake an intervention strategy to resolve the problem which may include the following:

- The student will be counselled by the DOS to identify any specific issues affecting learning.
- The student maybe encouraged to do practice tasks.
- Teachers will work with DoS to prepare strategies to help at- risk students individually.
- A written record of counselling, intervention activities and measures must be kept on the student's file. This record has to be referred for follow up meetings with a student.

5. Determining failure to make progress

Assessing an acceptable level of progress is a complex issue in relation to ELICOS students. Language background, aspects of educational background and culture, individual language learning capacities (as opposed to other learning capabilities), the objectives of the student and adjustment to life in a new country can make determining progress difficult in the case of some students. As problems arise, intervention strategies, as detailed earlier, will be put in place to assist individual students who are experiencing difficulties with their studies.

Students who have completed a course level twice and still not have attained a pass score, will be required to attend a meeting with the DoS. Such students may be permitted to enrol in the same course level for a third attempt, if the DoS is satisfied that the student is making genuine efforts to progress.

A student who fails to pass on their third attempt at a course level will not be permitted to enrol in that course level again.

6. Reporting process

- 1 Student will be issued with a Breach letter advising the student of the college's intent to report the student to the Department of Home Affairs (DHA) through the PRISMS for unsatisfactory course progress.
- 2 The letter will inform the student that they have access to the Complaints and Appeal Policy and Procedure and they have 20 working days to lodge an appeal should they have objections to the Institute decision of reporting them to DHA.

1.4 Monitoring Process – Attendance

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Procedure

ELICOS have one study period each level. Each level of course is 12 weeks (including 2 weeks of tests and breaks). Students' duration of their Confirmation of Enrolment (CoE) vary between week 1 and 12 (10 weeks of study) weeks for each level of General English (GE) and English for Academic Purposes (EAP) course. As such, student individual attendance is recorded and calculated over the period of the enrolment as stated on the CoE.

In the case that a CoE duration is greater than 5 weeks, the student attendance is monitored over two periods: the first period is for the first 5 weeks; the second period is calculated on the remaining part as stated on the total duration of the CoE.

Maintaining satisfactory attendance is a student visa requirement.

Students must contact the College every time they will be absent prior to the regular class time, via email, phone or SMS to a member of staff. Students who do not advise the College of absences will be contacted/counselled by a Student Support Officer or another staff member.

Student attendance is monitored daily by trainers. Student absences are tracked and monitored for reporting calculations at the end of each week.

All absences due to illness should be accompanied by a medical certificate.

1. Process for assessing satisfactory attendance

Administrative staff review student attendance regularly to identify students who are at risk of not maintaining satisfactory attendance requirements. Regular assessments will be undertaken at intervals which will ensure that the administrative staff will be able to make an accurate assessment of whether the student:

- Is absent for more than 5 consecutive days without approval,
- Is not maintaining satisfactory attendance,
- Is at risk of not attending at the required level for the relevant attendance calculation period,
- Has actually fallen below the required attendance level within an attendance calculation period.

2. Calculation of Attendance and student's projected maximum possible attendance

Attendance is calculated from the start date of the attendance-monitoring period to the end date of the attendance-monitoring period. The projected maximum possible attendance figure, which is expressed as a percentage incorporates the actual number of hours absent together with a figure to incorporate the assumption that the student will not be absent for any timetabled class for the remainder of the attendance calculation period.

Student attendance data is taken from the rolls and is entered into an excel spreadsheet and the student management system (Wisenet) weekly by the administrative staff. Reports showing a student's projected maximum possible attendance are generated from Wisenet. Students at risk of not satisfying attendance requirements are identified on these reports. The attendance reports show the student number and the projected maximum possible attendance for each student for data entered onto Wisenet from the hard-copy rolls at the date of the generation of the report.

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appointment with the Student Support Officer ASAP for assistance/advice. Students may take along a support person.

- This letter is to also contain the consequences of not achieving a projected attendance of 80%. This communication will also indicate the student is required to organise an appointment with the ELICOS Director of Studies to discuss their poor attendance record and any intervention strategies to ensure they stay above 80% for course duration (total scheduled contact hours).
- If the student does not respond within 5 business days, Student Administration will attempt to contact the student and action the student enrolment status as required.

When a student's projected attendance falls below 80%

Intention to Report (Less than 80% Attendance)

- The student shall be sent a 'Intention to Report letter' indicating the student has breached the attendance requirements. This letter will also identify the student is going to be reported to the appropriate government agency(s) for unsatisfactory attendance of their course of study.
- They will also be informed of their ability to access the 'Complaints and Appeals Policy and Procedure' and that they have 20 business days to access this process.
- If the student does not access the complaints and appeals process within 20 business days, the student's enrolment status is to be updated on PRISMS. The student will be given another copy of the Complaints and Appeals Policy with the Intention to Report Letter.

Dalton may decide not to report a student for 80% attendance where the College recognises the student has a valid reason for and satisfy at least 70% of the scheduled course contact hours maintaining satisfactory academic performance. When the College is satisfied they are a genuine/bona fide student and where they provide:

- documentary evidence demonstrating compassionate or compelling circumstances for their absences e.g., medical illness supported by a medical certificate, AND
- attendance has not fallen below 70%, AND
- academic progress is satisfactory.

Where a student with low attendance is able to demonstrate (and provide evidence of) compassionate or compelling circumstances, the CEO will assess whether a temporary suspension of studies is in the best interest of the student. Refer Deferment, Suspension and Cancellation Policy.

In all circumstances if the student's attendance drops to below 70%, students will be reported to DET/DHA via PRISMS.

Any other circumstance would require evidence to be considered as compassionate or compelling. If a student ceases attending a course or does not return from leave, and/or is unable to be contacted, under Section 19(1) of the ESOS Act, Dalton will notify DHA via PRISMS of termination of the student's studies within 14 days of the event via a Student Course Variation. The College in this instance does not have to give students access to the appeals process. Students would not be entitled to a refund unless at the discretion of the CEO.

5. Reporting 'Breach of Student Attendance'

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- As identified above, when a student's attendance falls below 80%, and has no supporting reasons, the student must be reported to the appropriate government agency(s) via PRISMS for a breach of their Visa condition.
- This process of reporting into PRISMS is the responsibility of the Administration Manager who will monitor the recorded breach and report the breach as required.
- A copy of all letters, details of phone calls made, and reports are to be maintained in the individual

Summary

Process of Intervention after Attendance Monitoring over the period of 12 weeks			
Process	Scenario /timing of action	Procedure and documents	Responsible person
Attendance reminder / notification	Absent for the first 4 days of study period	The Student Support Officer (SSO) will immediately contact the student by phone/email to gain an explanation for non-commencement and inform them of the need to attend classes and the effect on their projected attendance if they do not attend. If contacted by phone is not successful, the Administration Manager is to be informed and shall attempt to identify the student's current contact details.	SSO
1 st warning	Attendance falls behind 90%	The student is to be sent a 'Student Attendance 1st Warning Letter' informing them of their projected attendance and the need to ensure they maintain a minimum of 80% attendance for the course duration (total contact hours). This letter is to also contain the consequences of not achieving a projected attendance of 80%. This communication will also indicate the student is required to organise an appointment with the ELICOS Director of Studies to discuss their poor attendance record and any intervention strategies to ensure they stay above 80% for course duration (total scheduled contact hours).	SSO
Intervention strategy plan	When the student attends the following session	ISP Signed by the student after consultation process. If the student does not respond within 5 business days, Student Administration will attempt to contact the student and action the student enrolment status as required.	DOS , student and SSO
2 nd warning	Attendance falls behind 85 %	Students whose attendance fall to 85% will be contacted by letter/email and/ or SMS warning them that they are now at risk of being reported to DHA and they must make an appointment with the Student	SSO

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		Support Officer and DOS for assistance/advice. Students may take along a support person.	
Intervention strategy plan	When the student attends the following session	ISP Signed by the student after consultation process. If the student does not respond within 5 business days, Student Administration will attempt to contact the student and action the student enrolment status as required.	DOS , student and SSO
'Intention to Report letter	Attendance falls behind 80%	The student shall be sent a 'Intention to Report letter' indicating the student has breached the attendance requirements. This letter will also identify the student is going to be reported to the appropriate government agency(s) for unsatisfactory attendance of their course of study. They will also be informed of their ability to access the 'Complaints and Appeals Policy and Procedure' and that they have 20 business days to access this process. If the student does not access the complaints and appeals process within 20 business days, the student's enrolment status is to be updated on PRISMS. The student is also to be sent a 'Student Attendance Breach Reported Letter' notifying the student of the action taken.	SSO
Complaints and Appeals	Student appeal	Complaints and Appeal form Intervention strategy	DOS, student and SSO
Reporting 'Breach of Student Attendance'		As identified above, when a student's attendance falls below 80%, and has no supporting reasons, the student must be reported to the appropriate government agency(s) via PRISMS for a breach of their Visa condition. This process of reporting breaches into PRISMS is the responsibility of the Administration Manager who will monitor the recorded breach and report the breach as required. A copy of all letters, details of phone calls made, and reports are to be maintained in the individual student file.	

Intervention Strategies to be discussed may include but not limited to -

- Identify what support strategies would best suit the situation and planning implementation.
- Academic and or personal support/counselling offered to the student internally or externally as appropriate
- Planned regular follow up and feedback from the teaching staff to track progress and keep communication open
- Advice on alternate units/courses if considered more suitable/appropriate for the student
- Resitting units
- Any other support appropriate to the individual circumstances.

Eg

- attending tutorials/study groups
- receiving individual assistance
- attending counselling /bilingual support

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- receiving assistance with personal issues which are influencing progress
- receiving mentoring to cross the barrier in learning
- 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.

All records **MUST** be kept on the student file.

As part of an intervention strategy, students may take a normal, reduced or increased study load in a study period, if the workload is monitored to ensure the student completes the course within the duration specified on the CoE, and, that it does not have a detrimental effect on the principal course of study.

Students are encouraged to increase their workloads to 'catch up' on any missed units. The College is open 5 days per week to assist students.

Should students refuse to maintain an agreed/approved workload; the student will be firstly counselled and then warned of impending visa implications.

If there are compelling or compassionate reasons, Dalton may grant the student a less than 'full time' workload. This would be monitored as part of the student's intervention strategy.

2. EXTENDING COURSE DURATION

Dalton College can only extend the overseas student's enrolment after assessment, if:

- there are compassionate or compelling circumstances and there is evidence to support this assessment;
- an intervention strategy has been implemented, or is in the process of implementing, for the student who is at risk of not meeting course progress requirements; or
- an approved deferral or suspension of the overseas student's enrolment has occurred.

When Dalton College decides to extend the duration of the student's study due to any of the conditions above, Dalton will report via PRISMS and/or issue a new CoE if required. PRISMS will indicate to the user if a new CoE is required. This reporting must be done within 31 days of the determination that the student will need to change/extend the duration of their COE unless the student is under 18, in which they must be reported within 14 days.

If the registered provider extends the duration of an overseas student's enrolment and the student's visa will expire prior to completion of the course, the student will need to apply for a new Student visa (subclass 500) to complete their study. More information about the Student visa (subclass 500) is available on the Department of Home Affairs website (<https://www.homeaffairs.gov.au/Trav/Visa1/500->).

Professional judgement will be used to assess each case on its individual merits. When determining whether compassionate or compelling circumstances exist, documentary evidence provided to support the claim must be provided, and copies of these documents will be kept in the student's file.

CoE changes performed by Admission staff

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Where Dalton decides to extend the duration of the student's study due to any of the conditions above, Dalton will issue a new CoE if required.

- When the student is required to repeat units in a term or study period, Admissions staff will be notified by the Student Support Staff in writing, whether a change to the student COE and/or an update in PRISMS is required.
- Any record of variations to student enrolment must be kept on the student's file and updated in PRISMS as applicable.

3. ONLINE LEARNING

ELICOS programs are excepted from any online learning.

4. COMPLAINTS & APPEALS PROCESS

A student may appeal on the following grounds:

1. The College's failure to record or calculate the student's marks accurately,
2. compassionate or compelling circumstances, or
3. The College's documented policies and procedures that have been made available to the student were not followed.

If a student chooses to access the provider's complaints and appeals process, the College must maintain the student's enrolment while the complaints and appeals process is ongoing as per our *Complaints and Appeals Policy and Procedure*.

1. To lodge an internal appeal, student must submit the Complaints and Appeal Form within 20 days from the receipt of the Breach letter to the Student Administration for an appeal meeting with the Director of Studies and Student Support Officer.
2. The completed Complaints and Appeal Form must be submitted along with the supporting documents if any.
3. The Director of Studies will assess the appeal and provide the student with the outcome in writing within 10 working days from the date the appeal is submitted. Student enrolment will be maintained until the appeal process ends.
4. If the appeal is withheld, the student will remain enrolled and be given the final attempt for the unit of study in order to show satisfactory progress. The student will be advised of a revised study plan by the Director of Studies. The Director of Studies will advise the Admissions team for the re-enrolment of the student to repeat the level.
5. The Admissions Department will issue the student a new Letter of Offer and make the corresponding variation for the CoE (Confirmation of Enrolment) to issue to student. The changes will be recorded in both Wisenet and PRISMS.
6. Students identified as unsatisfactory progress at the second attempt will be issued the Breach letter advising of the college's intent of reporting the student to DHA via PRISMS for unsatisfactory course progress.
7. If the appeal is unsuccessful, the student will receive a written notification explaining the grounds of the appeal rejection. In this letter, student will be also notified of their rights of a further avenue of appealing through the Ombudsman.

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8. Students intending to lodge an external appeal through the Ombudsman within 20 working days of receiving the internal appeal written outcome.
9. Students are required to maintain attendance for the enrolment where they have a valid CoE until the appeal outcome is finalised.
10. The Ombudsman decision will be the final and no further avenues of external appeal are available.

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 over two consecutive study periods) the College does not report the student, and there is no requirement for intervention.

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, ongoing support must be provided to the student through Dalton's intervention strategy, and the College does not report the student.

NOTE: Dalton will only await the outcome of our internal and external appeals process before reporting a student for unsatisfactory course progress (if found in favour of the College).

If a student chooses NOT to access the complaints and appeals processes within the 20-working day period, withdraws from the process or the process is completed, or the decision is in support of Dalton, the College will notify the Secretary of DET via PRISMS that the student is not achieving satisfactory attendance/course progress as soon as practicable (within 5 working days).

When a student is reported for unsatisfactory course progress DHA will consider all the information available and if they decide to consider cancellation, DHA will send a Notice of Intention to Consider Cancellation (NOICC) prior to a decision being made to cancel the student's visa. Students will be given an opportunity to respond to the NOICC and explain their situation.

5. ERRATIC COURSE PROGRESS AS A POTENTIAL INDICATION OF NON-BONA FIDE STUDENTS

If Dalton suspects a student is not a genuine/bona fide student, the College may cancel the student's enrolment, as allowed under Standard 9 and as stated in our Standard 9 policy.

Refer Standard 9 Deferring, suspending or cancelling the overseas student's enrolment

A non genuine/non bona fide student is defined by Dalton as a student with erratic (irregular/inconsistent) course progress or does not progress in their course and does not attend/does not participate in regular classes. The College will ensure that prior to enrolment; students are made aware of the grounds on which cancellation of enrolment may occur as provided to them via the International Student Handbook.

All breaches to student's visa conditions must be reported via PRISMS even if the student has ceased study.

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