

MONITORING COURSE PROGRESS AND INTERVENTION - VET POLICY and PROCEDURE

PURPOSE

The purpose of this policy is to ensure the RTO:

- monitors the course progress of students
- identify and offer support to those at risk of not meeting course progress requirements
- only extend the duration of an overseas student's enrolment in certain circumstances and advise them of potential impacts on their student visa
- only deliver online learning in accordance with the online learning requirements for their sector.

APPLICABLE LEGISLATION/ STANDARDS

National Code of Practice for Providers of Education and Training to Overseas Students 2018 ESOS Act.

Standards for RTOs 2015 - National Vocational Education and Training Regulator Act 2011

English Language Intensive Courses for Overseas Students (ELICOS) Standards 2018

REFERENCE

National Code – Standard 8: Overseas Student Visa Requirements

National Code – Standard 10: Complaints & Appeals

SRTOs 2015 – Standard 1

1 MONITORING COURSE PROGRESS - VET

The ESOS framework and DHA visa conditions require that VET students maintain satisfactory course progress as a condition of their student visa.

Dalton will advise the requirements to achieve satisfactory course progress requirements to students on commencement. Any variations are advised to students in writing as soon as they are known.

The expected duration of study specified on the overseas student's Confirmation of Enrolment (CoE) must not exceed the Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) registered duration for the course.

1.1 Course progress requirements

Course Progress

Unsatisfactory progress is defined by the College as not successfully completing or demonstrating competence in or below 50% of the course requirements in a study period.

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.

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'Study period' - For the purpose of course progress, Dalton defines a study period as 1 term of approximately 7-11 weeks depending on each course. Please refer to **Schedule 1** for the study periods and requirements to achieve satisfactory course progress per study period for each course.

'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).
- or
- where the registered provider was unable to offer a pre-requisite unit, or the overseas student has failed a prerequisite unit and therefore faces a shortage of relevant units for which they are eligible to enrol.

These are only some examples of what may be considered compassionate or compelling circumstances.

1.3 Monitoring Process – Course Progress

Procedure

1. Recording Results

Dalton College will assess, monitor and record student results on completion of *each unit of competency* or at the *end point of each study period*, at the minimum.

The College will at the minimum monitor and record student's course progress on completion of each unit of competency or a minimum of once per study period.

The trainer **MUST** monitor, record and assess student course progress on completion of each unit of the course or at the minimum, at the end of each study period. Details are to be kept on the student academic file and recorded in Wisenet.

2. Regular course progress review

Trainers will discuss any concerns with students and offer assistance as they arise, to help prevent students falling behind in their course progress. At any time, when a trainer becomes aware of issues or has concerns regarding the student's progress, they should first speak to the student (ensuring that all communication is recorded in the student's individual file) and then advise the Academic Manager of these concerns.

At any time during the study period if student is identified by their teacher /trainer/facilitator as 'a possible risk', the student will be given a verbal warning and offered counselling and assistance. This must be documented on the students file and advice provided to the Academic Manager /Student Support Officer.

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3. Unsatisfactory course progress

Any student that fails a unit of competency in their course may be considered 'at risk' to not complete the course in the expected duration and intervention strategies commenced at any point, if approved by the Academic Manager/Compliance Manager/CEO.

Students are notified as soon as it is identified that they **are 'at risk'** to not achieve satisfactory course progress (NC in 50% or more of units attempted) during a study period. Trainers notify the students about them being high risk and will closely monitor student progress and offer additional support to students if necessary.

Teachers/Trainers will discuss any concerns with students and offer assistance as they arise, to help prevent students falling behind in their course progress. Teachers /Trainers will constantly monitor the progress of students and report any concerns to the Academic Manager/Compliance Manager/CEO as soon as identified.

At the end of the study period, should students continue to not meet satisfactory course progress they will be notified in writing as soon as it is identified they **are 'at high risk'** to not achieve satisfactory course progress A 1st Warning Letter will be issued to students. Intervention strategies will be also be activated requiring them to meet with a teacher/ trainer/academic manager to discuss what action/intervention strategies are to be taken. (Please refer to the section on Intervention Strategies for more details)

During the subsequent study period, should students continue to not meet satisfactory course progress (50% or less of the units completed for current study period + unsatisfactory in previous term/1st warning letter), they will be notified in writing as soon as it is identified they are 'at high risk' to not achieve satisfactory course progress. A 2nd Warning Letter will be issued. Students will be given 5 days to contact the school to discuss and agree to additional intervention strategies. The warning letters will also advise students unsatisfactory course progress (50% or less than 50% competency over two consecutive study periods), may lead to them being reported to DHA and the possible cancellation of their visa.

If a student is identified for a second, but not consecutive study period as not making satisfactory course progress, the College **does not** report the student for unsatisfactory course progress.

4. Reporting process

Dalton College must report overseas students who do not meet course progress.

Students who are identified as having unsatisfactory course progress over two consecutive study periods will be reported to DHA for unsatisfactory course progress. Students in this instance will be issued with an Intention to Report Letter for not making satisfactory progress, outlining to them they have 20 working days to access the College's complaints and appeals process.

The Notice of Intention to Report issued must describe intervention so far/warning letters already sent/ what has taken place and the intention to report the student. It also must detail their right to appeal the decision and provide advice on what the student must do regarding their visa.

All records will be kept on student files.

Dalton College must maintain the overseas student's enrolment by only reporting a breach of course progress in Provider Registration and International Student Management System (PRISMS) if:

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- the internal and external complaints processes have been completed and the breach has been upheld;
- the overseas student has chosen not to access the internal complaints and appeals process within the 20 working day period;
- the overseas student has chosen not to access the external complaints and appeals process;
- or
- the overseas student withdraws from the internal or external appeals process by notifying the registered provider in writing.

5. Intervention strategies

Any student that fails a unit of competency in their course may be considered 'at risk' to not complete the course in the expected duration and intervention strategies can be commenced at any point, if approved by the Academic/Compliance Manager.

Intervention strategies are tailored to meet each student's individual needs. Any intervention required is discussed with students as needed.

An intervention strategy could be activated by:

- A letter to the student
- Personal contact with the student by a suitably authorised staff member
- Contact with the student by the course counsellor/convenor or
- Other methods in accordance with the provider's policy)

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
 - receiving assistance with personal issues which are influencing progress
 - receiving mentoring
 - 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.

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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.

Reduced Study Load

A student CAN enrol in less than a 'full-time' load in any study period if:

- there are compassionate or compelling reasons for reducing the load
- the reduced load is part of the provider's intervention strategy
- the student has studied, or plans to study, extra units in another study period
- the student has only a few units left to complete and these do not constitute a full-time load
- Pre-requisite units are not available in that study period.

By studying less than what used to be considered a 'full-time' load, a student is at risk of not completing the course within the expected duration as specified on the student's CoE. Therefore, the student may need to catch up by studying subjects during a non-compulsory study period or by overloading in some compulsory study periods to compensate for those study periods in which the student was studying a reduced load.

A student who deliberately under-enrols may represent a risk for Dalton's compliance of Standard 9 (*refer Student Rules/Code of Behaviour*). In this instance Dalton College would implement one of two options -

- Cancel the student's enrolment when the student refuses to enrol in an appropriate load as outlined in *Dalton's Deferring, Suspending or Cancelling a Student's Enrolment Policy and Procedure, Standard 9 and stated on the Written agreement Std 2 & 3.*

Or

- Document the student's behaviour and, if the student requests an extension of duration of study, refuse to extend the CoE as outlined in *Dalton's Deferring, Suspending or Cancelling a Student's Enrolment Policy and Procedure, Standard 9*. Dalton must inform the student of its intention to cancel the student's enrolment and notify the student that he or she has 20 working days to access the Complaints and Appeals process. If the second option is chosen Dalton must make the reasons for not granting a further CoE clear to the student.

Regardless of the option chosen, Dalton must be able to demonstrate that it has monitored the student's load and taken action to keep the student on track to finish within the duration.

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

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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

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. 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 Academic Manager and Student Support Officer.
2. The completed Complaints and Appeal Form must be submitted along with the supporting documents if any.
3. The Academic Manager 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 Academic Manager. The Academic Manager will advise the Admissions team for the re-enrolment of the student to repeat the level.

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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.
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.

4. 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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Schedule 1: Requirements for achieving satisfactory course progress

Course of Study	Duration of study	Total No. of units	No. of Terms	Each Study Period	no of enrolled units per Study period	No of units required to complete to satisfy 50% academic requirement per study period
BSB50120 Diploma of Business	40 weeks	12	4	10 weeks	3	2
BSB60120 Advanced Diploma of Business	60 weeks	10	5	10 weeks	2	1
BSB40520 Certificate IV in Leadership and Management	33 weeks	12	3	11 weeks	4	2
BSB50420 Diploma of Leadership and Management	40 weeks	12	4	10 weeks	3	2
BSB60420 Advanced Diploma of Leadership and Management	60 weeks	10	5	10 weeks	2	1
BSB80120 Graduate Diploma of Management (Learning)	40 weeks	8	4	10 weeks	2	1
CHC30121 Certificate III in Early Childhood Education & Care	42 weeks	17	3	14 weeks	6	3
CHC50121 Diploma of Early Childhood Education & Care	44 weeks	15	4	11 weeks	4	2

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COURSE PROGRESSION BREACH REPORTED LETTER

CRICOS PROVIDER: 03450E

RTO TOID: 41340

Date : dd/mm/yyyy

Student Name : [insert student name]

Student Number: GEC00000XX

Student Address: [insert postal address of student]

[insert course code and title]

Dear [insert student name],

Subsequent to Dalton College issuing to you a NOTICE OF INTENTION TO REPORT Letter on [insert date] and in the absence of no correspondence from you regarding any intention to appeal the decision of reporting the breach of satisfactory course progress within 20 business days, I am advising you that Dalton College has now notified the appropriate government agency(s) via the PRISMS reporting system regarding the breach of your Visa conditions.

The Department of Immigration and border protection as a result of this report may cancel your student visa. I recommend that you contact DIBP regarding the status of your student visa.

Should you have any queries, please feel free to contact Dalton College in regards to your enrolment.

Yours sincerely,

[Admission staff name]

Administration Manager

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