National Code Standard 8

This policy and process outlines Student Completion of Studies in the Duration of their COE (1); Monitoring of Course Progress (2)

### 1 COMPLETION OF STUDIES IN THE EXPECTED DURATION OF THE CONFIRMATION OF ENROLMENT and ONLINE DISTANCE STUDY

**Choice Business College (CBC)** staff will constantly monitor student assessments and workloads and record any changes /variations on the student file.

CBC will monitor every students enrolment load a minimum of once per study period (per term / 10 weeks) to ensure students can complete the course in the duration as per the Confirmation of Enrolment (COE).

A generic course progress policy may not be appropriate for more than one course. Courses that require additional or varied progress rules will be provided a separate course progress policy, REFER 2 below.

Facilitators/trainers will discuss any concerns with students and offer assistance as situations arise to help prevent students falling behind in their course progress. Facilitators/trainers will constantly monitor the progress of students and report any concerns to the CEO as soon as identified.

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 CEO, at the discretion of the CEO.

Students may take a normal, reduced or increased study load in each study period, as long as the workload is monitored to ensure the student completes the course within the duration specified on the CoE.

The expected course duration for overseas students should not differ from the expected duration for domestic students.

CBC will ensure students do not exceed the 1/3 of the total course by online /distance mode. In each compulsory study period students must complete at least one unit face to face unless it is the last unit of the course. Details of online/distance modes are also to be kept on the student file and listed on the Student Letter of Offer.

CBC will only extend the duration of a COE -

- Under **compassionate** or **compelling circumstances**, when it is clear the student will not be able to complete by the end date of the COE.
- where intervention strategies have been implemented for students at risk of not completing satisfactory course progress
- where there is an approved deferment or suspension of study

Student progress is assessed and recorded at the minimum on completion of each unit of competency / or once each study period.

National Code Standard 8

Any intervention required is acted upon and discussed with students as needed. Students are encouraged to increase their workloads to 'catch up' on any missed units.

Compassionate or compelling circumstances may be deemed as serious illness; bereavement of a closely related family member (evidence will be required); natural disasters; traumatic experience or political upheaval in home county.

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 CBC may grant the student a less than 'full time' workload. This would be monitored as part of the student's intervention strategy.

CBC will issue a new COE should the student need to extend the duration of their course.

A student who deliberately under-enrols may represent a risk for CBC's compliance of Standard 8. This could result in a cancellation of the student's enrolment as per 'Student Rules'.

In this instance CBC would implement one of two options -

- cancel the student's enrolment when the student refuses to enrol in an appropriate load; or
- Document the student's behaviour and, if the student requests an extension of duration of study, refuse to extend the CoE.

Intervention strategies are tailored to meet each student's individual needs. Formal intervention strategies and counselling of the student will be implemented.

Intervention Strategies could include:

- attending academic skills programs
- attending tutorial or study groups
- receiving individual assistance / mentoring
- attending study groups
- attending counselling
- receiving assistance with personal issues which are influencing progress
- being placed in a suitable alternative subject within a course or a suitable alternative course; or
- a combination of the above and a reduction/increase in course load.

#### **ONLINE / DISTANCE**

- Only courses that are registered with the regulator as having online/distance components can be offered for this mode of study.
- No international student can study entirely online or by distance in any compulsory study period.
- Students may study <u>up to but no more than 1/3 of their total course</u> by online or distance mode.
- Students units of competency are monitored each compulsory study period to ensure they are studying at least one unit (1) face to face unless it is the final unit of the course
- During NON-COMPULSORY study periods students may study entirely by distance or online. However, students cannot study more than 1/3 of the total enrolment load by online or distance learning.
- Students are monitored to ensure they will complete their course with the Expected Duration as per their COE.

NOTE: A student is expected to complete their course within the duration of their COE **unless** compassionate and compelling circumstances are approved where the student was unable to attend classes eg due to illness or the college was unable to offer a pre-requisite unit; the student is under an intervention strategy identified as at risk of not meeting course progress or the student has an approved deferment or suspension of studies granted refer *Deferring, Suspending or Cancelling a Student's Enrolment Policy and Procedure Standard 9.* 

#### **PROCEDURE**

The progress of each student is monitored, recorded and assessed for each unit of competency in which they are enrolled.

Student progress must be monitored to ensure they are on track to complete within the duration of their COE. This is recorded via RTO Manager and relevant notes etc kept on student files.

The Compliance Manager/CEO will monitor PRISMS a minimum of monthly to ensure CoEs are issued no longer than the approved duration as registered on CRICOS via the *Course Duration Comparison Report*.

Any change to the course's approved delivery mode, must first be sought by the regulator before implementation.

CBC teaching staff will monitor every students enrolment load a minimum of once per study period/term (once per term) and on completion of each unit of competency to ensure students can complete the course in the duration as per the Confirmation of Enrolment (COE) and add notes/records to the student file.

After all results are available, Trainers request to the Academic Manager to authorise the addition of units that have been failed in the previous term to be added to the student's current term timetable to enable the student to complete units within the expected duration and fulfil prerequisite requirements. Support /intervention would be offered to the student at this time.

CBC will only extend the duration of a COE -

- Under **compassionate or compelling circumstances**, when it is clear the student will not be able to complete by the end date of the COE.
- where intervention strategies have been implemented for students at risk of not completing satisfactory course progress
- as approved deferment or suspension of study

Staff is to firstly encourage students to increase their workloads to 'catch up' on any missed units. The College is open 5 days per week to further assist students. Trainers are to consult with the Academic Manager before increasing or decreasing student workloads.

Where CBC decides to extend the duration of the student's study due to any of the conditions above, CBC 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 <u>must</u> be done within fourteen days of the determination that the student will need to change/extend the duration of their COE.

#### **CoE** changes performed by Admission staff

- When the student is required to repeat units in a term or study period, Admissions staff
  will be notified by the Academic Manager in writing, whether or not 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.
- Any record of online and distance education study must be kept on students files.

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 CBC's compliance of Standard 9 (refer Student Rules/Code of Behaviour). In this instance CBC would implement one of two options -

• Cancel the student's enrolment when the student refuses to enrol in an appropriate load (as outlined in CBC's *Deferring Suspending or Cancelling Student's Enrolment Policy and procedure Std 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 CBC 's *Deferring Suspending or Cancelling Student's Enrolment Policy Std 9*.

CBC 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 CBC must make the reasons for not granting a further CoE clear to the student.

Regardless of the option chosen, CBC 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.

#### ONLINE / DISTANCE

- Student study loads are monitored each compulsory study period by the Academic Manager to ensure students do not study more than 1/3 of their total course by online or distance mode. This is recorded and monitored via RTO Manager
- Units of competency are also monitored at least each compulsory study period to ensure students are studying at least one unit (1) face to face.
- Online / distance units undertaken during NON COMPULSORY study periods are also
  monitored in the same manner to ensure no more than 1/3 of the total enrolment load
  is by online or distance learning.
- Students are constantly monitored to ensure they will complete their course with the Expected Duration as per their COE.
- Students are monitored to ensure they do not study their last unit of a course during a <a href="mailto:compulsory study period">compulsory study period</a> by ONLINE OR DISTANCE learning.
- Should a student wish to complete their last unit of competency via online or distance
  that is in a compulsory study period, the student would be required to request their COE
  be cancelled (no longer on a student visa) and return to their home country and study the
  final unit by distance or online study.
- All applicable evidence is kept on the RTO Manager and student file.
- Course duration comparison reports (PRISMS) are monitored by the Compliance Officer a
  minimum of monthly to ensure COEs are not generated over the allowed durations. All
  entries on the report must be investigated/noted/corrected as applicable.

#### 2 MONITORING COURSE PROGRESS POLICY & PROCEDURE

Choice Business 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 ESOS framework and Department of Home Affairs (DHA) visa conditions require that students maintain satisfactory academic progress in their course.



A generic course progress policy may not be appropriate for more than one course. Courses that require additional or varied progress rules will be provided a separate course progress policy.

Unsatisfactory progress is defined by Choice Business College (CBC) as not successfully completing or demonstrating competence in at least 50% of the course requirements in a study period.

CBC advises the course and study requirements of each study period clearly to students on commencement. Any variations are advised to students in writing as soon as they are known. Trainers will discuss any concerns with students and offer assistance as they arise to help prevent students falling behind in their course progress.

Trainers will constantly monitor the progress of students and report any concerns to the Academic Manager/CEO as soon as identified.

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 CEO. This is at the discretion of the CEO.

For the purpose of course progress CBC defines a study period as 1 term (approximately 10 study weeks).

CBC 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 (study period = 1 term).

Students are notified in writing as soon as it is identified they are 'at risk' to not achieve satisfactory course progress (less than 50% of course requirements) (Warning Letter 1) during a study period.

Students will be required to meet with a trainer/academic manager to discuss what action/intervention strategies are to be taken.

Intervention strategies are tailored to meet each student's individual needs. Formal intervention strategies and counselling of the student will be implemented.

- Intervention Strategies could include:
  - receiving individual assistance

attending tutorials/study groups

- 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.

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 (less than 50% of course requirements) (Warning Letter 2). Students will be required to meet with a

National Code Standard 8

trainer / academic manager to discuss further intervention strategies to be taken.

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 CBC's complaints and appeals process. All records will be kept on student files.

#### **BASIC PROCESS:**

- 1. Students, who fail more than 50% of their enrolled units in any given term (study period) will be deemed as 'at risk', receive a warning letter and offered counselling/intervention strategies.
- 2. Students who continue to fail more than 50% of their enrolled units in any given term (study period) will be deemed as 'at high risk' and receive a 2nd warning letter and required to attend counselling/undertake intervention strategies.
- 3. Students who fail more than 50% of the course requirements over two consecutive study periods will receive an 'Intention to Report Letter'.
- 4. Students are given 20 working days from the date of the letter to initiate an internal or external appeal.
- 5. Student enrolment will be maintained during an appeals process. Refer Complaints and Appeals Policy and Procedure.

#### PROCEDURE AND INTERVENTION STRATEGY

The trainer/facilitator 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.

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 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.

If the student fails more than 50% of the course requirements in a study period, they must be sent an 'at risk of being reported' for unsatisfactory course progress warning letter and advice they are required to meet with the Academic Manager to discuss / action intervention strategies. Students may take a support person to this meeting.

If the student continues to fail more than 50% of their units of competency in a study period, they will be sent an 'at high risk of being reported' for unsatisfactory course progress warning letter and required to meet with the Academic Manager to discuss further action / intervention strategies. Students may take a support person to this meeting.

National Code Standard 8

The warning letters will also advise students unsatisfactory course progress (less than 50% competency over two consecutive study periods), may lead to them being reported to DHA and the possible cancellation of their visa. Students will also be told of their rights to appeal such a decision and provided a copy of the Complaints and Appeals Policy and Procedure.

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.

All records MUST be kept on the student file.

Course progress in a non-compulsory study period is to be disregarded when considering whether or not a student has made satisfactory course progress over two consecutive study periods.

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

When a student fails to achieve 50% of the course requirements over two consecutive compulsory study periods this will be deemed as not making satisfactory academic progress.

The student will then be provided with a written notice of 'Intention to Report' to DHA, informing them that they are able to access the Complaints and Appeals process, and that they have 20 working days in which to do so.

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

A student may appeal on the following grounds:

- i. CBC's failure to record or calculate the student's marks accurately,
- ii. compassionate or compelling circumstances, or
- iii. CBC's documented policies and procedures that have been made available to the student.

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

National Code Standard 8

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) CBC 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 CBC's intervention strategy, and CBC does not report the student.

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

If the student chooses not to access the complaints or appeals processes within the 20 working day period or withdraws from the process OR

On completion of the appeals process unsatisfactory course progress is confirmed, they will be reported to DET and DHA via PRISMS within 5 working days of finalising the decision to report, for unsatisfactory course progress.

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.

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

If CBC suspects a student is not a genuine/bona fide student, CBC 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 policy and procedure.

A non-genuine/non-bona fide student is defined by CBC 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. CBC 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.

NOTE: To report a student for not making satisfactory progress, CBC staff must go into the Student Course Variation screen, from the drop down list under 'Reason for Course Variation', and choose *Unsatisfactory Course Progress* 

National Code Standard 8 must be adhered to at all times

#### FORMS/LETTERS /TEMPLATES FOR POLICY/PROCEDURE

Course Progress Warning Letter 1 Course Progress Warning Letter 2 Course Progress Notice of Intention to Report