

The English Language School in Sydney
Monitoring Student Course Progress, Attendance and
Course Duration Policy and Procedures

ESOS National Code Standard 8

Overseas Student Visa Requirements

The English Language School in Sydney Monitoring Student Course Progress,
 Attendance and Course Duration Policy and Procedures

Policy and Procedure Name	Monitoring Student Course Progress, Attendance and Course Duration Policy and Procedures
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Administrator	ELSIS Quality and Compliance Officer
Compliance and Monitoring	DoS Compliance Manager

8.1 Purpose and Scope

8.1.1 This policy and procedures for monitoring overseas student course progress and attendance, to ensure the student is in a position to complete the course within the expected duration specified on their CoE, is designed to ensure compliance with 'Standard 8 – 'Overseas Student Visa Requirements' of the National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students.

8.1.2 The purpose of this policy is to:

- identify and describe ELSIS' approach to monitoring students' Course Progress, Attendance and Duration;
- articulate the ELSIS commitment to identifying, and proactively notifying and counselling, students who are at risk of failing to meet their Course Progress and Attendance requirements;
- provide a clear framework for reporting students, under section 19 of the ESOS Act, who have breached the Course Progress and Attendance requirements;
- Ensure students complete their courses within the duration specified on their confirmation of enrolment (CoE).

8.1.3 This policy applies to all students on student visas enrolled in courses in ELSIS Sydney, Brisbane and Melbourne campuses. This policy also applies to all staff involved in the management and reporting of ELSIS students' Course Progress and Attendance requirements.

8.1.4 This policy and procedures should be read in relation to policies and procedures relating to:

- international student services;
- critical incident response management; and
- complaints and appeals.

8.2 Policy and Procedures

8.2.1 ELSIS provides high quality educational services to international students and applies its policy and procedures according to the *National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students (2018)*.

8.2.2 The English Language School in Sydney's Standard 8 of The National Code, 'Overseas Student Visa Requirements', applies to all of its Certificate Courses. It is the key element in a broader strategy designed to ensure the early identification of all ELSIS students who are at risk of failure to meet course attendance, progress and course duration requirements.

8.2.3 This policy and procedure applies to all ELSIS students at the Sydney, Brisbane and Melbourne Campuses. The relevant ELSIS Course Coordinators are responsible for the implementation of the Course Progress and intervention strategies.

8.3 *Monitoring overseas student progress, attendance and course duration.*

- 8.1 *The registered provider must monitor overseas students' course progress and, where applicable, attendance for each course in which the overseas student is enrolled.*
- 8.2 *The expected duration of study specified in the overseas student's CoE must not exceed the CRICOS registered duration.*
- 8.3 *The registered provider must monitor the progress of each overseas student to ensure the overseas student is in a position to complete the course within the expected duration specified on the overseas student's CoE.*
- 8.4 *The registered provider must have and implement documented policies and processes to identify, notify and assist an overseas student at risk of not meeting course progress or attendance requirements 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.*
- 8.5 *The registered provider must clearly outline and inform the overseas student before they commence the course of the requirements to achieve satisfactory course progress and, where applicable, attendance in each study period.*

8.3.1 ELSIS is required to monitor student course attendance and progress throughout the period of study to ensure that students are able to complete their course within the expected duration specified on their CoE, and to meet the conditions of their student visa.

8.3.2 The English Language School in Sydney's *Monitoring Student Progress, Attendance and Course Duration Policy and Procedures* (National Code Standard 8) outlines the means by which the School systematically monitors students' progress and attendance and is proactive in notifying and counselling students who are at risk of failing to meet their course progress and attendance requirements. Students who are identified as having difficulty, as evidenced through their assessment tasks, participation in academic activities and other indicators of academic progress, are offered a range of support options.

8.3.3 Prior to commencement of their course at ELSIS, students are informed of the requirements necessary to achieve satisfactory course progress and attendance. This information is given to them during the student Orientation process, is included in the ELSIS Orientation Guide, on the ELSIS website, and is outlined in the ELSIS terms and conditions of enrolment and in the ELSIS Application form.

8.4 *Schools, ELICOS and Foundation Programs: course progress and attendance requirements*

- 8.6 *The registered provider of a school, ELICOS or Foundation Program course must have and implement a documented policy and process for monitoring and recording attendance of the overseas student, specifying:*
 - 8.6.1 *requirements for achieving satisfactory attendance for the course which at a minimum must be 80 per cent—or higher if specified under state or territory legislation or other regulatory requirements—of the scheduled contact hours*

- 8.6.2 *the method for working out minimum attendance under this standard*
- 8.6.3 *processes for recording course attendance*
- 8.6.4 *details of the registered provider's intervention strategy to identify, notify and assist overseas students who have been absent for more than five consecutive days without approval, or who are at risk of not meeting attendance requirements before the overseas student's attendance drops below 80 per cent*
- 8.6.5 *processes for determining the point at which the overseas student has failed to meet satisfactory course attendance.*

Attendance Monitoring and Recording

8.4.1 Satisfactory Course Attendance for ELSIS is defined as attending at least of 80% of scheduled course contact hours per study period.

Daily Attendance Monitoring and Recording Procedure by Teachers

8.4.2 Teachers monitor course attendance on a daily basis:

- The teacher marks the Attendance Roll at the beginning and end of every session (class day).
- All students arriving from 20 to 30 minutes late will be recorded as a Late Arrival (L), and all students arriving more than 30 minutes late will be recorded as Absent (A) for that hour.
- Similarly, all students leaving from 20 to 30 minutes early will be recorded as Early Leaving (EL), and students leaving more than 30 minutes early will be recorded as Absent (A) for that hour.
- These entries will be included in attendance calculations, with three (3) "L" and/or "EL" entries in a week amounting to one hour Absent (A).
- All Absences (A) are marked hourly, with four (4) hours Absent considered as one session (day) Absent.
- The Attendance Roll is locked nightly in the Teacher's Room for security purposes.

8.4.3 At the end of each day, teachers enter all absences into the RTO Manager student management system. Teachers are to advise Student Services if students have been absent for 2 consecutive timetable days without approval. Student Services will attempt to contact the student to query the *absenteeism*.

8.4.4 If, during the query issues relating to personal well being, accommodation, transport, study progress or similar issues are identified, Student Services will brief the Course Coordinator who will then speak to the student to decide if they need any welfare arrangements need to be scheduled.

Weekly Attendance Monitoring and Recording Procedure by Student Services

8.4.5 Student Services review each student's attendance on a weekly basis. The RTO Manager student management system ensures that an up-to-date electronic master copy of all student attendance records is kept off-site at all times and regularly backed up.

Satisfactory/Unsatisfactory Attendance Procedures

8.4.6 ELSIS may decide not to report a student for breaching 80% Satisfactory Course Attendance if the student produces documentary evidence demonstrating compassionate and compelling circumstances, adheres to an Intervention Strategy and has attendance of at least 70% of scheduled course contact hours per study period.

Intervention Strategy

8.4.7 When an ELSIS student is considered to be 'at risk' of not successfully completing their studies within the registered course duration, the School shall make available and activate an intervention strategy for the student.

8.4.8 Student Attendance is monitored regularly by class teachers and recorded for all ELSIS students. The intervention type and strategy depends on a student's level of absenteeism and reasons for the absences. All stages of the Intervention Strategy will be recorded in the 'diary' section of the Student's records in RTO Manager.

Student Services procedure for notifying students who they have failed to meet satisfactory attendance requirements

8.4.9 If a student's overall attendance declines before the end of their course enrolment, they are sent warning letter via email and are also notified by their teachers. A list of student attendance below 85% updated weekly and displayed in the teachers' staffroom.

1. Students receive a *Student Attendance: 'At Risk' Warning Letter* when their class attendance is below 90% of their course contact hours.
2. Students receive a *Student Attendance Below 85%: Notice to Report to Course Coordinator* when their class attendance is below 85% of their course contact hours.
3. Students receive a *Student Attendance: Letter of Intention to Report to DHA* for unsatisfactory attendance when their class attendance is below 80% of their course contact hours.
4. Student receives *Notification of Cancellation of Enrolment* and Reporting to DHA.

Student Attendance: At Risk' Warning Letter

8.4.10 If a student's overall attendance falls below 90% before the end of their course enrolment, an 'At Risk' Warning Letter' is generated by RTOM and sent to students via email.

8.4.11 Similarly, if a student fails to attend classes without notification or known reason for two (2) consecutive days, that student will be deemed to be 'at risk' of not attending at least 80% of the scheduled contact hours for the course and Student Services will attempt to contact the student via telephone and email to query the absenteeism.

8.4.12 RTOM keeps record of all warning letters sent to students in individual student diaries

8.4.13 If the email contact is successful, the student will be required to discuss their low attendance with their teacher.

8.4.14 The teacher will:

- ask the student to explain the reasons for their absences;
- remind the student of the Student Visa condition which requires them to attend at least 80% of the contact hours scheduled for each study period of their course;
- warn students that unsatisfactory attendance will be reported to DHA (Department of Home Affairs) which may result in the cancellation of their Student Visa.

8.4.14 If during the discussion issues relating to personal well-being, accommodation, transport, study progress, or similar issues are identified, the teacher will brief their Coordinator who will then speak to the student to decide if a welfare meeting needs to be scheduled

8.4.16 A student file note is entered in the 'diary' section in RTO Manager by the Coordinator to document the meeting with the Coordinator and/or Welfare counselor, highlighting issues discussed and outcomes.

Student Attendance Below 85%: Notice to Report to Course Coordinator

8.4.17 If the weekly monitoring of attendance indicates that a student's overall attendance falls below 85% before the end of their course enrolment, a Below 85% 'At Risk' Notice to Report to Course Coordinator is generated by RTO and sent to students via email.

8.4.18 All students sent this letter are required to make an appointment with their Course Coordinator who will:

- ask the student to explain the reasons for their absences;
- remind the student of the Student Visa condition which requires them to attend at least 80% of the contact hours scheduled for each study period of their course;
- warn students that unsatisfactory attendance will be reported to DHA (Department of Home Affairs) which may result in the cancellation of their Student Visa.
- decide if the student is to be placed on a Student Learning Contract. To place a student on a learning contract the Coordinator will consider if:
 - the student's level of academic progress is sufficient for them to complete the course within the expected duration specified on their CoE.
 - the student's assessment tasks, participation in class activities or other indicators of academic progress meet the requirements of ELSIS Progress Policy.

8.4.19 If put on a Student Learning Contract, they will be required to:

- Maintain their attendance at the current level;
- Sign a Learning Contract with their Course Coordinator in cooperation with the class teacher at the end of each week.
- Student must be made aware that any breach to the learning contract terms may lead to student being reported to DHA

8.4.20 A student file note is entered in RTO Manager to document the outcome of the meeting and/or content of the Learning Contract which is to be scanned and uploaded into RTO Manager by the Course Coordinator at the end of each class week.

8.4.21 If, during the discussion issues relating to personal well-being, accommodation, transport, study progress, or similar issues are identified, the coordinator will decide if a welfare meeting needs to be scheduled. All meetings with the student will be recorded in RTO Manager 'Diary'.

8.5 *Schools, ELICOS and Foundation Programs: course progress and attendance requirements*

8.7 *The registered provider must have and implement a documented policy and process for monitoring and recording course progress for the overseas student, specifying:*

- 8.7.1 *requirements for achieving satisfactory course progress for the course*
- 8.7.2 *processes for recording and assessing course progress*
- 8.7.3 *details of the registered provider's intervention strategy to identify, notify and assist students at risk of not meeting course progress requirements in sufficient time for those students to achieve satisfactory course progress*
- 8.7.4 *processes for determining the point at which the student has failed to meet satisfactory course progress.*

Course Progress

8.5.1 Student Course Progress is determined by grades attained for summative and formative assessments. For students enrolled in:

- General Intensive English Course, course progress is monitored after each testing period every 6 weeks; or
- IELTS, Course Progress is monitored after each mock test which is administered every 3 weeks; or
- FCE, Course Progress is monitored every 4 weeks; or
- EAP Courses, Course Progress is monitored with each summative assessment approximately every 2 to 3 weeks.
- PREAP, Course Progress is monitored with each summative assessment each week following week 2 of the course.

Formative assessments occur throughout each ELSIS course on a weekly basis.

Passing and Failing Grades

No intention to progress / No Pathway Programme

8.5.2 For the purpose of assessing Course Progress:

GIE and EAP 1 & 2 / PREAP Courses: if the student is **not intending to progress** to a higher level of study in any course or is not enrolled in a Pathway Programme:

- The overall grade of D, C, B, A are considered to be passing grades.
- A student who has an overall score of 50% or more for all summative assessment tasks in a study period shall be regarded as having met Course Progress requirements.

- The overall grade of Fail (F) is considered a failing grade.
- A student who has an overall score of below 50% for all summative assessment tasks in a study period shall be regarded as having not met Course Progress requirements.

FCE Preparation Course:

- The grades of D, C, B, A are considered to be passing grades.
- A student who has an overall score of 40% or more for all summative assessment tasks in a study period shall be regarded as having met Course Progress requirements.
- The grade of Fail (F) is considered a failing grade.
- A student who has an overall score of below 40% for all summative assessment tasks in a study period shall be regarded as having not met Course Progress requirements.

IELTS Preparation Course:

- The grades of D, C, B, A are considered to be passing grades.
- A student who has an overall score above IELTS band 4 for all summative assessment tasks in a study period shall be regarded as having met Course Progress requirements.
- The grade of Fail (F) is considered a failing grade.
- A student who has an overall score band 4 or below for all summative assessment tasks in a study period shall be regarded as having not met Course Progress requirements.

Intention to Progress / Pathway Programme

8.5.3 Each course carries specific Course Progress requirements; if the student **is intending to progress** to a higher level of study in any course, or **is enrolled in a Pathway Programme**.

General Intensive English Course

8.5.4 For the purpose of assessing Course Progress:

- The minimum grade of B is considered to be a passing grade, where a student may progress to the next level of study. Grade B is regarded as having met Course Progress requirements.
- The grades of B minus, C, D are considered to be failing grades, where the student cannot progress to the next level of study. These grades are regarded as not having met Course Progress requirements.

Preliminary English for Academic Purposes (PREAP) Progression to EAP 1

8.5.5 For the purpose of assessing Course Progress:

- The minimum grade of B is considered to be a passing grade, where the student is intending their next course of study to be at the level of EAP 1. This grade is regarded as having met Course Progress requirements.

- The grades of B minus, C, D are considered to be failing grades, and are regarded as having not met Course Progress requirements.

English for Academic Purposes 1 (EAP 1) Progression to Certificate IV and Diploma Vocational Courses

8.5.5 For the purpose of assessing Course Progress:

- The minimum grade of B is considered to be a passing grade, where the student is intending their next course of study to be at the level of Certificate IV or Diploma Vocational Courses. This grade is regarded as having met Course Progress requirements.
- The grades of B minus, C, D are considered to be failing grades, and are regarded as having not met Course Progress requirements.

English for Academic Purposes 2 (EAP 2) Progression to Bachelor Degree

8.5.6 For the purpose of assessing Course Progress:

- The minimum grade of B is considered to be a passing grade, if the student is intending their next course of study to be at the level of a Bachelor's degree and is regarded as having met Course Progress requirements.
- The grades of B minus, C, D are considered to be failing grades and shall be regarded as having not met Course Progress requirements.

English for Academic Purposes 2 (EAP 2) Progression to Master's Degree

8.5.7 For the purpose of assessing Course Progress:

- The minimum grade of A is considered to be a passing grade, if the student is intending their next course of study to be at the level of a Master's degree and is regarded as having met Course Progress requirements.
- The grades of A minus, B, C, D are considered to be failing grades and shall be regarded as having not met Course Progress requirements.

Intervention Strategy

8.5.8 When an ELSIS student is considered to be 'at risk' of not successfully completing their studies within the registered course duration, the School shall make available and activate an intervention strategy for the student.

Student Course Progress is monitored regularly by class teachers and recorded for all ELSIS students. The intervention type and strategy depends on a student's level of academic performance. All stages of the Intervention Strategy will be recorded in the 'diary' section of the Student's records in RTO Manager.

If a student's course progress declines before the end of their course enrolment, they are notified by Student Services who generate warning letters. These are given to teachers to pass onto their student. The student is also notified by email. The warning letters are as follows:

1. *Student Progress: 'At Risk' Warning Letter.*
 2. *Student Progress: Notice to Report to Course Coordinator.*
 3. *Student Progress: Letter of Intention to Report to DHA for Unsatisfactory Course Progress.*
 4. *Notification of Cancellation of Enrolment and Reporting to DHA.*
- See Appendix A: Course Progress Table, at the end of this document, outlining the stage at which students are sent Course Progress Warning Letters.

Student Progress: 'At Risk' Warning Letter

8.5.9 Students are identified as 'at risk' of not completing their course within the expected duration specified on their CoE, and sent a *Student Progress: 'At Risk' Warning Letter* when their grades fall below a specific level as outlined in Appendix A: Course Progress Table. The letter is generated by Student Services and given to teachers to pass onto their student. The student is also notified by email.

8.5.10 The Progress letter instructs students to improve their level of academic progress and asks them to meet with their teacher to identify if there are any compassionate and/or compelling circumstances affecting their study, and to determine if the student is in need of counselling, academic or other professional support. Possible strategies may include but are not limited to one on one tutoring, specific in class/homework tasks focusing on areas of student need or class change. Outcomes are entered into the 'diary' section of RTO Manager.

Student Progress: Notice to Report to Course Coordinator

8.5.11 If a student is not making satisfactory academic progress by not achieving the requisite grades for their course (see Appendix A, Course Progress Table), or despite earlier intervention, a *Student Progress: Notice to Report to Course Coordinator* is generated by Student Services and given to teachers to pass onto their student. The student is also notified by email.

8.5.12 All students sent this letter are required to make an appointment with their Course Coordinator who will:

- ask the student to explain the reasons for their lack of academic progress;
- remind the student of the Student Visa condition which requires them to progress in their course;
- warn students that unsatisfactory course progress will be reported to DHA (Department of Home Affairs) which may result in the cancellation of their Student Visa; and
- decide if the student is to be placed on a Student Learning Contact.

8.5.13 To place a student on a Learning Contract the Coordinator will consider if:

- the student's level of academic progress is sufficient for them to complete the course within the expected duration specified on their CoE; and if

- the student's assessment tasks, participation in class activities or other indicators of academic progress meet the requirements of ELSIS Progress Policy.

If put on a Student Learning Contract, they will be required to:

- make all attempts to improve their course progress;
- sign a Learning Contract with their Course Coordinator in cooperation with the class teacher at the end of each week; and
- adhere to the specific conditions on the Contract.

8.5.14 A student file note is entered in RTO Manager to document the outcome of the meeting and/or content of the Learning Contract which is to be scanned and uploaded into RTO Manager by the Course Coordinator at the end of each class week.

8.5.15 If, during the discussion issues relating to personal well-being, accommodation, transport, study progress, or similar issues are identified, the teacher will brief their Coordinator who will then speak to the student to decide if they need to visit the Welfare Coordinator. All meetings with the student will be recorded in the RTO Manager 'diary'.

8.5.16 The point at which the student has failed to meet satisfactory course progress is outlined above in 'Passing and Failing Grades' sections 8.5.2 – 8.5.7.

8.6 Reporting unsatisfactory course progress or unsatisfactory course attendance

8.13 *Where the registered provider has assessed the overseas student as not meeting course progress or attendance requirements, the registered provider must give the overseas student a written notice as soon as practicable which:*

8.13.1 *notifies the overseas student that the registered provider intends to report the overseas student for unsatisfactory course progress or unsatisfactory course attendance*

8.13.2 *informs the overseas student of the reasons for the intention to report*

8.13.3 *advises the overseas student of their right to access the registered provider's complaints and appeals process, in accordance with Standard 10 (Complaints and appeals), within 20 working days.*

8.14 *The registered provider must only report unsatisfactory course progress or unsatisfactory course attendance in PRISMS in accordance with section 19(2) of the ESOS Act if:*

8.14.1 *the internal and external complaints processes have been completed and the decision or recommendation supports the registered provider, or*

8.14.2 *the overseas student has chosen not to access the internal complaints and appeals process within the 20-working day period, or*

8.14.3 *the overseas student has chosen not to access the external complaints and appeals process, or*

8.14.4 *the overseas student withdraws from the internal or external appeals processes by notifying the registered provider in writing.*

8.15 *The registered provider may decide not to report the overseas student for breaching the attendance requirements if the overseas student is still attending at least 70 per cent of the scheduled course contact hours and:*

8.15.1 *for school, ELICOS and Foundation Program courses, the overseas student provides genuine evidence demonstrating that compassionate or compelling circumstances apply ...*

Reporting Attendance

Student Attendance below 80%: Letter of Intention to Report to DHA

8.6.1 If the weekly monitoring of attendance indicates that a student's overall attendance is unsatisfactory, falling below 80% but above 70% before the end of their course enrolment, a *Notification of Intention to Report Letter* will be generated by Student Services, notifying the student in writing of ELSIS's intention to report them to DHA via PRISMS, for unsatisfactory attendance. The letter will be given to teachers to pass on to the student. The student is also notified by email.

8.6.2 The student will be informed of their right to submit, the possible grounds for, and the means of submitting an Internal Appeal against being reported, within 20 working days (four calendar weeks) of the receipt of the letter.

8.6.3 A student file note is entered in the 'diary' section in RTO Manager indicating that the documents were issued. The DoS/ADoS will be notified of the action.

8.6.4 All students sent this letter are required to make an appointment with the DoS or ADoS to discuss their circumstances.

8.6.5 If the student believes that they should not be reported, they have 20 working days to access the school's Complaints and Appeal Process to provide documentary evidence of compelling and compassionate circumstances.

8.6.6 If the student decides to Appeal, and it is upheld in their favour and they are on a Student Learning Contract, the Course Coordinator will review and/or update the conditions of the Contract. If the student is not already on a Student Learning Contract, they will be placed on one.

8.6.7 If put on a Student Learning Contract, they will be required to:

- Maintain their attendance at the current level;
- Attend a meeting with their Course Coordinator to identify any personal issues affecting their course progress and attendance; and
- Sign a Learning Contract with their Course Coordinator in cooperation with the class teacher at the end of each week.

8.6.8 A student file note is entered in RTO Manager to document the outcome of the meeting and, if applicable, content of the Learning Contract.

8.6.9 The Learning Contract is signed by the Student, class Teacher and Course Coordinator and scanned and uploaded into RTO Manager by the Coordinator at the end of each class week. If the student is absent, and therefore unable to sign, the procedure is completed as above with the student noted as absent on the contract.

8.6.10 A student with documentary evidence of compelling or compassionate circumstances must still maintain at least 70% overall attendance. If the student's circumstances make this unlikely, the student is offered the option of suspending studies in accordance with ELSIS Deferment, Suspension or Cancellation of a Student During Enrolment Policy and Procedures which complies with Standard 9 of the *National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students*.

8.6.11 If the student Appeals and it is unsuccessful, or if they do not lodge an Appeal within the 20 working days, ELSIS will report their inadequate attendance to DHA.

8.6.12 If a student is required to undertake further ELICOS study after completing the original duration designated in their offer of admission, a new offer of admission is issued, and the calculation of attendance will recommence.

Letter of Intention to Report to DHA for Unsatisfactory Attendance

8.6.13 A student will be subject to being reported for unsatisfactory attendance if:

- their overall attendance falls below 70% for their course either before the end of their course enrolment or on completion of their course enrolment; or
- their overall course attendance is between 80% and 70% and they have made Unsatisfactory Course Progress; and/or
- failed to participate in and/or comply with the Intervention Strategy; or if
- they fail to respond to communications from ELSIS concerning their unsatisfactory attendance.

8.6.14 A *Letter of Intention to Report to DHA for Unsatisfactory Attendance* will be generated by Student Services notifying the student in writing of ELSIS's intention to report them to DHA, via PRISMS, for unsatisfactory attendance.

8.6.15 The letter will be given to teachers to pass on to the student. The student is also notified by email. A student file note will be made in the diary section of RTO Manager to document that the letter has been issued and the Dos or ADoS will be informed of the action.

8.6.16 The student will be informed of their right to submit, the possible grounds for, and the means of submitting an Internal Appeal against being reported, within 20 working days of the receipt of the letter. No action will be taken to report the student until the passing of the 20 working days.

8.6.17 At that time, if the student has not submitted an Internal Appeal, or has submitted an Appeal but has subsequently withdrawn from the Appeal process, Student Services will notify the Registrar who will report the student to DHA, via PRISMS, for unsatisfactory attendance.

8.6.18 If during the prescribed 20 days the student submits an appeal, it will be processed and assessed in accordance with ELSIS's ESOS National Standard 10 Policy and Procedures on Appeals within 10 working days.

8.6.19 The student will be informed that they are expected to maintain their class attendance for the duration of the Appeal process.

8.6.20 The Appeal will be assessed by the DoS against the identified National Standards grounds for appeal:

- a failure by ELSIS to properly inform the student of the attendance requirements, policy and procedures;
- a failure by ELSIS to properly record the student's attendance and/or properly implement its policy; or
- compassionate and compelling circumstances.

8.6.21 The student will be provided the opportunity to make an oral presentation and to be supported in such meeting by a person of their choice.

8.6.22 Upon completing the investigation and consideration of the Appeal the DoS will complete the Appeal processing form.

8.6.23 If it is decided that the Appeal should be upheld, the student will not be reported and will be informed of this decision.

8.6.24 If the decision is to reject the Appeal, Student Services will prepare a letter informing the student of the decision and the grounds for that decision.

8.6.25 That *Appeal Outcome Letter* will also inform the student of their entitlement to access the External Appeal process, and provide information on the means of making an appeal to the Overseas Students Ombudsman. They will be given 20 working days to make this decision and will be informed that no action will be taken to implement the decision to report the student until any potential external appeals process has been completed.

8.6.26 A student file note will be made in RTO Manager to document that the letter has been issued and the Director of Studies will be notified of the action.

Reporting Progress

Course Progress: Letter of Intention to Report to DHA

8.6.27 If students are identified as having Unsatisfactory Course Progress, an *Intention to Report Letter* will be generated by Student Services notifying the student in writing of ELSIS's intention to report them to DHA, via PRISMS, for Unsatisfactory Course Progress. The letter will be given to teachers to pass on to the student. The student is also notified by email.

8.6.28 The student will be informed of their right to submit, the possible grounds for, and the means of submitting an Internal Appeal against being reported, within 20 working days (four calendar weeks) of the receipt of the letter.

8.6.29 A student file note is entered in the 'diary' section in RTO Manager indicating that the documents were issued. The DoS/ADoS will be notified of the action.

8.6.30 All students sent this letter are required to make an appointment with the DoS or ADoS to discuss their circumstances.

8.6.31 If the student believes that they should not be reported, they have 20 working days to access the school's Complaints and Appeal Process to provide documentary evidence of compelling and compassionate circumstances.

If the student decides to Appeal, and it is upheld in their favour, an Intervention Strategy will be activated and they will be placed on a Student Learning Contract.

8.6.32 If the student accepts the terms and conditions of the Student Learning Contract, they will be required to:

- Maintain a level of academic performance that will enable them to satisfactorily complete their course:

- Attend a meeting with their Course Coordinator to identify any personal issues affecting their course progress and/ or attendance;
- Accept referral to additional professional support if required and;
- Sign a Learning Contract with their Course Coordinator in cooperation with the class teacher at the end of each week.

8.6.33 A student file note is entered in RTO Manager to document the outcome of the meeting and, if applicable, content of the Learning Contract.

8.6.34 The Learning Contract is signed by the Student, class Teacher and Course Coordinator and scanned and uploaded into RTO Manager by the Coordinator at the end of each class week. If the student is absent, and therefore unable to sign, the procedure is completed as above with the student noted as absent on the contract.

8.6.35 A student with documentary evidence of compelling and/or compassionate circumstances must still maintain at least a satisfactory level of Course Progress that will enable them to complete their course within the duration of their CoE.

8.6.36 If the student Appeals and it is unsuccessful, or if they do not lodge an Appeal within the 20 working days, ELSIS will report their inadequate Course Progress to DHA.

Letter of Intention to Report for Unsatisfactory Course Progress

8.6.37 A student will be subject to being reported for unsatisfactory course progress if:

- they have made Unsatisfactory Course Progress and failed to participate in the Intervention Strategy; or if
- their overall attendance falls below 70% for their course either before the end of their course enrolment or on completion of their course enrolment; or
- they fail to respond to communications from ELSIS concerning their unsatisfactory progress.

8.6.38 An *Intention to Report Letter* will be generated by Student Services notifying the student in writing of ELSIS's intention to report them to DHA, via PRISMS, for unsatisfactory Course Progress. The letter will be given to teachers to pass on to the student. The student is also notified by email.

8.6.39 The student will be informed of their right to submit, the possible grounds for, and the means of submitting an Internal Appeal against being reported, within 20 working days (four calendar weeks) of the receipt of the letter. No action will be taken to report the student until the passing of the 20 working days.

8.6.40 At that time, if the student has not submitted an Internal Appeal, or has submitted an Appeal but has subsequently withdrawn from the Appeal process, Student Services will notify the Registrar who will report the student to DHA, via PRISMS, for unsatisfactory Course Progress.

8.6.41 ELSIS will only report unsatisfactory course progress or and/ or attendance if:

- the internal and external complaints processes have been completed and the decision or recommendation supports ELSIS, or
- the overseas student has chosen not to access the internal complaints and appeals process within the 20-working day period, or

- 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 processes by notifying ELSIS in writing.

Internal Appeal

8.6.42 If, during the prescribed 20 days, the student applies for an Internal Appeal, it will be processed and assessed in accordance with ELSIS ESOS National Code Standard 10 Policy and Procedures on Appeals, within 10 working days.

8.6.43 The student will be informed that they are expected to maintain their class attendance/ course progress for the duration of the Appeal process.

8.6.44 The Internal Appeal will be assessed by the DoS/ADoS against the identified National Standards grounds for appeal:

- a failure by ELSIS to properly inform the student of the attendance/course progress requirements, policy and procedures;
- a failure by ELSIS to properly record the student's attendance/course progress and/or properly implement its policy; or
- compassionate and/or compelling circumstances.

8.6.45 The student will be provided an opportunity to meet with the DoS/ADoS, and to be supported in the meeting by a person of their choice.

8.6.46 If it is decided that the Appeal should be upheld, the student will not be reported and will be notified by Student Services of the outcome by issuing an *Appeal Outcome Letter*. The letter will also outline the conditions under which the student is to be granted the Internal Appeal. These conditions are to be entered in the *Appeal Outcome Letter* by the DoS/ADoS.

8.6.47 If the decision is to reject the Appeal, the DoS/ADoS/Compliance Manager will instruct Student Services to prepare a letter informing the student of the decision and the grounds for that decision.

8.6.48 A student file note will be entered in the 'diary' section in RTO Manager by Student Services to document the outcomes.

External Appeal

8.6.49 That *Appeal Outcome Letter* will also inform the student of their entitlement to access the External Appeal Process if they are not satisfied with the outcome of their Internal Appeal, and provide information on the means of making an Appeal to the Overseas Students Ombudsman. They will be given 20 working days to make this decision and will be informed that no action will be taken to implement the decision to report the student until any potential External Appeals process has been completed. A student file note will be entered in the 'diary' section in RTO Manager to document that the letter has been issued and the DoS/ADoS will be notified of the action.

8.6.50 If after the 20 days the student has failed to submit an External Appeal, Student Services will notify the Registrar who will report the student to DHA, via PRISMS, for unsatisfactory attendance/course progress. If the student submits an External Appeal and if it is upheld, the student will not be reported.

8.6.51 If the student submits an External Appeal and if it is rejected by the Overseas Students Ombudsman, the student will be reported via PRISMS. A note will be entered by Student Services in the diary section of RTO Manager stating the Appeal outcome, and all supporting documents uploaded to the 'Documents' section.

8.6.52 ELSIS will only report unsatisfactory course attendance and or / course progress if:

- the internal and external complaints processes have been completed and the decision or recommendation supports ELSIS, or
- the overseas student has chosen not to access the internal complaints and appeals process within the 20 working-day period, or
- 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 processes by notifying ELSIS in writing.

8.6.53 ELSIS may decide not to report a student for breaching course progress requirements if:

- the student is still attending at least 70 per cent of the scheduled course contact hours and;
- the student provides genuine evidence demonstrating that compassionate or compelling circumstances apply.

8.7 Course Duration

Allowable extensions of course duration

8.16 *The registered provider must not extend the duration of the overseas student's enrolment if the overseas student is unable to complete the course within the expected duration, unless:*

- 8.16.1** *there are compassionate or compelling circumstances, as assessed by the registered provider on the basis of demonstrable evidence, or*
- 8.16.2** *the registered provider has implemented, or is in the process of implementing, an intervention strategy for the overseas student because the overseas student is at risk of not meeting course progress requirements, or*
- 8.16.3** *an approved deferral or suspension of the overseas student's enrolment has occurred under Standard 9 (Deferring, suspending or cancelling the overseas student's enrolment).*

8.17 *If the registered provider extends the duration of the student's enrolment, the provider must advise the student to contact Immigration to seek advice on any potential impacts on their visa, including the need to obtain a new visa.*

8.7.1 The completion of their courses within the expected duration identified in international students' Confirmations of Enrolment (CoEs) plays an important role in ensuring the integrity and quality of the education provided to those students, and in maintaining the integrity of immigration policies, regulations and procedures relating to international student visas.

Effective monitoring and documentation of student progress and effective intervention strategies play essential roles in ensuring that these standards and integrity are maintained.

8.7.2 ELSIS is committed to ensuring that:

- students complete their courses within the duration specified on their confirmation of enrolment (CoE); and

- extensions to that time are limited to circumstances and reasons relating to:
 - compassionate or compelling circumstances;
 - intervention in the case of unsatisfactory course progress and attendance; and to
 - cases of approved deferment and or suspension of enrolment.

8.7.3 ELSIS monitors and records student attendance and course progress and has in place intervention strategies to identify and address problems with individual student attendance (see 8.4.7 in this document) and course progress (8.5.8).

8.7.4 If a student has documented evidence of compassionate and compelling circumstances that prevent them from completing their course within the specified duration, for example on referral to professional assistance where a student is advised that they are unfit to attend classes for a significant period of time on medical/psychological grounds, the student can submit a Leave of Absence Application for the identified period of time, and, if approved, any consequential actions such as a temporary Suspension of Enrolment and an extension of Course duration and CoE will be implemented.

8.7.5 A student with documentary evidence of compelling or compassionate circumstances must still maintain at least 70% overall attendance and academically be in a position to complete the course within the expected duration specified on their CoE. If the student's circumstances make this unlikely, the student is offered the option of deferring or suspending studies in accordance with ELSIS Deferment, Suspension or Cancellation of a Student During Enrolment Policy and Procedures which complies with Standard 9 of the *National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students*.

8.7.6 All variations to a student's enrolment will be recorded, along with documentary evidence, in the student's file in RTO Manager and on PRISMS.

8.8 Modes of delivery

Note: *Online learning is study where the teacher and overseas student primarily communicate through digital media, technology-based tools and IT networks and does not require the overseas student to attend scheduled classes or maintain contact hours. For the purposes of the ESOS framework, online learning does not include the provision of online lectures, tuition or other resources that supplement scheduled classes or contact hours. Distance learning is any learning that an overseas student undertakes off campus and does not require an overseas student on a student visa to physically attend regular tuition for the course on campus at the provider's registered location.*

8.18 *A registered provider must not deliver a course exclusively by online or distance learning to an overseas student.*

8.19 *A registered provider must not deliver more than one-third of the units (or equivalent) of a higher education or VET course by online or distance learning to an overseas student.*

8.20 *A registered provider must ensure that in each compulsory study period for a course, the overseas student is studying at least one unit that is not by distance or online learning, unless the student is completing the last unit of their course.*

8.21 *For school, ELICOS or foundation programs, any online or distance learning must be in addition to minimum face-to-face teaching requirements approved by the relevant designated State authority or ESOS agency as part of the registration of the course, if*

applicable.

8.22 *The registered provider must take all reasonable steps to support overseas students who may be disadvantaged by:*

8.22.1 *additional costs or other requirements, including for overseas students with special needs, from undertaking online or distance learning*

8.22.2 *inability to access the resources and community offered by the education institution, or opportunities for engaging with other overseas students while undertaking online or distance learning.*

8.8.1 All ELSIS Courses are taught on campus, face to face with qualified teachers, for a minimum of 20 hours per week. No courses are taught by either distance or on-line learning.

Definitions

Building on definitions in *The National Code*, ELSIS defines **Compassionate and/or Compelling Circumstances** as those which are generally beyond the control of the student and which have an adverse impact on the student's capacity and/or ability to:

- commence their course on the scheduled start date, but within two weeks of that date, or to
- attend scheduled classes for a significant period of time during the Course.

Such circumstances include:

- the late issue of a student's visa and consequent delay in travel to Australia;
- serious illness or injury, where a medical certificate states that the student was unable to attend classes before the day of arrival;
- bereavement of close family members such as parents or grandparents (where possible a death certificate should be provided);
- the student recently giving birth or a student's partner recently giving birth, thus preventing commencement on the published start date (supported by the birth or doctor's certificate);
- major political upheaval or natural disaster in the home country preventing their departure for Australia, or requiring their emergency travel to their home country for the time of their absence;
- a traumatic experience which could include but is not limited to:
 - witnessing or involvement in an accident; or
 - witnessing or being the victim of a crime

and which has impacted on the student's ability to commence classes on the start date and/or attend scheduled classes (these cases should be supported by police or psychologists' reports).

GIE	Score
<i>Student Progress: At Risk</i>	C+ or below for any summative assessment; or
<i>Student Progress: Report to Course Coordinator</i>	C or below for any summative assessment; or shows no improvement after intervention
<i>Student Progress: Notification of Intention to Report</i>	Fail 2 consecutive courses; or 3 consecutive courses where there is evidence of extenuating circumstances; or

	it is clear the student has no prospect of progressing
<i>Reassessment</i>	Where there is evidence of extenuating circumstances
<i>If a student is identified for a second, but not consecutive, study period as not making satisfactory course progress, the student is not reported for unsatisfactory course progress.</i>	
PREAP: Progression to EAP 1	
<i>Student Progress: At Risk</i>	C+ for any summative assessment
<i>Student Progress: Report to Course Coordinator</i>	C for any summative assessment; or C+ or lower for 2 assessments or more; or no improvement after intervention.
<i>Student Progress: Notification of Intention to Report</i>	Fail 2 consecutive courses; or 3 consecutive courses where there is evidence of extenuating circumstances; or it is clear the student has no prospect of progressing
<i>Resubmission</i>	D for any assessment
<i>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.</i>	
EAP 1: Progression to Certificate IV and Diploma Vocational Courses EAP 2: Progression to Bachelor Degree	
<i>Student Progress: At Risk</i>	C+ for any summative assessment
<i>Student Progress: Report to Course Coordinator</i>	C for any summative assessment; or C+ or lower for 2 assessments or more; or no improvement after intervention.
<i>Student Progress: Notification of Intention to Report</i>	Fail 2 consecutive courses; or 3 consecutive courses where there is evidence of extenuating circumstances; or it is clear the student has no prospect of progressing
<i>Resubmission</i>	D for any assessment
<i>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.</i>	
EAP 2: Progression to Master's degree	Score
<i>Student Progress: At Risk</i>	B- or lower for any summative assessment
<i>Student Progress: Report to Course Coordinator</i>	C+ for any summative assessment; or B- or lower for 2 assessments or more; or shows no improvement after intervention.
<i>Student Progress: Notification of Intention to Report</i>	Fail 2 consecutive courses; or 3 consecutive courses where there is evidence of extenuating circumstances; or it is clear the student has no prospect of progressing
<i>Resubmission</i>	D for any assessment
<i>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.</i>	
FCE	Score
<i>Student Progress: At Risk</i>	Below 50% for at least 4 summative assessments (any category)
<i>Student Progress: Report to Course Coordinator</i>	Below 45%; or shows no improvement after intervention
<i>Student Progress: Notification of Intention to Report</i>	Fail 2 consecutive courses; or 3 consecutive courses where there is evidence of extenuating circumstances; or it is clear the student has no prospect of progressing
<i>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.</i>	
IELTS	Score

<i>Student Progress: At Risk</i>	Equivalent IELTS score Band 5 or below for 2 or more consecutive summative assessments.
<i>Student Progress: Report to Course Coordinator</i>	Equivalent IELTS score Band 4 or below for 2 or more consecutive summative assessments; or shows no improvement after intervention
<i>Student Progress: Notification of Intention to Report</i>	Fail 2 consecutive courses; or 3 consecutive courses where there is evidence of extenuating circumstances; or it is clear the student has no prospect of progressing
<i>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.</i>	