

Course Progress and Attendance Policy and Associated Procedures

Purpose of the policy

This policy and associated procedures outline Grenfell Institute of Technology Australia's approach to ensuring international students maintain satisfactory course progress and attendance throughout their studies to ensure they can complete their course within the required duration as specified in their confirmation of enrolment (CoE). This policy and associated procedures also outline the procedures for managing unsatisfactory progress.

The purpose of this policy is to specify Grenfell Institute of Technology Australia's approach to recording and monitoring student attendance, course progress and intervention in compliance with Standards 8 and 11 of the National Code 2018 and student visa requirements.

This policy documents how Grenfell Institute of Technology Australia assists and supports overseas students to complete their course within the required duration and fulfil their visa requirements for course attendance and course progress.

Policy statements

Overview

Grenfell Institute of Technology Australia monitors international students' course progress and attendance to ensure they are able to complete their course within the required duration. Grenfell Institute of Technology Australia advises students before they commence their course of the requirements to achieve satisfactory course progress and attendance, including that students who do not meet course progress requirements are at risk of having their visas cancelled. This advice is included in the International Student Handbook, Course Brochure and within the Orientation Presentation. All records of course progress and monitoring will be kept.

The duration of the course as specified on the student's CoE will never exceed than registered on the CRICOS register.

Grenfell Institute of Technology Australia seeks to ensure that students can complete their course within the duration specified on their Confirmation of Enrolment (CoE) and that timely interventions are implemented for students at risk of failing to meet course progress requirements as per Standard 8 of the National Code 2018. Students who do not make satisfactory course progress will be at risk of being reported to the Department of Home Affairs through PRISMS. This document outlines appropriate intervention strategies to be employed by Grenfell Institute of Technology Australia.

In addition, Standard 11 of the National Code 2018 requires a minimum of 20 scheduled course contact hours per week for overseas students. Grenfell Institute of Technology Australia implements and monitors course attendance as part of its course progress requirements.

Students coming to Australia to undertake a vocational education qualification are granted entry on a student visa. One of the conditions of the student visa is that the student shows satisfactory course progress. An additional condition of the student visa is that a student needs to maintain a satisfactory attendance record. Course attendance and participation is monitored as part of the monitoring of course progress.

Grenfell Institute of Technology Australia will:

- a. systematically monitor and assess course progress of all students.
- b. monitor attendance as one of the key indicators in determining the successful course progression of an overseas student
- c. be proactive in notifying and counselling students who are at risk of failing to meet course progress requirements
- d. support students who are at risk of meeting course progress requirements by implementing appropriate intervention strategies
- e. report students (on student visas) to the Secretary of the Department of Home Affairs and DHA (via PRISMS) who have breached the course progress requirements.
- f. provide this policy to students and staff

Scope

This policy applies to all Grenfell Institute of Technology Australia's overseas students studying onshore at Grenfell Institute of Technology Australia's campus/es. An overseas student is a student studying in a CRICOS registered course at Grenfell Institute of Technology Australia on a student visa (subclass 500).

All overseas students are required to familiarize themselves with the content of this policy to ensure they are aware of the Grenfell Institute of Technology Australia's policy and procedure on attendance and course progress.

Responsibility

The CEO is responsible for the implementation of this policy and procedure and to ensure that staff and students are aware of its application and that staff implement its requirements.

The CEO is responsible for monitoring the effectiveness of interventions, hearing appeals relating to intention to report visa breach decisions and making appeals decisions.

The CEO is responsible for reporting visa breaches via PRISMS.

Administration & Student Support Officers, Trainers and Assessors have the direct responsibility for reviewing and identifying the attendance and course progress of overseas students, including any follow up required based on that review.

Requirements

Grenfell Institute of Technology Australia must comply with the following requirements regarding overseas students' course progress and attendance.

National Code Standard 8

- 8.9 *The registered provider of a VET course as defined in the NVETR Act must have and implement a documented policy and process for assessing course progress that includes:*
 - 8.9.1 *requirements for achieving satisfactory course progress, including policies that promote and uphold the academic integrity of the registered course and meet the training package or accredited course requirements where applicable, and processes to address misconduct and allegations of misconduct*

- 8.9.2 *processes for recording and assessing course progress requirements*
- 8.9.3 *processes to identify overseas students at risk of unsatisfactory course progress*
- 8.9.4 *details of the registered provider's intervention strategy to assist overseas students at risk of not meeting course progress requirements in sufficient time for those overseas students to achieve satisfactory course progress*
- 8.9.5 *processes for determining the point at which the overseas student has failed to meet satisfactory course progress.*

National Code Standard 11

11.2.1 *...the expected duration of the course does not exceed the time required to complete the course on the basis of full-time study – for VET courses, this is a minimum of 20 scheduled course contact hours per week unless specified by an accrediting authority.*

Visa condition – 8202 which states that: *“The visa holder must satisfy the requirements of course enrolment, course level, course progress and course attendance.”*

ESOS Act 2000 Section 19:

1. *A registered provider must give the following information within the applicable number of days after the event specified below occurs:*
 - (d) any termination of an accepted student's studies (whether as a result of action by the student or the provider or otherwise) before the student's course is completed;*
 - (e) any change in the identity or duration of an accepted student's course;*
- (1A) The **applicable number of days** is:*
- (a) if the accepted student is less than 18 years old and the information is of a kind referred to in paragraph (1)(c) or (d)—14 days; or*
 - (b) otherwise—31 days*

Procedures

Course Attendance

Attendance Requirement - Full Time Study

International students are required to study a full-time study load. A full-time study load is normally a minimum of 20 hours per week for the term.

Trainers and Assessors mark student attendance each day for each class. The completed Weekly Attendance Sheets are given to the Administration & Student Support Officers for completeness check before they are recorded in the Attendance Monitoring Registers on a weekly basis.

If a student's attendance drops below 80% over the term, Grenfell Institute of Technology Australia will review their involvement, counsel them, implement an intervention strategy (if required) and, if poor attendance persists, Grenfell Institute of Technology Australia reserves the right to

- Require that all assessment tasks are completed on campus
- Refuse permission for the student to undertake an assessment which may require them to repeat a unit
- Cancel or suspend the student's enrolment, which may put their visa at risk. Students have a right of appeal. See Student Appeals section later in this document.

Absences

Students are advised at Orientation of the importance of notifying the college when they are absent due to illness or any other matter.

Absences are dealt with by:

- Administration & Student Support Officers or a delegate, sending an SMS or phoning or sending an email to all students who do not notify Grenfell Institute of Technology Australia of their absence for the day of absence.
- Administration & Student Support Officers, Trainers & Assessors and/CEO will analyse student absences a minimum of fortnightly and take action for students 'at risk'.
- Students who have been absent for more than five consecutive days or are at risk of falling below 80% will be contacted, counselled and reminded of the attendance policy. The actions described in Attendance Requirement - Full Time Study section above may commence.

All absences due to illness should be accompanied by a medical certificate. Grenfell Institute of Technology Australia will only accept medical certificates signed by a registered medical practitioner, health practitioner or approved health specialist.

Written notification is required for all absences where it is known by the student in advance that they will not be attending class. These absences will still be counted when calculating an attendance percentage.

Grenfell Institute of Technology Australia has a duty of care to its students and any absences of 5 consecutive days without approval will be investigated to ensure the safety of the student.

Grenfell Institute of Technology Australia will undertake the following actions:

- The Administration & Student Support Officers will attempt to contact the student by phone and/or

SMS.

- If student is not able to be contacted, their nominated emergency contact will be contacted.
- If student is not able to be contacted, their nominated agent will be contacted.
- If contact cannot be made, the Administration & Student Support Officers will discuss with CEO to contact the relevant authorities (eg Local Police, Department of Home Affairs).

Attendance Review

- Administration & Student Support Officers review the attendance data to identify individual student's attendance rates.
- Students are sent the appropriate attendance notification based on the attendance level at the time when the monitoring report is reviewed fortnightly
- If a student's attendance falls below 85% per cent, they will be sent an Attendance Reminder email by Administration & Student Support Officers. This reminder will notify the student, the attendance requirements of Grenfell Institute of Technology Australia as well as the student attendance requirement as per Visa Condition 8202.
- If a student's attendance falls below 80%, they will be sent an Attendance Warning Letter. This letter will ask the student to make an appointment with the CEO and provide Grenfell Institute of Technology Australia with information and evidence explaining their absences. Sharing of this information will occur through a private counselling session.
- If required, the CEO will decide if it is necessary to implement an intervention strategy. The strategy will aim to assist the student to maximize his/her attendance for the remaining scheduled contact hours for the duration of his/her course.
- If a student is unable to reach 70% of attendance for the remaining scheduled contact hours for the duration of their course and the intervention strategies have previously been implemented, the student's enrolment may be cancelled by Grenfell Institute of Technology Australia.

Course Progress

Academic Course Progress Requirements

- In order to progress satisfactorily, overseas students must demonstrate competency in fifty percent (50%) or more of enrolled units of competency within each term.
- Academic progress is monitored by Administration & Student Support Officers, Trainers and Assessors and the CEO to enable appropriate intervention strategies to be implemented as soon as progress issues emerge for individual students who are identified as 'at risk'
- Should an overseas student fail the same unit twice, they will be deemed as not making satisfactory course progression. This includes previous versions of the unit.
- A student who has not demonstrated satisfactory course progress for **two consecutive study periods**, is not meeting Grenfell Institute of Technology Australia's course progression requirement and will be unable to complete their course within the duration specified in the student's COE. This will be a breach of their student visa conditions.

Identifying Students 'At Risk'

- Early identification of students 'at risk' is critical to ensure that early intervention strategies can be provided to support and assist the student's academic success.
- Training and Student Support staff use a variety of indicators or assessments to identify any students

who are 'at risk' of making unsatisfactory progress. These may include, but are not limited to, the review of:

- The student's attendance record
- Class participation and level of engagement
- Formative assessment completions
- Late submissions of assessments
- Number of resubmissions
- Requests for extension of class work or assessments
- Requests for additional help with assessments or class work
- Feedback from other training staff
- Not yet competent on unit assessments
- Results of assessments and unit
- Administration & Student Support Officers have the responsibility, in consultation with Trainers & Assessors and the CEO, for identifying individual students who are 'at risk' of not meeting satisfactory course progress.
- A final review of student academic performance will occur following the unit results release at the completion of each study period.
- Once a student has been identified as making unsatisfactory course progress, the Administration & Student Support Officers and/or CEO will issue the student with a First Warning Letter for Unsatisfactory Course Progress and/or Attendance.
- The First Warning Letter for Unsatisfactory Course Progress and/or Attendance will require the student to meet with the CEO (or other designated staff) to discuss their course progress, and if necessary, activate an intervention strategy.

Course Progress Review

- The Administration & Student Support Officers will continue to monitor the course progress of a student with an intervention strategy for the remainder of the current study period and if required, into the next study period.
- A student who demonstrates competency in more than fifty percent (50%) of the units of competency undertaken in the study period in which they were earlier identified as 'at risk', or in the next study period, will no longer be considered 'at risk' and the intervention strategy may be cancelled.
- Any student provided with an intervention strategy during the study period (therefore identified as 'at risk'), who then achieves less than 50% competency in enrolled units of competency will receive a Notice of Intention to Report for Unsatisfactory Course Progress and/or Attendance.

Intervention Strategies

Addressing the National Code 8.4

- Where necessary, the CEO (or other designated staff) will develop an intervention strategy in consultation with the student and, if required, the relevant Trainer & Assessor of the student. The intervention strategy will outline the strategies to be adopted and the support services that the student can access to assist with improving their academic performance and/or attendance.
- If the student is identified as 'at risk' of making unsatisfactory progress or is making unsatisfactory progress before the end of the study period, an intervention strategy will be implemented as early as practicable. If the student is deemed as making unsatisfactory progress at the end of the study period, the intervention strategy is required to be commenced within the first two weeks of the following study period.
- Intervention strategies may include the following but are not limited to:
 - advising the student of available study skills workshops, time management skills, academic

- counselling, English language support or other support Grenfell Institute of Technology Australia offers
- requiring the student to meet regularly with a trainer to review their progress before the end of the current study period or during the next study period
 - requiring the student to submit assessments or complete assessments within a certain timeframe
 - requiring the student to attend a minimum percentage of classes, which may include make-up classes
 - referring the student to other support services that may be relevant, e.g. counselling for personal issues, appropriate medical services, housing services, financial counselling services, etc.
 - considering a period of deferment or temporary suspension of studies
 - providing a mentor or study buddy
 - placing student in suitable alternative subject within a course or a suitable alternative course, or a combination of the above and a reduction in course load
 - providing supplementary exercises to assist understanding of attending academic skills programs
 - providing access to supplementary or modified materials
 - mentoring, counselling and coaching
 - assist with personal issues which influence progress
 - requiring the student to undertake additional training or to re-enrol in English language training. This may require the award course to be suspended to attend the required number of English classes.
- Intervention strategies must be signed by both the CEO (or the other designated staff) and the student.
 - It is the student's responsibility to follow through on any assistance offered and to maintain contact with the nominated staff members identified to provide assistance.
 - A student may receive a Notice of Intention to Report for Unsatisfactory Course Progress and/or Attendance Letter if they fail to comply with the intervention strategy or is deliberately disengaging with the process.

Student Appeals

Internal appeal process

- Students who wish to appeal their attendance rate/academic progression determination or the Notice of Intention to Report for Unsatisfactory Course Progress and/or Attendance Letter may lodge an appeal within 20 working days to Grenfell Institute of Technology Australia staff. In addition to the Grenfell Institute of Technology Australia internal processes, an overseas student may also wish to approach an external agent, see External Agency Process below in this document.
- Overseas students who wish to lodge an appeal against Grenfell Institute of Technology Australia Notice of Intention to Report for Unsatisfactory Course Progress and/or Attendance Letter or any other matter are advised to refer to the Complaints & Appeals Policy and Associated Procedure on Grenfell Institute of Technology Australia website for further explanation.

External Agency Process

- Overseas students may approach an external agent such as the Overseas Students Ombudsman (OSO). Such an approach may be made after the internal resolution process has been finalized and the overseas student is not happy with the outcome of the internal resolution.
- Overseas Students Ombudsman (OSO) investigates complaints that overseas students have with private education providers. A private education provider can be a school, college or university in Australia. The Ombudsman provides support to future, current or former students.
- OSO's service is free and they do not charge for making a complaint.

Overseas Students Ombudsman (OSO)
In Australia: 1300 362 072
Outside Australia: +61 2 6276 0111

Reporting

All students identified as maintaining an unsatisfactory attendance level and/or academic progress will be notified in writing via a Notice of Intention to Report for Unsatisfactory Course Progress and/or Attendance letter.

The Notice of Intention to Report for Unsatisfactory Course Progress and/or Attendance letter provides formal notification to the student that Grenfell Institute of Technology Australia intends to report their poor attendance and/or unsatisfactory academic progress to Department of Home Affairs visa PRISMS.

Students who maintain unsatisfactory progress in two (2) consecutive study periods will receive a Notice of Intention to Report for Unsatisfactory Course Progress and/or Attendance Letter.

Students who maintain unsatisfactory progress in two (2) study periods that aren't consecutive will not be reported, unless they did not comply with the agreed intervention strategy.

Grenfell Institute of Technology Australia will only report overseas students for unsatisfactory course progress and/or unsatisfactory course attendance if:

- The overseas student has chosen not to access the internal and/or external appeals process within the allowed timeframe, or
- If an overseas student chose to access the internal and/or external complaints process, and the completed process decision or recommendation supports Grenfell Institute of Technology Australia's decision, or
- The overseas student withdraws from the appeals process by formally notifying Grenfell Institute of Technology Australia.

All records will be kept on the student's file including warning letters and the notice of intention to report.