



Monitoring Attendance and Course Progress Policy and Procedures – International Students

1. Statement of policy and procedure

This document describes the policies, procedures and management of monitoring attendance and course progress of international students.

2. Scope

This policy and procedure applies to all onshore international students on a student VISA who are enrolled at The Gordon.

3. Definitions

Compassionate or compelling circumstances: circumstances should be beyond the control of the student and the grounds are supported by substantiating documentation. Examples of compelling or compassionate circumstances are:

- Illness of the student or immediate family member evidenced by a medical certificate.
- Death of a student's immediate family member evidenced by a death certificate.

Other compassionate grounds where adequate evidence can be provided to show cause for release:

- Significant natural disaster in home country
- Political instability in home country
- Mental health illness or significant personal issues, evidenced by a psychological or medical report of a nature that would warrant release
- Student is stranded overseas

Intention to Report letter: a formal notification to the student that the Gordon intends to report unsatisfactory attendance or course progress to the Department of Home Affairs

Intervention strategy: an individual plan to assist students who are 'at risk' of or making unsatisfactory course progress, may include but not limited to:

- Meeting regularly with a designated teaching staff
- Attending extra learning support with teaching staff or study support
- Extension or additional opportunities of submission
- Attending The Gordon's counselling service
- Reassessment or re-enrolment
- Being withdrawn and re-enrolling in the "at risk" units
- Suspension of enrolment
- Changing to an alternative course where appropriate

PRISMS: The Provider Registration and International Student Management System (PRISMS) is an Australian Government secure online system that allows providers to issue confirmations of enrolment (CoEs). Australian Government agencies use PRISMS to monitor student compliance with visa conditions and provider compliance.

Confirmation of Enrolment (CoE): The Confirmation of Enrolment (CoE) is a document issued by an education provider to verify the applicant's enrolment in a specified course.

ELICOS: English Language Intensive Courses for Overseas Students

ASQA: The <u>Australian Skills Quality Authority (ASQA)</u> is the national regulator for the vocational education and training sector and registered training organisations (RTOs). Under the ESOS Act, ASQA is the ESOS

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> agency for providers or registered providers of vocational education courses and standalone ELICOS providers.

> Confirmation of Enrolment (CoE): Confirmation of Enrolment is a document provided electronically and issued by The Gordon (the registered provider) to intending overseas students. The COE must accompany the application for a student visa and confirms the student's eligibility to enrol in the particular course of the registered provider.

4. **Overview / principles**

The National Code of Practice for Providers of Education and Training to Overseas Students (National Code) sets nationally consistent standards that govern the protection of international students and delivery of courses to those students by providers registered on CRICOS. The National Code is a legislative instrument of the ESOS Act and is legally enforceable under Part 4. Detailed information on The ESOS Legislative Framework can be found on the International staff portal page

Under Standard 8 Overseas student visa requirements, overseas students must make satisfactory course progress and, where applicable, attendance as a condition of their student visa.

As the registered provider The Gordon must:

- Monitor overseas students' course progress and, where applicable, attendance for each course in which the overseas student is enrolled
- The expected duration of study period specified in the student's CoE must not exceed the CRICOS registered duration (consideration will be given for compelling or compassionate circumstances)
- 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
- Have an implemented policy and process to identify, notify and assist a student at risk of not (or is at risk) of meeting course progress or attendance requirements
- Clearly outline and inform students before they commence the course of the requirements to achieve satisfactory course progress and, where applicable, attendance in each study period.

4.1 ELICOS Programs: course progress and attendance requirements

ELICOS programs must have a document policy and procedure for monitoring and recording attendance of international student, refer ELICOS Progress and Attendance Monitoring Policy and Procedure INT PR 08.

4.2 VET Programs: course progress and attendance requirements

Students are advised of course progress and attendance requirements:

- Letter of Offer (Terms and Conditions) •
- **Compulsory Student Orientation**
- From the Program Area as part of the unit commencement information
- The International Student Portal

4.2.1 Assessing Course Progress

- Requirements for achieving satisfactory course progress, policies that promote and uphold the academic integrity of the course requirements and the process to address misconduct and allegations of misconduct
- Process for recording and assessing course progress requirements
- Process to identify students at risk of unsatisfactory course progress
- Intervention strategy to assist students at risk of not meeting course progress requirements in sufficient time for students to achieve satisfactory course progress
- Determination point in which a student has failed to meet satisfactory course progress.

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Assessing course progress is also managed in accordance with the Assessment Policy TED PO 10 and the Student Conduct Policy QA PO 12

4.2.2 Monitoring of attendance

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- The Gordon must have and implement a documented policy and process for monitoring the attendance of overseas students if the requirement to implement and maintain minimum attendance requirements for international students is set as a condition of registration by ESOS Agency.
- If required to monitor international students attendance as a condition of registration, the minimum requirement for attendance is 80 per cent of the scheduled contact hours for the course.
- The policy shall include:
 - Method for working out minimum attendance
 - Process for recoding attendance
 - Details of intervention strategy to identify, notify and assist international 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 students attendance drops below 80 per cent
 - Process for determining the point at which the student has failed to meet satisfactory course attendance

Currently not required by ASQA as a condition of registration, the Gordon will however record and monitor international students' attendance as a key indicator in determining international student course progress. International students are expected to maintain a minimum attendance of 80%. This is recorded and monitored in eCentral by the Program Area.

Students who are absent for class for five or more consecutive days and/or have a pattern of absence without legit image of substantiate reasons will be considered "at risk" or unsatisfactory course attendance.

4.2.3 Managing students with unsatisfactory course and / or attendance requirements

The International Office and Program Area use a variety of indicators and assessments to monitor international student progress, these may include but are not limited to:

- Attendance
- Results of assessments and units
- Late submissions or number of resubmissions
- Completing competency based assessments and recording results
- Withdrawn Students Report
- Discussing any concerns directly with the student
- Feedback from teaching staff

Early intervention

Teaching staff shall notify "at risk" students as early as possible and notify the Vocational Education Manager and International Office for early intervention.

A student will be considered 'at risk' of achieving satisfactory course progress if:

- Failing to submit a key piece of assessment that may result in failure of the unit
- Failing to attend an assessment or sit an examination (first attempt)
- Failing a unit
- Failing core unit(s) which prevent the student from continuing studies in the current semester
- At risk of failing a unit due to being deemed incompetent for a number of assessments and tasks



Being absent from class for five consecutive days or more and/or has a consistent pattern
of absence without legitimate and substantiated reasons

The International Office and Program office will meet with the student to discuss action required. It is the student's responsibility to follow through on any assistance offered in the intervention strategy.

Unsatisfactory course progress

A student will be identified as "Unsatisfactory Progress".

Progress Trigger	Intervention
 Unsatisfactory Progress: Failing unit(s) in the first enrolment Failing core unit(s) which prevent the student from continuing studies in the current semester At risk of failing a unit due to being deemed incompetent for a number of assessments and tasks Failing 50% of enrolled units in one semester 	International Office will issue a warning letter with intervention strategy
 Unsatisfactory Progress: Failing unit(s) in the second enrolment Failing 50% of enrolled units in two consecutive study semesters 	International Office will issue an Intention to Report letter

If there are evident compassionate or compelling circumstances, the International Office might decide to implement intervention strategy without issuing a warning letter

The Intervention strategy will be discussed between program area, International Office and the student.

The Program area may use *Work Plan for International Students INT FO 01.01* to propose intervention strategy.

It is the student's responsibility to follow through on any assistance offered in the intervention strategy.

Reporting unsatisfactory course progress or unsatisfactory course attendance

Where a student has been assessed as not meeting the course progress or attendance requirements and continues with inaction as per actions in intervention strategies, the student will be advised with written notice:

- The Gordon intends to report the student of unsatisfactory course progress and/or unsatisfactory course attendance
- The reasons for the intention to report
- The students' rights and access to the *Complaints and Appeals Policy* QA PO 10 within 20 working days

PRISMS

Unsatisfactory course progress or unsatisfactory course attendance must only be recorded in PRISMS:

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- Once the internal and external complaints processes have been completed and the decision or recommendation supports The Gordon
- The student has chosen not to access the internal complaints and appeals process within the 20 working day period
- The student has chosen not to access the external complaints and appeals process
- The student withdraws from the internal or external appeals processes and notifies The Gordon in writing

Decision not to report student for breaching attendance requirements

The Gordon may decide to not report the student, if the student is still attending at least 70 per cent of the scheduled course contact hours and:

- ELICOS Programs, the student has provided evidence demonstrating compassionate and compelling circumstances
- VET Programs, the student is maintaining satisfactory course progress.

4.2.4 Allowable extensions of course duration

Where the student is unable to complete the course within the expected duration, a student's enrolment will only be extended when

- There are compassionate and compelling circumstances as assessed by the international office. Students must provide demonstrable evidence.
- An intervention strategy has been implemented, or in the process of implementing, because the student is at risk of not meeting course progress requirements
- A student has been approved for a Leave of Absence Refer Deferring, Suspending or Cancelling Enrolment Policy International Students INT PR 02

Where the duration of the student's enrolment has been extended the student is advised in writing of the outcome and advised to contact the Department of Home Affairs to seek advice on potential impacts on their visa (including the need to obtain a new visa)

Where the extension of course duration is rejected, the student will be advised in writing with the reasons why and the rights and access to the *Complaints and Appeals Policy QA PO 10* within 20 working days

4.1.1 Modes of delivery

Modes of delivery are discussed at regular scheduled meetings between the International Office and Program Area. The modes of delivery available for international students are defined as part of the course registration process.

- The Gordon must not deliver a course exclusively online or distance learning to an international student
- The Gordon must not deliver more than one-third of the units (or equivalent) by online or distance learning to an international student
- In each compulsory study period for a course, the student must be studying at least one unit that is not online or distance learning, unless the student is completing the last unit of their course
- For ELICOS programs and online or distance learning must be in addition to minimum faceto-face teaching requirements approved by ASQA or the ESOS Agency as part of the registration of the course (If applicable)
- The Gordon will take all reasonable steps to support international students disadvantaged by:
 - Additional costs of other requirements, including students with special needs, undertaking online or distance learning
 - Inability to access the resources and student services or opportunities to engage with other international students while undertaking online or distance learning

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5. Procedure

Assessing Course Progress

ACTION	RESPONSIBILITY	GUIDANCE
		Monitor course progress with program areas
Monitor and review course progress VET	Program Area / International Office	Regular meetings each Semester to discuss international student list
Programs		Identify students 'at risk' of or are making unsatisfactory course progress and report to International Office
		Meet with the Program area and student to discuss concerns with course progress
Implement Early Intervention	International Officer / Program Area /	Decide on best outcome for the student to continue with course progress
Strategy	Student	Student advised of risks with continued course progress issues
		Issue student in writing details of the intervention actions as per recommendation from Program Area
		Meet with the Program area and student to discuss continued concerns with course progress
	International Officer / Program Area / Student	Decide on best outcome for the student to continue with course progress
Unsatisfactory Course Progress		Student advised of risks with continued course progress issues
		Issue student in writing details of the intervention actions as per recommendation from Program Area
		If a warning letter is issued the student is advised of the reasons why and actions required and the next intervention would be intention to report
Intervention Action	Student	The student shall follow through with actions to improve course progress
Intention to report	International Officer / Student	Where the student fails to complete actions required to improve course progress an intention to report correspondence will be issued. The student will be required to respond in a specified time frame
Complaints and Appeals process	International Officer	Where an Intention to Report letter is issued, the student is advised of the right to appeal the decision within 20 working days
Recording unsatisfactory course progress in PRISMS	International Officer	If the student chooses not to appeal, or the appeal outcome supports The Gordon, International Office will report in PRISMS and save records in eCentral
Update student record	International Officer	Update student records in eCentral



Monitoring Attendance

ACTION	RESPONSIBILITY	GUIDANCE
Record and Monitor attendance VET	Program Area	Monitor student attendance with program areas Regular meetings each Semester to discuss international student list
Programs		Identify students 'at risk' of or unsatisfactory course attendance and report to International Offic
Review attendance and	International Officer /	Meet with the Program area and student to discuss attendance
implement intervention	Program Area / Student	Decide on best outcome for the student to continue with course progress
strategy		Student advised of risks with continued attendance issues
Implement intervention strategy	International Officer / Program Area / Student	Issue student in writing details of the intervention actions as per recommendation from Program Area
Intervention action	Student	If a warning letter is issued, the student shall follow through intervention strategy to improve attendance
Complaints and appeals process	Student	Where an Intention to Report letter is issued, the student is advised of the right to appeal the decision within 20 working day
Decision not to report student for breaching attendance requirements	International Officer / Manager Commercial Operations / Program Area	 Considered when: The student is making course progress Compelling or compassionate circumstances Student will be advised of reasons why and actions required
Recording unsatisfactory course attendance in PRISMS	International Officer	If the student chooses not to appeal, or the appeal outcome supports The Gordon, International Office will report in PRISMS and save records in eCentral
Update student record	International Officer	Update student records in eCentral

Extending Course Duration

ACTION	RESPONSIBILITY	GUIDANCE
		Review course completion and CoE at the end of each term
Review CoE and course	International Officer	Identify students who are not able to complete the course within CoE duration
completion		Discuss with Program Areas at scheduled meetings
		Meet with Program area and students as required with action plan
Request CoE extension	Student/Program Area	Student or Program Area requests for CoE extension in order to complete the course



ACTION	RESPONSIBILITY	GUIDANCE
Assess CoE Extension	International Officer / Manager Commercial	Review the student's progress and circumstances with program area
Öperations		Determine the student's eligibility for CoE extension
		Advise outcome of CoE extension
CoE Extension Outcome International Officer		If approved, extend CoE in PRISMS and advise the student seek visa advice from the Department of Home Affairs

5. Responsibilities

POSITION	GOVERNANCE / RESPONSIBILITY
Executive Director Commercial	Unless otherwise stated in this procedure the Executive Director Commercial Business is responsible for the issue, revision, re-issue and authorisation of this
Business	document.
International Office	For the monitoring of student progress and attendance and working with the program area to ensure the best outcome of the student.
Teaching Staff	For recording attendance for each session they teach, and for entering participation and results for each Unit of Competency they deliver into the Student Management System within ten working days so that attendance and progress can be monitored for all students.
Program Area	For monitoring progress on a weekly basis for each enrolled international student and for establishing a study support <i>Work Plan for International Students' INT FO 01.01</i> for any student who is falling behind progress milestones.
English Language Centre Manager (or delegate)	For reporting attendance of each student enrolled in an ELICOS course to International Office on a weekly basis.

6. Key aligned internal documents

Refer to the <u>Operational Management System (OMS)</u> for copies of all policies, procedures and supporting documents.

Work Plan for International Students INT FO 01.01

Deferring, Suspending or Cancelling Enrolment Policy and Procedure – International Students INT PR 02

Admission and Selection Policy and Procedure – International Students INT PR 03

International Education Agent Procedure INT PR 04

Genuine Temporary Entrant and Genuine Student Assessment Policy and Procedure – International Students INT PR 07

ELICOS Progress and Attendance Monitoring Policy and Procedure INT PR 08

Students Transfer Policy and Procedure – International Students INT PR 09

Assessment Policy TED PO 10

Student Conduct Policy QA PO 12

Complaints and Appeals Policy QA PO 10

7. Key aligned external documents

ELICOS Standards 2018

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Education Services for Overseas Students Act 2000

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

8. Review and approval

	POSITION	AREA	
Business Process Owner	Executive Director	Commercial Business	
Endorsed by (if applicable):	Nil		
Ratified by (if applicable):	Nil		
Review schedule:	This policy and procedure will be reviewed every 3 years / annually (or earlier as required)		
Last reviewed / updated:	5 November 2021		