Progress, Completion and Attendance Policy

1   PURPOSE

This policy provides a documented process for monitoring students' academic progress and completions, with a view to ensure completion within the expected CoE duration and the consequent procedures for reporting to the relevant Immigration and Education departments of international students' unsatisfactory performance.

This policy has been developed to satisfy the requirements of The National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2018, known as 'the National Code 2018' Standard 8 - Overseas student visa requirements

2   SCOPE

This policy applies to all overseas students current and prospective students as well as those continuing study

This policy is relevant to Pal Education as a registered training organisation required by the regulators and Australian Department of Home Affairs to report upon students' academic progress, rather than attendance. Within this policy are policy items (Section 3.5 Attendance Monitoring) for attendance monitoring requirements should Pal Education be required by ASQA to use attendance-based monitoring now or in the future. (8.10)

The attendance of each client enrolled with the RTO will be monitored closely to ensure there is full-time study activity, as attendance is necessary for satisfactory course progress. However, the Progress, Completion and Attendance Policy does not require the RTO to report unsatisfactory attendance under the conditions of the overseas student visa. However, as part of our academic support and monitoring, our internal policy is that students must attend classes and we record attendance at every class.

3   DEFINITIONS

Academic performance	Assessment of competency as a student progresses through the qualification
CoE	Confirmation of Enrolment
Course	Refers to the specific course a student is enrolled
Intervention Strategy	Systematic plan of action consciously adapted in an attempt to address and reduce the causes of academic failure to complete studies within the course duration
Learning Contract	Intervention strategy
Satisfactory course progress	Attending scheduled classes and successfully completing all assessments and obtaining a Competency (C) in all the units in the prescribed study period.
SSO	Student Support Officer(s)
Unit	Unit of Competency
Unsatisfactory course progress	Where the student is deemed Not Competent (NC) in 50% or more of the units attempted in any study period
VET	Vocational Education and Training
SMS	Student Management System
Study Period	A study period is the regular scheduled term of study between study breaks, often of ten weeks duration

4 POLICY STATEMENT

The monitoring of and awareness of student progress plays an essential role in ensuring that international students experiencing academic difficulties and who are at risk of failing can be identified insufficient time and provided with appropriate academic support and counselling and access to appropriate student services.

All overseas students are clearly informed about the requirements to achieve satisfactory course progress and, where applicable, attendance in each study period, prior to their commencement in any course. (8.5)

4.1 ATTENDANCE FORMS

Pal Education will continue to use attendance forms in every training session scheduled to be run by all trainers/flight instructors. These attendance forms are used to determine last point of contact with students and assist in students who don't achieve competency on assessments regarding intervention strategy meetings. (8.1)

Attendance forms are updated by Admissions Student Support Officer and printed out each Friday by the rostered Student Support Officer. Please reference Attendance Monitoring Flowchart for process.

4.2 COURSE COMPLETION WITHIN THE EXPECTED DURATION OF STUDY

4.2.1   Pal Education is required to manage student's course progress and workload to ensure they complete within the specified timeframe as outlined in the Confirmation of Enrolment (COE) and in accordance with the CRICOS registered course curriculum. (8.2)

4.2.2   In addition, Pal Education must monitor each student's enrolment to ensure they:
- Take no more than one-third of their course Online or by Distance learning, and
- Are enrolled in at least one face to face subject in each compulsory study period.

4.3 MONITORING AND TRACKING COURSE PROGRESS AND COMPLETION

4.3.1   maintains and tracks academic progress via the Record of Attainment, which in turn allows SSO's to update the Student Management System. (8.1, 8.9, 8.9.1)

4.3.2   Each course is setup within the Student Management System, with the required units, qualification rules, timeframes, delivery methods and sessions for delivery.

4.3.3   Students are then enrolled into the course and a Class Schedule is printed and provided to the student this includes all term brakes and each term is a study period. (8.9, 8.9.1-3)

4.3.4   The Class Schedule is in addition to the Training Plan provided prior to Confirmation of Enrolment.

4.3.5   The Theory Class Schedule will be provided to the student on their orientation day or at the beginning of each semester. For AVI students, all class schedules are provided on Smart Aviation.

4.3.6   The class schedules for each study period are then monitored to ensure that students are meeting the minimum 50% competency requirement and is achieving satisfactory academic progress.

a) Four (4) weeks prior to end of each study period a SSO will complete an End of Study Period Report. This report will enable Pal Ecuation staff to send out letters via the SMS to students at risk and advise them hand in any outstanding assessments for processing. Assessors will update the Record of Attainment and SSO's in turn update the SMS.

b) This process enables Pal Education to identify any students at risk of not completing within the expected duration on their CoE, and promptly reminds them to hand in assessments, helping to minimise any adverse effects to the student. (8.3, 8.4)

c) At the immediate end of each study period, this process is repeated and students who are failing to achieve better than 50% completion rate are sent a warning letter. The warning letter notifies the student about options for connecting with a SSO to plan an effective intervention strategy for the student to progress to a positive academic progress that enables the student to complete their studies as per the duration stated on their CoE. (8.3, 8.4, 8.9, 8.9.1-5)

d) Every student that receives a warning letter will be recorded on a register to ensure all students have an effective follow up plan. This register also enables Pal Education staff to manage the response from students in an appropriate and unbiased procedure.

e) Students who fail to achieve satisfactory academic progress in two consecutive study periods and fail to engage in an intervention strategy will be issued with an intention to report letter as soon as practicable, notifying them of:

- our intention to report the overseas student to Australian Department of Home Affairs for unsatisfactory course progress (8.13.1-2)
- their right to access our complaints and appeals process, in accordance with Standard 10 (Complaints and appeals), within 20 working days. (8.13.3)

4.4   REPORTING FOR UNSATISFACTORY ACADEMIC PROGRESS

4.4.1   Pal Education will only report unsatisfactory course progress in PRISMS and advise Australian Department of Home Affairs in accordance with section 19(2) of the ESOS Act if: (8.14)

- All internal and external complaints/appeals processes have been completed and the decision or recommendation supports Pal Education as the registered provider, or (8.14.1)
- the overseas student has chosen not to access the internal complaints and appeals process within the 20-working day period, or (8.14.2)
- the overseas student has chosen not to access the external complaints and appeals process, or (8.14.3)
- the overseas student withdraws from the internal or external appeals processes by notifying the registered provider in writing. (8.14.4)

4.4.2   Only when the above criteria are met the student's case may be referred to the RTO Manager for cancelation of CoE and the subsequent updating to Australian Department of Home Affairs as soon as practicable. (8.13, 8.3-4, 8.9, 8.9.1-5)

4.4.3   In instances of misconduct and allegations of misconduct these are addressed in the Student Misconduct Policy. (8.9.1)

4.5   ATTENDANCE MONITORING

Policy items and processes for attendance monitoring requirements should Pal Education be required by ASQA to use attendance-based monitoring **now or** in the future (8.10)

(Please note this is relevant only if ASQA have the monitoring of minimum attendance requirements set as a condition of RTO registration. Where this is not the case at the present time, disregard this section 4.5

Attendance Monitoring.)Whereby directed by ASQA as the ESOS Agency, it is a student visa requirement for overseas students to attend campus for a minimum of 80% of the scheduled course contact hours.

4.5.2   If Pal Education is required by ASQA to monitor overseas student attendance, monitoring and recording attendance of the overseas student will be conducted. (8.12)

4.5.3   Each students' attendance is recorded and calculated over the period of a term/study period using information from weekly class attendance sheets which are input to the student management system (SMS). (8.12.1)

4.5.4   Using this information in the SMS the weekly attendance records are reviewed and a report is generated to identify Students at risk of not satisfying attendance requirements. (8.12.2)

4.5.5   The student identified as being at risk are notified by email and their current attendance percentage is given in the form of an Attendance Reminder Notice. This notification is recorded in the SMS against the contacted students' contact log.

4.5.6   Students with will falling attendance percentages will be notified by email a minimum of two times before their attendance level reaches the 80% minimum. In each contact the Attendance Reminder Notice issued will include:
- a request that the student contact student support staff for assistance in getting back on track with the options for intervention processes and any other assistance that may be viable
- a statement explaining that Pal Education is obligated to monitor attendance and notify the Australian Department of Home Affairs of students with attendance below 80%, which may ultimately result in the cancellation of the student's visa.

4.5.7   Should the student be absent for four consecutive days absent without prior approval, they will be contacted by email and may also be phoned to initiate an intervention process and book an intervention interview. (8.12.3)

4.5.8   Should the attendance rate of a student fall to 80% a Final Attendance Warning Letter is sent to the student requesting an immediate intervention interview with student support staff and further warning the student of the imminent risk of reaching attendance percentages under the 80% minimum rate. (8.12.3-4)

4.5.9   At five consecutive days absent without our prior approval, or having reached attendance levels below 80% the student is sent a Notification to Report letter outlining our intention to report the student to Australian Department of Home Affairs, the reasons and their right to access the appeals and complaints process within 20 days. (8.13, 8.13.1)

4.5.10 Australian Department of Home Affairs will be notified only after the student has received an Intention to Report Letter and has been afforded the opportunity to internally appeal within 20 days. (8.12.4)

4.5.11 If the student uses the 20 day period after receiving an Intention to Report Letter to appeal and is successful, Australian Department of Home Affairs will not be notified at this time, however the attendance breach, all correspondence and appeal process will be recorded and retained. Future appeal processes for unsatisfactory attendance will review this information to make decisions on whether or not to report the student to Australian Department of Home Affairs. (8.12.4)

4.5.12 We may decide not to report the overseas student for breaching the attendance requirements if the overseas student is still attending at least 70% of the scheduled course contact hours and is maintaining satisfactory course progress. (8.15, 8.151-2)

4.6   REPORTING FOR UNSATISFACTORY ATTENDANCE

4.6.1   Pal Education will only report unsatisfactory attendance in PRISMS and advise Australian Department of Home Affairs in accordance with section 19(2) of the ESOS Act if: (8.14)
- All internal and external complaints/appeals processes have been completed and the decision or recommendation supports Pal Education as the registered provider, or (8.14.1)
- the overseas student has chosen not to access the internal complaints and appeals process within the 20 working day period, or (8.14.2)
- the overseas student has chosen not to access the external complaints and appeals process, or (8.14.3)
- the overseas student withdraws from the internal or external appeals processes by notifying the registered provider in writing. (8.14.4)

4.6.2   Only when the above criteria are met the student's case may be referred to the Admissions Officer for cancelation of CoE and the subsequent updating to Australian Department of Home Affairs as soon as practicable. (8.13, 8.3-4, 8.9, 8.9.1-5)

4.7   EXTENSION TO COURSE DURATION

4.7.1   Pal Education will only extend the duration of the student's study where the student is assessed as not being able to complete the course within the expected duration, as specified on the students COE, as the result of: (8.16)
- Compassionate or compelling circumstances as assessed on the basis of demonstrable evidence, or; (8.16.1)
- Implementing or being in the process of implementing, an Intervention Strategy for students who are at risk of not meeting satisfactory course progress, or; (8.16.2)
- Approved deferment or suspension of study has been granted in accordance with Standard 9 (see Deferral Suspension Cancellation Policy) (8.16.3)
- All Intervention Strategies or Extensions will be assessed individually, taking into account the circumstances of the student.

4.7.2   Except in the circumstances listed above, the expected duration of study specified in the students COE must not exceed the CRICOS registered course duration.

4.7.3   If an extension to the duration of the student's enrolment is granted, Pal Education will advise the student in writing of this decision and of the need for the student to contact Immigration immediately for advice on any potential impacts on their visa, including the need to obtain a new visa. (8.17)

4.8   PUBLISHING AND DISSEMINATION OF COURSE PROGRESS MONITORING

4.8.1   Course Progress Monitoring information will be published in all student information so that students and/or future students will be notified of:
- The requirements for achieving satisfactory course progress
- The process for assessing satisfactory course progress
- The Intervention strategies that will be implemented for students at risk of failing to achieve Satisfactory course progress
- The process for determining the point at which the student has failed to meet Satisfactory Course Progress
- Procedure for notifying students that they have failed to meet satisfactory course progress requirements

4.8.2   Pal Education will also make this policy and intervention strategy readily available to staff and will instruct trainers and student service staff appropriately.

5   RESPONSIBILITIES

Role within RTO	Area of responsibility
CEO	Approval Authority
RTO Manager	Development/Review
RTO Manager	Monitoring and Evaluation
RTO Manager	Compliance
Administration/ Student Support Officer	Implementation

Trainers and SSO will be responsible for:

- reminding students of their visa attendance obligations;
- Reminding students of their requirement to maintain satisfactory academic progress
- informing students of the availability of counselling and support services should
- they be experiencing study and/or personal problems; and to
- informing students that further action will be taken should they make unsatisfactory academic progress

The SSO are responsible for monitoring the progress of the students and filling in the appropriate End of Term Academic Progress Form. As soon as SSO become aware of any student who fails to meet the intervention strategy the SSO must inform RTO Manager.

SSO or the RTO manager shall be responsible for correspondence to or meetings with students at risk, at the behest of the RTO Manager.

The RTO Manager is responsible for final decisions about students at risk and those who have been deemed to have made unsatisfactory academic progress.

4   RELATED LEGISLATION AND REGULATIONS

- Education Services for Overseas Students (ESOS) Act 2000
- *The National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2018, known as 'the National Code 2018' Standard 8
- Standards for Registered Training Organisations (RTOs) 2015

5   RELATED DOCUMENTS

- Progress Completion and Attendance Procedure
- Student Intervention Policy and Procedure
- Academic Progress Notification Letter
- Unsatisfactory Academic Progress 1st Warning Letter
- Unsatisfactory Academic Progress 2nd Warning Letter
- Student Intervention Strategy Form
- Intention to report letter
- Complaints and Appeals Form
- Where section 4.5 Attendance Monitoring is relevant: Attendance Reminder Notice

Note: CEO of Pal Education provides full authority to RTO Manager to deal with all matters relevant with compliance and RTO management.