



Global Business College of Australia Pty Ltd

trading as

Global Business College of Australia (GBCA)

Course Progress and Intervention Strategy

Policy & Procedure 15

337-339 La Trobe Street, Melbourne VIC 3000

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## 1.0 Purpose

1.1 This policy is designed to govern the student academic monitoring processes across Global Business College of Australia's operation (GBCA). This is to ensure that GBCA meet the requirements of the following legislations requirements:

National Code 2018: Standard 6: Student Support Services

National Code 2018: Standard 8: Overseas student visa requirements

Standards for Registered Training Organisations 2015 – Standard 1.7

ASQA factsheet – overseas student attendance

1.2 Student visa conditions require that overseas students maintain satisfactory academic progress/attendance in their course.

1.3 GBCA monitors overseas student progress, attendance and course duration.

## 2.0 Scope

This policy applies to all GBCA VET overseas students and the student administration and student support operations within GBCA VET courses. This includes:

Compliance Manager - reports students to relevant government departments via PRISMS.

Trainer - monitoring student progress at minimum of on completion of each unit of competency, provide academic assistance, follow up on intervention arrangement.

Training Manager – identifies student at risks and provide academic counselling.

This policy does not apply to GBCA ELICOS students. GBCA ELICOS students are monitored by Policy 30 ELICOS Progress, Attendance and Intervention Policy and Procedure.

## 3.0 Responsibility

3.1 The Training Manager 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.

## 4.0 Definitions

4.1 "Course progress" is referring to:

- participating in scheduled classes course related information sessions, supervised study sessions and mandatory and supervised work-based training (if applicable) **and**
- completing required assessment

4.2 "At risk of not able to complete the course within the expected duration" is defined by GBCA as:

- Not participating in at least 60% of scheduled classes, course related information sessions, supervised study sessions and mandatory and supervised work-based training (if applicable) during the first half of the study period; or
- unsuccessfully completed or demonstrated competence of one or more during the first half of a study period

4.3 "At risk of unsatisfactory course progress" is defined by GBCA as:

- not successfully completed or demonstrated competence in 50% or more of the units in a study period.
- 4.4 "Unsatisfactory course progress" is defined by GBCA as:
- not successfully completed or demonstrated competence in 50% or more of the units in a study period during two consecutive study periods.
- 4.5 "Fail" is generally referring to students attempted assessment but received Not Yet Competent outcome and students did not come to class or students did not submit/complete assessments. This includes when a student was found of breaching the GBCA Plagiarism and Cheating Policy and Procedure.
- 4.6 "Intervention strategies" may include the followings:
- GBCA to arrange for the student to:
    - attend tutorials/study groups
    - provide individual assistance or mentoring
    - attend professional counselling session
    - assist students by advising of opportunities for the students to be reassessed for tasks in units or subjects they had previously failed, or demonstrate the necessary competency in areas in which they had not been previously able to demonstrate competency
    - receive assistance with personal issues which are influencing progress
    - being placed in a suitable alternative subject within a course or a suitable alternative course; or
    - a combination of the above and a reduction in study load.

## 5.0 **Requirements**

### **Course duration**

- 5.1 The duration of a CoE issued to overseas students will not exceed the CRICOS registered duration.

### **Online course delivery**

- 5.2 GBCA will not deliver a course exclusively by online or distance learning to an overseas student.
- 5.3 In each compulsory study period students must be studying at least one unit that is not by distance or online learning.
- 5.4 GBCA will not deliver more than one-third of the units (or equivalent) of its courses by online or distance learning to an overseas student.

### **Monitoring of student course progress**

- 5.5 For general VET courses, a study period means 10 weeks of study. This does not include holidays or term breaks.
- 5.6 GBCA advises the course and study requirements of each study period clearly to students prior to commencement, during orientation and stated in the student handbook. Students will be given a training plan which include these details during orientation. This will identify the units required to be completed in each study period in order to complete the qualification within the duration of study as indicated on the CoE and the CRICOS register. Students will also be advised during orientation that unsatisfactory course progress in two consecutive study periods for a course could lead to the student being reported to relevant government agencies via PRISMS.

- 5.7 GBCA advises any variations to students in writing as soon as they are known.
- 5.8 GBCA monitors the course progress of students to ensure at all times students are in a position to complete the course in the time as specified on their CoE.
- 5.9 When GBCA monitors a student's course progress to assess if that progress is satisfactory, GBCA will also review the student's attendance to assess if he/she has been participating in scheduled classes, course related information sessions, supervised study sessions or any mandatory and supervised work-based training (as applicable).
- 5.10 If an overseas student is not attending scheduled classes, but is successfully completing or demonstrating competence in at least 50% of the units in a study period, GBCA will need to reduce the duration of the course to the minimum duration required, while requiring a student to maintaining a minimum of 20 scheduled course contact hours per week.
- 5.11 Students are required to complete their course within the expected duration of study as recorded on the Student Confirmation of Enrolment (CoE). GBCA will not extend the duration of a student CoE if he/she is unable to complete the course within the duration of its CoE, unless one or more of exceptional circumstances procedure applies (refer to Completion Within the Expected Duration of Study Policy):
- On medical grounds (a medical practitioner's certificate indicating the student is unable to attend class); or
  - In exceptional compassionate circumstances beyond the students' control, such as serious illness or death of a close family member (independent evidence of the exceptional circumstances is required) or,
  - Where GBCA is unable to offer a prerequisite unit at the time it is required, or
  - Where GBCA is implementing an intervention strategy for students at risk of not meeting academic progress requirements.
  - Where GBCA has approved the deferral of commencement of studies or the suspension of study.
  - *Note: Compassionate or compelling circumstances may be deemed as serious illness; bereavement of a closely related family member (evidence will be required); natural disasters; traumatic experience or political upheaval in home country.*
- 5.12 If GBCA extends the duration of student CoE, the student will be advised to contact immigration to seek advice on any potential impacts on their visa, including the need to obtain a new visa. Any extension to the duration of a student's course, and the reasons for the extension must be recorded by GBCA on PRISMS and in the student's file.
- 5.13 GBCA implements an intervention strategy to assist students who are identified as "At risk of not able to complete the course within the expected duration " and "At risk of unsatisfactory progress".
- 5.14 GBCA identifies, monitors and records student's course progress on *mid way through a study period*, and at the *end point of each study period*.
- 5.15 GBCA sends a 'Notice of Intention to Report' to students who are identified as "unsatisfactory course progress".
- 5.16 For monitoring of student academic progress and record tracking purposes, GBCA uses its designated student management system – RTOmanager – to record student results, monitor student progress, communicates with students regarding their course process,

including sending Warning letters etc..., records intervention strategies and minutes of meeting with students. Students can view all communications via their student portal.

## 6.0 **Process and Strategy**

### **Early Intervention**

- 6.1 Trainers monitor and record students' attendance on GBCA's official attendance monitoring system.
- 6.2 At any time, when a trainer becomes aware of issues or has concerns regarding the student's attendance/course progress, they will first communicate with the student, and then the Training Manager.
- 6.3 At the middle of each study period, students who are identified as 'at risk of not able to complete the course within the expected duration' (as defined in Section 4.2 of this Policy) will receive a "Letter of Advice – At risk of not able to complete the course within the expected duration'. GBCA will advise students the requirement to improve their attendance, the opportunity to resubmit the assessment for the unit that he/she was not achieved a Competent result during the first half of a study period and to contact GBCA support services to discuss any personal issues (if applicable) which may have influenced their study. GBCA provides intervention strategies as describes in section 4.6 of this policy
- 6.4 This is the stage where GBCA identifies and alerts those students who have not engaged in their studies and advise them to approach the GBCA support services so that they can better engage in their learning activities.

### **Intervention**

#### **Stage 1 - End point of a study period**

- 6.5 At the end point of each study period, students who are identified as "at risk of unsatisfactory course progress" in any given study period will receive a First Warning letter and be required to contact the training department to undertake intervention strategies. Students who do not attend the intervention meeting as required by the First Warning Letter will be moved to stage 2.
- 6.6 GBCA uses the intervention function in GBCA's student management system to guide and record the discussion of intervention strategies. GBCA will arrange intervention strategy as described in Section 4.6 of this Policy. GBCA will advise students to pay the out-of-term reassessment fee and resubmit assessment within the first five (5) weeks of the following term.
- 6.7 Follow up review from the first intervention meeting will be five (5) weeks of the following study period. GBCA will, in consultation with the student, adjust the intervention if required and update the Intervention record.

#### **Stage 2 - Middle of the following study period**

- 6.8 On the review date, if students achieve a Competent result during the reassessment, and no longer being "At risk of unsatisfactory course progress" of the preceding term, GBCA will change the intervention status to "Case closed".
- 6.9 Students who neither attend the meeting as required on the First Warning Letter nor participate in the support services as discussed during the intervention meeting in stage 1 will be sent the Letter of Warning – Second and Final warning of not achieving satisfactory course progress. The student will be moved to stage 3.

### Stage 3 - End point of the study period identified in stage 2

- 6.10 At the end of the study period identify in stage 2, GBCA monitors course progress for students who had been escalated to Stage 3. Those who are “At risk of unsatisfactory course progress” during this study period will be deemed as “unsatisfactory course progress” and GBCA will send a Notice of Intention to Report. Student who are not “At risk of unsatisfactory course progress” during this study period will exit the intervention strategy 3. GBCA will change the intervention status to “Case closed” and record the reason “student no longer at risk of unsatisfactory course progress during the study period from --- to ---”.

#### Reporting

- 6.11 Students who are identified as "unsatisfactory progress" for two (2) consecutive study periods will receive a 'Notice of Intention to Report'. The Notice of Intention to Report issued will describe intervention so far, warning letters already sent and what has taken place and the intention to report the student. It also will detail the student’s right to appeal the decision and provide advice on what the student must do regarding their visa.
- 6.12 Students are given 20 working days from the date of the Notice of Intention to Report to access GBCA's Complaints and Appeals Policy and Procedure 07.
- 6.13 A student may appeal on the following grounds:
- GBCA's failure to record or calculate the student’s marks accurately,
  - compassionate or compelling circumstances, or
  - GBCA documented policies and procedures that have not been made available to the student.
- 6.14 If a student chooses to access GBCA’s complaints and appeals process, student enrolment will be maintained during an appeals process. *Refer to Complaints and Appeals Policy and Procedure.*
- 6.15 If the internal appeal shows that there was an error in calculation, and the student actually made satisfactory course progress, GBCA does not report the student, and there is no requirement for intervention.
- 6.16 If the appeals process shows that the student has not made satisfactory progress, but there are compassionate or compelling reasons for the lack of progress, ongoing support must be provided to the student through GBCA's intervention strategy, and GBCA does not report the student. *NOTE: GBCA will only await the outcome of the internal and one external appeal process before reporting a student for unsatisfactory course progress (if found in favour of GBCA).*
- 6.17 If the student chooses not to access the internal appeals processes within the 20 working day period or withdraws from the process
- OR*
- On completion of the external appeals process, the unsatisfactory course progress is confirmed
- The student will be reported to Department of Education (DET) and Department of Home Affairs (DOHA) via PRISMS.
- 6.18 Course progress in a non-compulsory study period is to be disregarded when considering whether or not a student has made satisfactory course progress over two consecutive study periods.

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

#### **Reporting “unsatisfactory progress” in PRISMS**

- 6.20 To report a student for not making satisfactory progress, the reporting staff must go into the Student Course Variation screen, from the drop-down list under ‘Reason for Course Variation’, and choose Unsatisfactory Course Progress.
- 6.21 GBCA must report the “unsatisfactory course progress” to PRISMS within 31 days (or 14 days if a student is under 18 years of age) from the date the student’s studies is terminated. The date the student’s studies are terminated is defined as:
- Last date of the 20 working day period for a student to access GBCA’s internal appeal process, and the student did not access the appeal process, or
  - 5 working days after the decision of the internal appeal process was emailed to the student’s registered email address with GBCA, and the student did not advise GBCA of their intention to access external appeal, or
  - 25 working days after the decision of the internal appeal process was emailed to the student’s registered email address with GBCA, and GBCA did not receive the receipt of the external appeal has been lodged with the designated external appeal authority, or
  - The next working day after GBCA receives the decision of the external appeal body and the decision was supporting the GBCA’s decision to cancel the student’s enrolment (for cancellation relating to unsatisfactory course progress).

#### **Intention to reduce the course duration**

- 6.22 Students who receive the “intention to reduce the course duration” must attend the intervention meeting in which they are required to show cause of why their course duration should not be reduced. GBCA will make a final decision based on the student’s existing skills and knowledge and the student’s commitment to maintain a minimum of 20 scheduled course contact hours per week.

### **7.0 Non-bona fide students**

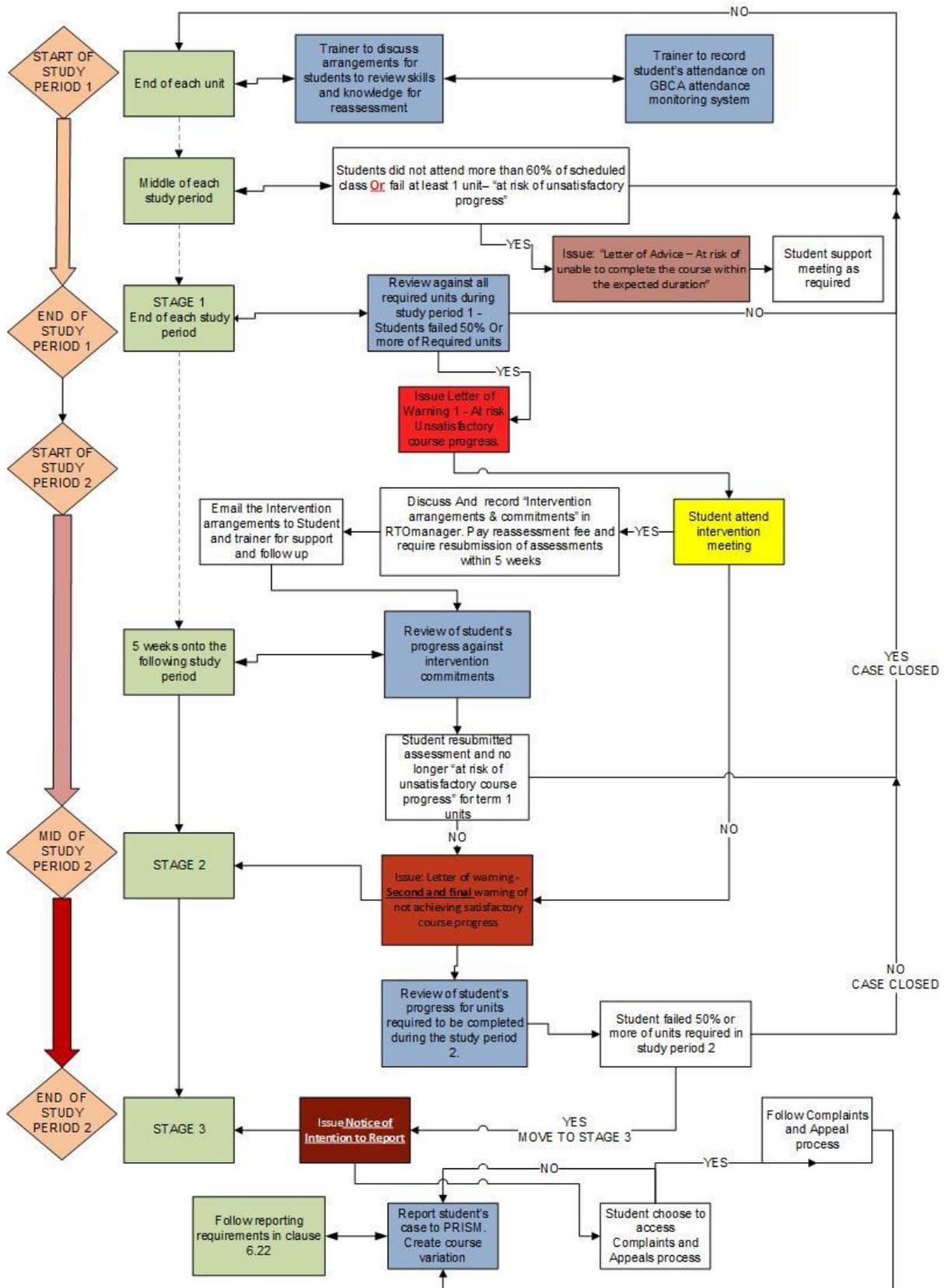
#### **7.1 Erratic course progress as a potential indication of non-bona fide students.**

If GBCA suspects a student is not a genuine/bona fide student, GBCA may cancel the student’s enrolment, as allowed under Standard 9 and as stated in our Standard 9 policy. (*Refer to Policy 19 Deferral suspension and cancellation*).

- 7.2 **A non-genuine/non bona fide student is defined by GBCA as a student with erratic (irregular/ inconsistent) course progress or does not progress in their course and does not attend/does not participate in regular classes.** GBCA will ensure that prior to enrolment; students are made aware of the grounds on which cancellation of enrolment may occur as provided to them via the International Student Handbook.

- 7.3 All breaches to student's visa conditions will be reported via PRISMS even if the student has ceased study.

**PROCESS MAP: COURSE PROGRESS AND INTERVENTION STRATEGY**



## DOCUMENT CONTROL

|  |   |                     |                          |                            |
|--|---|---------------------|--------------------------|----------------------------|
| <b>Department</b>  | GBCA Training & Learning<br>GBCA Student Administration<br>GBCA Student Support   | <b>Author(s)</b>    | GBCA Training & Learning |                            |
| <b>Quality Controlled Policy No. &amp; Title Version</b> | Policy 15 Course Progress and Intervention strategy Policy and Procedure V3.0   | <b>Approved</b>     | GBCA Compliance          |                            |
|  |   | <b>Authorised</b>   | Compliance Manager       |                            |
| <b>Standards</b>   | National code 2018 - Standard 6<br>Student supports<br>National code 2018 - Standard 8<br>Overseas student visa requirements<br>SRTOs 2015 – Standard 1.7<br>ASQA factsheet – Overseas student attendance | <b>Distribution</b> | Internal                 | GBCA Manager<br>GBCA Staff |
|  |   |                     | External                 | GBCA Students              |

## REVISION RECORD

| Date                            | Version | Revision description  |
|---------------------------------|---------|---|
| June 22, 2015                   | 1.0     | GBCA creates policies and procedures against Standards for Registered Training Organisations (RTOs) 2015 and The National Code 2007   |
| January 13, 2016                | 2.0     | Update policy to reflect current practices in development of course progress and intervention strategy  |
| October 17, 2016                | 2.1     | Update policy to reflect form SA041   |
| November 4 <sup>th</sup> , 2016 | 2.2     | Modify clause 4.1 to have study period for English course   |
| February 27 <sup>th</sup> 2017  | 2.3     | Remove monitoring “at risk” students to reflect current practices   |
| 30 August 2017                  | 2.4     | Minor updates – Position and titles   |
| 15 September 2017               | 2.5     | Update: titles, address on cover  |
| 15 March 2018                   | 2.6     | Update policy to meet NC 2018   |
| 16 Aug 2019                     | 3.0     | Major update policy to widening the definition of course progress to include the attendance requirement.  |
| 28 Aug 2020                     | 3.1     | Revised policy to: <ul style="list-style-type: none"> <li>○ Include the clarification of reporting to PRISMS</li> <li>○ Combine strategy and processes</li> <li>○ Clarify the intervention processes into three stages</li> </ul> |