

Vose Seminary

Course Progress Intervention Strategy

1 Purpose and Background

This policy's purpose is to implement the DEST-DIAC Course Policy and Procedures for CRICOS Providers of VET courses under the National Code 2007. It relates to progress of overseas students enrolled in the Seminary's VET courses.¹

The National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2007 (The National Code 2007) and the ESOS Act 2000 include two standards that relate:

Standard 9 mandates completion by an international student of their course of study within the expected duration of study. Standard 10 of the National Code mandates monitoring of course progress by international students.

Standard 9 – Completion within the expected duration of study

Outcome of Standard 9

Registered providers monitor the enrolment load of students to ensure they complete the course within the duration specified in their CoE and do not exceed the allowable portion of online or distance learning. Registered providers only enable students to extend the expected duration of study for the course through the issuing of a new CoE in limited circumstances.

9.1 The registered provider must have and implement documented policies and procedures for monitoring the progress of each student to ensure that at all times the student is in a position to complete the course within the expected duration as specified on the student's CoE. In monitoring this enrolment load, the registered provider must ensure that in each compulsory study period for a course, the student is studying at least one unit that is not by distance or online learning.

9.2 The registered provider may only extend the duration of the student's study where it is clear that the student will not complete the course within the expected duration, as specified on the student's CoE, as the result of:

- a. compassionate or compelling circumstances (e.g. illness where a medical certificate states that the student was unable to attend classes or where the registered provider was unable to offer a pre-requisite unit)
- b. the registered provider implementing its intervention strategy for students who were at risk of not meeting satisfactory course progress, or
- c. an approved deferment or suspension of study has been granted under Standard 13.

9.3 Where there is a variation in the student's enrolment load which may affect the student's expected duration of study in accordance with 9.2, the registered provider is to record this variation and the reasons for it on the student file. The registered provider must correctly report the student via PRISMS and/or issue a

¹ For students (domestic and overseas) enrolled in ACT degree programs the ACT Progression and Intervention Policy applies.

new CoE when the student can only account for the variation/s by extending his or her expected duration of study.

9.4 The registered provider may allow the student to undertake no more than 25 per cent of the student's total course by distance and/or online learning. However, the registered provider must not enrol the student exclusively in distance or online learning units in any compulsory study period.

9.5 Except in the circumstances specified in 9.2, the expected duration of study specified in the student's CoE must not exceed the CRICOS registered course duration.

Standard 10 – Monitoring course progress

Outcome of Standard 10

Registered providers systematically monitor students' course progress. Registered providers are proactive in notifying and counselling students who are at risk of failing to meet course progress requirements. Registered providers report students, under section 19 of the ESOS Act, who have breached the course progress requirements.

10.1 The registered provider must monitor, record and assess the course progress of each student for each unit of the course for which the student is enrolled in accordance with the registered provider's documented course progress policies and procedures.

10.2 The registered provider must have and implement appropriate documented course progress policies and procedures for each course, which must be provided to staff and students, that specify the:

- a. requirements for achieving satisfactory course progress
- b. process for assessing satisfactory course progress
- c. procedure for intervention for students at risk of failing to achieve satisfactory course progress
- d. process for determining the point at which the student has failed to meet satisfactory course progress, and
- e. procedure for notifying students that they have failed to meet satisfactory course progress requirements.

10.3 The registered provider must assess the course progress of the student in accordance with the registered provider's course progress policies and procedures at the end point of every study period.

10.4 The registered provider must have a documented intervention strategy, which must be made available to staff and students, that specifies the procedures for identifying and assisting students at risk of not meeting the course progress requirements. The strategy must specify:

- a. procedures for contacting and counselling identified students
- b. strategies to assist identified students to achieve satisfactory course progress, and
- c. the process by which the intervention strategy is activated.

10.5 The registered provider must implement the intervention strategy for any student who is at risk of not meeting satisfactory course progress requirements. At a minimum, the intervention strategy must be activated where the student has failed or is deemed not yet competent in 50% or more of the units attempted in any study period.

10.6 Where the registered provider has assessed the student as not achieving satisfactory course progress, the registered provider must notify the student in writing of its intention to report the student for not achieving satisfactory course progress. The written notice must inform the student that he or she is able to access the registered provider's complaints and appeals process as per Standard 8 (Complaints and appeals) and that the student has 20 working days in which to do so.

10.7 Where the student has chosen not to access the complaints and appeals processes within the 20 working day period, withdraws from the process, or the process is completed and results in a decision supporting the registered provider, the registered provider must notify the Secretary of DEST through PRISMS of the student not achieving satisfactory course progress as soon as practicable.

2 Definitions:

“Unsatisfactory progress is defined as not successfully completing or demonstrating competency in at least 50% of the course requirements in a given study period” (maximum length six months)” (DEST-DIAC definition).

“Risk of unsatisfactory progress” relates to regularity of attendance and submission of assessment tools by due date and the sitting of exams, along with “not yet competent” assessment in individual components of a unit.

DIAC: Commonwealth Department of Immigration and Citizenship

ESOS: Education Services for Overseas Students

3 Strategies:

3.1 *Initial Information and guidance to students:*

The Academic Dean will ensure that students will be provided with detailed information as to course requirements for each semester, including details of the assessment tools within each unit.

Where there are options or electives within a given semester, the Academic Dean will ensure that the units enrolled in provide an appropriate path to completion of the course.

3.2 *Monitoring of students during semester to determine whether there is “risk of unsatisfactory progress”:*

1. Each lecturer will maintain a record of attendance at classes and the submission of assessment tools.
2. After two events such as unexcused absences or late submission of assignments, the lecturer will notify the Academic Dean (a standard form will be provided). A form letter will be sent to the student reminding the student of responsibilities and consequences of failure to maintain satisfactory progress. The letter will include details of counselling available relating to both learning skills and personal issues which may be affecting study.

3. The Academic Board will review mid-semester cases of “risk of unsatisfactory progress” to determine further action is required.

3.3 Progression Rules – application and criteria

1. Progression of students in their enrolled course of study will be evaluated by the Academic Board during the processing of unit results normally occurring at the end of each semester.
2. Progression of students in their enrolled course of study may be evaluated at other times. In these circumstances the Seminary may impose sanctions retrospectively on a student. The Academic Dean has authority to determine whether sanctions will be applied retrospectively following, for example, the submission of grades after deferred examinations.
3. The Progression Rules against which the progress of students in a course shall be evaluated are as follows:
 - (a) Failing 50% or more of the credit points available in a half-year period (Jan – Jun/Jul – Dec) in units for which they were formally enrolled at the end of Week 5 of the semester;
 - (b) Failure of the same compulsory unit, or equivalent unit,
 - (i) on two occasions
 - (ii) on three occasions
 - (c) Failure in the same elective unit, or equivalent unit, on two occasions;
4. The following outcomes are possible from the application of the Seminary’s progression rules:
 - (a) The progression of a student for whom none of the Progression Rules in 3 apply will be deemed “satisfactory” and the student declared “in good standing”.
 - (b) The progression of a student for whom Progression Rule 3(a) applies will be deemed “unsatisfactory” and the student declared “at risk” of the imposition of future warnings/sanctions.
 - (c) If in a second *consecutive* half-year period a student’s progression is identified as “unsatisfactory” due to Progression Rule 3(a) the Seminary shall inform the student of its intention to report the student to DIAC for unsatisfactory progress and the student shall be informed of the right to appeal and to “show cause” why DEST should not be informed about their progression status. (see §3.5)
 - (d) The progression of a student for whom Progression Rule 3(b)(i) applies will be deemed “unsatisfactory” and the student declared “at risk” of the imposition of future warnings/sanctions.
 - (e) For a student for whom Progression Rule 3(b)(ii) applies, the Seminary shall inform the student of its intention to report the student to DIAC for unsatisfactory progress and the student shall be requested to “show cause” why DEST should not be informed about their progression status. (see §3.5)
 - (f) A student for whom Progression Rule 3(c) applies shall be excluded from that unit.

3.4 Procedures when a student's progression is "unsatisfactory"

1. Students identified as having "unsatisfactory progress" and hence "at risk" will receive a written communication from the Seminary drawing their circumstances to their attention and requiring them to seek the counsel of the Academic Dean. Attendance with the Academic Dean shall be noted on the student's file.
2. The Academic Dean shall as part of counsel:
 - (a) Where appropriate, advise students on the suitability of the course in which they are enrolled
 - (b) Advise students of opportunity for reassessment for tasks in units previously failed, or for demonstrating the necessary competency in areas in which they had not previously been able to demonstrate competency.
 - (c) Advise students that unsatisfactory course progress in two consecutive study periods for a course could lead to the student being reported to DIAC and visa cancellation, depending on the outcome of any appeals process.
 - (d) Provide details of counselling available relating to both learning skills and personal issues which may be affecting study.
 - (e) Such intervention shall be implemented as soon as practicable, but no later than the end of week 4 of the following semester. (Refer also to §3.2 concerning earlier intervention where there appears to be "potential to be unsatisfactory.")

3.5 Student right of appeal against Seminary intention to report "unsatisfactory progress" to DIAC.

1. When the Seminary notifies the student in writing of its intention to report the student to DIAC for unsatisfactory progress, the letter shall inform the student that he or she is able to access the Seminary's complaints and appeals process and that the student has 20 working days from the date of the letter in which to do so.
2. A student may appeal on the following grounds:
 - a. The Seminary's failure to record or calculate a student's marks properly.
 - b. Compassionate or compelling circumstances, or
 - c. The Seminary has not implemented its intervention strategy and other policies according to its documented policies and procedures that have been made available to the student.
3. Where the student's appeal is successful:
 - a. If the appeal shows there was an error in calculation and the student has actually made satisfactory course progress, the Seminary does not report the student and there is no requirement for intervention.
 - b. If the appeals process shows the student has not made satisfactory progress, but there are compassionate or compelling reasons for the lack of progress, ongoing support will be provided to the student in terms of the intervention strategy and the Seminary does not report the student.
4. Where:

- a. the student does not elect to access the complaints and appeals process within 20 working days of the date of the request on the letter from the Seminary,
 - b. the student withdraws from the process, or
 - c. an appeal fails,
- the Seminary shall report the student through PRISMS within 5 days of finalising the decision to report.

3.6 Student right of appeal against exclusion from a unit.

Students who are excluded from an elective unit (§3.3.4.f) shall be informed by the Academic Dean by mail and they may appeal the imposition of that sanction through the Seminary's complaints and appeals process. If the appeal is successful, the student may be permitted to enrol in the unit on only one (1) more occasion in the current course.

3.7 Monitoring of students for course completion within the expected duration of study

1. The Seminary is obliged to monitor the enrolment load of international students to ensure that at all times they are in a position to complete their course within the duration on each student's CoE, usually the normal duration of the course.
2. Before the commencement of study and each semester the Academic Dean shall negotiate/confirm with each international student a program of study designed to complete the student's course within the period specified on the student's CoE.
3. In the discussion with the Academic Dean before the commencement of each semester, the student may request a variation which will extend the period of study beyond the expected duration only on the grounds of:
 - (a) compassionate or compelling circumstances (e.g. illness where a medical certificate states that the student was unable to attend classes or where the Seminary was unable to offer a pre-requisite unit); or
 - (b) the Seminary implementing its intervention strategy for students who were at risk of not meeting satisfactory course progress,
 - (c) approved deferment or suspension of study.
4. Should the Academic Dean approve a request to extend the period of study beyond the expected duration, the Academic Dean must:
 - (a) record this approval on the student's file along with the reasons for the approval
 - (b) report this approval for the student via PRISMS and/or issue a new CoE.

3.8 Related Internal Documents

Dispute Resolution Policy for International Students (to be placed on website)

3.9 Related External Documents

ESOS Act - <http://aei.dest.gov.au/AEI/ESOS/ESOSLegislation/default.htm>

National Code 2007 -

<http://aei.dest.gov.au/AEI/ESOS/NationalCodeOfPractice2007/default.htm>

ESOS ACT 2000, DEST-DIAC Course Progress Policy and Procedures for CRICOS Providers of VET Courses.

3.10 Responsibility and Authority

Body/Position with authority to initially approve the policy and procedures and amend the policy:

Academic Board/ Baptist Churches of WA Council

Non-substantive amendments may be made by the Academic Board and notified to the Council.

Body/Position(s) with delegated authority to amend the procedures consistent with the policy:

Principal/Academic Dean

3.11 Approvals

Document Title:	Course Progress Intervention Strategy	Document Number:	
Approval Authority:	Academic Board Baptist Union of WA Council	Approval Date:	9 Aug 2007 10 Sept 2007
Resolution No:	Acad Board, 3.1 Baptist Union Council,	Effective Date:	1 July 2007
Document Administrator	Academic Dean	Review Date:	June 2009
Revision History			
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4 Part B: Procedures

4.1 *Appeals by students*

1. When a student wishes to appeal in response to the letter to the student notifying the imposition of a sanction or issuing a warning, such appeals must be in writing and the student does not have an automatic right to appear in person to speak to their written submission. Submissions should therefore include appropriate documentation (eg. statements from counsellors, medical certificates, etc.) to substantiate the student's claim to have experienced special circumstances.
2. An appeal statement lodged outside the timeframe stated in the letter to the student notifying the imposition of a sanction or issuing a warning will not be considered.
3. If initial decisions are delayed and/or the student subsequently appeals the initial decision such that the final outcome is not available until after the Administrative Date of the next period of study, the student may not be permitted to enrol in additional units in that half-year.
4. Late or non-receipt of official letters from the Seminary will not be accepted as grounds for appeal if the student has not ensured that the Seminary is in receipt of accurate and current contact details.

4.2 *Recording of treatment of students*

1. The Academic Dean shall establish a Progression File at the Seminary in which to place folders that pertain to each student who appeals.
2. The written record of treatment of each student by the Seminary Academic Dean or by the Seminary Progression Appeals Panel shall be held in the designated folder.
3. The statement(s) from each student along with copies of other correspondence shall also be held in the designated folder.

4.3 *Forms and sample notices (attached)*

Notification by Lecturer of "Risk of unsatisfactory progress"

Notification to Student of "Risk of unsatisfactory progress"

Notice to student of "Unsatisfactory progress"

Notice to student of intention to report a student to DIAC: sample letter available at http://aei.dest.gov.au/AEI/ESOS/QuickInfo/SampleNotice_pdf.pdf

Vose Seminary

Notification of Student with “Risk of Unsatisfactory Progress”

[To be used when a student has had two events of unexcused absence and/or unapproved late submission]

Student Name: _____ Course: _____

Unit No.: _____ Unit Title _____

The student named on this form has:

Been absent from the classes without excuse on: _____ (date[s])

Has failed to submit assignment(s) on time, without approval of deferment, as follows:

Brief description: _____ Due date: _____ Submitted: _____

(Signed, Lecturer)

(Date)

Received by Academic Dean:

Student contacted by email/letter:

Follow up meeting with student:

Sample letter to student who has “Risk of Unsatisfactory Progress”

To:

Date:

Re: Risk of Unsatisfactory Progress

As an overseas student you will be aware of visa requirements concerning satisfactory progress and it is the desire and responsibility of the Seminary to assist you in your studies so that your study here is fulfilling, achieving your goals. For these reasons it is a requirement for study at the Seminary that students attend classes and submit assignments on due date. This is necessary for your own learning and also for the total learning experience of your fellow-students.

Unexcused absence from class and late submission of assignments is commonly a warning sign of risk of not passing the unit, achieving the necessary competencies.

The lecturer(s) in have notified me of your absences/late submission as follows:

There are people available who can assist in learning/planning skills, and the Chaplain is available to discuss confidentially personal issues that may be affecting you attendance and study.

Please contact the office to arrange a time to meet with me to discuss and plan these ways forward.

Academic Dean

Vose Seminary

Sample letter to student who has “Unsatisfactory progress” (first time)

(Student name and address)

Your enrolment in [course] at the Seminary began on [course commencement date]. During the orientation programme, you were informed of the student visa condition relating to course progress. You were also informed that Seminary uses the DEST-DIAC Course Progress Policy and Procedures for CRICOS Providers of VET Courses.

Under the DEST-DIAC Course Progress Policy, a student has made unsatisfactory progress if the student has not successfully completed or demonstrated competency in at least 50% of the course requirements in a study period.

[Possible paragraph if there was earlier warning] You were first identified as at risk of making unsatisfactory progress on [date of identification] and the Seminary implemented our intervention strategy [on date/ shortly thereafter].

The results for the past semester mean that your progress is now classed as unsatisfactory.

Note that unsatisfactory course progress in two consecutive study periods for a course could lead to you being reported to the Department of Immigration and Citizenship (DIAC) and could result in the cancellation of your student visa.

It is a requirement for you to meet with the Academic Dean as soon as practicable but at the latest by [a date no later than the end of week 4 of the next semester]. At that time the Academic Dean will discuss with you:

- (a) Where appropriate, advise on the suitability of the course in which you are enrolled
- (b) Opportunity for reassessment for tasks in units previously failed, or for demonstrating the necessary competency in areas in which you have not previously been able to demonstrate competency.
- (c) Details of counselling available relating to both learning skills and personal issues which may be affecting study.

Academic Dean