

## Overseas Students Visa Requirements Policy & Procedure National Code Standard 8

This policy and process outlines Student Completion of Studies in the Duration of their COE (1);  
Monitoring of Course Progress (2) & Monitoring of Attendance –ELICOS (3)

### 1. COMPLETION OF STUDIES IN THE EXPECTED DURATION OF THE CONFIRMATION OF ENROLMENT and ONLINE/DISTANCE STUDY

**Federation Technology Institute (FTI)** staff will constantly monitor student assessments and workloads and record any changes /variations on the student file.

FTI will monitor every students enrolment load a minimum of once per study period (approximately 10 weeks) to ensure students can complete the course in the duration as per the Confirmation of Enrolment (COE).

A generic course progress policy may not be appropriate for more than one course. Courses that require additional or varied progress rules will be provided a separate course progress policy, REFER 2 below.

Facilitators/trainers will discuss any concerns with students and offer assistance as situations arise to help prevent students falling behind in their course progress. Facilitators/trainers will constantly monitor the progress of students and report any concerns to the Academic Manager/Director of Studies as soon as identified.

Any student that fails a unit of competency in their course may be considered 'at risk' to not complete the course in the expected duration and intervention strategies can be commenced at any point.

Intervention strategies are tailored to meet each student's individual needs. Formal intervention strategies and counselling of the student will be implemented.

Intervention Strategies could include:

- regularly attend classes
- receive extra time to complete tasks
- attending academic skills programs
- attending tutorial or study groups
- receiving individual assistance / mentoring
- attending study groups
- attending counselling
- receiving 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/increase in course load

Students may take a normal, reduced or increased study load in each study period, as long as the workload is monitored to ensure the student completes the course within the duration specified on the CoE.

The expected course duration for overseas students should not differ from the expected duration for domestic students.

FTI will ensure students do not exceed the 1/3 of the total course by online /distance mode for VET courses. In each compulsory study period students must complete at least one unit face to face unless it is the last unit of the course. Details of online/distance modes are also to be kept on the student file and listed on the Student Letter of Offer.

All ELICOS programs are delivered face-to-face for a minimum of 20 hours per week. There is no online/distance mode offered by FTI.

Student progress is assessed and recorded at the minimum on completion of each unit of competency / or once each study period.

Should students refuse to maintain an agreed/approved workload; the student will be firstly counselled and then warned of impending visa implications.

A student CAN enrol in less than a 'full-time' load in any study period if:

- there are compassionate or compelling reasons for reducing the load
- the reduced load is part of the intervention strategy
- the student has studied, or plans to study, extra units in another study period
- the student has only a few units left to complete and these do not constitute a full-time load
- Pre-requisite units are not available in that study period.

By studying less than what used to be considered a 'full-time' load, a student is at risk of not completing the course within the expected duration as specified on the student's CoE. Therefore the student may need to catch up by studying subjects during a non-compulsory study period or by overloading in some compulsory study periods to compensate for those study periods in which the student was studying a reduced load.

Trainers are to consult with the Academic Manager before increasing or decreasing student workloads.

A student who deliberately under-enrols may represent a risk for FTI's compliance of Standard 8. This could result in a cancellation of the student's enrolment as per '*Student Rules*'.

In this instance FTI would implement one of two options -

- cancel the student's enrolment when the student refuses to enrol in an appropriate load; or
- Document the student's behaviour and, if the student requests an extension of duration of study, refuse to extend the CoE.

**FTI will only extend the duration of a COE -**

- Under **compassionate or compelling circumstances**, when it is clear the student will not be able to complete by the end date of the COE.
- where intervention strategies have been implemented for students at risk of not completing satisfactory course progress
- where there is an approved deferment or suspension of study

*“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.”*

Where FTI decides to extend the duration of the student’s study due to any of the conditions above, FTI will report via PRISMS and/or issue a new CoE if required. PRISMS will indicate to the user if a new CoE is required. This reporting must be done within fourteen days of the determination that the student will need to change/extend the duration of their COE.

## ONLINE / DISTANCE

- Only courses that are registered with the regulator as having online/distance components can be offered for this mode of study.
- FTI ELICOS programs – General English and English for Academic Purposes are not offered by this mode.
- No international student can study entirely online or by distance in any compulsory study period.
- Students may study up to but no more than 1/3 of their total course by online or distance mode.
- Student study loads are monitored each compulsory study period by the Academic Manager to ensure students do not study more than 1/3 of their total course by online or distance mode.
- Students units of competency are monitored each compulsory study period to ensure they are studying at least one unit (1) face to face unless it is the final unit of the course
- During **NON-COMPULSORY** study periods students may study entirely by distance or online. However, students cannot study more than 1/3 of the total enrolment load by online or distance learning.
- Students are monitored to ensure they will complete their course with the Expected Duration as per their COE.
- *Course duration comparison reports* (PRISMS) are monitored by the Administrator a minimum of monthly to ensure COEs are not generated over the allowed durations. All entries on the report must be investigated/noted/corrected as applicable.

## 2. MONITORING COURSE PROGRESS POLICY & PROCEDURE

The ESOS framework and Department of Home Affairs (DHA) visa conditions require that students maintain satisfactory academic progress in their course.

Unsatisfactory progress is defined by Federation Technology Institute (FTI) as not successfully completing or demonstrating competence in at least 50% of the course requirements in a study period.

A generic course progress policy may not be appropriate for more than one course. Courses that require additional or varied progress rules will be provided a separate course progress policy

Federation Technology Institute will assess, monitor and record student results on completion of *each unit of competency* or at the *end point of each study period (approximately 10 weeks)*, at the minimum.

FTI advises the course and study requirements of each study period clearly to students on commencement. Any variations are advised to students in writing as soon as they are known.

Trainers/Teachers will discuss any concerns with students and offer assistance as they arise to help prevent students falling behind in their course progress.

Trainers/Teachers will constantly monitor the progress of students and report any concerns to the Academic Manager/Director of Studies/CEO as soon as identified.

Any student that fails a unit of competency in their course may be considered 'at risk' to not complete the course in the expected duration and intervention strategies commenced at any point, if approved by the Academic Manager/Director of Studies.

Students are notified in writing as soon as it is identified they are 'at risk' to not achieve satisfactory course progress (less than 50% of course requirements) (Warning Letter 1) during a study period. Student will be invited to meet with the trainer/student support/ director of studies to discuss intervention/support strategies.

Should students continue to not meet satisfactory course progress they will be notified in writing as soon as it is identified they are 'at high risk' to not achieve satisfactory course progress (less than 50% of course requirements) (Warning Letter 2). Students will be required to meet with a trainer/teacher/academic manager/director of studies to discuss what action/intervention strategies are to be taken.

#### **For students enrolled in ELICOS:**

- A full (END OF COURSE) assessment of student progress will take place at the end of each study period.
- A progress (MID-COURSE) assessment of students' performance will take place at the mid-point of each study period. As a guideline, teachers should categorise such students as follows:
  - Aggregate marks 55-60% - Class level counselling required
  - Aggregate marks below 55% - initiation of Intervention strategy
- A student will be deemed to have achieved satisfactory course progress at the end of each study period if he or she has participated regularly during classes, completed all scheduled course assignments, tests and activities and has demonstrated improved language skills.
- The Director of Studies will review the overall progress of all students in the ELICOS program. If a student has been identified as being at risk of failing to demonstrate satisfactory course progress, there must be documentary evidence of this (e.g. repeated failure of the same level course, poor attendance records, samples of the student's work, written reports on participation and homework etc.) and then the intervention strategy will be implemented.

Students who are identified as having unsatisfactory course progress over two consecutive study periods will be reported to DHA for unsatisfactory course progress. Students in this instance will be issued with an Intention to Report Letter for not making satisfactory progress outlining to them they have 20 working days to access the FTI's complaints and appeals process. All records will be kept on student files.

The Notice of Intention to Report issued must describe intervention so far/warning letters already sent/ what has taken place and the intention to report the student. It also must detail their right to appeal the decision and provide advice on what the student must do regarding their visa.

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.

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

A student may appeal on the following grounds:

- i. FTI's failure to record or calculate the student's marks accurately,
- ii. compassionate or compelling circumstances, or
- iii. FTI's documented policies and procedures that have been made available to the student.

If a student chooses to access the provider's complaints and appeals process, FTI must maintain the student's enrolment while the complaints and appeals process is ongoing as per our *Complaints and Appeals Policy and Procedure*.

If the appeal shows that there was an error in calculation, and the student actually made satisfactory course progress (successfully completed more than 50% of the course requirements over two consecutive study periods) FTI does not report the student, and there is no requirement for intervention.

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 FTI's intervention strategy, and FTI does not report the student.

*NOTE: FTI will only await the outcome of our internal and one external appeals process before reporting a student for unsatisfactory course progress (if found in favour of FTI).*

If the student chooses not to access the complaints or appeals processes within the 20 working day period or withdraws from the process; *OR*

On completion of the appeals process unsatisfactory course progress is confirmed, they will be reported to Department of Home Affairs (DHA) via PRISMS within 5 working days of finalising the decision to report, for unsatisfactory course progress.

## **INTERVENTION STRATEGY**

Federation Technology Institute ensures that it identifies, notifies and assist students where there is evidence that the student is at risk of not meeting course progress requirements.

The aim of intervention strategy is to help students manage their studies successfully and maintain satisfactory academic progress to complete their study in the expected timeframe.

Intervention strategies are tailored to meet each student's individual needs. Formal intervention strategies and counselling of the student will be implemented.

An intervention plan will include a meeting with the Student Support officer or Academic Manager / Director of Studies. It may include one or more of the following strategies:

- Advising students on the suitability of the course in which they are enrolled and possible alternatives;
- Advising students of opportunities for reassessment; and
- Advising students of assistance that Federation Technology Institute can provide including:
  - receiving English language support;
  - reviewing learning materials with the student and providing information to students and in a context that they can understand;
  - providing extra time to complete tasks;
  - providing access to supplementary or modified materials
  - providing supplementary exercises to assist understanding
  - attending academic skills programs;
  - attending tutorial or study groups;
  - receiving individual case management;
  - attending counselling;
  - receiving assistance with personal issues which are influencing progress;
  - receiving mentoring;
  - referral to external organizations where Federation Technology Institute is unable to address the identified learning or academic issues:
  - 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 course load.
- Any other support appropriate to the individual circumstances.

All records MUST be kept on the student file.

### **3. MONITORING ATTENDANCE POLICY & PROCEDURE – ELICOS**

This policy is only applicable to students who are enrolled in English language intensive courses for overseas students (ELICOS) at Federation Technology Institute (FTI).

This document provides procedures to ensure the attendance of all ELICOS students is recorded and that these attendance records are monitored. This allows for early detection of a student's poor attendance and enables FTI to provide the student an opportunity to rectify their situation before being reported for breaching attendance requirements.

Students should attend all classes (100%) of their course to gain optimum learning. All ELICOS courses are delivered face-to-face for a **minimum of 20 hours per week**.

**All International ELICOS students must maintain a minimum of 80% projected attendance** rate for their course duration (total scheduled contact hours) to avoid being reported to the Department of Home Affairs (DHA).

All student attendance records shall be regularly monitored against this requirement as described below.

All staff are made aware of the requirements of this policy and procedure and related attendance requirements through the FTI Staff Induction process and ongoing professional development activities.

Students are made aware of attendance requirements through a variety of methods such as: Pre-enrolment information provided to students; Student Orientation undertaken on commencement; And throughout the course where students are identified as being at risk of not meeting the required attendance requirements.

Students must contact the College every time they will be absent prior to the regular class time, via email, phone or SMS to a member of staff.

Students who do not advise the College of absences will be contacted/counselled by the Student Support Officer or another staff member.

Student attendance is monitored daily by trainers. Student absences are tracked and monitored at the end of each week.

All absences due to illness should be accompanied by a medical certificate that states the student was unable to attend classes.

*Note: The College does not accept certificates from alternative medical practitioners such as herbal practitioners, acupuncturists, Chinese therapists, massage therapists, iridologists, psychics etc.*

Any absences for five (5) consecutive days without approval will be investigated as a matter of urgency.

- Student Support officer will attempt to contact the student
- If student is not able to be contacted their agent will be contacted.
- Student Support Officer will counsel student on the importance of notifying the College when absent.
- If contact cannot be made the Student Support Officer will discuss with CEO and the relevant authorities will be notified (eg police, DHA, next of kin)

## **Responsibility**

The Director of Studies of ELICOS is responsible for the implementation of this policy and for ensuring that staff and students are aware of its application and procedures.

## **Recording Student Attendance**

Before the course begins:

- the Director of Studies will produce a formal class attendance roll for each class, including contact hours and names of all enrolled students, and



- teachers will receive a class attendance roll (either in hard or electronic copy) for the courses they teach.

Teachers will ensure that the attendance roll is completed at the beginning of each class as specified in the official timetable. At the designated class start time the teacher will mark the roll.

Student attendance is monitored each and every hourly session of scheduled class time using the class attendance roll. This sheet is broken down into 4 or 5 x 1-hour sessions and requires an indication of attendance in every session.

A symbol shall be placed in the box beside each student's name to indicate their attendance.

**Absence:** Besides not attending class, any student who arrives over 15 minutes late to a scheduled study session will be marked absent for that session. Students who leave a study session for extended periods of time during a scheduled study session will also be marked as absent

**Lateness:** A student who arrives less than 15 mins late to **one study session** in the week will not be deducted attendance hours. However, a student who arrives late to any subsequent study session in that week (without a valid reason) will be marked absent from each of those sessions.

The following symbols are to be used in recording a student's attendance:

**P** = Present for entire session

**L** – Less than 15 minutes late for a study session.

**A** – Absent for an entire session

The ELICOS teacher will be required to sign the attendance record at the end of each session and confirm the accuracy for the recorded attendance of each student. The Student Attendance Record is to be submitted to Student Administration at the end of each day.

All attendance shall be recorded in a spreadsheet which records each student's attendance and calculates the projected attendance of each student if they were to attend all remaining classes.

At the end of each week, attendance data will be input into a spreadsheet by the teacher, senior teacher, Director of Studies or administration staff.

### **Monitoring Student Attendance**

The projected attendance will be monitored each week to ensure students are given every opportunity to rectify a poor attendance record and prevent reporting procedures being implemented.

Calculation of attendance will be made on each Monday of the course starting from Week 2. If a student is absent for five (5) consecutive days without approval, the teacher will notify the Director of Studies/ Student Support Officer. The Director of Studies/ Student Support Officer will contact the student to check that they are safe and if necessary warn the student of their attendance obligations. The Director of Studies will request a meeting with the student, and keep a written record of this meeting.

On a weekly basis, the Director of Studies, senior teacher or administration staff will advise Student Support Officer of any student/s who need to be sent a notification.



Student Support Officer will notify the student by email of their low attendance and that they are at risk of failing the course and breaching their student visa.

Students will be sent two warning letters/emails. The **first warning** will be sent **when projected course attendance falls below 90%**. The **second warning** will be sent when **projected course attendance falls below 85%**.

On the occasion of each warning sent to the student, the Director of Studies or senior teacher will meet with the student to discuss their attendance record and establish a plan to ensure the student's projected course attendance remains above 80%. Written records of meetings, including follow up meetings will be recorded in the student intervention plan.

Teachers, senior teachers and the Director of Studies will closely monitor students whose projected attendance is low throughout the remainder of the course. If the student's attendance continues to decline, the Director of Studies will request a meeting with the student to discuss.

**If a student's projected attendance falls below 80%**, the student will be notified in writing/email (a *Notice of Intention to Report*) of the FTI's intention to report the student's breach of course attendance to the Department of Home Affairs. Students will also be notified of their right to access the FTI's complaints and appeals process within 20 working days.

After the 20-working day period, if a student does not submit an appeal or the student's appeal is unsuccessful, the director of studies will advise CEO/Administrator to report the matter to the Department of Home Affairs (via the PRISMS website) as a course variation caused by unsatisfactory attendance.

FTI may choose not to report a student for attending less than 80% where all of the conditions below are met:

- the student produces documentary evidence demonstrating that compassionate or compelling circumstances apply, and
- the student has attended at least 70% of the scheduled course contact hours.

In all other circumstances if the student's attendance drops below 80%, FTI must report the student for breach of course attendance to the Department of Home Affairs.

#### **FORMS/LETTERS /TEMPLATES FOR POLICY/PROCEDURE**

*Intervention Plan*

*Course Progress Warning Letter 1*

*Course Progress Warning Letter 2*

*Course Progress Notice of Intention to Report*

*Attendance Warning Letter 1*

*Attendance Warning Letter 2*

*Attendance Notice of Intention to Report*

**National Code Standard 8 must be adhered to at all times.**

<https://internationaleducation.gov.au/Regulatory-Information/Pages/National-Code-2018-Factsheets-.aspx>