



## Monitoring Course Progress

### Purpose

The purpose of this policy is to ensure Ingress Training Academy systematically monitors students' course progress which includes recording, monitoring, assessing, counselling and reporting the course progress of each student.

The college also monitors each student's progress to ensure they are able to complete their students in the duration of their COE.

### Policy

Ingress Training Academy will assess, monitor and record student results on completion of *each unit of competency* or at the *end point of each study period*, at the minimum.

The ESOS framework and DHA visa conditions require that students maintain satisfactory academic progress in their course.

Ingress Training Academy will assess each student's progress in each unit of competency or at the end of each compulsory study period at the minimum. Each study period will equal one semester which equates to approximately 3 months of study.

Students must be monitored to ensure they are able to complete their course in the duration of their COE.

Any students identified at risk of not meeting course progress will have intervention strategies put into place.

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.

**Note: For the purposes of this policy, the maximum length for a study period is three months.**

Unsatisfactory progress is defined as not successfully completing or demonstrating competency in at least 50% of the course requirements in **a study period**.

Students who fail/do not achieve satisfactory progress over two consecutive study periods will be reported to the Department of Border Protection, as not meeting satisfactory course progress requirements.

Ingress Training Academy defines in the timetable the course requirements for each study period and can identify when a student has not passed or demonstrated competency in 50% or more of the course requirements. The course requirements for each study period must also be made clear to the student at the start of the course, or if variable, each study period. Any variations are advised to students in writing as soon as they are known.



Trainers will discuss any concerns with students and offer assistance as they arise, to help prevent students falling behind in their course progress. Trainers will constantly monitor the progress of students and report any concerns to the Campus Manager/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 Campus Manager /CEO. This is at the discretion of the Campus Manager /CEO.

For the purpose of course progress Ingress defines a study period as 1 semester (approx.3 months).

Ingress Training Academy has and will implement an intervention strategy for any student who is not making satisfactory course progress, or, any student that is at risk of not meeting satisfactory course requirements, or, not completing their course in the duration of their COE.

It must be made available to staff and students and must specify:

- i. procedures for contacting and counselling students;
- ii. strategies to assist identified students as at risk, to achieve satisfactory course progress or complete within the duration of their COE; and
- iii. the process by which the intervention strategy is activated.

The intervention strategy must include provisions for:

- i. where appropriate, advising students on the suitability of the course in which they are enrolled;
- ii. assisting 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;
- iii. assisting students to meet course progress requirements and finish their COE in the duration it has been issued, and
- iv. advise students that unsatisfactory course progress in two consecutive study periods for a course could lead to the student being reported to DHA and cancellation of his or her visa, depending on the outcome of any appeals process.

At the end of each compulsory study period, students must be assessed against the course progress policy. If a student is identified as at risk of not making satisfactory course progress, the intervention strategy as outlined above and in the "Intervention Strategy Document" is implemented. The intervention strategy must be activated at the latest, within the first four weeks of the following study period. However, if the college identifies that a student is at risk of making unsatisfactory course progress before the end of the study period, the college will implement its intervention strategy as early as practicable.



Details are to be kept on the student academic file and recorded in VETtrak.

Intervention strategies are tailored to meet each student's individual needs. Formal intervention strategies and counselling of the student will be implemented as soon as a student is identified as at risk.

Intervention Strategies could include:

- o attending tutorials/study groups
- o receiving individual assistance
- o attending counselling
- o receiving assistance with personal issues which are influencing progress
- o receiving mentoring
- o being placed in a suitable alternative subject within a course or a suitable alternative course;  
or
- o a combination of the above and a reduction in course load.

Should students continue to be at risk of not meeting 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 (60% course progress or less) (Warning Letter 2) during a study period and, reminded that should they fail course progress requirements over two consecutive study periods they will be reported to the Department of Border Protection for unsatisfactory course progress. Students will be required to meet with a teacher /trainer / academic manager to discuss further intervention strategies to be taken.

If a student is identified as not making satisfactory course progress in a second **consecutive compulsory study period** in a course, the college **must notify** the student of its intention to report the student to DHA for unsatisfactory progress. The provider does this through the written notice described below.

The written notice (of intention to report the student for unsatisfactory progress) must inform the student that he or she is able to access the registered provider's complaints and appeals process under Standard 10 and that the student has 20 working days in which to do so. A student may appeal on the following grounds:

- i. provider's failure to record or calculate a student's marks accurately,
- ii. compassionate or compelling circumstances, or
- iii. provider has not implemented its intervention strategy and other policies according to its documented policies and procedures that have been made available to the student.

Where the student's appeal is successful, the outcomes may vary according to the findings of the appeals process.



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- i. 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 for that study period), the provider does not report the student, and there may be no requirement for intervention.
- ii. 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 the provider's intervention strategy, and the provider does not report the student. (See notes at the end of this document)

Where:

- i. the student has chosen not to access the complaints and appeals processes within the 20-working day period; or
- ii. the student withdraws from the process; or
- iii. the process is completed and results in a decision supporting the registered provider (i.e. the student's appeal was unsuccessful);

Ingress Training Academy **must** notify the DET and DHA through PRISMS as soon as practicable of the student not achieving satisfactory course progress.

#### **Related Policies and Procedures:**

- Early Intervention Strategy

#### **Related National Code 2018 Standard 8 Overseas student visa requirements**

#### **Procedures**

##### **BASIC PROCESS:**

1. Students who fail 20% of their units in any given term (study period) will be deemed as 'at risk', receive a warning and offered counselling/intervention strategies.
2. Students who continue to fail 40% of their units in any given term (study period) will be deemed as 'at high risk' and receive a 2nd warning letter and required to attend counselling/undertake intervention strategies.
3. Students who fail more than 50% of a unit of competency over two consecutive study periods will receive an 'Intention to Report Letter'.
4. Students are given 20 days from the date of the letter to initiate an internal or external appeal.
5. Student enrolment will be maintained during an appeals process.

Refer Complaints and Appeals Policy and Procedure NC Standard 10.

Note:

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Monitoring course progress Policy fnl (1) and Procedure

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If an overseas student is not attending scheduled classes, but is making satisfactory progress in their course, then the course duration set is not suitable for that student—because they must already have the skills, knowledge and experience to progress in their course without receiving structured training. In this case, the college will need to reduce the duration of the course to the minimum duration required given the student's existing skills and knowledge, while maintaining a minimum of 20 scheduled course contact hours per week.

### **Procedure for assessing satisfactory course progress and determining the point at which the student has failed to meet satisfactory course progress**

To ensure fairness, equity and maintain an open process, Ingress Training Academy will use the following process for determining the point at which the student has failed to meet satisfactory course progress.

Trainers MUST monitor record and assess student course progress on completion of each unit of the course or at the minimum, at the end of each study period. Details are to be kept on the student academic file and recorded in VETtrak

At any time, when a trainer becomes aware of issues or has concerns regarding the student's progress they should first speak to the student (ensuring that all communication is recorded in the student's individual file) and then advise the Academic Manager of these concerns.

At any time during the study period if student is identified by their trainer as 'a possible risk', the student will be given a verbal warning and offered counselling and assistance. This must be documented on the students file and advice provided to the Academic Manager /Student Support Officer.

1. The Campus Managers of Ingress Training Academy will assess and monitor the course progress of students by:
  - reviewing attendance records
  - reviewing class participation
  - evaluating any mid-course assessments
  - reviewing final assessments
  - checking overall competency to ensure students are able to complete in the duration of their COE.
2. All Trainers at Ingress Training Academy are required to record and access the progress of each student at the end of each semester to identify students at risk of progressing.
3. If the Campus Managers identifies a learner at risk of not meeting their course progress requirements, they will offer counselling/implement the appropriate Early Intervention Strategy.

4. If the student fails more than 30% of their units of competency in a study period, they must be sent an 'at risk of being reported' for unsatisfactory course progress warning letter and advice they are required to meet with the Academic Manager to discuss / action intervention strategies. Students may take a support person to this meeting.
5. If the student fails more than 40% of their units of competency in a study period, they will be sent an 'at high risk of being reported' for unsatisfactory course progress warning letter and required to meet with the Academic Manager to discuss further action / intervention strategies. Students may take a support person to this meeting.
6. The warning letters will also advise students, they must attend regular classes for 20 hours per week as a requirement of their visa, and, unsatisfactory course progress (less than 50% competency over two consecutive study periods), may lead to them to be reported to DHA and the possible cancellation of their visa. Students will also be told of their rights to appeal such a decision and provided a copy of the Complaints and Appeals Policy and Procedure.

**Intervention Strategies to be discussed may include but not limited to -**

- Identify what support strategies would best suit the situation and planning implementation.
- Academic and or personal support/counselling offered to the student internally or externally as appropriate
- Planned regular follow up and feedback from the teaching staff to track progress and keep communication open
- Advice on alternate units/courses if considered more suitable/appropriate for the student
- Resitting units
- Any other support appropriate to the individual circumstances.
- All records MUST be kept on the student file.

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, the College does not report the student for unsatisfactory course progress.

When a student fails to achieve 50% competency over two consecutive compulsory study periods this will be deemed as not making satisfactory academic progress.

The student will then be provided with a written notice of 'Intention to Report' to DHA, informing them that they are able to access the Complaints and Appeals process, and that they have 20 working days in which to do so.

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.

### **Procedure for notifying students of unsatisfactory progress in two consecutive study periods**

If a student is identified as failing to meet the required 50% completion rate in two consecutive study periods the following process should be followed.

1. The Campus Managers drafts a letter using the template (Letter to Student - Intent to Report.doc)
2. The CEO/PEO will review the letter before authorising it to be send using registered post to the student.
3. The Administrative Officer will post the letter (via registered mail), to the current address on file.

*Copy of all correspondence must be put on student file for future reference*

4. The Director of International Studies will contact the Student within 4 working days of sending the letter, either by phone and / or email, to ensure they have received the letter.
5. The Director of International Studies will note and set a reminder in a calendar when 20 working days has lapsed and check if an Appeal has been lodged.
6. If no appeal has been lodged, they will proceed to report the breach on PRISMS.
7. If an appeal has been lodged, the appeals process will begin.

A student may appeal on the following grounds:

- The College's failure to record or calculate the student's marks accurately,
- compassionate or compelling circumstances, or





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- The College's documented policies and procedures that have been made available to the student were not followed.

If a student chooses to access the provider's complaints and appeals process, the College 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) the College 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 Ingress Training Academy's intervention strategy, and the College does not report the student.

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

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 DET and DHA via PRISMS within 5 working days of finalising the decision to report, for unsatisfactory course progress.

### **Procedure Reporting Students for Unsatisfactory Progress by Notifying DET/DHA of Visa Breach**

The following process should be followed when reporting a student for breach of their visa requirements relating to unsatisfactory course progress.

Refer to the "[PRISMS - Provider User Guide](#)" to assist in the following process.

1. If appeal lodged, wait until appeal is heard and finalised before progressing. Once finalised and the intent to report is to proceed continue.
2. If no appeal lodged or it is finalised, Administrative Officer advises the CEO/PEO of intent to advise breach on PRISMS.
3. CEO/PEO checks all the facts and documentation related to the case and if everything is in order, authorises the report to be entered into PRISMS.



#### 4. Follow the PRISMS - Provider User Guide on page 39 for Reporting Requirements

**Note:**

- *Reporting a student for unsatisfactory course progress occurs only when the student has been identified as not making satisfactory course progress in two consecutive compulsory study periods, and the student has not made a successful appeal against this assessment.*
- *If a student is identified for a second, but not consecutive, study period as not making satisfactory course progress, the provider does not report the student for unsatisfactory course progress.*
- *When a student is reported for unsatisfactory course progress, DHA will, in all but exceptional circumstances, cancel the student's visa. DHA will rely on the provider's report of unsatisfactory course progress, as the report cannot be made until the provider has completed the complaints and appeals process. If a student is dissatisfied with the provision of a complaints and appeals process, the student may lodge a complaint with DET.*
- *Section 19(2) of the ESOS Act 2000 requires providers to report the student for unsatisfactory course progress 'as soon as practicable' after the breach occurs. Good practice would be to report the student through PRISMS within 5 days of finalising the decision to report (i.e. within 5 days of 3.9 i., ii., or iii. occurring).*

**Procedure:**

- *The progress of each student is monitored, recorded and assessed.*
- *The provider has documented course progress policies and procedures.*
- *The provider assesses each student at the end point of each study period according to its course progress policy.*
- *The provider has an intervention strategy that identifies and assists students who are at risk of not making satisfactory course progress.*
- *Where a provider has assessed the student as not meeting satisfactory course progress, the provider informs the student in writing of its intention to report the student and that he or she is able to access the provider's complaints and appeals process within 20 working days.*
- *The provider notifies the Secretary of DET through PRISMS of the student not achieving satisfactory progress after the appeals process (if actioned) is finalised and upholds the provider's decision to report.*

- *The CoE must have a status of 'Studying', 'Cancelled', 'Finished', 'Cancelled' or 'Reported On' for you to select this Student Course Variation reason.*
- *You must enter a response to each of the Appeals Processing prompts as well as responding to the other prompts that you will be presented with when processing this SCV option.*
- *On-screen 'Help' is available by clicking on the book icon at the front of each prompt.*
- *In the SCV Comments field, enter any comments that may be appropriate. These comments will NOT appear on the Non-compliance letter (the Section 20 notice) – they are for your information only.*
- *This Student Course Variation reason results in the Non-compliance letter being generated for you to send to the Student.*
- *The letter contains particulars of the breach and provides options as to the actions required to be taken by the student.*
- *Generally speaking, the student is required to attend in person before a DHA officer within 28 days after the date the Non-compliance letter was issued.*
- *Once you have completed the Student Course Variation the CoE status will change to 'Cancelled' and DHA will be sent the reason code you selected, as well as your responses to the 'Appeals' processing prompts.*
- *You should report using this variation as soon as practicable.*

When a student is reported for unsatisfactory course progress DHA will consider all the information available and if they decide to consider cancellation, DHA will send a Notice of Intention to Consider Cancellation (NOICC) prior to a decision being made to cancel the student's visa. Students will be given an opportunity to respond to the NOICC and explain their situation.

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

If Ingress Training Academy suspects a student is not a genuine/bona fide student, the College may cancel the student's enrolment, as allowed under Standard 9 and as stated in our Standard 9 policy.

*Refer Standard 9 Deferring, suspending or cancelling the overseas student's enrolment*

**A non-genuine/non bona fide student is defined by Ingress Training Academy 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 as per their timetable requirements. The College will ensure that prior to enrolment; students are**



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**made aware of the grounds on which cancellation of enrolment may occur as provided to them via the International Student Handbook and on the college website.**

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

NOTE: To report a student for not making satisfactory progress, College staff must go into the PRISMS Student Course Variation screen, from the drop-down list under 'Reason for Course Variation', and choose Unsatisfactory Course Progress

### **REFER - COMPLAINTS AND APPEALS POLICY**

<http://www.ingressacademy.edu.au/wordpress/wp-content/uploads/2016/09/International-Student-Complaints-and-Appeals-Policy.pdf>

- All evidence including action taken e.g. counselling student, MUST be retained on the student file.

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

Course Progress Warning Letter 1  
Course Progress Warning Letter 2  
Course Progress Notice of Intention to Report

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

[Standard 8: Overseas student visa requirements](#)

FACTSHEET ATTENDANCE 2019:

<https://www.asqa.gov.au/news-publications/news/new-fact-sheet-overseas-student-attendance>