

Course progress and attendance monitoring for international students (VET and ELICOS)

Written Direction No. WDDG20301

Approved by: Chief Delivery Officer

Approval Date: 17 April 2020

Effective From: 5 June 2020

1. Introduction

This is the procedure for monitoring attendance and course progress for international students on student visas enrolled in TAFE NSW VET and ELICOS programs as per their student visa and other relevant legislative requirements.

2. Purpose

The purpose of this procedure is to support the compliance of TAFE NSW with the relevant legislation framework: the *Education for Overseas Students Act 2000* (ESOS Act) and the *National Code of Practice for Providers of Education and Training to Overseas Students 2018* and the *ELICOS Standards 2018*, regarding monitoring international students' attendance and course progress.

3. Scope

International students on student visas enrolled in VET and ELICOS courses at TAFE NSW, and all staff involved with the enrolment, delivery of courses and providing care and support to the international students.

Note: The International Customer Experience Co-ordinator and International Customer Experience Lead mentioned in this procedure are future state International Department positions. These future positions are currently performed by different positions depending on the TAFE NSW Region. Please refer to the current positions equivalent [document](#) for details.

4. Procedure

The National Code 2018 provides guidelines for monitoring international student's course progress, under Standard 8. TAFE NSW complies with the student visa conditions which require all international students on student visas enrolled in VET and ELICOS courses at TAFE NSW, to demonstrate satisfactory course progress and where applicable, meet the attendance requirements.

4.1 Attendance monitoring for international students on student visas enrolled in VET courses.

There is no legal requirement for monitoring attendance of international students enrolled in VET courses, unless specifically required as a condition of CRICOS registration by ASQA. Attendance will be taken for each student, and recorded to ensure management of their safety and welfare, and for student non-commencement requirements.

4.2 Course Progress monitoring for international students on student visas enrolled in TAFE NSW VET and ELICOS courses.

Satisfactory course progress for international students at TAFE NSW is defined as demonstrating competency in fifty percent (50%) of the program requirements in a study period. A study period is defined as one term (two terms per semester). The program requirements for the purposes of this policy are measured in terms of units of competency that are expected to be completed by a full time student within the study period.

TAFE NSW will identify those students who do not achieve satisfactory progress in a term, as students “at risk” of not meeting course progress requirements. TAFE NSW will support these students by implementing an [Intervention Strategy](#).

Any international student identified as “at risk” of not meeting course progress and provided with an *Intervention Strategy* during their study period, who then achieves less than fifty percent (50%) competency in enrolled units of competency in the next consecutive term, will be deemed as a student with unsatisfactory progress. Unsatisfactory course progress will be recorded when a student has failed to demonstrate competency in 50% or more of the units attempted in a study period and is deemed Not Competent (NC) in those units.

An international student who has not demonstrated satisfactory course progress for two consecutive study periods (two terms) is identified as not meeting the TAFE NSW course progression requirements, and will be unable to complete their course within the duration specified on the student’s Confirmation of Enrolment (CoE). This is a breach of their student visa conditions and the student will receive an [Intention to Report Letter \(Progress\)](#) and will be advised of their rights to access the TAFE NSW internal complaints and appeals policy within 20 working days.

If a student wishes to make an appeal, TAFE NSW will commence assessment of the student’s appeal within 10 working days and advise the student in writing of the decision. If the student is not satisfied with the decision of the internal review, the student will be advised to apply for an external review of the complaint by an agency, appropriate for that purpose.

Any VET or ELICOS student who demonstrates competency in more than fifty percent (50%) of the units of competency undertaken in the study period in which they were identified as ‘at risk’, or in the following study period, will no longer be considered ‘at risk’. The student will continue to be supported to meet their course progress requirements.

All international students will be informed about the legal requirements to achieve satisfactory course progress and attendance requirements before they begin a course. The students will be informed before they begin a course, in the following ways:

- information given on the TAFE NSW website
- verbally as part of the orientation process and
- in writing as part of their written agreement and in each orientation pack

Each study period/term **TAFE NSW International Customer Experience Team Lead** will identify students who have failed to submit assessments or been deemed Not Competent (NC) in more than fifty (50%) of their units, by running a report through the electronic students management system, as students “at risk”.

TAFE NSW International Customer Experience Team will notify all the students identified as students “at risk” of not meeting their course progression requirements. Notification will be sent by email and the students will be invited to participate in an Intervention Strategy, and as an outcome, will be given support to meet the course progress requirements in the next study period/term.

Intervention Strategy for students enrolled in VET courses

- The international students identified as “at risk” students will be invited by email to meet their **TAFE NSW International Customer Experience Coordinators**. The purpose of the Meetings will be to identify the student’s reasons for failing to meet the requirements of course progression.
- **TAFE NSW International Customer Experience Coordinators** will complete a [Learning Agreement](#) with the student at risk.
- Student will enter into a *Learning Agreement*, after meeting their TAFE NSW International Customer Experience Coordinators, by signing the *Learning Agreement*.
- **TAFE NSW International Customer Experience Coordinators** liaises with the relevant teaching sections, counselling and/or other support staff and coordinates assistance and support for the student at risk.
- **TAFE NSW International Customer Experience Coordinators** monitor the student’s attendance and further progress by liaising with the teaching sections.
- **TAFE NSW International Customer Experience Coordinators** organise regular fortnightly follow up meetings with the student to monitor their course progress.
- Evidence of the **TAFE NSW International Customer Experience Coordinator’s** meetings and other contacts with the student and teaching and support staff, such as notes, emails and phone calls, will be retained and kept in the student’s file.
- Evidence from the international student’s assessment tasks, participation in tuition activities, or other indicators of academic progress, to indicate the overseas student is at risk of not satisfying these requirements, should be collected and retained by the **TAFE NSW International Customer Experience Coordinators** in the student’s file.
- Any VET student who demonstrates competency in more than fifty percent (50%) of the units of competency undertaken in the next study period, will no longer be considered ‘at risk’, and the intervention strategy may be cancelled.
- Any student, identified as ‘at risk’ and provided with an intervention strategy during the study period who then achieves less than fifty percent (50%) competency in enrolled units of competency, will be in breach of their student visa conditions and will receive an [Intention to Report Letter \(Progress\)](#) due to not meeting the course progress or attendance requirements.
- The students will be advised of their right to access the TAFE NSW internal complaints and appeals process within 20 working days in an **Intention to Report Letter**.
- The internal review of the students appeal/ complaint will be dealt with as per **TAFE NSW Internal Complaints and Appeals Policy and Procedure**
- If the student is not satisfied with the decision of the internal review, the student will be advised to apply for an external review of the complaint by an agency, appropriate for that purpose. The details of The NSW Ombudsman will be provided in the TAFE NSW written response to the student’s complaint.
- If the student is successful in their appeal to TAFE NSW, the student will continue to study and TAFE NSW will continue to monitor their progress in order to support them in meeting the student visa requirements.

Intervention Strategy for students enrolled in ELICOS courses

- The international students identified as “at risk” students will be counselled by their class teacher
- **Class Teacher** will complete a [Learning Agreement](#) with the student at risk.
- Student will enter into a *Learning Agreement*, after meeting their teacher, by signing the *Learning Agreement*.
- **Teacher** liaises with the **Head Teacher / Manager (ELICOS Centre)** counselling and/or other support staff and coordinates assistance and support for the student at risk.
- **Head Teacher / Manager (ELICOS Centre)** monitors the student’s attendance and further progress.

- **Class teacher** organises regular fortnightly follow up meetings with the student to monitor their course progress.
- Evidence of all meetings and other contacts with the student and teaching and support staff, such as notes, emails and phone calls, will be retained and kept in the student's file.
- Evidence from the international student's assessment tasks, participation in tuition activities, or other indicators of academic progress, that show the overseas student is at risk of not satisfying these requirements, should be collected and retained in the student's file.
- Any student who demonstrates competency in more than fifty percent (50%) of the units of competency undertaken in the next study period, will no longer be considered 'at risk', and the intervention strategy may be cancelled.
- Any student, identified as 'at risk' and provided with an intervention strategy during the study period who then achieves less than fifty percent (50%) competency in enrolled units of competency, will be in breach of their student visa conditions and will receive an [Intention to Report Letter \(Progress\)](#) due to not meeting the course progress or attendance requirements.
- The students will be advised of their right to access the TAFE NSW internal complaints and appeals process within 20 working days in an **Intention to Report Letter**.
- The internal review of the students appeal/ complaint will be dealt with as per **TAFE NSW Internal Complaints and Appeals Policy and Procedure**
- If the student is not satisfied with the decision of the internal review, the student will be advised to apply for an external review of the complaint by an agency, appropriate for that purpose. **The details of The NSW Ombudsman** will be provided in the TAFE NSW written response to the student's complaint.
- If the student is successful in their appeal to TAFE NSW, the student will continue to study and TAFE NSW will continue to monitor their progress in order to support them in meeting the student visa requirements.

4.3 Course attendance monitoring for international students enrolled into an ELICOS course.

TAFE NSW complies with the legal requirements for ELICOS student attendance to be monitored and reported regularly. Students are informed of their attendance requirements and responsibilities at the time of enrolment. Students are then reminded again at the orientation sessions and the first day of class for each session. An ELICOS study period for reporting on attendance is twenty (20) weeks or the period of the student's CoE, whichever is the lesser. If an English course is extended, then attendance will be calculated over the total period of enrolment, including the extension period.

Satisfactory attendance for ELICOS international students is defined as at least eighty percent (80%) attendance of scheduled contact hours for the duration of the course. Unsatisfactory attendance is defined as less than eighty percent (80%) of the schedule course contact hours in an English program. ELICOS teachers will follow the following steps:

- a. **Teachers record attendance in the roll at least once in every class period.**
- b. **Teachers immediately advise the Head Teacher / Manager (ELICOS Centre) of any student under 18 who is more than one hour late so the guardian can be contacted.**
- c. **Teachers advise the Head Teacher / Manager (ELICOS Centre) of any student under 18 who has been absent for three consecutive days, or any student over 18 who has been absent for five consecutive days. The Head Teacher / Manager (ELICOS Centre) contacts the student and/or guardian for under 18s.**
- d. **Attendance is tallied in weeks 1, 3 and 5 of each 5-week session.**

TAFE NSW supports its international students by identifying, notifying and assisting ELICOS students who have been absent for more than five consecutive days without approval, or who are at risk of not meeting

attendance requirements before their attendance falls below eighty per cent (80%), as per ELICOS attendance monitoring procedure. A **Warning Letter (Attendance)** is issued. The student is interviewed and counselled by a responsible officer. Records of all contact and counselling made with overseas students who are at risk of not meeting attendance requirements, will be kept on the student’s file. If attendance continues to be a problem for a student, two further warning letters may be issued over the enrolment period.

If a student’s attendance falls below the point where an overall average of eighty percent (80%) cannot be achieved within the reporting period, and evidence of compassionate or compelling circumstances has not been provided, **or** falls below seventy percent (70%), the student will be issued with an **Intention to Report Letter (Attendance)** and advised of their right to access the TAFE NSW internal complaints and appeals process within 20 working days. During the appeal process, the student must continue to attend their classes as per their student visa requirements. If the student is not satisfied with the decision of the internal review, the student will be advised to apply for an external review of the complaint by an agency, appropriate for that purpose. If an ELICOS student is under 18 years of age, a copy of all correspondence is sent to the guardian-carer and parents via the agent. If the student is over 18 years of age, a copy of all correspondence is sent to the agent, only if the student has signed authority at the time of enrolment giving permission to do so.

4.4 Reporting an international student to the Department of Home Affairs for unsatisfactory course progress

TAFE NSW International Customer Experience Team will report a breach of course progress or attendance and report the student to the Department of Home Affairs via Provider Registration and International Student Management System (PRISMS), only when:

- the internal and external complaints processes have been completed and the breach has been upheld;
- or the international student has chosen not to access the internal or external appeals process;
- or the international student withdraws from the internal or external appeals process.

TAFE NSW International Customer Experience Coordinators/Lead will advise the student in writing that they have been reported to the Department of Home Affairs for the breach of their student visa, that they will be required to attend an interview within the next 28 days and that failure to do so may result in the automatic cancelation of their student visa. International Student Unit will report the student for the breach of their student visa on PRISMS.

The copies of these documents will be kept in in the students’ files by the **International Student Customer Experience Co-ordinators**.

5. Responsibilities

Position	Responsibility
Chief Delivery Officer	The Chief Delivery Officer is the Approver for this Procedure.
All Employees of TAFE NSW	Employees of TAFE NSW who teach, manage or advise international students on course progress and attendance.

6. Definitions

Term	Meaning
International/Overseas Students	A person (whether within or outside Australia) who holds a student visa, other than one exempted by the ESOS Regulations 2001. Students on other classes of visa are not included. Note: International Students in the context of this policy are limited only to those students subject to the ESOS Act, that is, on a student visa.
The National Code 2018	National Code of Practice for and Providers of Education and Training to Overseas Students 2018 (The National Code 2018). The National Code is a set of nationally consistent standards that governs the protection of overseas students and delivery of courses to those students by providers registered on the Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS).
Provider	(as defined in the ESOS Act) An institution or other body or person in Australia that provides or seeks to provide courses to overseas students. To provide courses, a provider must comply with State or Territory approval requirements and become registered on CRICOS.
Student Visa	A visa granted under the Migration Act 1958 to overseas students. The Department of Home Affairs administers the Act and issuing of visas.
The International Customer Experience Coordinator	The International Customer Experience Coordinator is responsible for directly providing international students with educational, pastoral and cultural support on campus to enhance their transition, engagement, academic experience and wellbeing.
The International Customer Experience Lead	The International Customer Experience Lead is responsible for positioning the student experience as the centre piece of the TAFE International offering by implementing initiatives, business and market intelligence that enhance student retention, engagement and satisfaction.

7. Related documents

This procedure should be read in conjunction with the following related documents:

- a. [Policy - Course progress and attendance monitoring for international students \(VET and ELICOS\)](#)
- b. [Responsible Positions - Course Progress and Attendance Monitoring](#)

8. Contacts

Accountable Officer Chief Delivery Officer
Written Direction Officer International Secretariat

9. Document information and review

This procedure document will be reviewed at least every three years.

Record No. DOC20/64393

Review Due: 6 June 2023

Approval History

No	Effective	Approved by	Amendment
1	5 June 2020	Chief Delivery Officer	Initial Procedure