

1. PURPOSE

The purpose of this policy is to outline the requirements, responsibilities and processes for monitoring and managing course progress and attendance for international students enrolled at The Quality Training and Hospitality College, trading as Quality College of Australia (QCA).

QCA is committed to supporting international students to:

- Make satisfactory course progress;
- Participate in scheduled training and assessment;
- Complete their course within the expected duration specified on their Confirmation of Enrolment (CoE);
- Understand their course progress, attendance and student visa and course participation obligations; and
- Access appropriate support and intervention where they are identified as being at risk of not meeting course requirements.

This policy establishes a documented process for identifying, notifying and assisting students who may be at risk of unsatisfactory course progress or, where applicable, attendance.

QCA will administer this policy in accordance with the Education Services for Overseas Students Act 2000 (ESOS Act), the National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code) and other applicable legislative and regulatory requirements.

2. SCOPE

This policy applies to all international students enrolled in a CRICOS-registered course at QCA who hold a Confirmation of Enrolment (CoE).

It applies to relevant QCA Management, Trainers and Assessors, Administration Staff, the International Student Support Officer (ISSO), Placement Coordinator and other staff involved in monitoring or supporting international student course progress.

This policy should be read in conjunction with the students:

- CoE and course enrolment information;
- Course timetable;
- Assessment and Industry Placement requirements, where applicable; and
- Other relevant QCA policies and procedures.

The policy is made available to students before and during their studies through relevant enrolment and orientation information, the QCA website, student management systems and other appropriate communication channels.

3. DEFINITIONS

3.1 At Risk

A student whose course progress, participation, attendance or other indicators suggest that they may be unable to achieve satisfactory course progress or complete their course within the expected duration.

3.2 CoE

Confirmation of Enrolment issued through PRISMS.

3.3 Compassionate or Compelling Circumstances

Circumstances that are generally beyond the student's control and have an impact upon the student's course progress, attendance or ability to complete the course within the expected duration. QCA will assess such circumstances based on the individual circumstances and supporting evidence provided.

3.4 Course Progress

A student is considered to be making satisfactory course progress where, based on the student's assessment outcomes, competency outcomes, participation and progress against the scheduled training and assessment plan, QCA reasonably determines that the student remains on track to successfully complete the course within the expected duration specified on their CoE.

A student will be determined to have failed to achieve satisfactory course progress where, following monitoring and intervention, QCA determines that the student is not progressing at a rate that will enable them to successfully complete the course within the expected duration and there is no reasonable basis for further intervention.

3.5 Intervention Strategy

An individual plan developed by QCA in consultation with the student and relevant QCA staff to provide appropriate support and identify actions to assist the student to achieve satisfactory course progress and/or complete the course within the expected duration.

3.6 ISSO

International Student Support Officer.

3.7 PRISMS

Provider Registration and International Student Management System.

3.8 Study Period

A period of study defined by QCA for the purpose of monitoring course progress. The applicable study period will be communicated to students as part of their course and enrolment information.

3.9 Visa Obligations

QCA will explain provider requirements and refer students to Immigration for Visa advice.

4. COURSE PROGRESS REQUIREMENTS

Students are expected to actively participate in their course and make satisfactory progress towards completing the assessment requirements for each study period.

QCA will monitor course progress using relevant indicators, which may include:

- Assessment results and competency outcomes;
- Submission of required assessment tasks;
- Completion of practical assessments;
- Participation in scheduled training activities;
- Participation in required Holistic and Industry Placement, where applicable;
- Failure to complete assessment by scheduled due dates;
- Repeated assessment resubmissions or unsuccessful attempts;
- Requests for additional time or assistance;
- Failure to attend scheduled training or assessment activities;
- Communication from trainers or assessors regarding student progress; and
- Other information indicating that the student may be at risk of not meeting course requirements.

A student will generally be considered as making satisfactory progress where they are progressing through their scheduled units and assessment requirements at a rate that enables them to complete the course within the expected duration stated on their CoE.

QCA may also establish course-specific progress benchmarks where appropriate to the course structure and assessment requirements.

A student may be identified as at risk before reaching a formal course progress benchmark where there are other indicators that they may not be able to successfully complete the course within the expected duration.

Indicators may include:

- Failure to achieve competency in consecutive assessments;
- Failure to submit consecutive assessments;
- Repeated failure to attend scheduled classes or assessment activities;
- Poor participation;
- Significant delays in completing scheduled assessment;
- Repeated requests for extensions;
- Demonstrated learning difficulties;
- Demonstrated language or communication difficulties;
- Failure to complete required placement hours, where applicable;

- Failure to follow an agreed intervention strategy; or
- Compassionate or compelling circumstances affecting the student's studies.

Students must comply with QCA's academic integrity, assessment and student conduct requirements. Academic misconduct, assessment misconduct, plagiarism, falsification of evidence or other conduct that may compromise the integrity of assessment will be managed in accordance with QCA's relevant policies and procedures.

Where academic misconduct or other misconduct affects a student's course progress, the outcome may be considered as part of the student's course progress monitoring and intervention process.

Any allegations of misconduct will be managed fairly and in accordance with QCA's complaints, appeals, assessment and disciplinary processes.

5. ATTENDANCE REQUIREMENTS

QCA expects international students to attend at least 80% of scheduled course contact hours and to actively participate in scheduled training, assessment and other compulsory course activities. The 80% attendance level represents QCA's expected standard of participation and is used as an important indicator of student engagement and course progress.

QCA will monitor attendance against its 80% expected attendance level, identify and support students whose attendance falls below this level, and consider whether their attendance is affecting their course progress or ability to complete the course within the expected duration.

Where a student's attendance falls below 80%, this will generally result in the student being identified as at risk and may result in an intervention strategy. Falling below 80% does not, in itself, mean that QCA will report the student for unsatisfactory attendance.

Where an international student is attending at least 70% of scheduled course contact hours and maintaining satisfactory course progress, QCA may exercise the discretion available under Standard 8.15 of the National Code not to report the student for an attendance breach. Any decision will be made having regard to the student's individual circumstances, attendance, course progress and ability to complete the course within the expected duration and will be appropriately documented.

Where attendance falls below 70%, QCA will consider whether the student's attendance constitutes unsatisfactory participation and whether reporting may be required, taking into account the student's course progress, individual circumstances, any compassionate or compelling circumstances, intervention undertaken and the requirements of the ESOS framework.

Attendance is monitored as an important indicator of student participation and engagement and may be used as an indicator of course progress.

Students are expected to attend scheduled training and assessment activities and complete all compulsory course requirements, including any required practical, work-based or placement activities. Applicable scheduled work-based training will be included when calculating attendance. For example, students enrolled in SIT30821 Certificate III in Commercial Cookery must meet the applicable theory attendance and Holistic Placement hours to meet the requirements for SITHCCC043 Work effectively as a cook. Likewise, students enrolled in SIT40521 Certificate IV in Kitchen Management and SIT60322 Advanced Diploma of Hospitality Management must comply with the applicable theory attendance and Industry Placement requirements.

Failure to participate in scheduled training, assessment or placement activities may indicate that a student is at risk of not achieving satisfactory course progress or completing the course within the expected duration.

Where applicable, QCA will apply any attendance requirements specified in the student's course information, timetable, placement requirements and QCA policies.

5.2 Recording Attendance

Attendance will be recorded using QCA's attendance recording system on aXcelerate.

Trainers will record attendance accurately and consistently, including relevant instances of lateness and early departure.

Where a student is repeatedly absent, arrives late, leaves early or otherwise demonstrates poor participation, QCA will contact the student and/or identify the student as being at risk of not meeting course requirements.

Where a student's attendance falls below QCA's expected 80% attendance level, or where the student is repeatedly absent, arrives late, leaves early or otherwise demonstrates poor participation, QCA will contact the student and/or identify the student as being at risk of not meeting course requirements.

Attendance concerns may result in an intervention strategy where the student's attendance is affecting, or is likely to affect, their ability to make satisfactory course progress or complete the course within the expected duration.

6. ABSENCE AND NOTIFICATION

Students who are unable to attend scheduled training or assessment activities must notify QCA as soon as reasonably practicable and, where possible, before the scheduled commencement of the activity.

Where an absence is due to illness or another circumstance that may significantly affect the student's studies, QCA may request appropriate supporting evidence. Examples may include medical evidence or other relevant documentation, depending on the circumstances.

Where a student is absent for multiple consecutive scheduled sessions without notification, QCA will take reasonable steps to contact the student.

Contact may include:

- Telephone;
- Email;
- SMS or other approved communication methods;
- Contact with the student's nominated emergency contact where appropriate; and/or
- Contact with the student's education agent where appropriate.

As an internal student-support measure, three consecutive scheduled classes without notification may result in the student being identified as at risk and referred to the ISSO for follow-up.

Where a student is absent for an extended period and cannot be contacted, QCA will follow its applicable processes for student welfare, course progress, suspension, cancellation and/or reporting.

7. MONITORING COURSE PROGRESS AND ATTENDANCE

QCA will monitor both course progress and attendance for each international student throughout their course.

Attendance will be monitored against QCA's expected attendance level of 80%. Where attendance falls below 80%, QCA will consider whether the student is at risk and whether intervention or additional support is required.

For students, attendance below 80% will not automatically result in reporting. Where the student continues to attend at least 70% of scheduled course contact hours and maintains satisfactory course progress, QCA may exercise its discretion under Standard 8.15 of the National Code not to report the student for an attendance breach.

Where attendance falls below 70%, QCA will undertake a further assessment of the student's circumstances, course progress and ability to complete the course within the expected duration and determine the appropriate action.

The frequency and method of monitoring will reflect the structure and duration of the relevant course.

The ISSO and relevant training staff will review available course progress and attendance information to identify students who may be at risk.

Monitoring may include review of:

- Attendance records;
- Assessment results;
- Outstanding assessment tasks;
- Competency outcomes;
- Learning and assessment plans;
- Practical assessment participation;
- Holistic and Industry Placement progress, where applicable;
- Student participation and engagement; and
- Previous intervention strategies.

Course progress monitoring will be undertaken sufficiently frequently to enable QCA to identify and assist students at risk in sufficient time for the student to improve their progress and complete the course within the expected duration.

QCA will, where practicable, identify students at risk and commence appropriate intervention before the student reaches the point at which satisfactory course progress is determined to have been failed.

8. STUDENTS IDENTIFIED AS AT RISK

Where QCA identifies that a student is at risk of not meeting course progress and/or QCA's expected attendance level, the ISSO or authorised QCA staff member will contact the student.

A student may be identified as at risk where their attendance falls below 80%, particularly where there are additional indicators that their attendance is affecting their course progress, participation or ability to complete the course within the expected duration.

Identification as at risk due to attendance below 80% does not, by itself, mean that the student has failed to meet a regulatory attendance requirement or will be reported.

QCA will consider the student's overall circumstances, including attendance, course progress, participation, assessment outcomes and any compassionate or compelling circumstances, when determining whether intervention is required.

The student will be given an opportunity to discuss the circumstances affecting their studies.

QCA will consider relevant information provided by the student and determine whether additional support or an intervention strategy is appropriate.

The first stage of intervention may include:

- Written notification of the concern;
- Counselling or a progress meeting;
- Review of the student's assessment and attendance requirements;
- Additional academic support;
- Tutorial or supported study sessions;
- Assessment catch-up arrangements;
- Additional practical training or assessment opportunities where appropriate;
- Assistance with study planning and time management;
- Referral to appropriate student support services;
- Review of placement arrangements, where applicable; and/or
- Development of an individual intervention strategy.

The student will be advised of the actions they are required to take and any applicable timeframes.

The intervention strategy will be documented and provided to the student where appropriate.

QCA will monitor the student's progress following implementation of an intervention strategy.

The intervention strategy may be reviewed and adjusted where:

- The student has made a reasonable attempt to meet the agreed requirements;
- Additional support is reasonably required;
- Compassionate or compelling circumstances have been demonstrated; or
- The original strategy is no longer appropriate.

9. COMPASSIONATE OR COMPELLING CIRCUMSTANCES

QCA may consider compassionate or compelling circumstances where a student is unable to meet course progress, attendance or course completion requirements.

QCA will assess compassionate or compelling circumstances on a case-by-case basis, having regard to the nature and impact of the circumstances and any relevant supporting evidence. Examples may include serious illness or injury, bereavement, major political or natural events, or other circumstances that have a significant impact on the student's ability to study.

Where compassionate or compelling circumstances are accepted, QCA may consider appropriate measures including:

- Adjusting an intervention strategy;
- Providing additional academic support;
- Arranging assessment catch-up activities;
- Approving a deferral, suspension or other change to enrolment where permitted;
- Reviewing the student's study plan; and/or
- Extending the student's course duration where permitted under the National Code.

Where a student is unable to attend a scheduled class, assessment or practical activity due to accepted compassionate or compelling circumstances, QCA will make reasonable arrangements for the student to complete the missed training or assessment requirement. No catch-up fee will apply where the absence has been accepted by QCA as being due to compassionate or compelling circumstances.

Where a course duration is extended, QCA will advise the student to contact Immigration (Department of Home Affairs) to seek advice about any potential impact on their visa, including whether a new visa may be required.

10. ASSESSMENT, CATCH-UP AND REASSESSMENT

10.1 Assessment Requirements

Students are expected to complete all scheduled assessment tasks and practical assessment activities within the required timeframes.

Where a student does not achieve competency, QCA will provide assessment feedback and manage reassessment in accordance with the QCA Assessment Resubmission Policy.

10.2 Catch-Up Following an Accepted Absence

Where a student misses a scheduled training or assessment activity due to an accepted compassionate or compelling circumstance, QCA will arrange a reasonable catch-up opportunity where required to enable the student to complete the relevant course or assessment requirements.

Catch-up arrangements may include:

- Attendance at the next available supported study session;
- Completion and submission of an outstanding written assessment;
- Joining another scheduled practical session;
- An additional practical training or assessment session; or
- Another reasonable arrangement appropriate to the course and assessment requirements.

No catch-up fee will apply where QCA has accepted the absence as being due to compassionate or compelling circumstances.

10.3 Catch-Up Following an Unapproved or Unacceptable Absence

Where a student misses a scheduled training, theory or practical session, assessment activity or other compulsory course activity without providing an acceptable reason, or where the absence has not been accepted by QCA as compassionate or compelling, QCA may require the student to undertake a paid catch-up session.

The applicable catch-up fees are:

- **Theory catch-up session - \$150**
- **Practical catch-up session - \$250**

The applicable fee must be paid before the catch-up session is undertaken, unless otherwise approved by QCA.

Catch-up sessions will be scheduled subject to trainer and class availability and may include attendance at another scheduled class, an additional session or another arrangement determined by QCA.

The catch-up fee relates to the additional training or support required as a result of the missed session and is separate from any reassessment or resubmission fee that may apply under the QCA Assessment Resubmission Policy.

10.4 Reassessment / Resubmission Following an Unsuccessful Assessment

Where a student has participated in an assessment but has been assessed as Not Yet Competent, the student will be provided with appropriate feedback and an opportunity for reassessment or resubmission in accordance with the QCA Assessment Resubmission Policy.

Any applicable reassessment, resubmission or additional assessment fees will be charged in accordance with the QCA Assessment Resubmission Policy.

A reassessment fee and a catch-up fee are separate charges and will not be applied interchangeably.

Where a student is required to undertake additional practical training or a practical assessment session following an unsuccessful assessment attempt, the applicable requirements and fees will be determined in accordance with the QCA Assessment Resubmission Policy. Where the additional session is required solely because the student missed a scheduled class without an acceptable reason, the catch-up fee in Section 10.3 applies.

10.5 Intervention Catch-Up

Where a student is identified as at risk and an intervention strategy requires additional tutorial, supported study, practical training or assessment activities, QCA will advise the student of the required activities and whether any applicable fee applies.

Where the additional activity is required as part of QCA's intervention and academic support to address unsatisfactory course progress, QCA will not charge a catch-up fee solely because the student has been identified as at risk.

However, where the additional activity is required because the student has missed scheduled training or assessment without an acceptable reason, the applicable catch-up fee under Section 10.3 may apply.

10.6 Recording of Catch-Up and Reassessment

All catch-up, reassessment and resubmission arrangements, including the reason for the activity, applicable fees, agreed dates and outcome, must be recorded in QCA's student management system (aXcelerate).

Students must be informed of any applicable fee before the catch-up, reassessment or resubmission activity is scheduled or undertaken.

11. SECOND WARNING AND FURTHER INTERVENTION

Where a student does not meet the requirements of an intervention strategy, QCA may issue a further written warning and require the student to attend a further meeting.

At this stage, QCA will consider:

- The student's progress since the initial intervention;
- Whether the student has made a reasonable attempt to comply;
- Whether additional support or reasonable adjustment is appropriate;
- Whether compassionate or compelling circumstances exist;
- Whether the student can still complete the course within the expected duration; and
- Whether the student remains suitable to continue in the course.

Where appropriate, QCA may revise the intervention strategy and continue monitoring the student.

Where the student has failed to meet satisfactory course progress requirements and there are no circumstances supporting further intervention, QCA will commence the process for reporting unsatisfactory course progress in accordance with the ESOS Act and National Code.

12. INTENTION TO REPORT

Where QCA determines that a student has not met satisfactory course progress, or where applicable determines that reporting for unsatisfactory attendance is required, QCA will provide the student with written notice of its intention to report the student to the Department of Home Affairs through PRISMS.

For international students, a reduction in attendance below QCA's expected 80% attendance level will not, by itself, result in a decision to report.

Where the student is still attending at least 70% of scheduled course contact hours and maintaining satisfactory course progress, QCA may exercise the discretion available under Standard 8.15 of the National Code not to report the student for unsatisfactory attendance.

Where the student's attendance falls below 70%, QCA will assess the student's individual circumstances, course progress and ability to complete the course within the expected duration and determine whether reporting is required.

Any decision not to report under Standard 8.15 will be documented, including the student's attendance level, course progress, relevant circumstances and the reasons for the decision.

QCA will only report unsatisfactory course progress or attendance in accordance with the ESOS Act and National Code.

12.1 Notice of Intention to Report

Where QCA intends to report a student, written notice will be sent to the student by email and will:

- Identify the relevant course progress and/or attendance concern;
- Provide the reasons for the intention to report;
- Advise the student of their right to access QCA's complaints and appeals process; and
- Advise the student of the applicable timeframe for lodging an appeal.

QCA will also send an SMS notification to the student advising them that the written notice has been issued.

The student will have **20 working days** from receiving the written notice to access QCA's internal complaints and appeals process.

QCA will not report the student through PRISMS for unsatisfactory course progress or attendance until the applicable internal and external complaints and appeals requirements have been completed, or the student has chosen not to access the available appeal process within the applicable timeframe.

Where a course progress or attendance matter may result in suspension or cancellation of an international student's enrolment, QCA will manage the matter in accordance with the QCA Deferral, Suspension & Cancellation Policy and Standard 9 of the National Code.

Any suspension or cancellation initiated by QCA will be subject to the required written notice, reasons and internal appeals process before the action takes effect, unless an exception under Standard 9 applies.

13. COURSE DURATION AND COMPLETION

QCA will monitor students to ensure they remain in a position to complete their course within the expected duration specified on their CoE.

QCA will ensure that the expected duration specified on an international student's CoE does not exceed the CRICOS registered duration of the course.

QCA will not extend a student's course duration unless the extension is permitted under the National Code.

Permitted circumstances may include:

- Compassionate or compelling circumstances supported by appropriate evidence;
- An intervention strategy implemented because the student is at risk of not meeting course progress requirements; or
- An approved deferral or suspension in accordance with the relevant QCA policy.

Where a student is unable to complete the course within the expected duration, QCA will assess the circumstances and determine the appropriate action in accordance with the ESOS framework and QCA policies.

14. RESPONSIBILITIES

14.1 Students

Students are responsible for:

- Attending and participating in scheduled training and assessment activities and making every reasonable effort to maintain at least 80% attendance;
- Completing assessment tasks within required timeframes;
- Making satisfactory course progress;
- Complying with course and assessment requirements;
- Meeting applicable industry and holistic placement requirements;
- Notifying QCA of absences as soon as reasonably practicable;

- Providing supporting evidence where requested;
- Communicating with QCA where they are experiencing difficulties affecting their studies;
- Participating in intervention meetings and agreed support arrangements; and
- Maintaining current contact details with QCA.

Students should seek assistance from QCA as soon as they become aware of circumstances that may affect their ability to meet course requirements.

14.2 Trainers and Assessors

Trainers and assessors are responsible for:

- Accurately recording attendance;
- Monitoring student participation and assessment progress;
- Identifying students who may be at risk;
- Providing appropriate assessment feedback and support;
- Communicating identified concerns to the ISSO or International Administration Manager; and
- Maintaining appropriate records in QCA's student management system.

14.3 International Student Support Officer (ISSO)

ISSO's are responsible for:

- Monitoring course progress and attendance information;
- Identifying students at risk;
- Communicating with students regarding progress and attendance concerns;
- Coordinating intervention strategies;
- Maintaining appropriate records; and
- Coordinating relevant support.

14.4 International Administration Manager

The International Administration Manager is responsible for overseeing the monitoring of international students' course progress and attendance by:

- Providing direction and support to the ISSO's;
- Ensuring ISSO's identify and follow up students who are at risk of unsatisfactory progress or attendance;
- Ensuring students are provided with appropriate communication, support and opportunities to improve where concerns are identified;
- Reviewing escalated cases and determining appropriate actions; and
- Maintaining accurate records of monitoring, interventions, communications and outcomes.

Formal decisions regarding unsatisfactory course progress, suspension, cancellation of enrolment or reporting to PRISMS will be made by the International Administration Manager in consultation with the Managing Director and/or Compliance Manager, where appropriate.

14.5 Compliance Manager

QCA's Compliance Manager is responsible for ensuring that this policy is implemented consistently and remains aligned with applicable legislative and regulatory requirements.

15 RECORDS

QCA will maintain appropriate records relating to course progress and attendance in accordance with its records management requirements.

Records may include:

- Attendance records;
- Assessment results and outcomes;
- Course progress monitoring records;
- Student communications;
- Warning letters;
- Intervention strategies;
- Supporting evidence;
- Counselling or progress meeting records;
- Catch-up and support arrangements;

- Complaints and appeals records; and
- PRISMS reporting documentation, where applicable.

Records must be maintained securely and made available where required for regulatory, audit or compliance purposes.

16 POLICY REVIEW AND CONTINUOUS IMPROVEMENT

QCA will review this policy periodically to ensure that course progress and attendance processes remain appropriate, effective and consistent with applicable legislative and regulatory requirements.

Feedback, monitoring outcomes, identified issues, student outcomes, audit findings and changes to the ESOS framework may be considered as part of the review and continuous improvement process.

17 RELATED DOCUMENTS

- QCA Deferral, Suspension & Cancellation Policy
- QCA Assessment Resubmission Policy
- QCA Feedback, Complaints and Appeals Policy
- QCA Academic Integrity and Plagiarism Policy
- QCA Holistic Placement Policy - International Students
- QCA Industry Placement - International Students
- QCA Placement Agreements and Logbooks
- Education Services for Overseas Students Act 2000 (Cth)
- Education Services for Overseas Students Regulations 2019
- National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code)