

Version	8.0
Last Amended	12 July 2019
Approved By	CEO
Date Approved	12 July 2019
Reference	Monitoring Course Progress and Intervention Policy and Procedures v8.0

Monitoring Course Progress and Intervention Policy and Procedures

1 Purpose

This policy:

- regulates Windsor in monitoring overseas/ international students' course progress in conjunction with the Completion within the Expected Duration of Study Policy and Procedures.
- identifies and offers support to those at risk of not meeting course progress requirements.
- only extend the duration of an overseas student's enrolment in certain circumstances and advise them of potential impacts on their student visa

2 Policy Statements

- 2.1 Windsor monitors overseas students' course progress and, where applicable, attendance for each course in which the overseas student is enrolled.
- 2.2 The expected duration of study specified in the overseas student's CoE must not exceed the CRICOS registered duration.
- 2.3 Windsor monitors the progress of each overseas student to ensure the overseas student is in a position to complete the course within the expected duration specified on the overseas student's CoE.
- 2.4 Windsor has and implements documented policies and processes to identify, notify and assist an overseas student at risk of not meeting course progress or if applicable attendance requirements where there is evidence from the overseas student's assessment tasks, participation in tuition activities or other indicators of academic progress that the overseas student is at risk of not meeting those requirements.
- 2.5 Windsor clearly outlines and informs the overseas student before they commence the course of the requirements to achieve satisfactory course progress and, where applicable, attendance in each study period.
- 2.6 Unsatisfactory progress is defined as not successfully completing or demonstrating competency in at least 50% of the course requirements in that study period.
- 2.7 In monitoring its ELICOS students course progress, Windsor College follows the requirements of ESOS National Code 2018 Standard 8 and ELICOS Standards 2018 C1.1, P3.1, P4.1 and P4.2. This policy defines the requirements for students to achieve the learning outcomes of the ELICOS course(s) they are enrolled and the intervention strategies for those failing to meet such requirements.

Student progress will be monitored through formative and summative assessment, teacher feedback and teacher/student consultations. Assessments are weekly formative tasks and summative tests conducted in week 5 and week 10, covering listening, speaking, reading and

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writing skills. The tasks are clearly listed in the prescribed syllabus and the individual teachers' daily lesson plans. The overall score and corresponding grades for each course level are calculated on the basis that the Mid-course test marks constitute 45% of the course level final score, the End of course test marks constitute 45% of the course level final score while that of formative assessments (weekly activities) constitute 10% (calculated based on the average score from week 3 and week 8 progress tests) of the course level final score. The satisfactory result for passing a course level must be a minimum of 50% for all tests.

- 2.8 Windsor as registered provider of VET courses as defined in the NVETR Act has and implements this documented policy and process for assessing course progress that includes:
- a. requirements for achieving satisfactory course progress, including policies that promote and uphold the academic integrity of the registered course and meet the training package or accredited course requirements where applicable, and processes to address misconduct and allegations of misconduct
 - b. processes for recording and assessing course progress requirements
 - c. processes to identify overseas students at risk of unsatisfactory course progress
 - d. details of the college's intervention strategy to assist overseas students at risk of not meeting course progress requirements in sufficient time for those overseas students to achieve satisfactory course progress
 - e. processes for determining the point at which the overseas student has failed to meet satisfactory course progress.
- 2.9 Where Windsor has assessed the overseas student as not meeting course progress or if applicable attendance requirements, the college will give the overseas student a written notice as soon as practicable which:
- a. notifies the overseas student that Windsor intends to report the overseas student for unsatisfactory course progress or if applicable unsatisfactory course attendance
 - b. informs the overseas student of the reasons for the intention to report
 - c. advises the overseas student of their right to access Windsor's complaints and appeals process, in accordance with Standard 10 of the National Code 2018 (Complaints and appeals), within 20 working days.
- 2.10 Windsor will only report unsatisfactory course progress or if applicable unsatisfactory course attendance in PRISMS in accordance with section 19(2) of the ESOS Act if:
- a. the internal and external complaints processes have been completed and the decision or recommendation supports the college, or
 - b. the overseas student has chosen not to access the internal complaints and appeals process within the 20 working day period, or
 - c. the overseas student has chosen not to access the external complaints and appeals process, or
 - d. the overseas student withdraws from the internal or external appeals processes by notifying the college in writing.
- 2.11 Windsor assesses the course progress of students in accordance with these policy and procedures at the end point of every study period. A Study Period is equal to 10 weeks for ELICOS Courses and 9 weeks for VET courses.

3 Scope

This policy applies to:

- International students enrolled at Windsor

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- Windsor Marketing, Admissions, Academic, Student Services and Administrative staff.

All staff are made aware of the requirements of this policy through staff induction, regular meetings, staff updates and continuous improvement practices. Students are made aware of the course progress requirements through the Student Prospectus, College's website, Student Handbook, and during the enrolment and orientation processes.

4 Procedures

4.1 For Vocational Education and Training Students

4.1.1 Recording Student Academic performance

All VET students shall be deemed 'Competent (C)' or 'Not Yet Competent (NYC)' for each unit within the qualification that they are enrolled in based on their assessment outcome. The assessment shall be conducted by qualified trainers / assessors according to the Windsor's assessment tools, methods and the recording processes.

All academic results are entered into the Students Management System by the Student Support Officer.

4.1.2 Monitoring Student Course Progress

- The progress of VET students is monitored through the completion of unit assessments, which occur as a minimum at the end point of each study period.
- A Study Period is equal to 9 weeks for VET courses.
- The VET trainers monitor students' progress for each unit through formative and summative assessments and record students' progress. Every two weeks, the VET trainers are to enter students' assessment results for each unit into a result report for VET students and submit it to the Administration staff. When the trainers identify that the students are at risk of not being able to successfully complete the unit as scheduled, the trainers will provide extra support to help the students. If the students are deemed "Not Yet Competent" in a unit, after providing extra support, trainers will organise re-assessments for the students.
- Student competency results for VET students are recorded in our Student Management System.
- At the end of a study period the Director of Studies will prepare reports from the Student Management System regarding students with any of the following issues:
 - A VET student who has been deemed 'Not Yet Competent (NYC)' in 50% or more of the units that he/she has attempted in the study period.
 - The current course load may restrain the student from completing the course within the expected duration as specified on the student's CoE.
- If a student is identified for the first time as not making satisfactory course progress, the intervention strategy is implemented. The intervention strategy must be activated 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 is to implement its intervention strategy as early as practicable.
- The Director of Studies will inform the Student Support Officer to send relevant warning letters to the students who are "at risk" of not meeting satisfactory course progress requirements. The Student Support Officer will send relevant warning letters to the students with unsatisfactory course progress results by email.

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- h) Where a trainer/assessor has identified a student at risk of making unsatisfactory course before the end of the study period, the trainer/assessor needs to notify the Director of Studies immediately.
- i) There are 2 warning letters to be sent to students with unsatisfactory course progress. They are “Unsatisfactory Course Progress Warning –Initial” and “Unsatisfactory Course Progress Warning – Final” letters. They will be sent by email.
- j) The students will be contacted by the Student Support Officer by telephone or email and invited to a meeting to develop an action plan, which assists to improve student’s academic performance.
- k) The student will need to come and discuss the appropriation of the course selection and opportunities for reassessment in units previously been assessed as ‘Not Yet Competent’ with the Director of Studies.
- l) The student will be made aware that unsatisfactory course progress in two consecutive study periods will be reported to the ESOS Agency and Department of Home Affairs by Windsor and can lead to cancellation of their student visa (depending on the outcome of any appeal process if accessed).
- m) Delegated by the Director of Studies, the Trainer/Assessor will work with the student to ensure that the discussed action plan is implemented and produces higher levels of academic performance. Where the intervention strategy fails to promote student’s academic performance a further meeting will be arranged to discuss additional support / counselling.
- n) Without a reasonable cause for ongoing underperformance (i.e. not making satisfactory course progress for two consecutive study periods), the Windsor's Director of Studies will evaluate the situation for the termination of student enrolment.
- o) The reasonable cause is compassionate or compelling circumstances that are beyond the control of the student and they have an impact on the student’s capacity and/ or ability to progress through course. These could include but are not limited to:
- Serious illness to injury, where a medical certificate states that the student was unable to attend classes
 - Bereavement of close family members such as parents or grandparents (where possible death certificate should be provided).
 - Major political upheaval or natural disaster in the home country requiring their emergency travel and this has impact on their studies.
 - A traumatic experience which could include but not limited to:
 - Involvement in or witnessing of an accident, or
 - A crime committed against the student, or
 - The student has been a witness to a crime and that has impact on the student (these cases should be supported by the police or psychologist’s report).
- p) If a student is identified as not making satisfactory course progress in a second consecutive compulsory study period in a course, the Director of Studies will notify the student in writing of its intention to report the student to the ESOS Agency and Department of Home Affairs for unsatisfactory progress using the Student Course Progress Breach Recorded Letter. The written notice “Student Course Progress Breach Recorded Letter” will inform the student that he or she is able to access the Windsor’s complaints and appeals process and that the student has 20 working days in which to do so. This letter will be sent by post and email.
- q) Where the student has chosen not to access the complaints and appeals processes within the 20 working day period, the student withdraws from the process, or the process is completed and results

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in a decision supporting Windsor (ie. the student's appeal was unsuccessful) the Director of Studies will notify the ESOS Agency and Department of Home Affairs through PRISMS as soon as practicable of the student not achieving satisfactory course progress.

- r) A copy of all letters, details of phone calls/SMS made, and any reports are to be kept in the student's file by the Student Support Officer

4.1.3 Activation of Intervention Strategy

- a) **If a student is not making satisfactory course progress in a study period**, within the first four weeks of the following study period, the Director of Studies will inform the Student Support Officer to send a **Warning Letter** indicating the student is required to contact the college and organise an appointment with the Director of Studies to discuss his/her unsatisfactory course progress and intervention strategies to ensure their course progress is satisfactory for the following study period.
- b) If the student does not respond within 7 days, the Student Support Officer will contact the student via telephone or email. If this fails, the matter shall be forwarded to the Director of Studies who will then again try to contact the student and pursue the matter further.

4.1.4 If a student is identified as not making satisfactory course progress 2 consecutive compulsory study periods in a course:

- a) The student shall be sent a 'Student Course Progress Breach Recorded' letter indicating they are going to be reported to the ESOS Agency and Department of Home Affairs for unsatisfactory course progress in their course of study.
- b) They are also informed of their ability to access the complaints and appeals process and have 20 working days to do so.
- c) Where the student has chosen not to access the complaints and appeals processes within the 20 working day period, the student withdraws from the process, or the process is completed and results in a decision supporting Windsor (ie. the student's appeal was unsuccessful) the Director of Studies will notify the ESOS Agency and Department of Home Affairs through PRISMS as soon as practicable of the student not achieving satisfactory course progress.
- d) A copy of all letters, details of phone calls/SMS made, and any reports are to be kept in the student's file by the Student Support Officer

4.2 For ELICOS Students

4.2.1 Course progress requirements

The Monitoring Course Policy for ELICOS students at Windsor College follows requirements of ESOS National Code 2018 Standard 8 and ELICOS Standards 2018 C1.1, P3.1, P4.1 and P4.2.

This policy defines the requirements for students to achieve the learning outcomes of the ELICOS course(s) they are enrolled and the intervention strategies for those failing to meet such requirements.

Student progress will be monitored through formative and summative assessment, teacher feedback and teacher/student consultations. Assessments are weekly formative tasks and summative tests conducted in week 5 and week 10, covering listening, speaking, reading and writing skills. The tasks are clearly listed in the prescribed syllabus and the individual teachers' daily lesson plans. The overall score and corresponding grades for each course level are calculated on the basis that the Mid-course test marks

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constitute 45% of the course level final score, the End of the course test marks constitute 45% of the course level final score while that of formative assessments (weekly activities) constitute 10% (calculated based on the average score from week 3 and week 8 progress tests) of the course level final score. The satisfactory result for passing a course level must be a minimum of 50% for all tests.

4.2.2 Definitions

'Medical certificate' means a certificate issued by a registered medical provider such as hospitals, doctors, dentists, physiotherapists, chiropractors, optometrists, ophthalmologists, psychiatrists and psychologists. Windsor College does not accept certificates from alternative medical practitioners such as herbal practitioners, acupuncturists, Chinese therapists, massage therapists, iridologists, psychics etc.

'Satisfactory course attendance' means attendance of at least a minimum of 80% of the scheduled course contact hours for the study period undertaken.

'Study period' means - 10 weeks.

'Level' means a range of skill level starting from Level 1 Elementary, Level 2 Pre-intermediate, Level 3 Intermediate, Level 4 Upper-Intermediate and Level 5 Advanced for General English and Level 1 Upper-Intermediate and Level 2 Advanced for English for Academic Purposes (EAP).

'Compassionate or compelling circumstances' are generally those beyond the control of the student and which have an impact upon the student's course progress or wellbeing. These could include, but are not limited to:

- serious illness or injury, where a medical certificate states that the student was unable to attend classes
- bereavement of close family members such as parents or grandparents
- major political upheaval or a natural disaster in their home country, requiring emergency travel and this has impacted on the student's studies; or
- a traumatic experience which could include:
 - involvement in, or witnessing of a serious accident; and
 - Witnessing or being the victim of a serious crime, and this has impacted on the student (these cases should be supported by a police or psychologists reports).

These are only some examples of what may be considered compassionate or compelling circumstances.

4.2.3 Procedure

4.2.3.1 Recording Results

The ELICOS courses consist of General English (Elementary, Pre-Intermediate, Intermediate, Upper-Intermediate and Advanced) and English for Academic Purposes (Upper-Intermediate, Advanced). Each level comprises of 10 weeks with 20 contact hours per week. Students are assessed through the weekly formative assessment (activities) based on different language skills and projects in the General English (GE) and English for Academic Purposes (EAP) courses. There is a summative test every 5 weeks. Mid-course test is conducted at the end of the 5th week, while the End of course test is conducted in the 10th week. Teachers will be required to record the results no later than the next day of the assessments.

The progress report will show the tracked course progress for each student in each level of the course in which the student is enrolled. The report will be maintained in hard copy in the student's file.

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All ELICOS students will be assessed and given a score ranging between 0 – 100 for each of the English language skills that include listening, reading, writing, speaking and their overall score. All assessments shall be conducted by qualified ELICOS teachers according to the Windsor College’s assessment tools, methods and the recording processes.

All academic results are entered into the Students Management System by the Student Support Officer.

4.2.3.2 Regular course progress review

At the end of week 10 of every level, the teachers, ELICOS Coordinator or delegate and Student Support Officer will review the course progress for each student. If deemed appropriate, a relevant student will be required to take part in a course progress consultation session (intervention). An intervention report will be filled in identifying the student’s strengths and weaknesses through class and assessment performance and the areas to focus on. The learning outcomes, assessment rubrics, assessment tasks and students’ performance on the tasks will be used as the tools for the consultation sessions.

ELICOS Teachers will be available 5 days a week to further assist students. Teachers must consult with the ELICOS Coordinator before increasing or decreasing student workloads.

CoE changes performed by the Admission staff

- When the student is required to repeat a study period, the Admissions staff will be notified by the Chief Executive Officer or the Director of Studies in writing, whether a change to the student’s COE and/or an update in PRISMS is required.
- Any record of variations to student enrolment must be kept on the student’s file and updated in PRISMS as applicable.

4.2.3.3 Intervention strategies

Documented evidence of all student consultations at each stage of their course progress monitoring is mandatory. Consultation with teachers and students or the Student Support Officers or the ELICOS Coordinator must be recorded on all intervention forms.

Students identified as ‘at-risk’ by their teacher will be reported to the ELICOS Coordinator during the weeks before the first consultation sessions, that is, week 5 or if they have received an overall grade of below 50% in their mid-course test or end of course test or they have scored less than 50% in any component (reading, speaking, listening and writing) in the test.

Stage 1 at-risk

- 1) When a student is identified as having skills level inadequate for the current study load, the student can be moved to a lower level course within 5 days of enrolment (unless the student has participated in that level of course before) after Diagnostic test and consultation with the ELICOS Coordinator.
- 2) Students will be identified as Stage 1 at-risk if they:
 - have difficulty in understanding the learning activities
 - have difficulty with their homework
 - fail to do homework on a regular basis
 - fail to engage in the class activities
 - score less than 50% (mid-course test score in the 5th week) after the first 5 weeks of study

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- 3) Students identified as Stage 1 at-risk will have the same week 5 course progress consultation session as the other students. In the consultation session, Stage 1 at-risk students will complete an Intervention Strategy Plan (ISP). The Plan needs to be agreed by student and teacher and approved by the ELICOS Coordinator.
- 4) The ISP may include extra-curricular classes, additional assignments, independent learning resources or identification and referral to student support services such as the Student Welfare Counsellor.
- 5) The Stage 1 at-risk student's progress will be monitored during the second half of the study block.
- 6) A student at stage 1 at-risk who continues to show no progress leads to the activation of stage 2 at-risk and an Unsatisfactory Course Progress Warning Letter-Final for limited or no course progress.

Example: Jin was enrolled for a period of 20 weeks and was placed in a GE 2 Pre-Intermediate course following a placement test. However, he failed to meet the requirements by scoring less than 50% during the progress tests and Mid-course test. As a result, when he was offered to be moved one level lower, student agreed to DO the course followed by strict monitoring of attendance.

Stage 2 at-risk

- 1) Students will be identified as Stage 2 at-risk if they receive an overall grade of below 50% after 10 weeks of their study (final result by the 10th week).
- 2) A student at stage 1 at-risk who continues showing no progress will lead to stage 2 at risk stage and be sent an Unsatisfactory Course Progress Warning Letter-Initial for consultation and intervention for poor course progress.
- 3) A Stage 2 at-risk student will have a consultation session with the teacher to review the Progress Report in week 10 and then be referred to the ELICOS Coordinator on the same day.
- 4) The ELICOS Coordinator will have a formal meeting with the student in the 10th week to discuss their course progress, pathway, progression implications and course extension. The ELICOS Coordinator will then refer the matter to the Director of Studies confirming that the student is required to repeat the level. Upon the agreement of the student and approval of the Director of Studies, the case will then be referred to the Admissions team to process their re-enrolment.

Example: Gina was enrolled for a period of 20 weeks and was placed in a GE 2 Pre-Intermediate course following a placement test. However, she failed to meet the requirements by scoring less than 50% during the progress tests and final test. As a result, when she was offered to re-enrol, she agreed to repeat the course followed by a strict monitoring of her attendance.

There are 2 warning letters to be sent to students with unsatisfactory course progress - The "Unsatisfactory Course Progress Warning –Initial" and the "Unsatisfactory Course Progress Warning – Final" letter, which will be sent via email.

The students will be then contacted by the Student Support Officer by telephone or email and invited to a meeting to develop an action plan, which targeted to improving the student's academic performance.

4.2.3.4 Unsatisfactory course progress

- 1) Students will be considered as making unsatisfactory course progress when they:
 - fail to participate in the intervention processes
 - fail the course levels consecutively
 - poor attendance records

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At this stage, a student will be sent an unsatisfactory Course Progress Warning Letter-Final for consultation and intervention for unsatisfactory course progress.

At this stage, the student is required to attend a meeting with the ELICOS Coordinator and the Director of Studies. The student may be permitted to enrol in the same course level for a third attempt if the student has identified as a slow learner/ learner that needs additional support / requires some flexibility due to physical needs.

Once the Director of Studies identifies that the student's intention to continue studies is reasonable and the cause for failure is due to any acceptable reason or under 'Compassionate or compelling circumstances', student will be allowed to enrol the course for a third time.

At this stage, it is a requirement under the terms of the National Code of 2018 that the college must undertake an intervention strategy to resolve the issue of concern, which may include the following:

- The student will be counselled by the ELICOS Coordinator to identify any specific issues affecting learning
- The student maybe encouraged to do practice tasks
- Teachers will work with the ELICOS Coordinator to prepare strategies to help at-risk students individually
- A written record of counselling, intervention activities and measures must be kept on the student's file. This record has to be referred to for follow up meetings with the student

4.2.3.5 Determining failure to make progress

Assessing an acceptable level of progress is a complex issue in relation to ELICOS students. Language background, aspects of educational background and culture, individual language learning capacities (as opposed to other learning capabilities), the objectives of the student and adjustment to life in a new country can make determining progress difficult in some students' cases. As problems arise, intervention strategies, as detailed earlier, will be put in place to assist individual students who are experiencing difficulties with their studies.

Students who have completed a course level twice and still not have attained a pass score, will be send a Student Course Progress Breach Recorded Letter and required to attend a meeting with the ELICOS Coordinator and Director of Studies. Such students may be permitted to enrol in the same course level for a third attempt, once the Director of Studies identifies that the student's intention to continue studies is genuine and the cause for failure is due to any acceptable reason or under 'Compassionate or compelling circumstances'.

A student who fails to pass the course on their third attempt at a course level will not be permitted to enrol in that course level again.

4.2.3.6 Reporting process

If a student is identified as not making satisfactory course progress in 2 consecutive compulsory study periods in a course or fail the same course level twice in a row:

- 1) The student will be issued with a **Breach letter** advising the student of the college's intention to report them to the Department of Home Affairs (DHA) through the PRISMS for unsatisfactory course progress.
- 2) The student will be sent a 'Student Course Progress Breach Recorded' letter indicating they are going to be reported to the ESOS Agency and Department of Home Affairs for unsatisfactory course progress in their course of study.

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- 3) The letter will also inform the student that they have access to the Complaints and Appeal Policy and Procedure, and they have 20 working days to lodge an appeal should they have objections to the college's decision of reporting them to the DHA.
- 4) Where the student has chosen not to access the complaints and appeals processes within the 20 working day period, the student withdraws from the process, or the process is completed and results in a decision supporting Windsor (i.e. the student's appeal was unsuccessful) the Director of Studies will notify the ESOS Agency and the Department of Home Affairs through PRISMS as soon as possible of the student not achieving satisfactory course progress.
- 5) A copy of all letters, details of phone calls/SMS made, and any reports are to be kept in the student's file by the Student Support Officer.

4.2.3.7 Extending Course Duration

Windsor College can only extend the overseas student's enrolment after assessment, if:

- there are compassionate or compelling circumstances and there is evidence to support this assessment;
- an intervention strategy has been implemented, or is in the process of implementing, for the student who is at risk of not meeting the course progress requirements; or
- an approved deferral or suspension of the overseas student's enrolment has occurred.

When Windsor College decides to extend the duration of the student's study due to any of the conditions above, Windsor College 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 31 days of the determination that the student will need to change/extend the duration of their COE.

If the registered provider extends the duration of an overseas student's enrolment and the student's visa will expire prior to completion of the course, the student will need to apply for a new Student visa (subclass 500) to complete their study. More information about the Student visa (subclass 500) is available on the Department of Home Affairs website.

Professional judgement will be used to assess each case on its individual merits and when determining whether compassionate or compelling circumstances exist, documented evidence to support the claim must be provided, with all copies of these documents to be kept in the student's file.

CoE changes performed by Admission staff

Where Windsor College decides to extend the duration of the student's study due to any of the conditions above, Windsor College will issue a new CoE if required.

- When the student is required to repeat a study period, the Admissions Staff will be notified by the Student Support Staff in writing, whether a change to the student COE and/or an update in PRISMS is required.
- Any record of variations to student enrolment must be kept on the student's file and updated in PRISMS as applicable.

4.2.3.8 Complaints and Appeals Process

Students are encouraged to refer to Windsor Colleges Complaints and Appeals Policy and Procedures.

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4.2.3.9 Erratic Course Progress as A Potential Indication of Non-Bona Fide Students

If Windsor College suspects a student is not a genuine/bona fide student, the College may cancel the student's enrolment, as allowed under Standard 9 of the National Code 2018.

A non-genuine/non bona fide student is defined by Windsor College 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. The College will ensure that prior to enrolment, students are made aware of the grounds on which cancellation of enrolment may occur as provided to them via the International Student Handbook.

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

5 Related Standard

This policy and procedure supports:

- 'Standard 8' of the ESOS National Code 2018.
- 'Standard 10' of the ESOS National Code 2018.
- English Language Intensive Courses for Overseas Students (ELICOS) Standards 2018.

6 Related Documents/Forms

1. Intervention Strategy form
2. Unsatisfactory Course Progress Warning Letter-Initial
3. Unsatisfactory Course Progress Warning Letter-Final
4. Student Course Progress Breach Recorded Letter
5. Complaints and Appeals from
6. Complaints and appeal log

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