

<b>Regulations and standards</b>	National Code 2018, Standard 8 ESOS Act 2000
<b>Policy</b>	<p>During the induction and orientation, students are informed of the student visa condition relating to course progress. They are also informed that Imagine Education uses the DHA (Department of Home Affairs) Course Progress Policy and Procedures for CRICOS Providers of VET Courses. Students are also advised that whilst we do not monitor attendance, Imagine Education still record attendance for VET students and attendance is encouraged for all classes. Students are also advised that DHA may request attendance details at anytime for a student.</p> <p>1.1 Imagine Education Australia will monitor, record and assess the course progress of each student for the course in which the student is currently enrolled.</p> <p>1.2 Imagine Education Australia must assess each student's progress at the end of each compulsory study period. Imagine Education Australia defines a study period as being 10 weeks.</p> <p>1.3 Unsatisfactory progress is defined as not successfully completing or demonstrating competency in at least 50% of the course requirements in that study period. Imagine Education Australia will define course requirements for each study period and will identify when a student has not demonstrated competency in 50% or more of the course requirements. The course requirements for each study period will also be made clear to the student at the start of the course during orientation.</p> <p>1.4 Imagine Education Australia has an intervention strategy for any student who is not making satisfactory course progress. It is made available to staff and students and specifies:</p> <ul style="list-style-type: none"> <li>i. procedures for contacting and counselling students;</li> <li>ii. strategies to assist identified students to achieve satisfactory course progress; and</li> <li>iii. the process by which the intervention strategy is activated.</li> </ul> <p>1.5 The intervention strategy includes provisions for:</p> <ul style="list-style-type: none"> <li>i. i. where appropriate, advising students on the suitability of the course in which they are enrolled;</li> <li>ii. ii. assisting students by advising of opportunities for the students to be reassessed for tasks in units to demonstrate the necessary competency in areas in which they had not been previously able to demonstrate competency; and</li> <li>iii. iii. advising students that unsatisfactory course progress in two consecutive study periods for a course could lead to the student being reported to DHA.</li> <li>iv. Campus Manager may telephone and/or email the student to alert them to the seriousness of their situation and asking them to attend an interview with Campus to discuss how Imagine can assist with their studies</li> </ul> <p>1.6 At the end of each compulsory study period, students are assessed against the course progress policy. If a student is identified for the first time as not making satisfactory course</p>

	<p>progress, the intervention strategy as outlined in 1.4 is implemented. The intervention strategy must be activated within the first four weeks of the following study period.</p> <p>However, if a provider identifies that a student is at risk of making unsatisfactory course progress before the end of the study period, the provider is encouraged to implement its intervention strategy as early as practicable.</p> <p>1.7 If a student is identified as not making satisfactory course progress in a <b>second consecutive compulsory</b> study period in a course Imagine Education Australia will notify the student of its intention to report the student to DHA for unsatisfactory progress. The provider does this through the written notice described in 1.8. The Campus Manager may also telephone or email the student advising that their course may be cancelled and asking them to attend an interview with Campus Manager to see how Imagine can assist with their studies.</p> <p>1.8 The written notice (of intention to report the student for unsatisfactory progress) informs the student that he or she is able to access the registered provider's complaints and appeals process under Standard 8 and that the student has 20 working days in which to do so. A student may appeal on the following grounds:</p> <ul style="list-style-type: none"> <li>i. provider's failure to record or calculate a student's marks accurately,</li> <li>ii. compassionate or compelling circumstances, or</li> <li>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.</li> </ul> <p>1.9 Where the student's appeal is successful, the outcomes may vary according to the findings of the appeals process.</p> <ul style="list-style-type: none"> <li>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 is no requirement for intervention.</li> <li>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</li> </ul> <p>1.10 Where:</p> <ul style="list-style-type: none"> <li>i. the student has chosen not to access the complaints and appeals processes within the 20 working day period, or</li> <li>ii. the student withdraws from the process, or</li> <li>iii. the student lodges an appeal and is denied in the course of the College's internal appeals process and</li> <li>iv. 20 working days has passed and the student has not lodged an external appeal, or</li> <li>v. the student lodged an external appeal which resulted in a decision supporting the registered provider (i.e. the student's appeal was unsuccessful)</li> </ul>
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	<p>Imagine Education Australia will notify the Secretary of DHA through PRISMS as soon as practicable of the student not achieving satisfactory course progress.</p>
<p><b>The intervention strategy</b></p>	<p><b>The intervention strategy</b></p> <ul style="list-style-type: none"> <li>• Imagine Education Australia will assist students who are at risk of not making satisfactory course progress in accordance with this intervention strategy. Imagine Education Australia needs to ensure that they follow their intervention strategy as failure to do so may provide a student with grounds for a successful appeal. Failure to implement the intervention strategy may also constitute a breach of the National Code 2018.</li> <li>• Imagine Education Australia will make students aware of opportunities and services to assist them if they are identified as at risk of not making satisfactory course progress by providing in writing by email. Imagine Education Australia have a counsellor available by appointment to discuss welfare related issues. Students wishing to see the Student Counsellor can make an appointment at the Student Services Desk.</li> </ul> <p><b>Strategies to assist identified students to achieve satisfactory course progress:</b> Possible intervention strategies include:</p> <ul style="list-style-type: none"> <li>• promoting regular attendance at lectures</li> <li>• Additional access to library resources and lecturer through review weeks</li> <li>• the submission of assessment</li> <li>• Where appropriate, students will be advised on the suitability of the course in which they enrolled.</li> <li>• Staff will assist students by advising them of opportunities for reassessment of the task in units in which they had not been previously able to demonstrate competency.</li> <li>• Extension of course duration as per Imagine Education Australia Intervention Extension Policy.</li> <li>• Compassionate or Compelling circumstances.</li> <li>• The Campus Manager (CM) may telephone or email the student advising that their course may be cancelled and asking them to attend an interview with CM to see how Imagine can assist with their studies.</li> <li>• Imagine Education Australia will save each written notice to students in their academic file.</li> </ul> <p><b>The written notice of intention to report a student for unsatisfactory progress</b></p> <ul style="list-style-type: none"> <li>• Imagine Education Australia will provide written notice to report a student for unsatisfactory progress.</li> </ul> <p><b>Reporting students for unsatisfactory progress</b></p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Course progress in a non-compulsory study period is to be disregarded when considering whether there has been unsatisfactory progress in two consecutive compulsory study periods.</li> </ul>

	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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 students visa. Students will be given an opportunity to respond to the NOICC and explain their situation.</li> <li>• Part 3, Division 1, Section 19(2) of the ESOS Act 2000 requires Imagine Education Australia 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).</li> </ul> <p><b>Compassionate or compelling circumstances</b></p> <ul style="list-style-type: none"> <li>• Compassionate or compelling circumstances are generally those beyond the control of the student and they have an impact on the student’s capacity and/or ability to progress through a course. These could include:             <ul style="list-style-type: none"> <li>○ serious illness or injury, where a medical certificate states that the student was unable to attend classes</li> <li>○ bereavement of close family members such as parents or grandparents (where possible a death certificate should be provided)</li> <li>○ major political upheaval or natural disaster in the home country requiring their emergency travel and this has impacted on their studies</li> <li>○ a traumatic experience which could include but is not limited to:                 <ul style="list-style-type: none"> <li>▪ involvement in or witnessing of an accident or</li> <li>▪ a crime committed against the student or</li> <li>▪ the student has been a witness to a crime and this has impacted on the student (these cases should be supported by police or psychologists’ reports).</li> </ul> </li> </ul> </li> </ul> <p>Please note that the above are only some of examples of what may be considered compassionate or compelling circumstances. Imagine Education Australia will use our professional judgment and assess each case on its individual merits. When determining whether compassionate or compelling circumstances exist, Imagine Education Australia will consider documentary evidence provided to support the claim. Imagine Education Australia will keep copies of these documents, together with a record of why the decision was made, in the student’s file.</p>
<p><b>Procedure</b></p>	<ol style="list-style-type: none"> <li>1. Course requirements for each compulsory study period (10 weeks) shall be defined and made clear to the student by the Trainer/Assessor at the start of each compulsory training period, on the individual student training record.</li> <li>2. At the end of the first compulsory study period as outlined on the training record (every 10 weeks) the Trainer/ Assessor will gather data on student’s progress for each</li> </ol>

unit against the expected timetable for the student as outlined on the training record requirements.

3. If the student is successfully progressing or demonstrating competency in at least 50% of the course, this will be documented for review at the end of the next study period. If the student is not successfully progressing or demonstrating competency in at least 50% of the course, the Trainer/Assessor will issue a **Progress Warning Letter**. This is the first stage of the intervention strategy.
4. At the end of the second compulsory period (end of 2<sup>nd</sup> study period) the Trainer/Assessor will gather data on student's progress for each unit against the expected timetable for the student as outlined on the training record requirements.
5. If the student is not successfully progressing or demonstrating competency in at least 50% of the course at the end of the **second compulsory study period**, the Trainer/Assessor will advise the Campus Manager.

The Campus Manager will issue the **Notice of Intention to Report for Unsatisfactory Progress Letter (ITC)** on behalf of the Chief Executive Officer. The Campus Manager will email a copy of the ITC letter to the student (and CC to the agent), so the Agent can also follow up with the student.

- i. Before the 20 day appeal period has elapsed, the Campus Manager may telephone or email the student advising that their course may be cancelled and asking them to attend an interview with Campus Manager to see how Imagine can assist with their studies.
- ii. The Campus Manager may also telephone or email the students' educational agent seeking assistance to obtain contact with the student.

#### **Appeals Process:**

An appeal is deemed to be a written correspondence to the Campus Manager stating reasons why the student believes they should not be reported, which may include but are not limited to compelling and compassionate reasons. Any appeal should be accompanied by documentary evidence to support any reason stated in the appeal (for example medical certificates or police reports).

**Submission of assessments is not deemed to be an appeal.** That is, a student submitting multiple assessments, or enough assessments to get to 50% academic progress prior to the 20 day appeal period, is **not** an appeal. The student must still make a written appeal as above.

If the 20 working days pass and the student has not lodged an appeal, the student will be reported to DET via PRISMS.

If the student lodges an appeal and this is denied in the course of the College's internal appeals process, the student still has the right to appeal to an external appeals body (eg.

	<p>the International Student Ombudsman). The College will arrange this external appeal for the student at minimal, or no cost.</p> <p>If the student lodges an external appeal and this is also denied, the College will then report him/her to DET via PRISMS. When a student is reported via PRISMS, a copy of the reporting action will be placed on the student’s file and a further copy provided to the student for his/her own records.</p> <p>Should a student achieve unsatisfactory course completion, they may be deemed ineligible to progress to the next AQF level, as per the requirements of the Training Package.</p>
<b>Supporting documentation</b>	<ul style="list-style-type: none"> <li>• Warning Letter</li> <li>• Intention to Report Letter</li> <li>• Intervention Extension Policy – located IEA. portal</li> <li>• Complaints and Appeals Policy – located IEA portal</li> </ul>
<b>Locations</b>	<p><a href="http://www.imagineeducation.com.au">www.imagineeducation.com.au</a></p> <p>Course handbooks</p>
<b>Reviewed</b>	Annually (05/06/2024)
<b>Version</b>	Version 4.0