



COURSE PROGRESS, MANDATORY INTERVENTION AND COMPLETION WITHIN EXPECTED DURATION POLICY AND PROCEDURE

POLICY NUMBER: NC18-PP006
RESPONSIBILITY: MANAGING DIRECTOR

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1. Scope

This policy applies to all current and future overseas students of WAIFS who are enrolled at WAIFS while this policy and procedure is in effect. Students should refer to other policies and procedures of WAIFS as applicable and appropriate.

2. Basic premise

2.1 WAIFS monitors, records and assesses the course progress of each student for the course in which the student is currently enrolled at WAIFS.

2.2 Unsatisfactory course progress in VET courses is defined as not successfully completing or demonstrating competency in at least 50% of the course requirements in that study period.

2.3 A VET study period at WAIFS is defined as one semester. i.e. 6 months or 26 weeks. The study period includes course study and holiday weeks as included in the registered duration of the course on CRICOS.

2.4 Unsatisfactory course progress in ELICOS courses is defined as not successfully achieving an overall grade of at least 50 %. This will be measured as per the ELICOS Formative, Summative Feedback Procedure.

3. Entering student outcomes into the student management database (currently WISENET)

3.1 WAIFS' trainers enter the assessment outcomes (satisfactory/ not yet satisfactory) or units which require work-based-training (theory satisfactory/theory not yet satisfactory) of each student for each assessment into the student progress spread sheets - *available on the training and assessment drive*.

3.2 Student unit results must be updated no later than 14 calendar days after the end date of a unit/module based on WAIFS' accepted timetables for unit delivery for each calendar year. If an assessment is submitted late



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by a student the 14 days commences from the first working day after receipt. Note: timetables are entered into the student management database (currently WISENET) for each course based on ACTUAL dates of delivery. These are the “accepted timetables for unit delivery”.

- 3.3 It is **critical** that trainers keep the information in both the progress spreadsheets and WISENET up to date as these are the main controls used by WAIFS to identify when a student is at risk of not meeting course progress requirements. **No trainer at WAIFS can use any other system to monitor course progress.**
- 3.4 The Head of Studies (HoS) and Head of Compliance (HoC) are equally responsible for ensuring that these procedures are being followed.
- 3.5 *Trainers are to be aware that non-completion of the spreadsheet and student management database in the required timeframes may be considered grounds for disciplinary action for the trainer/s as considered necessary by Senior Management.*

4. Emailing feedback to students through the student management database (currently WISENET)

Trainers must ensure students are given adequate, prompt feedback about both their individual assessments and unit/module outcomes, including (but not limited to):

WAIFS’ trainers email students:

- (i) The outcome of their individual assessments as soon as practicable after marking is completed (and no more than 5 working days later) and records the email in the student management database (currently WISENET). Marking and assessment outcome should be completed within 14 calendar days of assessment submission by the student.
- (ii) Adequate feedback on the student assessment (and specific to the student) for the student to be able to understand:
 - What the student needs to do better to get a satisfactory assessment outcome (if applicable), or;
 - What the student did well to get the assessment of satisfactory (to be able to continue).
 - All feedback will generally contain a mixture of positive and negative feedback where an assessment is submitted – although this will not always be the case.

- 4.1 Students must also be emailed the outcome of their unit as soon as it is updated in the student management database (currently WISENET) to either “Competent” or “Not Competent”. The Trainer/s must email the student and advise them of the unit name and outcome that has been recorded. Feedback from a trainer/HoS/any WAIFS staff member must never give the student the answer/s which (in whole or in part) would assist the student to obtain an assessment of satisfactory in an assessment.
- 4.2 Trainers are supposed to support their students to learn – this is achieved through giving them the techniques to research, critically analyse and present information for assessment as opposed to providing answer pro-formas (such behaviour from any WAIFS staff member/s would be subject to disciplinary procedures).
- 4.3 Why ongoing feedback is so important:
WAIFS is required to give students adequate, relevant, appropriate, timely feedback about their assessments and course progress. Trainers and HoS must ensure this is achieved at all times.
- 4.4 WAIFS reviews progress formally to see if a mandatory intervention strategy is required after 20 weeks of a study period at WAIFS. This is 20 weeks after the start of a student’s enrolments within that semester. In all cases, this will be 20 weeks after their first day of class in that semester.
Feedback enables students to continue improving with the aim of continuously meeting the requirements of industry in all areas, including knowledge, skills and presentation and their application in the “real world”.
- 4.5 The feedback a student receives on an ongoing basis is very important. The email from trainers should encourage students to approach their trainer for support/to request a support meeting and raise course-related and/or personal concerns (well before formal, mandatory intervention is commenced by WAIFS, thus aiming to ensure that issues are addressed well before the end of a student’s course).
- 4.6 Feedback for ELICOS
Feedback will be provided in line with ELICOS Formative, Summative, Assessment Feedback procedure.



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5. Informal review of Course Progress (at any other time)

5.1 The National Code 2018, Standard 8 states:

The registered provider must not extend the duration of the overseas student's enrolment if the overseas student is unable to complete the course within the expected duration, unless:

- There are compassionate or compelling circumstances, as assessed by the registered provider **on the basis of demonstrable evidence.**

5.2 WAIFS has a formal review process as required by the National Code, 2018 Standard 8. During the formal process, if a trainer becomes aware of a compassionate or compelling reason why a student will need a course extension, this can be addressed at this stage.

5.3 If a WAIFS staff member (any staff member) becomes aware of a compelling or compassionate issue in relation to a student, the staff member should inform the Head of Administration (or appropriate alternative). The Head of Administration (or appropriate alternative) will arrange a meeting between the student and the Head of Administration (or appropriate alternative).

5.4 Based on the outcome of the meeting and any evidence the student can provide to support a compelling or compassionate issue existing, a course extension may be required. A deferral or suspension may also be appropriate and WAIFS' staff should refer to the "Deferral, Suspension and Cancellation Policy" also.

5.5 WAIFS staff must remember that **demonstrable evidence must be provided**. Further, the Factsheet to Standard 8 states: there is evidence to support this assessment.

5.6 The student will still be reviewed as part of the formal course progress review when it becomes appropriate under this policy and procedure.

5.7 Compassionate and compelling circumstances are generally those beyond the control of the overseas student and which have an impact upon the overseas 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 overseas student was unable to attend classes
- Bereavement of close family members such as parents or grandparents (where possible a death certificate should be provided)
- Major political upheaval or natural disaster in the home country requiring emergency travel and this has impacted on the overseas student's studies; or
- A traumatic experience, which could include:
 - Involvement in, or witnessing of a serious accident; or
 - Witnessing or being the victim of a serious crime, and this has impacted the overseas student (these cases should be supported by police or psychologists' reports)
- Where the registered provider was unable to offer a pre-requisite unit, or the overseas student has failed a prerequisite unit and therefore faces a shortage of relevant units for which they are eligible to enrol; or
- Inability to begin studying on the course commencement date due to delay in receiving a student visa.

As all of the above need to be demonstrably evidenced and supported. WAIFS' staff must ensure that evidence is supplied and verified. WAIFS staff should also be aware that not all evidence has to be accepted. For example, if a general practitioner signs that a student has presented to them and stated they have been suffering from an illness for some time (and this is the first time they have sought medical advice and no medication/referral has been taken before this date), WAIFS staff are able to not accept the evidence supplied – but must always inform the student why and that they can access WAIFS' complaints and appeals process within 20 working days.

5.8 Decisions on other compassionate or compelling reasons will be made by the Head of Administration (or appropriate alternative) and another WAIFS staff member. Refer to the "Deferral, Suspension and Cancellation Policy" where this is further clarified.



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6. Formal Review of Course Progress within a study period.

6.1 For VET courses:

- On a monthly basis, WAIFS' Head of Administration (or appropriate alternative) will prepare a report by *course* and by *trainer* which will detail all students who will require a formal review in the coming month and the date the review should commence.
- The reports will be sent to the HoS.

6.2 For ELICOS courses

- On a monthly basis, WAIFS' Head of Administration (or appropriate alternative) will prepare a report by *course* and by *trainer* which will detail all students who will require a formal review in the coming month and the date the review should commence.
- The reports will be sent to the HoS.

6.3 The HoS and HoC are responsible for:

- (i) Ensuring that the training team understands and complies with this policy, and the associated policies and procedures that may impact this policy (as amended from time to time);

6.4 The Head of Administration (HoA) or suitable alternative if sending the reports by email to the appropriate trainer/s;

6.5 The trainer/s assess the report and take action in accordance with section 8.

7. How Does a Trainer Review and Assess Course Progress?

7.1 The procedure for the trainer undertaking the formal review for VET courses is as follows:

1. The trainer undertakes a review of the student's course progress, as required by the report received from the HoA listing student names requiring review.
2. The trainer compares the units/module completed successfully by the student compared to the units/modules that should have been completed successfully by the student as at the date of review.
Note: All units in WISENET are entered by admin with a timetabled delivery date which matches WAIFS' delivery dates for the calendar year. This simplifies this process.
3. The trainer must consider:
 - a) Can the student complete the course within the expected duration of the course – this will be the length of the CoE, which is issued originally for no longer than the standard registered course duration on CRICOS by WAIFS' admin.
Note: There may be differences on occasion e.g. a student joins WAIFS and receive credit transfer for 4 out of 8 units – their course duration is shorter than usual as a result.

The trainer should consider everything they know about the student at the date of review. For example:

- Has a recent traumatic experience occurred which may (or may not) explain the previous performance of the student but will realistically affect the future performance of the student?
or;
- Has the student been refused a current/upcoming work placement by their trainer for poor skills and knowledge performance below the level that can be accepted for a work placement and will therefore require additional training and an extended course?
- b) Does a formal intervention strategy need to be implemented to assist the student to complete the course?
- c) Will the course duration need to be extended to enable the student to achieve this.

7.2 If the answer to this 8.1.3a) above is "Yes" then the trainer writes that no intervention is required as below.

7.3 If the answer to any or all of 8.1.3 (b) to (d) above is "Yes" then the trainer must complete the "Intervention Strategy" request paperwork and email this to admissions@waifs.wa.edu.au within 10 working days (and sooner is better) of the date of the formal intervention review being required based on the report from the Head of Administration.

- (i) The formal review outcome by the trainer should be recorded within the Student's Course comment area and always follow the standard WAIFS' format:

- Formal Intervention Review Completed – Not Required. Further notes from the trainer must be made on why this is not required.
- Formal Intervention Review Completed – Intervention meeting with student requested via WAIFS admin.



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7.4 The procedure for the trainer undertaking the formal review for ELICOS courses is as follows:

- The trainer undertakes a review of the student's course progress, as required by the report received from the HoA listing student names requiring review.
- The trainer reviews the student's assessments to assess whether the student will be able to achieve an overall grade of at least 50 % for one study period.
- If the student has achieved an overall grade of at least 50 % within the study period then the trainer must write that no intervention is required
- If the student has not achieved an overall grade of at least 50 % within the study period then the trainer must then the trainer must complete the "Intervention Strategy" request paperwork and email this to admissions@waifs.wa.edu.au within 10 working days (and sooner is better) of the date of the formal intervention review being required based on the report from the HoA.
- The formal review outcome by the trainer should be recorded within the Student's Course comment area and always follow the standard WAIFS' format:
 - Formal Intervention Review Completed – Not Required. Further notes from the trainer must be made on why this is not required.
 - Formal Intervention Review Completed – Intervention meeting with student requested via WAIFS admin.

8. Review of intervention decisions made by trainers

8.1 Senior trainers (on a sample basis each month) must check whether they are in agreement with intervention decisions made by the trainer/s (both implemented and not).

8.2 If the senior trainer **agrees** with the sample of trainer decisions selected– WAIFS recommends a sample of one per 5 students per decision type (intervention required and intervention not required) - no further selection is required.

8.3 If the senior trainer **does not agree** with the sample of trainer decisions selected (in whole or in part) the HoS reviews the decision in question.

8.4 The HoS or HoC identify that a trainer/s is not undertaking the mandatory intervention reviews as they should (where this encompasses any part/s of the process), for any reason, including (but not limited to):

- The trainer is not undertaking the reviews on the dates that they should and there is no known reason for this;
- The trainer is not sending intervention request paperwork through to admin in a timely manner/ There is a significant backlog of unmet intervention requests
- The trainer is assessing an intervention as being required when it is not
- The trainer is assessing an intervention as not being required when it is

Then the HoS and the HoC must take the appropriate corrective action, which includes any or all of (as required):

- (i) Entering a new decision made by the HoS and/or HoC. Noting the reason why the new decision has been made in the student management database (currently WISENET) and ensuring the appropriate paperwork is sent to admin, and;
- (ii) Arranging an urgent meeting with the trainer/s to explain what has been done and why and ensuring they are prepared for the intervention meetings with the student/s, if applicable;
- (iii) Additional training for the trainer/s in WAIFS' requirements, including policies and procedures
- (iv) The commencement of disciplinary action with the trainer/s, particularly if this is not the first occasion for particular trainer/s.
- (v) Additional training for the HoS and HoC in managing staff and their training and comprehension thereof.
- (vi) Any and all other reasonable steps based on the requirements of WAIFS that this policy and procedure be implemented appropriately, accurately and completely at all times.

Notes:

- When the Head of Studies is absent for any reason, including sick, personal and annual leave, distribution of the list of students requiring review will be made by the Head of Administration (or appropriate alternative);
- When a trainer is absent for any reason, including sick, personal and annual leave, the formal intervention review must be undertaken by the HoS (or appropriate alternative);
- Any other requirement of this policy and procedure must be covered appropriately by a WAIFS' staff member in the absence of another WAIFS' staff member. The Head of Studies and Head of Administration are responsible for ensuring this always occurs. The HoS is responsible for all matters which do not relate tasks/actions undertaken usually by the administration department under this policy and procedure.



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9. Contacting Students for an intervention meeting (Admin)

9.1 Students are contacted by the Head of Administration (or suitable alternative) at the email address maintained on their student records in WISENET.

9.2 The wording for an email (and letter) should state:

- The name of the student and their student ID No.
- The Course in which they are enrolled.
- That WAIFS is contacting the student in accordance with WAIFS' policies and procedures
- That the student has been identified as not making satisfactory course progress
- That the student is requested to contact admissions@waifs.wa.edu.au within 5 working days to confirm their attendance at the intervention strategy meeting
- That the National Code 2018 states that WAIFS "must monitor 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."
- That Student Visa Condition 8202 states – "You **must** maintain satisfactory attendance in your course and course progress for each study period as required by your education provider."
- That it is important that the student attend the meeting or contact WAIFS to re-arrange
- That the meeting can occur sooner than the date requested with the agreement of both the WAIFS trainer and the student (Admin will be notified by the trainer if this occurs).
- That the National Code 2018 Standard 7, 7.2.2.1 requires that students engage with an intervention strategy implemented by their education provider to assist them to achieve course progress. WAIFS will generally not release a student from their course at WAIFS unless a student has done all they can to successfully complete their course (*refer to WAIFS' transfer between registered providers policy and procedure*).

9.3 The meeting date should be more than 5 working days from the date of the email.

9.4 A copy of this correspondence should be kept on the student's electronic or hard copy file.

10. Intervention Strategy Meetings and outcomes for VET courses

10.1 For VET courses:

1. During the intervention meeting (the trainer alone if the student does not attend), discusses what needs to be done to enable the student to complete the course successfully is what should be considered. The minimum WAIFS requirement is 50% but this is not necessarily what would be ideal for the student. One would assume a certificate is always best for a student. Trainers should also consider if a following student course has pre-requisite unit requirements. If this is the case, the recommendation should allow for completion of these.
2. Recommendations can also include other matters such as:
 - (i) The student attending WAIFS' free, Study Skills Classes
 - (ii) Free Referral to a personal counselling service (where performance is related to personal issues which have arisen)
 - (iii) Re-submission of assignments only (only appropriate in cases where the student has completed any outstanding assessment work already/largely completed the assessment work already). Late submission fees will be applicable.

10.2 For ELICOS courses:

1. During the intervention meeting (the trainer alone if the student does not attend), discusses what needs to be done to enable the student to complete the course successfully is what should be considered. The minimum WAIFS requirement is successfully achieving an overall grade of 50 % within the study period but this is not necessarily what would be ideal for the student. One would assume full competency is always best for a student.
2. Recommendations can also include other matters such as:
 - (i) Providing students with additional homework
 - (ii) Assisting students in developing more effective in-class study skills such as learning to ask questions if the student does not understand or keeping a vocabulary
 - (iii) book of the day's new words
 - (iv) Assisting students in developing more effective out-of-class study skills such as diary-keeping, developing networks and out-of-class peer support groups
 - (v) through whom they can learn English
 - (vi) Moving student to a lower level English proficiency class
 - (vii) Counselling students on the importance of maintaining good attendance



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- (viii) Receiving individual case management
- (ix) Appointing a student mentor to assist during classes
- (x) Reviewing student's organisational/time management skills

- 10.3 The above lists in 11.1.2 and 11.2.2 are not exhaustive and it is at the discretion of the Trainer (as applicable) to consider what is appropriate in each individual case.
- 10.4 Note: If a student does not attend the intervention strategy meeting, the Trainer should still complete the "Intervention Interview and Strategy Agreement" form. It is unfortunate that not all students will attend such meetings. However, it is important that an intervention is put into place and communicated to the student.
- 10.5 If a student does not attend, the Head of Studies/Trainer/Head of Administration/Suitable alternative should email the "Intervention Interview and Strategy Agreement" form to the student so that the student is aware of the intervention plan that they will be assessed against.
- 10.6 If the student contacts the Head of Studies/Trainer/ Head of Administration/Suitable alternative within a reasonable timeframe from emailing the "Intervention Interview and Strategy Agreement" to request that a subsequent meeting be held that they will attend, the Head of Studies/Trainer can agree to do so. "Reasonable timeframe" is not prescribed by WAIFS but should be judged based on the reasons a student gives for not attending the initial meeting.
- 10.7 When a meeting occurs between the trainer and/or HoS and the student, the trainer must inform the Head of Administration (or suitable alternative) that this has taken place and the outcome and requirements from admin e.g. new letter of offer for extended course duration and what the dates of extension are. The trainer must ensure that they know who will email admin and the information that will be emailed and must ensure that it is done. It is not acceptable for both parties to assume the other will do it and nothing happens. If this occurs, WAIFS' senior management may implement disciplinary proceedings – this is a very important requirement for international students and must be given the attention it deserves.
- 10.8 A copy of the outcome recommendations should be kept on the student's file (electronic or hard copy file). All WAIFS' employees (admin, training and accounts) must ensure that they take all appropriate steps to ensure that all changes are made.
- 10.9 The intervention strategy meeting outcome is to be documented on the "Intervention Interview and Strategy Agreement Form".
- 10.10 Intervention strategy recommendations must always include a course extension if this is required. Trainers must always consider the timing of the delivery of the units to be retaken by the student i.e. a student cannot pass a unit they have failed before it has been delivered again!
- 10.11 The Head of Administration (or appropriate alternative) will then issue a revised letter of offer to the student which reflects the change.
- 10.12 The Head of Administration (or appropriate alternative) must ensure these are followed up and finalized promptly so that PRISMS reflects the student's correct CoE status. Admin staff must ensure they set regular, frequent reminders for this purpose and take personal responsibility for completion - not assuming another staff member will do so.
- 10.13 Education and or migration agents **must** be informed of what is happening in relation to their students. Agents enrol students at WAIFS and are (as applicable) assisting with migration issues and receiving commission payments. These payments generally rely on the agent invoicing commissions due from WAIFS. These are based on due dates (derived from letters of offer). WAIFS' admin staff must be aware of this and ensure that agents are informed of what is happening with their students throughout the process.

11. Wording to be sent to student EVERY time a course extension is granted.

11.1 EVERY time WAIFS extends the duration of an overseas student's enrolment, the Head of Administration (or appropriate alternative) must advise the overseas student to visit the Department of Home Affairs (DoHA) website to seek advice on any potential impacts on their visa.

11.2 WAIFS notes that this wording must form part of every email sent to every student (and their agent (if



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applicable) or parent/guardian (if under 18) where a course duration change occurs for any reason.

12. Notice of Intention to Report for Poor Course Progress

- 12.1 If at the end of the intervention period (this may well be up to the second formal review in the following semester), the student is still not progressing satisfactorily in their course (i.e. they are not expected to complete at least 50% of their course by the end of the extended study period, a written warning - Notice of intention to report for unsatisfactory course progress ("NOIR") - is issued to the student.
- 12.2 The NOIR template is maintained in the student management database (currently WISENET). It must be sent with the template email for a NOIR, also in the database. Both the email and attachment are then automatically saved against the specific student in the student management database.
- 12.3 The template notification informs the student that he or she is able to access WAIFS' complaints and appeals process and that the student has 20 working days in which to do so.
- 12.4 Refer to WAIFS' Complaints and Appeals Policy and Procedure for further information.
- 12.5 Further useful information sources:
 - PRISMS website
 - www.legislation.gov.au/Details/F2017L01182
 - www.internationaleducation.gov.au/Regulatory-Information/Documents/National%20Code%202018%20Factsheets/Standard%208.pdf

13. Records maintenance

Copies of all correspondence to and from the student will be maintained in the student's electronic file or the student management database (currently WISENET) under the student's record.

14. Policy and Procedure Dissemination

This policy and procedure is made available to all students:

- On WAIFS' website
- On WAIFS' student portal
- By emailing admissions@waifs.wa.edu.au
- In hard copy from reception, on request.

15. This policy and procedure is made available to all staff:

- At induction
- On WAIFS' shared drive
- By email (and training sessions, as required) as changes occur.