

STUDENT PROGRESS POLICY AND PROCEDURE – INTERNATIONAL STUDENTS

This policy and procedure outlines how Equinim College Pty Ltd (RTO 45758; CRICOS provider 03952E) (referred to as “**Equinim College**” or “**the provider**”), monitors student progress. This policy and procedure applies to all staff and students of Equinim College.

1. POLICY STATEMENT: SERVICE STANDARD

Equinim College is committed to student progress and student outcomes. Our systems and staff are entirely focused on an organisation-wide level of care, designed to bring out the best in every student and facilitate their growth and development. Through passionate staff, industry expert trainers, carefully chosen and appointed venues, and quality management through every aspect of the organisation, from curriculum to systems, Equinim College is all about integrity in education.

- a) Equinim College is bound by the ESOS Act and has the privilege of being a CRICOS registered provider, delivering education to international students. Equinim College is fully aware of the regulatory environment in which CRICOS providers operate. Equinim College is committed to providing the highest possible quality in education and service delivery.

Equinim College sees that its commitment to quality should be the minimum level at which all providers operate. It takes its responsibility seriously in knowing that the way each stakeholder in the VET sector operates, affects the sector’s overall reputation, and the outcome that all graduates of VET share. It should be a matter of great pride to have graduated from VET.

Equinim College works on the basis that every student, when they know they have the backing of a whole College behind them, can be supported to be confident in themselves and their ability to learn and grow.

With a simple recipe of dedication to students, the entire Equinim College Team is there to support each and every student to maximise their learning, enjoy it, and be ready through detailed, leading-edge education, for what is next.

2. COMMITMENT TO STUDENT PROGRESS

2.1 The responsibility of a CRICOS registered provider

Part of the above purpose (service standard), is the importance of student progress. Equinim College does not check, monitor and follow up on student progress because the Standards state it has to. Equinim College does what is required to deliver effective, quality education. Our team operates to higher than the minimum standards, consistently, across every aspect of the organisation.

- a) The ESOS Act provides that the ESOS Agency (ASQA) may impose conditions on a CRICOS provider requiring them to ensure a minimum of 80% attendance. *The reason for such a condition is obvious* – providers should be ensuring a minimum level of attendance is reached, to ensure genuine students receiving sufficient touch points/contact hours in their education to achieve an outcome.
- b) The ESOS Agency has not imposed any such conditions on Equinim College. Equinim College has no conditions against its registration, *however, it exercises a level of responsibility it considers essential* to ensure that students are looked after. *It does not have to be told by the regulator to ensure its students are looked after and making progress – it is a fundamental responsibility of being an education provider to be taking such action.*

2.2 We understand absences occur

Equinim College recognises that students may face obstacles and difficulties in life and sometimes attendance may lapse or submission of assessment tasks may wane. Sometimes these reasons for absence may be allowable in advance, while in other situations, they will be unpredictable and require understanding and care in response.

2.3 We support

- a) A student who is missing classes or assessment submission responsibilities indicates a student who may be in need of support.
- b) By maximising the intelligence behind our tracking mechanisms, Equinim College keeps close track on each and every student's progress. Through care – and not through the imposition of a regulatory condition (i.e. '*because we were told to*') – Equinim College takes action if a student falls behind.
- c) Equinim College employs an immediate tracking of every student, which identifies if a student's usual behaviour of attendance or assessment submission is altered, such that they are tracking a certain level of non attendance on campus, missing several classes in a row, or falling behind in the assessments required. Staff are alerted to anomalies.
- d) We have deployed a huge investment in technology that is custom-built to be able to serve the student, and highlight where staff time is needed, before it becomes a big problem.
- e) Every student deserves to be supported, and to know they are supported, so that even if there are difficult circumstances for them in life, they know they have the backing of their College.

This is especially important for international students, who may be on their own, or in any event removed from their usual environment and network. However, it is a principle that Equinim College applies equally, everywhere, to domestic and international students.

- f) **We bring our all so that they know they can bring theirs.** Rightfully confident, and backed, each student has every chance of maximising what is on offer, and growing with it.

It is on this basis, that our Student Progress Policy and Procedure has been developed, and is implemented, for every student studying with us.

This is an internal policy and procedure which is part of the induction for all new staff of Equinim College. It is but one example of our ethos in action.

3. SYSTEMS THAT SUPPORT STUDENTS

Equinim College encourages and supports students to take equal responsibility for their learning. We provide them with everything to support an enjoyable, quality learning space and experience, and we offer them to step up to join that level of quality in their entire approach to their education.

In an unprecedented move in the field of education, Equinim College issues a schedule of permitted leave to students, which is much like what they would receive in undertaking a job. This schedule of permitted leave gives them an allocated list of absences which are what we term “explained non-attendance”. It operates as leave does, in an employment context, further preparing them for work.

Any other non-attendance, falling outside that system, is called “unexplained non-attendance”. It is unexplained non-attendance that may have a severe impact on a student’s progress and threaten their ability to successfully complete, by their end date as per their student visa. Staff time is therefore focused on supporting students in the areas of unexplained non-attendance, to offer everything possible to encourage and mentor a student back into a pattern of regular attendance once again.

This system manages non-attendance in a way that treats students as responsible adults, not incompetent in any way. They are invited to step up to the responsibility of attendance to all requirements, and we ensure that their learning environment is supportive and fulfilling for them.

3.1 Explained non-attendance: “Student Leave”

Each student has a recognised allowance for student leave allocated to them, comprising the following:

- Sick leave (unquantified but requires a certificate from registered medical practitioner)
- Mental health / personal health leave (3 days per semester)
- Holiday leave (4 days per year)

The principles and mechanism behind these allocations, are outlined below.

3.2 General principles

- a) The number of days of leave given in each case has been carefully determined by the Equinim College team. As it is similar to what is permitted in a work environment – part of what we offer students, is a further readiness to work upon graduation.
- b) We prepare them to use their leave wisely, so that it does not impact on their job. In this case, their “job” is their study and to complete their course.
- c) Second, we determine the amount of leave in a way that we know will not impact on their overall progress.
- d) We **offer them a means of being responsible for their leave**, preparing them for the workforce, and giving them breaks they can enjoy, while we know that we can deliver in a manner which means that short absences will not affect overall progress.
- e) Students are clearly told that anything beyond this, will put their course and student visa at risk, as well as their ability to stay in Australia and study (or do anything else here, for that matter).
- f) It asks students to work with us as responsible adults, just as they shall be invited to be responsible employees – in a future work context.
- g) Students are encouraged to contact Equinim College any time they know they will be taking leave, in advance. This way, their absence is not tracked as an unexplained non-attendance, triggering potential circumstances for their study and visa. The amount of leave that Equinim College has worked out can be absorbed into the curriculum delivery without throwing out end dates, is afforded to them, and then they are supported to stay on track.
- h) Short absences, will not affect their overall progress. If they are struggling, they fall into the category of any student who needs additional support to complete. The team responds accordingly. See the **Student Support Policy and Procedure**.
- i) That then leaves unexplained non-attendance. Unexplained non-attendance is tracked very carefully through ongoing class checks, as well as intelligent system monitoring, so that the Student Services Team has full insight into students who are not attending for no known reason. Those students, receive focused communication and support to either bring them back into line with completion requirements, or to recognise that a suspension or other intervention/change may be required in order to allow them to complete or do what is needed in the situation. Every student is considered in terms of their full circumstances.

3.3 Sick leave

- a) Sick leave is unquantified as sick leave requirements cannot be quantified in advance of symptoms arising.
- b) Sick leave is permitted, but must be supported by a medical certificate from a registered medical practitioner.
- c) The certificate is required to state how long the certificate is active for, i.e. how much absence the student requires in order to be fit to return to study.
- d) The principles of the Deferral, Cancellation and Suspension Policy and Procedure apply, as well as use of the Special Consideration Request Form, where applicable.

- e) At all times, Equinim College considers all of the circumstances applicable to the student, and weighs up what may be an obvious inability to attend for medical reasons, against the practicality of how this will affect the student's progress and ability to move through their course on time.
 - a. In some cases, it may be better for a student to skip a term and take it as sick leave, and then return in the new semester, even if this is allowing longer than the medical practitioner has advised as needed. What is best for the student is carefully considered.
 - b. Where this means a student's CoE needs to be re-issued with the potential requirement to apply for a new student visa, then the seriousness of the circumstances are recognised, and the student is supported to take the action that is needed – in this given example, to rest and recover, knowing their College is behind them.
 - c. In other cases, the required sick leave will be short, and the student will be supported to make up for the absence and stay on track with expected end dates.

3.4 Mental health / personal health leave

- a) Students are afforded a total of 3 mental health / personal health leave days per semester.
- b) Equinim College recognises that students do take days off. It is renowned to occur in the international student sector. Giving them a quota of mental health / personal health leave days they can use, encourages them to be responsible for their leave. In other words, through being given the quota of days, they are encouraged to use it wisely.
- c) At the same time, if something more serious arises, and they need more leave, they know their College will back them. They are also informed of all of the consequences – e.g. that a suspension for a semester (if required) is going to push out their end date, and thus would require both a new CoE and application for a new student visa.
- d) The mental health / personal health leave also caters for unexpected happenings in their family situation, such as a traumatic event or other serious incident, accident or any other reason that, understandably, would affect a student's ability to attend on campus at that time. Once again, if the situation becomes protracted, they are encouraged to talk with us, so that whatever is needed, can be put in place. Again, if this means a push out of their study end date, then this is explained with care and support, and all necessary action taken.
- e) Any change in dates is recorded in PRISMS so that the Government is fully informed of any changes to expected dates and thus impact on the student visa.
- f) Short absences can be consumed into the overall timetable. With support from the Trainer/Assessor and ongoing support from the Student Services Team, the student can make up missed study and/or assessments and not be behind. Such short absences, which do not impact on a student's overall progress against schedule, are not recorded as a suspension or reported as a change of dates in PRISMS. However, there is no delay in reporting anything which becomes apparent that it is affecting a student's ability to complete

the course within the expected duration. Thus close monitoring is always performed.

3.5 Holiday leave

- a) Students are given 4 days holiday leave per year.
- b) This is on the basis that we are aware that people are going to take leave days to go away with friends or family or otherwise just “take a break”. Our team knows through experience that this occurs. Through giving an allocated quota that we have designed our curriculum and delivery to not be affected by, we are encouraging students to take those “breaks” and supports them to want to use those days wisely. Again, support is given when they are back on campus to complete on schedule.

Through the above, staff time is focused on the unexplained non-attendance, or explained non-attendance that becomes protracted beyond the short periods noted above, in other words, absence that can affect a student’s study duration and/or course in general.

4. REQUIRED CONTACT HOURS

International students are required to fulfil 20 contact hours per week in their course. A total of 15 hours per week must be on campus, and a further 5 hours must be logged into and working within the Equinim Learning Hub. All hours are tracked and checked, for every student.

5. SYSTEMISED TRACKING OF STUDENT PROGRESS, AND INTERVENTION

5.1 Systemised Tracking

The following monitoring and tracking occurs:

- a) **(On campus tracking)** The system can generate on demand a total percentage attendance rate for every student (calculated over a semester).
- b) **(Equinim Learning Hub Tracking)** The system automatically tracks the attendance of all students against attendance requirements in the Equinim Learning Hub. Both login and assessment submission activity can be tracked and reported on demand.
- c) **(Full gauge)** This monitoring and tracking gives Equinim College a gauge of all attendance requirements: on campus attendance, as well as Equinim Learning Hub attendance.
- d) **(Intelligent system)** The system automates follow up with the student regularly, to encourage progress. The system is designed to perform tracking and auto-messaging where little slips occur, and then track when slips are greater, so the Student Services Team can focus on supporting students one-on-one where it is most needed. The system creates a flag for attendance missed.

5.2 Intervention

The following applies:

- a) **(Significant support is applied)** Significant support is offered to students to return to required attendance levels, if their attendance levels have dropped.
- b) **(Intervention Strategy)** In the case of lower than required attendance, Equinim College implements the thorough and supportive intervention strategy (“**Intervention Strategy**”), as set out in this policy and procedure. In particular:
 - a. **(On campus strategies)** Where the student has dropped attendance in on-campus classes, the Intervention Strategy is as set out in section 6, below.
 - b. **(Learning Hub strategies)** Where the student has dropped attendance in the Equinim Learning Hub, the Intervention Strategy is as set out in section 7, below.
 - c. **(Further strategies)** Further Intervention Strategies may be implemented, as outlined in section 8, below.
 - d. **(Compassionate or compelling reasons)** Whether there are compassionate or compelling reasons is also taken into account, as outlined in section 8.2, below.
 - e. **(Allowable extensions)** Allowable course extensions are outlined in section 8.3, below.
 - f. **(Non-competent results and re-sits)** Non-competent results, including after offering a re-sit, are also taken into account, as set out in section 9, below.
- c) **(If no or unsatisfactory response)** It is only if the Intervention Strategy is not successful that further action, to report and/or cancel is taken, as per the following section.

5.3 Action if Intervention Strategy is not effective

Where the Intervention Strategy has been fully implemented, and the student continues to make unsatisfactory course progress:

- a) **(Notice to student)** Equinim College will determine whether to issue a notice of intention to report the student (“**Notice of Intention to Report**”), to the Department of Home Affairs for failure to achieve satisfactory progress, which may result in the cancellation of their student visa.
- b) **(Right to appeal)** If such a notice is issued, the international student shall be informed in writing that the issue of such notice triggers the right of the student to access the internal review mechanism under the Complaints and Appeals Policy and Procedure within 20 working days from the date of the notice.
- d) **(Procedure)** Further details of the procedure to decide upon reporting to the Department and issuing the said notice are set out in section 10, below.

6. MONITORING OF ON-CAMPUS ATTENDANCE

6.1 Monitoring of student attendance on campus

Equinim College monitors all student attendance on campus.

- a) **(Class attendance sheet)** All attendance on campus is logged by the supervising Trainer/Assessor, who enters attendance details on the class attendance sheet for each class.
- b) **(Monitoring by system and Student Services)** After data entry by the Trainer/Assessor, the system tracks whether students have missed any consecutive days, as well as their overall attendance over each semester, and sends auto-notifications out as needed (described below), as well as creating flags/alerts in certain cases for Student Services Team follow up.

6.2 System monitoring: On campus attendance

The custom-built Equinim College system monitors attendance in class, and automatically tracks the percentage of attendance against the full required attendance on campus, on a semester basis. Permitted student leave (as described in section 3, above) is not used in calculating attendance as per below.

- a) **(System monitoring)** The system creates a flag for on campus attendance missed.
 - a. **(Message to student: 95%)** If a student's attendance on campus drops to 95% of required on campus attendance over a semester:
 - i. **(Message)** The system sends an automated message to the student warning them of the drop in attendance and referring to their attendance requirements as set out in the International Student Handbook.
 - ii. **(System flag)** The system flags students at the 95% attendance on campus level, and the Student Services Team is notified of all flagged students by an alert in the system.
 - b. **(Message to student: 90%)** If a student's attendance on campus drops to 90% of required on campus attendance over a semester:
 - i. **(Message)** The system sends an automated message to the student warning them of the drop in attendance and referring to their attendance requirements as set out in the International Student Handbook. The message warns the student that not meeting their attendance requirements as set out in the International Student Handbook can affect their student visa.
 - ii. **(System flag)** The system flags students at the 90% attendance on campus level, and the Student Services Team is notified of all flagged students by an alert in the system.
 - c. **(Message to student: 85%)** If a student's attendance on campus drops to 85% of required on campus attendance over a semester:
 - i. **(Message)** The system sends an automated message to the student warning them of the drop in attendance and stating that they are at risk of endangering their student visa.
 1. The message refers to their attendance requirements as set out in the International Student Handbook, and also refers to the extensive support in place for students at

- Equinim College, encouraging them to call our team to discuss why attendance has dropped, and receive support to get them back on track.
2. The message again warns the student that not meeting their attendance requirements as set out in the International Student Handbook can affect their student visa.
 - ii. **(System flag)** The system flags students at the 85% level of attendance on campus over a semester, and the Student Services Team is emailed with details of each student at this level.
 - iii. **(Personal follow up)** The Student Services Team individually contacts each student at this level of attendance over a semester and offers support, finds out what is or may be causing the absence, and takes whatever other action is required to support the student to come back to the required attendance level.
 - iv. **(Priority)** A priority is laid upon any student that drops to 85% of required attendance over a semester, so that through personal, one-on-one support and mentoring, everything possible is given to them to support them to not drop any further attendance over the ensuing semester, if possible.
 - v. **(Support to minimise impact)** The Team recognises where unusual circumstances intervene, such as illness or accident, and these are not flagged as unexplained non-attendance. Therefore staff time is focused on the unexplained non-attendance where a student may be supported to minimise the impact of absence on their studies and completion of their course.
 - vi. **(Tracking, to stay in touch)** The Equinim College Team recognises that sometimes circumstances in life can make things difficult for students. We are therefore tracking their every login and attendance (or non-attendance) in class, as a tracker of their welfare, and their educational progress.
 - d. **(Message to student: 80%)** If a student's attendance on campus drops to 80% of required on campus attendance over a semester, the same steps as above are taken, also recognising that the student has reached a more serious level of absence. Every effort is made to ensure a student does not get to this point, as per the above, however it is recognised that at times, there may be an absence that reaches this level:
 - i. **(Message)** The system sends an automated message to the student warning them of the serious drop in attendance and stating that they are at very real risk of endangering their student visa, through not making progress and possibly impacting their end date.
 - ii. **(Requirements and support)** The message refers to their attendance requirements as set out in the International Student Handbook, and also refers to the extensive support in place for students at Equinim College, encouraging them to call

our team to discuss why attendance has dropped, and receive support to get them back on track. The message again warns the student that not meeting their attendance requirements as set out in the International Student Handbook can affect their student visa.

- iii. **(System flag)** The system flags students at the 80% level of required attendance on campus over a semester, and the Student Services Team is emailed with details of each student at this level.
- iv. **(Personal follow up)** The Student Services Team individually contacts each student at this level of attendance:
 - 1. The Student Services Officer allocated to the student offers support, finds out what is or may be causing the absence, and takes whatever other action is required to support the student to come back to the required attendance level and make satisfactory progress in their course;
 - 2. The Student Services Officer actively mentors the student, staying in regular one-on-one contact to support attendance levels not dropping any further; and
 - 3. If student attendance levels do drop below 80% over a semester, all needed action is taken in the circumstances, including an assessment of whether the student can actually complete in the given circumstances and whether an adjustment to the CoE (causing a requirement for a new student visa) is required. (This is assessed in relation to overall attendance, encompassing all parts of the student's course. See section 5, above.)

6.3 System monitoring: On campus attendance – consecutive days

Besides tracking overall attendance percentages across a semester, the system also tracks attendance over consecutive days. Non-attendance over consecutive days is also a signal of potential problems in course completion. The following monitoring and tracking occurs:

- a) **(System monitoring)** The system creates a flag for on campus attendance missed.
 - a. **(Message to student: 1 class missed)** If a student misses attendance on campus at a scheduled class:
 - i. **(Message)** The system sends an automated message to the student noting their absence from a scheduled class, and referring to their attendance requirements as set out in the International Student Handbook.
 - ii. **(No message if an explained absence)** A message will not be sent if the student's absence was pre-notified, as part of permitted student leave (see section 3, above).
 - b. **(Message to student: 2 classes missed)** If a student misses attendance on campus at 2 consecutive days of scheduled classes:

- i. **(Message)** The system sends an automated message to the student noting their absence from 2 consecutive days of class, and referring to their attendance requirements as set out in the International Student Handbook.
 - ii. **(No message if an explained absence)** A message will not be sent if the student's absence was pre-notified, as part of permitted student leave (see section 3, above).
- c. **(Message to student: 3 classes missed)** If a student misses attendance on campus at 3 consecutive days of scheduled classes:
 - i. **(Message)** The system sends an automated message to the student noting their absence from 3 consecutive days of class, and referring to their attendance requirements as set out in the International Student Handbook.
 - ii. **(No message if an explained absence)** A message will not be sent if the student's absence was pre-notified, as part of permitted student leave (see section 3, above).
 - iii. **(System flag)** The system flags 3 consecutive days of unexplained absence. The Student Services Team calls each person with such a flag, to check on their welfare and progress in their course, and takes any action as needed.
- d. **(Message to student: 4 classes missed)** If a student misses attendance on campus at 4 consecutive days of scheduled classes (which may go over more than one week):
 - i. **(Message)** The system sends an automated message to the student noting their absence from 4 consecutive days of class, and referring to their attendance requirements as set out in the International Student Handbook.
 - ii. **(No message if an explained absence)** A message will not be sent if:
 - 1. the student's absence was pre-notified as part of permitted student leave (see section 3, above); or
 - 2. the student has responded to a previous message about the consecutive days of absence, which has explained the absence.
 - a. In this case, having received such a call/email, the Student Services team:
 - i. records the details in the Student Management System;
 - ii. follows up with any needed action; and
 - iii. monitors the student individually as needed.
 - iii. **(System flag)** The system flags 4 consecutive days of unexplained absence. The Student Services Team calls each person with such a flag, to check on their welfare and progress in their course, and takes any action as needed.
- e. **(Message to student: 5 classes missed)** If a student misses attendance on campus at 5 consecutive days of scheduled classes (which may go over more than one week):
 - i. **(Message)** The system sends an automated message to the student noting their absence from 5 consecutive days of class,

and referring to their attendance requirements as set out in the International Student Handbook. The message notifies the student that there is concern for their welfare, and their studies and student visa are also at risk, and asks them to urgently contact the Equinim College Team.

- ii. **(No message if an explained absence)** A message will not be sent if:
 1. the student's absence was pre-notified as part of permitted student leave (see section 3, above); or
 2. the student has responded to a previous message about the consecutive days of absence, which has explained the absence.
 - a. In this case, having received such a call/email, the Student Services team:
 - i. records the details in the Student Management System;
 - ii. follows up with any needed action; and
 - iii. monitors the student individually as needed.
- iii. **(System flag)** The system flags 5 consecutive days of unexplained absence and sends an email to the Student Services Team.
- iv. **(Personal follow up)** The Student Services Team individually contacts each student at this level of attendance:
 1. The Student Services Officer allocated to the student offers support, finds out what is or may be causing the absence, and takes whatever other action is required to support the student to come back to the required attendance level and make satisfactory progress in their course;
 2. The Student Services Officer actively mentors the student, staying in regular one-on-one contact to support attendance levels not dropping any further; and
 3. If student attendance levels do continue to drop (such that further consecutive classes are missed), all needed action is taken in the circumstances, including an assessment of whether the student can actually complete in the given circumstances and whether an adjustment to the CoE (causing a requirement for a new student visa) is required. (This is assessed in relation to overall attendance, encompassing all parts of the student's course. See section 4, above.)

7. MONITORING OF EQUINIM LEARNING HUB ATTENDANCE

In addition, the system monitors and tracks Equinim Learning Hub attendance. A detailed report on each student may be generated at any time. In addition, the system creates alerts for staff on students reaching particular levels of non-completion/non-attendance.

7.1 System monitoring: Equinim Learning Hub attendance

The custom-built system monitors attendance in the Equinim Learning Hub, by tracking both a student's login and time spent in the Hub, as well as specific assessments completed or other activity conducted. A synopsis of any student's login history and activity can be produced on demand.

- a) **(System monitoring)** The system creates a flag for any absences of attendance in the Equinim Learning Hub.
 - a. **(Message to student: no login for one week)** If a student has not logged into the system for 1 week:
 - i. **(Message)** The system sends an automated but very supportive message to the student noting that we've missed them and encouraging them to get back into their online study and assessments to keep their study on track. This message is a very warm message that recognises that sometimes, events may occur to stop students from being in their usual rhythm with study. This is fine – but our system reaches out to them at this point, because this touch-base of itself can be enough to restore expected activity.
 - ii. **(No message if pre-notified)** No message is sent if the student has pre-notified that there was going to be a period of absence, i.e. it is an “explained non-attendance”. Any such notification is recorded in the student notes on the system.
 - b. **(Message to student: no assessments submitted for 2 weeks)** If a student has not submitted any assessments in the Equinim Learning Hub for 2 weeks:
 - i. **(Message)** The system sends an automated message to the student noting that we've missed them and encouraging them to get back into their online assessments to keep their study on track. All system messages are pre-written with care and support, knowing that a caring touch-base of itself can be enough to restore expected activity.
 - ii. **(No message if pre-notified)** No message is sent if the student has pre-notified that there was going to be a period of absence, i.e. it is an “explained non-attendance”. Any such notification is recorded in the student notes on the system.
 - c. **(Message to student: no assessments submitted for 3 weeks)** If a student has not submitted any assessments in the Equinim Learning Hub for 3 weeks, this is starting to indicate a potentially deeper problem:
 - i. **(Message)** The system sends an automated message to the student noting that they have been absent from the Learning Hub for an extended period and encouraging them to get back

into their online assessments to keep their study on track. All system messages are pre-written with care and support, knowing that a caring touch-base of itself can be enough to restore expected activity.

1. The system refers to their attendance requirements as set out in the International Student Handbook. The message warns the student that not meeting their attendance requirements as set out in the International Student Handbook can affect their course progress and duration, which would affect their student visa.
 - ii. **(No message if pre-notified)** No message is sent if the student has pre-notified that there was going to be a period of absence, i.e. it is an “explained non-attendance”. Any such notification is recorded in the student notes on the system.
 - iii. **(System flag)** The system flags students who have not lodged any assessments for 3 weeks, and the Student Services Team is notified of all flagged students by an alert in the system, for checking, monitoring and follow-up contact as needed.
- d. **(Message to student: no assessments submitted for 4 weeks)** If a student has not submitted any assessments in the Equinim Learning Hub for 4 weeks, this is indicating a potentially deeper problem:
- i. **(Message)** The system sends an automated message to the student noting that they have been absent from the Learning Hub for an extended period and encouraging them to get back into their online assessments to keep their study on track. All system messages are pre-written with care and support, knowing that a caring touch-base of itself can be enough to restore expected activity.
 1. The system refers to their attendance requirements as set out in the International Student Handbook.
 2. The message warns the student that not meeting their attendance requirements as set out in the International Student Handbook can affect their course progress and duration, which would affect their student visa, and their ability to stay in Australia.
 3. It warns that the Australian Government is very strict about students meeting visa conditions. It states that Equinim College is there to support their study to help them complete on time, without prejudicing their ability to stay in Australia. It reminds them that problems can be avoided, if addressed early – even if that means that an extension is needed, and adjustments to their CoE and/or student visa are required.
 - ii. **(No message if pre-notified)** No message is sent if the student has pre-notified that there was going to be a period of absence, i.e. it is an “explained non-attendance”. Any such notification is recorded in the student notes on the system.
 - iii. **(System flag)** The system flags students who have not lodged any assessments for 4 weeks, and the Student Services Team

is notified of all flagged students by an alert in the system, for checking, monitoring and follow-up contact as needed.

1. The Student Services Team checks the student's file to see if the student has been attending their on campus classes. If they have, the Team member checks in with their Trainer/Assessor.
2. Depending on the outcome of that liaison, the Student Services Officer may call the student, if advisable in the circumstances, to check on them and offer support.
3. The Student Services Officer monitors the student, as needed, offering support.

8. FURTHER INTERVENTION

8.1 Further intervention strategies

Where a student has been recorded as having unsatisfactory progress and the Intervention Strategies as set out in sections 6 and 7 have been applied, the Equinim College Student Services Manager may also implement any of the following, to support the student to return to or attain satisfactory attendance and progress:

- a) **(Education department)** The international student may be referred to the Education Department where they are struggling, anxious or having a difficult time completing the theory component of their studies. An Equinim College Assessor will book a session with the student, where the student is able to receive one-on-one tutoring/support on any elected aspect of their course. There is no limit to the number of sessions a student may have with the Education Department.
- b) **(Trainer/Assessor)** Where the international student is struggling with class work or any practical aspect of the course, the Student Services Team shall notify the student's Trainer/Assessor. The Trainer/Assessor will discuss with the student methods of in-class support and areas of assistance they are able to provide.

8.2 Compassionate or compelling circumstances

Where the further Intervention Strategies as outlined in section 8.1, above, are ineffective, and where the Intervention Strategies as outlined in sections 6 and 7, above, have been ineffective, before taking any further action which may give rise to a report to the Department of Home Affairs, the Equinim College Team shall consider whether compassionate or compelling circumstances exist. The following applies:

- (a) **(Assessment of compassionate or compelling circumstances)** The Student Services Team shall ascertain whether compassionate or compelling circumstances exist, through inquiry with the student and/or through information and documentation previously gathered from the student. The Student Services Team may request any information or documentation from

the student as the Team considers necessary for the purpose of making this inquiry. The student must comply with all such requests within 5 working days of being issued them.

- (b) **(Election to suspend)** Where compassionate or compelling circumstances exist, and the student is at risk of not meeting the attendance requirements, the student may elect to suspend their enrolment with Equinim College for a required period of time, in accordance with the Deferral, Cancellation and Suspension Policy and Procedure.
- (c) **(Meaning of compassionate or compelling circumstances)** For the purposes of making a determination under paragraph (a), above, “compassionate or compelling circumstances” may include:
 - a. **(Illness/injury)** serious illness or injury, where a medical certificate states the overseas student is unable to attend class;
 - b. **(Bereavement)** bereavement of a close family member, where a death certificate can be provided;
 - c. **(Trauma)** a traumatic experience, such as witness or being victim to a serious crime or accident, where evidence of such trauma is provided;
 - d. **(Disaster)** major political upheaval or natural disaster in the home country requiring emergency travel and this has impacted on the overseas student’s studies, as supported by evidence;
 - e. **(Unit shortfall)** where the registered provider was unable to offer a pre-requisite unit, or the international student has failed a prerequisite unit and therefore faces a shortage of relevant units for which they are eligible to enrol; or
 - f. **(Student visa)** where there is an inability to commence the course due to a delay in the granting of a student visa.

8.3 Allowable extensions of course duration

In some circumstances, Equinim College may determine that an extension of the course end date is appropriate. The following process shall apply:

- (a) **(Extension requirements)** Equinim College will not extend the duration of the international student’s enrolment if the student is unable to complete the course within the expected duration, unless:
 - a. there are compassionate or compelling circumstances (see section 8.2, above), as assessed by Equinim College on the basis of demonstrable evidence;
 - b. Equinim College has implemented, or is in the process of implementing, an Intervention Strategy for the international student because the student is at risk of not meeting course progress requirements; or
 - c. an approved deferral or suspension of the international student’s enrolment has occurred in accordance with the Equinim College Deferral, Cancellation and Suspension Policy and Procedure.
- (b) **(Notify DHA re student visa impact)** Where Equinim College extends the duration of the student’s enrolment, Equinim College will advise the student to contact the Department of Home Affairs to seek advice on any potential impacts on their student visa, including the need to obtain a new visa.

9. NOT COMPETENT

9.1 Where marked not competent

Where a student is marked not competent in an assessment, whether on campus or in the Equinim Learning Hub, the student is given the opportunity to re-sit the assessment, free of charge. In Equinim College's discretion a further re-sit may be afforded to the student if the first re-sit is failed, and whether this is afforded to the student or not will depend on all of the circumstances including, without limitation, the student's overall attendance record and progress. There may be a charge for an additional re-sit as per the Administration Fee Schedule, as published on our website at www.equinimcollege.com. It is entirely at Equinim College's discretion whether any further re-sits are permitted. The student shall be advised accordingly.

9.2 Indication of non-progress

If a student fails a part of their course, this may be weighed up by Equinim College in addition to the student's overall progress as monitored and assessed under the remainder of this policy and procedure, to determine whether a student is making satisfactory progress in their course. All circumstances are taken into account.

10. REPORTING UNSATISFACTORY COURSE PROGRESS/ATTENDANCE

If the Intervention Strategy as set out in this policy or procedure has been followed and, in Equinim College's opinion, the student continues to have unsatisfactory course progress or attendance, Equinim College may proceed with the procedure outlined in this section.

The following applies after the Intervention Strategy outlined in this policy and procedure has been exhausted and Equinim College reaches the conclusion, weighing up all factors and information before it, that the student has breached the requirements for their student visa.

10.1 Written notice of intention to report

Where an international student breaches the requirements of their student visa, Equinim College is required to report information on the student visa breach as soon as practicable. If the student is assessed as not meeting course progress or attendance requirements, the Student Services Manager will provide the international student with a Notice of Intention to Report as soon as practicable that:

- (a) **(Notifies intention to report)** Notifies the international student of the intention to report them for unsatisfactory course progress or unsatisfactory course attendance;
- (b) **(Gives reasons)** Informs the student of the reasons for the intention to report;
- (c) **(Right to appeal)** Advises the student of their right to access Equinim College's complaints and appeals process, as set out in the Complaints and

Appeals Policy and Procedure, within 20 working days of the date of the notice; and

- (d) **(Advises to maintain attendance)** Informs the student that if they lodge an appeal and their course is not complete, it is important to maintain attendance while their appeal is being considered.

10.2 Where no report to the Department may be necessary

Equinim College may decide not to report the international student for breaching the attendance requirements if the student is still attending 70% of the scheduled on campus course contact hours, and:

- (a) is participating in an ELICOS and Foundation Program course, where the international student provides genuine evidence demonstrating that compassionate or compelling circumstances apply; or
- (b) is participating in a VET course, where the student is maintaining satisfactory course progress.

10.3 Report to the Department

The procedure in relation to reporting to the Department of Home Affairs is as follows:

- (a) **(Reporting requirements)** Equinim College will only report unsatisfactory course progress or unsatisfactory course attendance where:
 - a. **(Appeal unsuccessful)** The internal and external complaints processes have been completed in accordance with the Complaints and Appeals Policy and Procedure and the decision or recommendation from that process supports the registered provider in its intent to report;
 - b. **(No internal appeal)** The international student has chosen not to access the internal complaints and appeals process, as set out in the Complaints and Appeals Policy and Procedure, within the 20 working day period;
 - c. **(No external appeal)** The international student has chosen not to access the external complaints and appeals process, as set out in the Complaints and Appeals Policy and Procedure; or
 - d. **(Withdrawal from appeals process)** The international student withdraws from the internal or external appeals process, as set out in the Complaints and Appeals Policy and Procedure, by notifying Equinim College in writing.
- (b) **(Report)** Where it has been 20 working days since the date of the notice issued under section 10.1, and the student has not submitted an appeal, or the conclusion of the appeal, if one is submitted by the student, is that the appeal is unsuccessful, Equinim College will report the student to the Department of Home Affairs via PRISMS.
- (c) **(Information required)** In the event of reporting a student visa breach pursuant to paragraph (b), above, Equinim College is required to provide the following information to the Department:
 - a. The student's Australian residential address;
 - b. The student's overseas residential address; and

c. The student's phone number and email, and Equinim College will confirm these details are correct prior to submitting them to the Department of Home Affairs.