



RTO 41228 | CRICOS Provider No. 03640K

## Course progression monitoring policy & procedure

### Version Control History

Date	Version	Changes made	Author
Aug 2018	V1.0	Released for comment	Compliance Dept
May 2019	V1.1	Updated policy and procedures in line with the National Code 2018	Compliance Dept
Jan 2022	V2.0	Policy reviewed and updated	Compliance Dept
Feb 2023	V2.1	New template update and minor revision	K Adhikari
Feb 2024	V3.0	Revision to sections	K Adhikari
Jun 2025	V4.0	Updates to: Definitions, Policy, Course Monitoring, Intervention Strategy, Procedure – Stage 1, Course Duration & Extensions.	K Adhikari

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## 1. Scope

The scope of this document applies to all International Students enrolled at Axis Institute and all Axis Institute staff who deal with all matters concerning VET International Students.

## 2. Definitions

**National Code:** The National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas students 2018, established pursuant to Part 4 of the ESOS Act 2000, as amended from time to time

**ESOS Act:** Education Services for Overseas Students Act 2000

**Electronic communication:** a form of communication sent via email, fax web-based communication or any other form of electronic communication

**DHA:** Department of Home Affairs

**PRISMS:** Provider Registration and International Students Management System

**Unsatisfactory Course Progress:** Unsatisfactory course progress is defined as not successfully achieving a 'Competent' outcome in at least 50% of units in a compulsory study period **after all assessment attempts have been exhausted as per the RTO's assessment policy** (up to a maximum of 3 attempts), unless compassionate or compelling circumstances apply.

**Reassessment Attempt:** A second, third or consecutive attempt allowed for a student to demonstrate competency in an assessment task without having to re-enrol in the unit. Must be completed within the reassessment timeframe set by Axis Institute. unless compassionate or compelling circumstances apply.

**Not competent (NC):** failed to perform to the standard expected

**"At risk" students:** Students showing early indicators of potential academic difficulty, including but not limited to poor attendance, missed assessments, or failing grades in multiple units.

**CoE:** Confirmation of Enrolment

**SMS:** Student Management System

**Study Period:** a discrete period of study within a course. Axis Institute defines the number of study periods, duration of each study period (in weeks) and number of units to be completed in each study period for each course.

**Non- Genuine Student:** Being a student:

- who does not maintain minimum attendance requirements; or,
- fails to adhere to intervention strategies/plans put in place for support; or,
- fails to attend classes for 5 consecutive days without providing evidence of reason for absence; or,
- fails to respond to contact attempts by the Institute regarding current circumstances; or,
- is in breach of code of conduct (refer to Axis Institute Academic and General Code of Conduct Policy)

## 3. Responsibility

Student Administration Manager is responsible for the implementation of this policy and ensure that all relevant staff members and marketing agents are aware of this policy.

Trainers are responsible for monitoring student performance and attendance, flagging any students at risk, and entering assessment outcomes promptly into the SMS.

Student Support Officers are responsible for issuing warning letters, coordinating intervention meetings, documenting Intervention Strategy Agreements, and monitoring ongoing adherence. Administration/Compliance staff are responsible for issuing Notices of Intention to Report, managing internal and external appeal timelines, and completing PRISMS reporting within required timeframes.

#### 4. Policy

This policy is created pursuant to Section 19 of the ESOS Act 2000 and Standard 8 of the National Code of Practice for Providers of Education and Training to Overseas Students 2018.

Students are informed of the requirements regarding course progress at multiple stages prior to enrolment and commencement of studies. These include, but are not limited to:

- Pre-enrolment summary of the Axis Institute Course Progression Monitoring Policy, as outlined in the Student Handbook and Pre-Enrolment Guide
- Axis Institute Course Progression Monitoring Policy available on the Axis Institute website: [www.axisinstitute.edu.au](http://www.axisinstitute.edu.au)
- Link to this policy contained within each overseas student's written agreement/offer letter and issued from Axis Institute student management system
- Specific progression monitoring practices, timeframes and assessment due dates as part of the Student Orientation for each course
- Subsequent course entry requirement/ conditions to be met before commencing a higher-level qualification in case of the students being enrolled into multiple courses

For ESOS purposes Axis Institute study period is defined as a 'Semester' of study. The duration of a semester is usually 12 weeks but may vary in line with the academic calendar. It may also vary within different courses.

Students are required to achieve competency in a minimum of 50% of enrolled units in each study period. Individual study periods for each course will be pre-defined and students will be informed about the length of each study period at the enrolment. The number of units trained/assessed in each study period will be indicated in the Timetable. Hence, if a specific study period consists of 12 weeks and requires completion of 4 units, then calculating @ 50% of the units will be 2 units. If a student has completed less than 2 units, then they will be identified as not meeting the minimum completion requirement for satisfactory progression in that study period.

Students will not be classified as having failed to make satisfactory course progress until **all assessment attempts have been finalised** for that study period.

Trainers will monitor student performance continuously and may flag a student as 'at risk' **before the end of the study period** if they:

- Fail two or more assessment tasks in 2 or more units in the first half of the study period;
- Miss two consecutive assessment submission deadlines (no submissions); or
- Display disengagement, such as repeated absence or non-submission.

Early identification allows intervention to be offered before results are finalised.

For the purpose of this policy, completion of units includes student submission and marking by the assessor until a competent outcome is deemed. Resubmission attempts will not be factored into the monitoring deadline, unless compassionate or compelling circumstances apply.

The Trainers and Student Support Officers will work together to finalise grades, run reports, and communicate with students if they have not met the requirements at the end of a given term of study.

In addition to end-of-study period monitoring, trainers and Student Support Officers must initiate **early intervention** when clear risk indicators emerge during the study period (e.g. repeated non-submissions, extended absences, or failure in early major assessments). Students identified mid-term must be contacted within 5 working days and offered support options prior to final results being determined.

This policy may be used in conjunction with Attendance policy and procedure.

#### 4.1. Course Monitoring

- Axis Institute monitors, records, and assesses students' course progress to support completion within the expected course duration stated on the CoE. Monitoring occurs after each study period, and additionally during the study period when early risk indicators are identified.
- All competency results, including outcomes for each assessment attempt, are recorded in the Learning Management System. Any student who has not achieved competence in at least 50% of units, or is otherwise identified as 'at risk', will be flagged for intervention.
- All final competency results for students are recorded in Axis Institute's Student Management System – Galaxy 360.
- Unsatisfactory course progress is defined as not successfully completing or demonstrating competency in at least 50% of the course requirements in one compulsory study period.
- Students will not be classified as having failed to make satisfactory course progress until all assessment attempts have been finalised. Intervention strategies may still be initiated earlier if the student exhibits lack of engagement, non-submission patterns, or early indicators of risk.
- Axis Institute assesses each student's course progress at the endpoint of each compulsory study period. A 'study period' includes a specific number of contact weeks.
- The number and length of each study period per qualification, will be outlined in the student's course timetable and is provided to the student upon completion of the enrolment process.
- During the orientation process, students are again informed of their course progress requirements and progress review dates.
- At the end of each study period, students will be assessed to determine satisfactory course progress. If a student is identified for the first time as not achieving satisfactory course progress, an Intervention Strategy Agreement Plan will be initiated and implemented.
- Axis Institute may choose to intervene at the end of a study period should a student be deemed "at risk" of not achieving satisfactory course progress.
- Students deemed "at risk" will be notified in writing and asked to make an appointment with Student Support Services to discuss their progress.
- Reasons for which students are deemed "at risk" of not achieving satisfactory course progress may include (but not limited to):
  - The student is deemed to have irregular attendance that places satisfactory course progress at risk.
  - The student is deemed to have an identified Language, Literacy and Numeracy (LLN) issue affecting study and completion progress.
  - The student demonstrates a general lack of commitment and does not complete assessment tasks/activities within the timeframes provided or provides assessment.
  - The student has stressful personal circumstances (medical, housing, financial or other) causing an impact on progression.
  - The student did not perform satisfactorily in the previous study period.
  - The student does not response to Axis Institute's attempts to assist the student in achieving satisfactory course progress.

#### 4.2. Intervention Strategy

- Two weeks from the end of the study period is the point in time when a determination of all the students 'at risk' of not progressing satisfactorily will be identified. The student support officer is to prepare and send a warning/reminder letter to each student who has been identified as not achieving satisfactory course progress at the end of the study period.
- The Intervention strategy may also be triggered before the end of the term if the student is found

to be absent consecutively for 5 days or more.

- The warning letter must list the start date and completion date of the study period in question, along with a list of units from that study period deemed not competent including calculation of how 50% competencies has not been met.
- Once complete, a warning letter is emailed to the student by the end of 15 working days of the study period, with a copy sent to the student's trainer and copy saved on student file.
- Student name is to be added to Unsatisfactory Course Progress and Intervention Strategy Tracking Spreadsheet. This is to enable tracking of student progress in their second consecutive study period. Notes to be added to student account in the Student Database Management System.
- Once issued, the warning letter requires students to contact the Institute within 10 working days to arrange a time to meet with the Student Support Officer in order to develop/implement an Intervention Strategy Agreement.
- Axis Institute will attempt to contact the student using a range of methods, including SMS, phone, email, trainer contact, and if necessary, the student's nominated emergency contact or education agent (in accordance with privacy requirements). Staff must confirm they are using the most current contact details as provided by the student, in line with ESOS obligations for students to update details within 7 days.
- At this stage, Axis Institute will issue a second warning letter identifying the student as Non-Genuine at this stage and inform the student they have 10 working days to days to arrange a time to meet with the Student Support Officer in order to develop/implement an Intervention Strategy Agreement.
- Once an Intervention Strategy has been developed and agreed between Axis Institute and the student, the student will have to sign to indicate that he or she understands and agrees with the Intervention Strategy.
- The Institute will re-affirm to the student that unsatisfactory course progress in two consecutive study periods may result in a Notification of Intent to Report the student to the Department of Home Affairs, which may result in cancellation of their student visa (pending the outcome of the internal and/or external appeals process).
- From that point, the student is required to comply with the Intervention Strategy which has been developed for him/her over subsequent study periods.
- Failure to do so will result in a Notice of Intention to Report the student to DHA for not complying with this policy.

An Intervention Strategy is initiated by:

- Notifying students in writing that they have been identified as not achieving satisfactory course progress.
- Requesting that the student contact the Institute to make an appointment to meet and discuss the activation of an intervention strategy agreement.
- Following discussion with the student, creating a formal intervention strategy agreement, which is then acknowledged, and the terms accepted, by both the student and the nominated Axis Institute member of staff.

The Intervention Strategy Agreement is activated as soon as practicable from the commencement of the subsequent study period, or earlier if necessary.

The strategies offered to help students meet course progress requirements may include, but are not limited to:

- Implementation of improved engagement through support from trainers
- Requirement to submit all subsequent assessments by the identified submission due date
- Discuss opportunities for makeup classes designed for intervention
- Academic counselling sessions with the applicable Department Coordinators
- Individual case management
- Opportunity for re-assessment
- Assigning a trainer mentor for ongoing monitoring
- Additional English language or LLN support
- Access to external support services for personal, housing, finance or medical issues
- Invitation for inclusion in support study groups or tutoring
- A change in their enrolment to another subject area
- Consideration of a period of deferment or temporary suspension of studies
- Re-affirming with students that unsatisfactory course progress in two consecutive study periods may result in a Notification of Intent to Report the student to the Department of Home Affairs. which may result in cancellation of their student visa (pending the outcome of the internal and/or external appeals process)

Where pre-enrolment LLN testing or other assessments identified support needs, the Intervention Strategy may include proactive measures from the start of the course. This ensures continuity between enrolment assessment and ongoing support.

After an Intervention Strategy Agreement has been put in place for a student, all documentation and evidence of the intervention process, including measures used to assist a student, will be saved electronically to the student's file.

The student's adherence to the terms of the Intervention Strategy Agreement will be monitored and appropriate action taken should the student deviate from these terms. These actions may include:

- Meeting with the student to again remind of agreed terms, requirement to achieve satisfactory course progress and possible consequences of continued unsatisfactory progress
- Issuance of another formal warning should agreed terms continue to be disregarded by the student
- Issuance of Notice of Intent to Report

Each Intervention Strategy Agreement will include:

- Specific benchmarks for the student to achieve in the next study period;
- Required attendance, submission, and performance expectations;
- Follow-up review dates during and at the end of the next study period;
- Signatures of both the student and the Student Support Officer.

The Agreement must also document scheduled **check-in dates** (e.g., mid-term review) where progress will be reviewed, and adjustments to the plan will be made if required.

### 4.3. Notice of Intention to Report

Before issuing a Notice of Intention to Report on grounds of non-engagement, Axis Institute staff must review whether compassionate or compelling circumstances (e.g., medical emergency) may explain the absence or lack of response. If evidence of such circumstances is provided, the student will not be reported but supported through an intervention strategy.

Axis Institute may issue a Notice of Intention to Report letter under the following circumstances:

- The student is deemed as 'Non-Genuine' due to their failure to respond/contact Axis Institute after receipt of the first and second warning letters within the prescribed timeframes following each warning letter (10 working days).

- The student is identified as not meeting satisfactory course progress requirements in a second consecutive study period, usually after the implementation of the intervention strategy, will be notified in writing (Notice of Intention to Report Letter) as soon as practicable, of the Institute's intention to report the student to the Department of Home Affairs for unsatisfactory course progress.

This written notice of Notice of Intention to Report under Standard 10.6 will be given by electronic communication that includes, email, fax web-based communication or any other form of electronic communication.

Within the Notice of Intention to Report Letter, students are informed of the following:

- Reason/s the Institute intends to report them to the Department of Home Affairs
- A statement that the student has breached their visa condition in relation to course progress requirements under the National Code and Axis Institute Policy
- Advising the student of their right to lodge an external appeal with the Commonwealth Ombudsman (Overseas Students Ombudsman) if they are not satisfied with the outcome of the internal appeal. Contact details for the Ombudsman will be included in the NOIR letter.
- Students are entitled to access the Institute's appeals process at no cost, and may be accompanied by a support person (friend, relative, or advisor) during any appeal meeting or discussion.
- A consequence statement if the student fails to respond to the Letter of Intention to Report then:
  - Cancellation of the student's enrollment will take into effect
  - Such cancellation may affect the student's visa and they will need to seek appropriate advice regarding these implications

The student will also be notified that the Institute will maintain the student's enrolment and cancellation will not take effect, until the appeals process has been completed.

Students failing to make satisfactory course progress will be reported to the Department of Home Affairs only after:

- An outcome of the internal and/or external complaints and appeals processes is obtained and the breach has been upheld
- The student chooses not to access the internal complaints and appeals process within the 20 working days period
- The student chooses not to access the external complaints and appeals process
- The student withdraws, in writing, from the internal or external complaints and appeals process

The decision **not** to report and cancel a student's enrolment should circumstances under the appeal investigations/assessment identify:

- Axis Institute's failure to record or calculate a student's completion accurately although the student was in fact achieving satisfactory course progress, Axis Institute will not report the student and under the given circumstances, determine whether the intervention strategy agreement will remain in place
- Axis Institute had not implemented its intervention strategy effectively and the relevant information and support were not made available to the student, the student will not be reported, and steps will be taken to immediately implement the Institute's intervention strategy and provision of support options to assist the student to achieve satisfactory course progress
- The student was able to provide genuine evidence demonstrating that compassionate or



compelling circumstances apply, ongoing support will be provided to the student through Axis Institute's intervention strategy and the student will not be reported:

- 'Compassionate or 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 on the overseas student (these cases should be supported by police or psychologists' reports)

#### 4.4 Course Duration and Extensions:

Axis Institute will monitor each student's ability to complete their course within the expected duration as stated on their CoE. A student's CoE will only be extended in cases of:

- Documented compassionate or compelling circumstances; or
- Where an intervention strategy requires a reduced study load; or
- When an approved deferment or suspension has been granted.

All extensions will be recorded and reported via PRISMS in accordance with the ESOS Act and Standard 8 of the National Code. Each extension of course duration will be documented with evidence (e.g., medical certificates, approved intervention plan requiring reduced load, or approved deferment documentation). Students will be advised of the impact of failed units on their course timeline, including the need for a new CoE if required.

## 5. Procedure

The following procedure outlines the stages in the course progress and monitoring process. Students are made aware of the duration of each study period (in weeks), course timetable including units to be completed for each study period and the Course Progress Monitoring Policy during enrolment and at the Student Orientation Session.

Axis Institute allows multiple attempts per assessment task. The reassessment period must be completed within **specified date** from the initial notification of 'Not Yet Competent' unless compassionate or compelling circumstances apply. Students actively participating in reassessment will not be penalised under course progress policy until the final outcome is confirmed.

### 5.1. Stage 1- Identification of Unsatisfactory Course Progress

- 5.1.1 Within 10 working days of the study period ending and student submissions, trainers will enter all final assessment outcomes into the SMS.
- 5.1.2 The reassessment window (normally 3 weeks) will then be used for any permitted further attempts. Trainers must record each attempt's result in the SMS.
- 5.1.3 Within 10 working days after the reassessment window closes, the Student Management System will generate a list of students who:
  - Have achieved competency in less than 50% of units in the study period; or
  - Have been flagged by trainers during the study period as 'at risk' (e.g. failed early assessments, missed deadlines, disengagement).
- 5.1.4 These students will be flagged for intervention and a task will be created in

Galaxy 360 for the Student Support Officer.

## **5.2. Stage 2- Issuance of Warning Letter**

- 5.2.1 Student Support Officer prepares and sends warning letter to all students who have been deemed as not achieving satisfactory course progress for one study period along with an invitation to attend an intervention strategy meeting, by the end of 15 working days (given that all the assessment attempts have been used) of each study period.
- 5.2.2 Axis Institute will issue a warning letter and concurrently use a range of methods including telephone, text message and the student's trainer to ensure the student has received the warning letter.
- 5.2.3 If the first attempt at contact is unsuccessful, Axis Institute will make a second attempt to contact the student within 5 working days of the date of original issue of the warning letter.
- 5.2.4 Each contact attempt will be noted in the student's account in the Student Database Management System. If after the second attempt the Institute is still not able to contact the student, then the Institute will wait for the student to contact the Student Support Officer.
- 5.2.5 The student has a total of 10 working days to contact the Institute starting from the date of issue of the warning letter.
- 5.2.6 After 10 working days, if the student is not contactable and is also not attending classes, Axis Institute will deem the student as a 'non-genuine' student.
- 5.2.7 Once the student is deemed 'non-genuine' they will be issued with a 2nd warning Letter. The 2nd warning letter will inform the students that they have 10 working days to contact Axis Institute for an intervention meeting.

## **5.3. Stage 3- Intervention Strategy Agreement**

- 5.3.1 Student support officer meets with the student to discuss the student's unsatisfactory progress, student support options and creates a formal intervention strategy agreement.
- 5.3.2 The Agreement is acknowledged, and the terms accepted, by both the student and the student support officer. The Agreement will outline the point at which the student would be assessed as having failed to meet satisfactory course progress after the intervention strategy has been implemented. The point at which the assessment is made is at the end of the second consecutive study period.
- 5.3.3 The student support officer, in conjunction with the trainer/assessor and Course Coordinator, will monitor the student's adherence to the terms of the Intervention Strategy Agreement and take appropriate action should the student deviate from these terms.

## **5.4. Stage 4- Notice of Intention to Report**

- 5.4.1 Before issuing a Notice of Intention to Report on grounds of non-engagement, Axis Institute staff must review whether compassionate or compelling circumstances (e.g., medical emergency) may explain the absence or lack of response. If evidence of such circumstances is provided, the student will not be reported but supported through an intervention strategy.
- 5.4.2 Where a student is deemed non-genuine and been issued with a second warning

letter, if the student continues to disregard the warning letter and does not contact the Institute or is not contactable within 10 working days, then Axis Institute will issue a Notice of Intention to Report for non-engagement and failure to comply with attendance and contact requirements, under Standard 9 of the National Code, via electronic communication, as soon as practicable advising of the Institute's intention to report the student to the Department of Home Affairs.

- 5.4.3 Where a student is identified as not making satisfactory course progress in two consecutive study periods (achieving 50% or less competencies in each of those study periods), a Notice of Intention to Report letter will be issued via electronic communication, as soon as practicable advising of the Institute's intention to report the student to the Department of Home Affairs for unsatisfactory course progress.
- 5.4.4 Where a student is identified as not making satisfactory course progress for a second, but not consecutive study period, that student will not be reported, but be required to undergo further intervention and again be subject to an Intervention Strategy Agreement

## **5.5. Stage 5- Internal and External Appeal**

- 5.5.1 The Notice of Intent to Report letter will inform students that they have the right to access the Institute's complaints and appeals process in accordance with Standard 10 of the National Code (Complaints and Appeals) and that they have 20 working days to do so starting from the date of issue of the Notice of Intent to Report Letter.
- 5.5.2 Axis Institute will have 10 working days from the receipt of the internal appeal to make an assessment and provide a written response to the student about the outcome of the internal appeal process.
- 5.5.3 If the student is not satisfied with the result or the conduct of the appeal, Axis Institute will advise the student of their right to lodge an external appeal within 20 working days.
- 5.5.4 If the student lodges an external appeal within the Institute's timeframe, they have to provide evidence to support the external appeal has been lodged within the 20 working days. Axis Institute will wait until the process of assessment by the external appeal body is complete and the outcome is available.
- 5.5.5 If the external complaints and appeals body provides a decision in favor of the student, Axis Institute will immediately implement any decision and/or corrective and preventative action required and advise the student of the outcome.

## **5.6. Stage 6- Report Student to Department of Home Affairs**

- 5.6.1 The decision to report and cancel a student's enrolment will be actioned, under the following circumstances:
  - The internal and external complaints processes have been completed and the outcome is not in favors of the student
  - The student chooses not to access the internal complaints and appeals process within the 20 working days period
  - The student chooses not to access the external complaints and appeals process within the 20 working days of the internal appeal outcome (where the outcome is not in favors of the student).
  - The student withdraws, in writing, from the internal or external complaints and appeals process within the respective timeframe of 20 working days from the date of issue of the Notice of Intent to Report.
  - The student does not act on the opportunity to appeal and 20 working days have elapsed from the date of issue of the Notice of Intent to Report.

- 5.6.2 Any changes to the student's enrolment will be reported via PRISMS in accordance with Section 19 of the ESOS Act within 31 days, after any appeals process has been exercised and exhausted.

## 6. Evidence and Record Keeping

Axis Institute will retain comprehensive records of all course progress monitoring activities, including assessment results, warning letters, intervention agreements, contact logs, PRISMS variation records, and complaints/appeals documentation. These will be stored in the student's file and Student Management System for a minimum of two years after the student's final enrolment or completion of any appeals process, whichever is later.

## 7. Complaints and Appeals

Axis institute welcomes staff and stakeholders' feedback and comments. Please access our complaints and appeals policy and procedure from the website. Complaints and Appeal mechanism provides an opportunity for continuous improvement for the institutional governance.

## 8. Associated documents

- Pre-enrolment guide
- Student Handbook
- Axis institute Language, Literacy and Numeracy (LLN) Test
- Letter of Offer and Student Agreement
- Student Fee Payment Policy and Procedure
- Refund Policy and Procedure
- RPL and Credit Transfer Policy and Procedure
- Deferment, Suspension, Withdrawal and Cancellation Policy and Procedure
- Overseas students transfer policy
- Complaint and Appeal Policy and Procedure
- Student Enrolment Policy and Procedure
- Privacy Policy and Data Provision Requirements