

# Course Progress and Attendance Policy and Procedure

## 1. Purpose

The purpose of this policy is to specify St Thomas College's (the College) approach to recording and monitoring student attendance and course progress in compliance with Standards 8 and 11 of the National Code 2018 and student visa requirements. The policy and procedure document should be read in conjunction with the Student Support Policy and Procedure.

## 2. Policy

The College seeks to ensure that students can complete their course within the duration specified on their Confirmation of Enrolment (CoE) and that timely interventions are implemented for students at risk of failing to meet course progress requirements as per Standard 8 of the National Code 2018. Students who do not make satisfactory course progress will be at risk of being reported to the Department of Home Affairs through PRISMS.

In addition, Standard 11 of the National Code 2018 requires a minimum of 20 scheduled course contact hours per week for overseas students. St Thomas College implements and monitors course attendance as part of its course progress requirements.

Students coming to Australia to undertake a vocational education qualification are granted entry on a student visa. One of the conditions of the student visa is that the student shows satisfactory course progress. An additional condition of the student visa is that a student needs to maintain a satisfactory attendance record. Course attendance and participation is monitored as part of the monitoring of course progress.

The College will ensure that all students are made aware of their obligations regarding their course progression and attendance requirements, both before and during their enrolment through the Orientation program and in the Student Handbook.

The College will:

- a. systematically monitor and assess the course progress of all students.
- b. monitor attendance as one of the key indicators in determining the successful course progression of an overseas student
- c. be proactive in notifying and counselling students who are at risk of failing to meet course progress requirements
- d. support students who are at risk of not meeting course progress requirements by implementing appropriate intervention strategies
- e. report students (on student visas) to the Secretary of the Department of Home Affairs and DHA (via PRISMS) who have breached the course progress requirements.
- f. provide this policy to students and staff



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The College has established arrangements to monitor the progress of each student. Monitoring course progress occurs on two levels. These are:

1. Assessing satisfactory course progress. This is the process of formally assessing each student's progress at the end of each term.
2. Identifying students at risk of not meeting course progress requirements. This is the process of continually monitoring each student's completion of assigned assessment tasks within the term.

**Definitions:**

**Course progress** as per the National Code refers to 'the measure of advancement within a course towards the completion of that course, irrespective of whether course completion is identified through academic merit or skill-based competencies.'

**Satisfactory course progress** is defined as a student successfully achieving competency in 50% or greater of the course requirements in a study period. E.g. if there are 4 units of competency scheduled to be delivered in a study period, the student must achieve competency in at least 2 of those units to achieve satisfactory course progress.

**Unsatisfactory course progress** is defined as a student failing to successfully complete and achieve competency in at least 50% of the course requirements in that study period. E.g. if there are 4 units of competency scheduled to be delivered in a study period, the student will be deemed to have made unsatisfactory course progress if they achieve less than a minimum of two units of competency in the study period.

**Unsatisfactory attendance** - failure by a student to achieve at least 80% attendance for the study period.

**Satisfactory attendance** - a student who achieves 80% or more for the study period.

### 3. Responsibility

**Academic Manager** is responsible for monitoring the effectiveness of student interventions, making appeals decisions and hearing appeals relating to intention to report visa breach decisions

**Academic Manager and CEO** are responsible for reporting visa breaches via PRISMS.

**Administration Manager** is responsible for the implementation of this procedure and to ensure that staff and students are aware of its application and that staff implement its requirements.

**Administration staff** have the direct responsibility for reviewing and identifying the attendance and course progress of overseas students, including any follow-up required based on that review.

**Overseas students** are required to familiarize themselves with the content of this policy to ensure they are aware of the College's policy and procedure on attendance and course progress.

## 4. Requirements

The College must comply with the following requirements regarding overseas students' course progress and attendance.

### National Code Standard 8

- 8.9 The registered provider of a VET course as defined in the NVETR Act must have and implement a documented policy and process for assessing course progress that includes:
- 8.9.1 requirements for achieving satisfactory course progress, including policies that promote and uphold the academic integrity of the registered course and meet the training package or accredited course requirements where applicable, and processes to address misconduct and allegations of misconduct
  - 8.9.2 processes for recording and assessing course progress requirements
  - 8.9.3 processes to identify overseas students at risk of unsatisfactory course progress
  - 8.9.4 details of the registered provider's intervention strategy to assist overseas students at risk of not meeting course progress requirements in sufficient time for those overseas students to achieve satisfactory course progress
  - 8.9.5 processes for determining the point at which the overseas student has failed to meet satisfactory course progress.

### National Code Standard 11

11.2.1...the expected duration of the course does not exceed the time required to complete the course on the basis of full-time study – for VET courses, this is a minimum of 20 scheduled course contact hours per week unless specified by an accrediting authority

Visa condition – [8202](#) which states that: “*The visa holder must satisfy the requirements of course enrolment, course level, course progress and course attendance.*”

### ESOS Act 2000 Section 19, as below

A registered provider must give the following information within the applicable number of days after the event specified below occurs:

- (d) any termination of an accepted student's studies (whether as a result of action by the student or the provider or otherwise) before the student's course is completed.
  - (e) any change in the identity or duration of an accepted student's course.
- (1A) The *applicable number of days* is:
- (a) if the accepted student is less than 18 years old and the information is of a kind referred to in paragraph (1)(c) or (d) 14 days; or
  - (b) otherwise—31 days

### **Applicable Standards 2025 and Instruments**

This policy and procedure is additionally subject to the *Standards for RTOs 2025*

### **2.3 Standard 2.3 – Training Support Outcome Standard**



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- (1) VET students have access to support services, trainers and assessors and other staff to support their progress throughout the training product.
- (2) An NVR registered training organisation demonstrates:
  - (a) how it determines the training support services to be provided to each VET student and how it makes these training support services available to each VET student.
  - (b) VET students have access to trainers, assessors and other staff who are responsible for supporting the VET student.
  - (c) VET students are informed by the organisation about how and when they can access trainers, assessors and other staff who are responsible for supporting the VET student; and
  - (d) queries from VET students are responded to in a timely manner.

Full procedural and implementation details relating to these national VET requirements are provided in the Standards for RTOs 2025 Policy and Procedure Manual.

## 5. Scope

This policy applies to all the College's overseas students studying onshore at the College's campus/es. (An overseas student is a student studying in a CRICOS registered course at the College on a student visa (subclass 500)).

Overseas students are required to familiarize themselves with the content of this policy to ensure they are aware of the College's policy and procedure on attendance and course progress prior to enrolment and during the student orientation.

## 6. Procedures

### 6.1 Course Attendance

#### a. Attendance Requirement - Full Time Study

International students are required to study a full-time study load. A full-time study load is normally a minimum of 20 hours per week (face to face) for the term.

Trainers mark student attendance each day for each class and provide the roll to admin/student support 2 hours after class commencement for absent student follow-up.

The completed Attendance Rolls are given to the administration staff for completeness check before they are recorded in the Attendance Registers on a weekly basis.

If a student's attendance drops below 80% over the term the College will review their involvement, counsel them, implement an intervention strategy and, if poor attendance persists the College reserves the right to

- Require that all assessment tasks are completed on campus
- Refuse permission for the student to undertake an assessment which may require them to repeat a unit



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- Cancel or suspend the student's enrolment, which may put their visa at risk. Students have a right of appeal. See section 7

*b. Absences*

Students are advised at Orientation of the importance of notifying the college when they are absent due to illness or any other matter.

Absences are dealt with by:

- Student Services Officer or delegate sending an SMS or phoning or sending an email to all students who do not notify the College of their absence on the day of absence. A record is maintained of all absences and attempts to contact students
- Student Services Officer/Academic Manager will analyse student absences of a minimum of fortnightly and take action for students 'at risk'.
- Students who have been absent for more than five consecutive days or are at risk of falling below 80% will be contacted, counselled and reminded of the attendance policy. The actions described in 6.1a may be commenced.

All absences due to illness should be accompanied by a medical certificate. St Thomas College will only accept medical certificates signed by a registered medical practitioner, health practitioner or approved health specialist.

Written notification is required for all absences where it is known by the students in advance that they will not be attending class. These absences will still be counted when calculating an attendance percentage.

**Duty of Care**

The College has a duty of care to its students and any absences of 5 consecutive days without approval will be investigated to ensure the safety of the student.

The College will undertake the following actions:

- The Student Services Officer will attempt to contact the student by phone and/or SMS
- If student is not able to be contacted their agent will be contacted
- If contact cannot be made the Student Services Officer will discuss with CEO whether to contact the next of kin or the relevant authorities (e.g., police, DHA)

*c. Attendance Review*

- Administration staff review the attendance data to identify individual student's attendance rates.
- Students are sent the appropriate attendance notification based on the attendance level at the time when the monitoring report is reviewed fortnightly
- If a student's attendance falls below 85 per cent, they will be sent a Reminder Email by student services staff. This reminder will notify the student of the attendance requirements of the College as well as the student attendance requirement as per Visa Condition 8202.
- If a student's attendance falls below 80 per cent, they will be sent a Warning Letter. This letter will ask the student to make an appointment with the Academic Manager and



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provide the College with information and evidence explaining their absences. Sharing of this information will occur through a private counselling session.

During the counselling session, the Academic Manager or Student Support Officer is to:

- Enquire about the cause of the low attendance
- Enquire about the student's general welfare arrangements
- Enquire about the student's current work commitments if any
- Establish strategies to improve the student's attendance.

These may include:

- Addressing individual student needs that emerge during counselling
  - Suggesting to the student that they try to work on alternate days, if applicable
  - Establishing a "buddy" arrangement for the student
  - Establishing carpooling or shared travel arrangements
  - Implementing an alarm clock at the student's home
  - Providing the student with counselling about establishing good sleep / Work / Rest pattern
  - Enrolling the student in a study support skills program.
- If required, the Academic Manager will decide if it is necessary to implement an intervention strategy. The strategy will aim to assist the student to maximise his/her attendance for the remaining scheduled contact hours for the duration of his/her course.
  - If a student is unable to reach 70% of attendance for the remaining scheduled contact hours for the duration of their course and the intervention strategies have previously been implemented, the student's enrolment may be cancelled by the College.
  - Students have a right of appeal.

## **6.2 COURSE PROGRESS**

### **A. Academic Course Progress Requirements**

- In order to progress satisfactorily, overseas students must demonstrate competency in fifty percent (50%) or more of enrolled units of competency within each term.
- The students course progress is monitored by admin/student support staff by reviewing the competency record of each student on the student management system. This is achieved by running a competency achieved report at the end of the Term and comparing the units of competency each student has achieved with the course progress requirements specified in the training and assessment strategy. If a student is identified as not meeting satisfactory course progress, the course progress intervention strategy is implemented.
- In addition, academic progress is monitored by trainers and administration staff to enable appropriate intervention strategies to be implemented as soon as progress issues emerge for individual students who are identified as 'at risk'. See below.
- Should an overseas student fail the same unit twice, including previous versions of the unit, they will be deemed as not making satisfactory course progression.
- A student who has not demonstrated satisfactory course progress for two consecutive study periods, is not meeting the College's course progression requirement and will be unable to complete their course within the duration specified in the student's COE. This will be a breach of their student visa conditions.



Please note: If an overseas student is not attending scheduled classes, but is making satisfactory progress in their course, then the course duration set is not suitable for that student, and they may have their course duration shortened.

## **B. Identifying Students 'At Risk'**

- Early identification of students 'at risk' is critical to ensure that early intervention strategies can be provided to support and assist the student's academic success.
- Training and administration staff use a variety of indicators and assessments to identify any students who are 'at risk' of making unsatisfactory progress. These may include, but are not limited to, the review of:
  - The student's attendance record
  - Class participation and level of engagement
  - Formative assessment completions
  - Completion of self-study activities
  - Late submissions of assessments
  - Number of resubmissions
  - Requests for extension of class work or assessments
  - Requests for additional help with assessments or class work
  - Feedback from other training staff
  - Not yet competent on unit assessments
  - English ability
  - Results of assessments and unit
- Administration staff have responsibility, in consultation with trainers and the Academic Manager, for identifying individual students who are 'at risk' of not meeting satisfactory course progress.
- A final review of student academic performance will occur following the unit results release at the completion of each study period. See Section 6.2A above.
- Once a student has been identified as making unsatisfactory course progress, the administration staff will issue the student with a Course Progress Warning Letter.
- The Course Progress Warning Letter will require the student to meet with the Academic Manager (or other designated staff) to discuss their course progress, and if necessary, activate an intervention strategy.

## **C. Course Progress Review**

- The Administration staff will continue to monitor the course progress of a student with an intervention strategy for the remainder of the current study period and if required, into the next study period.
- A student who demonstrates competency in more than fifty percent (50%) of the units of competency undertaken in the study period in which they were earlier identified as 'at risk', or in the next study period, will no longer be considered 'at risk' and the intervention strategy may be cancelled.
- Any student provided with an intervention strategy during the study period (therefore identified as 'at risk'), who then achieves less than 50% competency in enrolled units of competency will receive an Intention to Report Letter.



### 6.3 INTERVENTION Strategies

Where necessary, the Academic Manager (or other designated staff) will develop an intervention strategy in consultation with the student and, if required, the Student Services Officers/Training staff.

- The intervention strategy is documented in the Student Intervention Agreement Form, which will outline the strategies to be adopted and the support services that the student can access to assist with improving their academic performance and/or attendance, progress review dates. Typically, the Intervention Plan is in place for a term.
- If the student is identified as 'at risk' of making unsatisfactory progress or is making unsatisfactory progress before the end of the study period, an intervention strategy will be implemented as early as practicable. If the student is deemed as making unsatisfactory progress at the end of the study period, the intervention strategy is required to be commenced within the first two weeks of the following study period.
- Intervention strategies may include the following:
  - advising the student of available study skills workshops, time management skills, academic counselling, English language support or other support the College offers
  - requiring the student to meet regularly with a trainer to review their progress before the end of the current study period or during the next study period
  - requiring the student to submit assessments or complete assessments within a certain timeframe
  - requiring the student to attend a minimum percentage of classes, which may include make-up classes
  - referring the student to other support services that may be relevant, e.g. counselling for personal issues, appropriate medical services, housing services, financial counselling services, etc.
  - considering a period of deferment or temporary suspension of studies
  - providing a mentor or study buddy
  - requiring the student to undertake additional training or to re-enrol in English language training. This may require the award course to be suspended to attend the required number of English classes.
- Intervention strategies must be signed by both the Academic Manager (or the other designated staff) and the student.
- It is the student's responsibility to follow through on any assistance offered and to maintain contact with the nominated staff member/s identified to provide assistance.
- A student may receive an Intention to Report Letter if they fail to comply with the intervention strategy or is deliberately disengaging with the process.

### 6.4 Student Appeals

#### *Internal appeal process*

Students who wish to appeal their attendance rate/ reduction in course duration/ academic progression/ determination or the Intention to Report Letter may lodge an appeal within 28 days to Student Support Staff or the Administration Manager. In addition to the College's internal processes, an overseas student may also wish to approach an external agent. The Internal Appeals form can be obtained from Reception or the website.



*External Agency process*

Overseas students may approach an external agent such as the Overseas Students Ombudsman (OSO) Ombudsman. Such an approach may be made after the internal resolution process has been finalized and the overseas student is not happy with the outcome of the internal resolution.

Overseas Students Ombudsman (OSO) investigates complaints that overseas students have with private education providers. A private education provider can be a school, college or university in Australia. The Ombudsman provides support to future, current or former students.

OSO’s service is free, and they do not charge for making a complaint.

Overseas Students Ombudsman (OSO)

In Australia: 1300 362 072

Outside Australia: +61 2 6276 0111

[Online Complaint Form](#)

[OSO Factsheets for International Students](#)

[Frequently Asked Questions \(FAQs\)](#)

*Reporting to Department of Home Affairs (DHA)*

- All students identified as failing to achieve satisfactory academic progress will be notified in writing via an Intention to Report letter.
- The Intention to Report letter provides formal notification to the student that the College intends to report their unsatisfactory academic progress to DHA.
- Students who maintain unsatisfactory progress in two (2) consecutive study periods will receive an Intention to Report Letter.
- Students who maintain unsatisfactory progress in two (2) study periods that aren’t consecutive will not be reported unless they did not comply with the agreed intervention strategy.
- The College will only report overseas students for unsatisfactory course progress if:
  - The overseas student has chosen not to access the internal and/or external appeals process within the allowed timeframe, or
  - If an overseas student chose to access the internal and/or external complaints process, and the completed process decision or recommendation supports the College’s decision, or
  - The overseas student withdraws from the appeals process by formally notifying the College.

**Procedure Summary Table – 6.1 Course Attendance**

Step	Action	Responsible Person	Supporting Documents / Systems
1	Mark daily class attendance; submit rolls within 2 hours for follow-up of absent students.	Trainer	Attendance Roll
2	Receive, check, and record weekly attendance rolls.	Administration Staff	Attendance Register



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<b>3</b>	Review attendance levels; if attendance <80%, initiate counselling or intervention as required.	Academic Manager	Attendance Report, Intervention Notes
<b>4</b>	Inform students at orientation about reporting absences and medical certificate requirements.	Student Services Officer	Orientation Handbook
<b>5</b>	Contact students who are absent without notice on the same day via SMS, phone, or email.	Student Services Officer / Delegate	Absence Contact Log
<b>6</b>	Analyse absences fortnightly to identify students 'at risk'; initiate contact if absent >5 days.	Student Services Officer / Academic Manager	Absence Reports
<b>7</b>	Investigate students with 5+ consecutive days of unexplained absence under duty of care obligations.	Student Services Officer	Student File, Contact Log
<b>8</b>	Notify agent and, if necessary, next of kin or authorities where contact with student cannot be made.	Student Services Officer / CEO	Emergency Contact Log
<b>9</b>	Review attendance fortnightly and send Reminder Email if attendance <85%.	Student Services Officer	Monitoring Report, Email Templates
<b>10</b>	Send Warning Letter if attendance <80%; invite student to counselling session with Academic Manager.	Student Services Officer	Warning Letter, Attendance Summary
<b>11</b>	Conduct counselling session and discuss strategies to improve attendance.	Academic Manager / Student Support Officer	Counselling Notes, Support Plan
<b>12</b>	If needed, implement a formal intervention strategy to improve attendance.	Academic Manager	Intervention Strategy Form
<b>13</b>	If projected attendance cannot reach 70%, consider enrolment suspension or cancellation.	Academic Manager / CEO	Student File, Cancellation Record
<b>14</b>	Inform students of the right to appeal any enrolment decision.	Student Services Officer	Appeals Policy and Form

**6.2 Course Progress and 6.3 Intervention Strategies**

Step	Action	Responsible Person	Supporting Documents / Systems
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1	Monitor student course progress at the end of each term by reviewing unit competency records.	Admin/Student Support Staff	Student Management System, Competency Achieved Report
2	Identify students who have not achieved 50% of units; initiate course progress intervention.	Admin/Academic Manager	Training and Assessment Strategy, Intervention Plan
3	Monitor academic progress indicators throughout the study period to detect students 'at risk'.	Trainers/Admin Staff	Assessment Records, Class Participation Logs
4	Identify academic risks (e.g., low engagement, multiple resubmissions, English difficulties).	Trainers/Admin/Academic Manager	Formative Assessment Review, Student File
5	Issue Course Progress Warning Letter to students not meeting course progress requirements.	Admin Staff	Warning Letter, Student File
6	Meet with students to discuss warning and develop intervention strategy.	Academic Manager or Delegate	Intervention Strategy Form, Meeting Notes
7	Continue to monitor student's progress through the remainder of the current or next study period.	Academic Manager/Admin Staff	Progress Review Record
8	Cancel intervention strategy if student achieves >50% in following study period.	Academic Manager	Competency Report, Student File
9	Issue Intention to Report Letter if student continues to demonstrate unsatisfactory progress.	Admin Manager	Intention to Report Letter, PRISMS
10	Develop and document a formal intervention strategy in consultation with the student.	Academic Manager	Student Intervention Agreement Form
11	Include appropriate support strategies: academic counselling, English support, study skills.	Academic Manager/Trainers/Support Staff	Support Services List, Strategy Notes
12	Ensure both student and Academic Manager sign the	Academic Manager and Student	Signed Intervention Agreement



	intervention strategy document.		
13	Monitor compliance with strategy; warn students of risk if disengaging or non-compliant.	Academic Manager	Progress Monitoring Log, Student File
14	Issue Intention to Report Letter if student fails to comply or disengages with strategy.	Admin Manager	Intention to Report Documentation

#### 6.4 Student Appeals

Step	Action	Responsible Person	Supporting Documents / Systems
1	Student lodges an internal appeal within 28 days of decision notice (e.g., attendance, course duration, academic progress, Intention to Report).	Student	Internal Appeals Form
2	Provide an appeal form via reception or website and confirm receipt of appeal submission.	Student Support Staff / Admin Manager	Internal Appeals Form, Email Record
3	Review appeals internally following College policy; allow students to present evidence.	Admin Manager or Designated Staff	Student File, Appeal Documentation
4	If students are dissatisfied with internal outcome, they may contact the Overseas Students Ombudsman (OSO).	Student	OSO Contact Details, Online Complaint Form
5	Support students to access external appeal options if requested.	Student Support Staff	OSO Factsheets, Contact Record
6	Maintain enrolment until all internal and external appeal avenues are exhausted.	Admin Manager / PRISMS Officer	Enrolment Records, PRISMS
7	Notify students of the outcome of the appeal and confirm whether reporting will proceed.	Admin Manager	Appeal Outcome Notification



<b>8</b>	Only report students to DHA if they: did not access appeals, withdrew, or outcome supports College decision.	PRISMS Officer	Intention to Report Letter, PRISMS
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## 7. Policy Implementation

This policy will be made available to all staff members and stakeholders through the internal communication channel, the website and Student Handbook.

## 8. Review and Continuous Improvement

This Policy and Procedure will undergo an annual review, or sooner if required, to ensure it remains relevant and effective in guiding the operations and strategies or as needed to reflect any changes in the regulatory environment or operational practices.

Feedback will be collected and analyzed and discussed at the monthly management meetings, for noting or action with any necessary changes documented in a Continuous Improvement Form and in the Continuous Improvement Register.

### Document Control

Version number:	V2	Approved by:	CEO
Approval date:	01 July 2025	Review date:	01 July 2027
Standards: National Code Standard 8 and 11			
Legislation: ESOS Act – section 19			

### Version Control

Version #	Changes	Approval By	Approval Date
2.0	Original Version	CEO	01 July 2027

### Associated Documents

- Student Support Policy and Procedure
- Complaints and Appeals Policy
- Deferral, Suspension and Cancellation Policy
- Student Intervention Agreement Form
- NC Result Notification Letter
- Warning letter 1 - Unsatisfactory Course Progress Warning Letter
- Warning letter 2 - Intention to Report Letter
- Warning letter 3 – Report process commenced through PRISMS