

## 1. POLICY STATEMENT AND PURPOSE

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The purpose of this policy is to ensure that ICHM fully complies with the requirements of Standard 8 of the National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code) and Section 104-1A of the Higher Education Support Act 2003. This Policy sets out the policy and procedure (including the Intervention Strategy) for monitoring, recording and assessing the course progress of students enrolled in the ICHM programs so that an international student completes the course within the periods of their student visa. Even though it is not required by legislation, ICHM considers the progress of domestic students to be equally relevant to international students, and they are covered by this policy. As required by Section 104-1A of the HESA, this policy sets restrictions on FEE-HELP availability.

## 2. SCOPE

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This policy applies to all ICHM students.

## 3. DEFINITIONS

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“International Student” is defined as a person studying at ICHM who is not a permanent resident or Australian citizen.

“PRISMS” is the Provider Registration and International Students Management System

“Satisfactory Course Progress” is where a student is or has successfully completing/ed all the units of study (including Work Integrated Learning (WIL)) for which they are enrolled in any study period.

“Study Period” is a period of enrolment which may include a semester, trimester, or term of study, including a period of WIL

“at risk” is where a student has been identified as consistently not submitting assessments or submitting assessments late. The definition also includes where a student is consistently absent from scheduled sessions or is exhibiting behaviour changes which suggest that the student is not likely to achieve pass marks in 50% or more subjects in a study period.

“HESA” is the Higher Education Support Act 2003, amended from time to time

“Student Support Agreement (SSA)” A structured agreement negotiated between ICHM and the student, which clearly articulates the requisite academic and/ or wellbeing support mechanisms necessary to

assist a student to successfully complete a course of study. An SSA may also be required for students who have been identified as needing additional structured support to assist them prior to commencing a course of study.

“Special circumstances” are defined in the Higher Education Support Act 2003 as circumstance which:

- were beyond the student’s control; and
- did not make their full impact on the student until on or after the census date(s) of the unit(s) in question; and
- were such that they made it impracticable for the student to complete the requirements for the unit(s).

## 4. POLICY DETAILS

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ICHM monitors, records and assesses each semester, the course progress of each student. The *ICHM Intervention Strategy* is implemented to assist students who have been either:

- 1) identified by the Student Support Group and/ or Academic Committee as being at risk of not making satisfactory course progress and/or
- 2) where the student has failed 50% or more of the subjects attempted in a study period and/or
- 3) where the student has failed a subject for the second time.

A record of all interventions and the outcome of those interventions is kept on the student’s file.

As part of the Intervention Strategy a student may be placed on a Student Support Agreement and is monitored, at a minimum, monthly by the Student Support Group.

The Academic Committee may recommend to the Academic Director that a student not be permitted to undertake a WIL Placement if the student is not making satisfactory progress in subjects related to duties to be performed during the WIL Placement and/or where a student has failed 50% or more of the subjects attempted in a study period and/or where the student has failed a subject for the second time.

For ICHM postgraduate courses the following apply:

- Students enrolled in the Graduate Certificate who successfully complete two of the four core subjects can progress to the Graduate Diploma.
- Students enrolled in the Graduate Diploma who successfully complete all eight subjects can progress to the Masters.

The Academic Committee may recommend to the Academic Director that a student be exited from the course where:

- The student has been identified as not making satisfactory course progress in two consecutive study periods and
- An intervention strategy was implemented after the student was assessed as not making

satisfactory course progress at the end of the first compulsory study period after which the student was again assessed as not making satisfactory progress at the end of the second consecutive compulsory study period.

For the purposes of assessing course progress, failure to achieve a pass grade on a WIL Placement, assuming no enrolment in other academic subjects, is deemed to be a failure of 100% of subjects in which the student is enrolled in a single study period.

Reporting an international student to the Department of Home Affairs for unsatisfactory course progress occurs only when:

- the international student has been identified as not making satisfactory course progress in two consecutive compulsory study periods; and
- an intervention strategy was implemented after the international student was assessed as not making satisfactory progress at the end of the first compulsory study period, after which the international student was again assessed as not making satisfactory progress at the end of the second compulsory study period; and
- the international student has not made a successful appeal against the Intention to Report to the Department of Home Affairs.

If an international student is identified for a second, but not consecutive, study period as not making satisfactory course progress, ICHM does not report the international student for unsatisfactory course progress.

Where a new student has not fully met the normal entry requirements of the course/s they may be invited to enrol on condition that the student enters into a Student Support Agreement. The decision to offer such enrolment is the determination of the Academic Director.

Where a student is placed on a Student Support Agreement and the student fails to meet the conditions of the Student Support Agreement, this failure to meet the conditions are taken into account by the Academic Committee when assessing progression to further study and/or WIL Placement.

### **FEE-HELP Eligible Students**

Higher Education Support Act (HESA) Section 104-1A applies to a domestic student who has undertaken a full time load at ICHM and did not successfully complete at least 50% of the study load. Such a student is ineligible to apply for FEE-HELP to fund future studies.

### **Procedure**

#### ***Monitoring Course Progress***

For each study period, students are enrolled in a load of subjects which, subject to normal academic progression requirements, allows them to complete their nominated qualification within the accredited duration.

At the beginning of each study period students receive a comprehensive set of materials for each

subject which outlines the material to be covered, the workload, the class schedule, the delivery and assessment methods, examination dates (where applicable) and the deadline for the submission of assessments.

Lecturers assess students in accordance with the requirements outlined in the Subject Statements and must follow the guidelines outlined in the Assessment Policy and in the Results, Grades and Awards Policy.

A student is considered to be making satisfactory course progress if they have successfully completed all subjects (or a WIL placement) for each study period.

Monitoring of the overall course progress of all students is the responsibility of the ICHM Learning Support Advisor with assistance provided by the Student Support Group which meets at least once a month. The Learning Support Advisor is responsible for initiating Level 1 of the ICHM Intervention Strategy (see below) and providing updates to the Student Support Group.

Where a student is identified as being at risk of not completing their qualification within the accredited duration (or have been admitted under certain conditions), their ongoing enrolment is conditional upon them agreeing to enter into a Student Support Agreement (see Level 2 of the ICHM Intervention Strategy below). The Student Support Agreement includes (but is not limited to) the following information:

- The subjects the student has already either completed or attempted
- The subjects the student is currently enrolled in
- The subjects which are yet to be attempted
- The expected completion date of the qualification in which the student is enrolled and the start and end dates of their Confirmation of Enrolment (International Students only)

At risk students are contacted for a meeting with the Learning Support Advisor to develop the Student Support Agreement. The focus of the meeting and matters to be discussed include a two-way discussion about how well the student is coping with the program overall, subjects passed or not, their personal welfare, attendance and whether or not the student is still able to complete the requirements of the course within the maximum time permitted or, in the case of international students, within the period of the student's visa.

At the end of each study period the ICHM Academic Committee reviews all students' academic results. The Learning Support Advisor attends these meetings. Where the Academic Committee identifies a student that may be at risk of not making satisfactory academic progress in future study periods, the Learning Support Advisor provides their details to the Student Support Group and their progress is monitored. The Learning Support Advisor maintains a *Register of Students at Risk* which includes all students who have failed subjects.

## ***Intervention Strategy***

ICHM's Intervention Strategy will consist of two levels.

### 1. Level 1.

Where a student is assessed as being "at risk" by either:

- The Admissions Team prior to entry to ICHM (i.e. not meeting an essential entry criterion), or
- During a study period by the Student Support Group, or
- The Academic Committee at the end of a study period

The Academic Director who may be accompanied by the Learning Support Advisor meets with the student to discuss the reasons why academic progress is poor. Counselling and additional support is offered, and the level of intervention escalates during the study period if academic performance continues to fall. Progress of the student is monitored by the Student Support Group. A record of all meetings and agreed outcomes is kept on the students file and a copy given to the student.

### 2. Level 2.

Where the Academic Committee identifies that a student has or is likely not to achieve pass marks in 50% or more subjects in a study period, and/or not be able to complete the qualification in which he/she is enrolled within the maximum period permitted and/or covered by the student visa, the Academic Director accompanied by the Learning Support Advisor meet with the student to discuss the reasons why academic progress is poor. Counselling and additional support is offered. As a condition of their ongoing enrolment, the student is required to sign a Student Support Agreement that details the responsibilities of the student and the responsibilities of ICHM to assist the student. This Intervention Strategy is implemented within the first four (4) weeks of the following study period or sooner if possible once a student is identified as likely not to achieve pass marks in 50% or more subjects in a study period. A copy of the Student Support Agreement and any other agreed outcomes are put on the students' file.

Specific intervention may include, but not be limited to, the following actions;

- Having students attend regular learning support sessions that may assist student with time management, study skills, exam preparation and essay writing.
- Study sessions with subject specialists.
- One on one tutorial sessions with a paid instructor.
- Counselling that may assist with personal issues that may be affecting progress.
- Reviewing appropriateness of course selection.
- A reduction of course load as long as this does not conflict with student visa conditions and completion of the course within the duration of the student visa and/or maximum period permitted.
- Reasonable adjustments where the student is identified as having a disability.

## **International Students Only**

If a student is identified by the Academic Committee as not making satisfactory progress in a second consecutive compulsory study period, the student is notified in writing of ICHM's intention to report the student to the Department of Home Affairs for unsatisfactory course progress. The notification of Intent to Report to the Department of Home Affairs is emailed to the student by the Admissions and Enrolments Director.

### ***Appeal Process***

Where a student has been sent a Notice of Intent to Report to Immigration the email informs the student that he/she is able to access the ICHM Academic Grievance Policy. The student is advised that they should follow the Second Stage of the Formal Internal Process outlined in the ICHM Academic Grievance Policy and that they have 20 working days from the date of the Intent to Report to Immigration email to lodge an appeal outlining the reasons for the substandard results and any compassionate or compelling circumstances to explain or justify them.

### ***Compassionate or Compelling Circumstances***

Compassionate or compelling circumstances are generally those beyond the control of the student and have an impact on the student's capacity and/or ability to progress through a course. Please note that these are different to 'special circumstances' as defined by HESA.

These could include:

- serious illness or injury, where a medical certificate states that the student was unable to attend classes
- bereavement of close family members such as parents or grandparents (evidence may be required)
- major political upheaval or natural disaster in the home country requiring student's emergency travel and this has impacted on his/her studies
- a traumatic experience which could include, but is not limited to, involvement in or witnessing of an accident or a crime committed against the student or the student has been a witness to a crime and this has had impact on the student. These cases should be supported by police or psychologists' reports.

The above are only some examples provided by the Department of Home Affairs of what may be considered compassionate or compelling circumstances. The Academic Director exercises their professional judgement and assesses each appeal on its individual merits. When determining whether compassionate or compelling circumstances exist, all documentary evidence provided to support the claim is considered. Copies of these documents, together with a record of why the decision was made is retained in the student's file.

If the first appeal is successful and the student continues to attend class and sit assessments as required and ICHM offers continuing support and counselling and the student commits to respecting the conditions agreed, the matter is not referred to the Department of Home Affairs.

If their appeal is not upheld by the Academic Director, the student is advised of the external appeal to the Visitor as detailed in the External Independent Review stage outlined in the ICHM Academic Grievance Policy and that they have 10 working days from the date of the advice that their appeal was not successful to lodge a further appeal.

If both appeals are unsuccessful, the Head of ICHM confirms to the Admissions and Enrolments Director that the student's enrolment is to be cancelled and the student shall be reported via PRISMS as “unsatisfactory course progress”. The student is advised by the Admissions and Enrolments Director that this cancellation has been processed and that their enrolment is terminated.

If the student chooses not to access the ICHM Academic Grievance Policy or within the 20-working day period after receipt of the letter of intent to report, or withdraws from the process, the student is reported on PRISMS as outlined in the above paragraph.

### **FEE-HELP Ineligible Students**

ICHM notifies students that they are ineligible to apply for FEE-HELP until their pass-rate again exceeds 50%.

Where the student has undertaken a WIL placement following an academic study period, Admissions advise the student of their FEE-HELP 90 days before the start of the next study period.

The student may appeal to the Academic Director for exemption to the HESA Section 104-1A exclusion, and the Academic Director shall consider such exemption using the guidelines in HESA Section 104-30

## **5. SUPPORTING DOCUMENTS (if applicable)**

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Student Support Agreement  
Students at Risk Register

## **6. RESPONSIBILITIES AND AUTHORITIES**

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The Learning Support Advisor with assistance provided by the Student Support Group, is responsible for monitoring the progress of students during their studies at ICHM. The Academic Committee is responsible for recommending that students be placed on a Student Support Agreement. The Learning Support Advisor is responsible for maintaining the *Register of Students at Risk*. The Admissions and Enrolments Director is responsible for sending notifications of intent to report students and cancellation notifications.

## 7. ACKNOWLEDGEMENT

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Not applicable

## 8. REVIEW

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The Academic Director is responsible for the review of this policy for all minor or major changes on a 3 yearly basis.



## 9. APPROVAL

Accountability and review			
<b>Delegate</b>	Academic Director	Ref: ICHM Delegations Register	
<b>Approval body</b>	Academic Board		
<b>Approval date</b>	20231121		
<b>Review date</b>	3 years from last review 20261121		
Supporting information			
<b>Related legislation</b>	Higher Education Standards Framework (Threshold Standards) 2021 (Cwlth)		
<b>Sector benchmarking</b>			
Supporting documents			
<b>Related documents</b>	Assessment Policy Results, Grades and Awards Policy WIL Placement policy Academic Grievance Policy		
<b>Superseded documents</b>			
Type and location			
<b>Policy type</b> <select row and shade>	Corporate Governance Academic Governance Academic Management Operational Management		
<b>Location/access</b> <select row and shade>	Website Student access Staff access Overseas		
Amendments			
Version No.	Amendment type	Amendment Date	Key changes
1.0	New Doc	05/01/2012	New policy
2.0	Major	27/06/2012	Changes to policy regarding fail in a subject more than twice
3.0	Major	06/11/2012	Addition to the Changes to the policy section
4.0	Major	09/07/2013	Addition of notes on Learning Contract
4.1	Minor	18/12/2013	Change of terminology from DIAC to DIBP
4.2	Minor	07/01/2014	Change of Grievance policy titles following recommendation by TEQSA in letter of 19/12/2013
4.3	Minor	07/01/2014	Change reference to degree to all ICHM programs following recommendation by TEQSA in letter of 19/12/2013
4.4	Minor	25/07/2014	Change Manager Student Welfare to Manager Administration

4.5	Minor	25/01/2016	Minor title changes
4.6	Minor	08/07/2016	Minor title change from 'Learning Contract' to 'Learning Support Agreement' and 'Training Plan' to 'Course Progression Plan' as recommended by AC
5.0	Major	10/07/2017	Progression for postgraduate courses added following presentation to June 22 <sup>nd</sup> Academic Board
5.1	Minor	15/02/2018	Change of terminology from Department of Immigration and Border Protection (DIBP) to Department of Home Affairs
6.0	Major	24/04/2018	Update to incorporate Section 104-1A HESA 2003
7.0	Major	07/09/2020	Full review, introducing Student Support Group, Registrar role and refinement of Student Support Agreements-approved by AB 07.09.2020; Changes to position titles
7.1	Minor	12 April 2022	Minor amendment to role titles due to restructure, changes to responsibilities and authorities
7.2	Minor	21/11/2023	Update to role titles (Program Director Academic to Academic Director, Manager Admissions and Administration to Admissions and Enrolments Director). Removal of Program Coordinator role and Student Welfare Advisor role.