KEYSTONE COLLEGE

OF BUSINESS & TECHNOLOGY

COURSE PROGRESS MONITORING POLICY

CONTENTS

Table of Contents

1. POLICY STATEMENT 3
2. SCOPE 3
3. BACKGROUND 3
4. DEFINITIONS AND ACRONYMS 3
5. PROCEDURES 5
6 RELATED POLICIES AND OTHER RELEVANT DOCUMENTS 10
7 RELEVANT LEGISLATION 10

1. POLICY STATEMENT

This policy establishes KCBT's processes for monitoring international VET students' course progress, identifying and supporting students at risk, supporting completion within the expected course duration, and managing appeals and reporting in accordance with applicable ESOS requirements.

The Chief Executive Officer approves this policy and authorises the resources required for its implementation. The Compliance Manager is accountable for implementation across KCBT's approved VET delivery locations. The Compliance Manager maintains the controlled version, monitors changes to legislation and regulatory guidance, and coordinates a documented policy review at least annually and following any material regulatory or operational change. Changes are recorded in the policy register, communicated to relevant staff and reflected in related forms, training and system settings.

2. SCOPE

This policy applies to overseas students enrolled in CRICOS-registered vocational education and training (VET) courses at KCBT's approved delivery locations, including Perth and Adelaide, and to all employees responsible for their delivery, assessment, student support, course-progress decisions, appeals and reporting.

Domestic VET students remain subject to the applicable domestic training, assessment and student-support procedures and are not subject to the ESOS reporting process described here.

3. BACKGROUND

KCBT monitors each international student's course progress, engagement and participation against the approved training and assessment strategy, delivery timetable, assessment requirements and expected completion date stated on the Confirmation of Enrolment (CoE). KCBT schedules full-time VET delivery in accordance with its CRICOS-approved course arrangements, generally on the basis of at least 20 scheduled course contact hours per week unless otherwise specified by the relevant authority. KCBT records attendance as an indicator of participation and potential academic risk. KCBT identifies, notifies and supports students at risk in sufficient time to improve their progress.

KCBT implements the following course-progress controls:

- Monitor course progress throughout each study period and record attendance and engagement as relevant risk indicators.
- Identify and support students at risk in sufficient time for intervention to be effective and provide clear information on satisfactory progress requirements.
- Approve changes to enrolment duration only on grounds permitted by the National Code and manage any formal reporting in accordance with the ESOS Act and appeal safeguards.

4. DEFINITIONS AND ACRONYMS

"At risk" Students	Students are considered to be "at risk" for not meeting Course Progress requirements if they did not achieve competency in at least 50% of the Units of Competency undertaken in any study period hence affecting them in being able to complete their course within the expected duration of their course of study due to one or more of the following factors: • level of English language proficiency insufficient to successfully achieve course requirements; • continued unsatisfactory level of attendance in their scheduled classes; • lack of participation in class activities.

	• failure to submit assessments in accordance with their Course schedule and/or Unit Assessment Agreement; and/or • Academic misconduct: Cheating, plagiarism, etc.
Compassionate or compelling circumstances	These may 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 immediate family members. • major political upheaval or natural disaster in the home country requiring emergency travel. • A traumatic experience which could include involvement in, or witness to a serious accident and/or incident; or witnessing or being a victim of a serious crime; • A student has failed occasional units throughout a course without warranting activation of any Intervention strategy; • where the student is unable to access required units in a study period; or • inability to begin studying on the course commencement date due to delay in receiving a student visa.
Course requirements	Students complete the training and demonstrate the required competence for each unit through valid assessments and mandatory practical activities in the approved TAS. Formative tasks support learning and early progress monitoring but are not automatically a separate competency requirement.
CRICOS	Commonwealth Register for Institutions and Courses for Overseas Students.
Intervention Strategy	A documented, individual plan addressing identified progress risk through specific training, support, adjustments, responsible staff, milestones and follow-up. The strategy commences while recovery remains achievable and is recorded in Wisenet.
PRISMS	Provider Registration and International Students Management System - the management information system used by the Department of Education and the Department of Home Affairs to record international Student program enrolment details.
Satisfactory Progress	Where an international student has successfully completed 50% or more of their course study requirements in a study period.
Satisfactory Class Attendance	Students studying on a student visa are required to undertake a minimum of 20 contact hours of study per week
Study period	A study period is defined as one of the following: • a term of 10 weeks duration (not including scheduled course breaks) • a term of 12 weeks duration (not including scheduled course breaks) As recorded in the approved course-specific TAS and timetable, no period exceeds six months.
Unsatisfactory Course Progress	A student who has not successfully completed 50% or more of course requirements for the total nominal hours in a study period is deemed to have unsatisfactory progress.
Extending Course Duration	KCBT may choose to extend a Student CoE in various situations including, but not limited to: • A student will not complete their enrolled course of study within the life of his/her

	CoE due to compelling or compassionate circumstances – beyond their control, and/or • A Student has an approved deferral/suspension of their enrolled course of study, and/or • KCBT has implemented an Intervention Strategy plan for the student who has been identified as being "at risk" of not meeting Satisfactory Course Progress. KCBT extends a CoE only on demonstrable grounds permitted by National Code Standard 8.16, with a documented revised completion schedule, management approval, visa-impact advice and required PRISMS update.

5. PROCEDURES

5.1 Monitoring of Attendance

KCBT provides and timetables the scheduled 20 contact hours required for full-time international delivery under its CRICOS registration and applicable regulatory requirements. Students are informed of and expected to participate in scheduled classes, supervised learning, mandatory practical activities, work-based training and assessments required for competent performance and timely course completion. Staff monitor and document participation to identify learning risk.

When a student is absent, KCBT requests information reasonably necessary to understand the absence and any effect on training, safety, mandatory learning activities or course progression. Evidence is assessed proportionately and may include a medical certificate or other appropriate documentation for compassionate, compelling, disability-related, cultural or personal circumstances. The Student Support Coordinator considers available support and reasonable adjustments, records the decision and respects the confidentiality of personal information. Adjustments do not remove the requirement to demonstrate competence

5.1.1 Students with unsatisfactory attendance/participation

KCBT monitors student class participation on a regular basis. Trainers update student attendance in the system weekly and the Student Support Coordinator verifies the updated attendance, archives them and sends attendance SMS/email reminders through the system. The procedure below is followed to monitor student class participation by KCBT staff.

- Trainer records attendance on the class roll and updates Wisenet weekly. This task is completed by Friday of every week.
- Trainer provides completed and signed weekly class rolls to the Student Support Coordinator each Friday for archiving.
- At the end of delivery week 1, the trainer identifies the non-commenced students and informs the Student Support Coordinator by Friday of the same week.
- The Student Support Coordinator sends the first non-attendance SMS/email through Wisenet to all non-commenced students of each class and reminds them to attend class.
- The same procedure is followed again in week 3 to send reminders for the non-commenced students in week 3.
- Students who do not respond to these reminders or who do not meet satisfactory attendance of their scheduled class by the end of unit delivery are not allowed to participate/submit assessments.

- These students receive unit outcome letters indicating their poor participation and are advised by the trainer to meet with the Student Support Coordinator for intervention.
- Where a student has missed essential training or has not demonstrated competency, the trainer and assessor review the outstanding training and assessment requirements and identify suitable additional training, reassessment or, where necessary, unit re-enrolment. The decision considers available evidence, reasonable adjustments, course sequencing, completion timeframe and applicable fees disclosed to the student. The Student Support Coordinator explains the decision and available review process and provides guidance for any further support.

5.2 Monitoring of academic progress

KCBT:

- provides course information and course requirements to students during designated orientation sessions and in the first class of each unit of study.
- Trainers record results promptly and notify the Training Coordinator and Student Support Coordinator when indicators show that a student may not achieve the required progress or complete within the CoE duration.
- Training Coordinators / Compliance Manager formally reviews the results of international students at the end of each study term.
- identifies students at risk of not completing their enrolled course of study and
- provides intervention strategies for identified “at risk” students.

5.2.1 Minimum course progress requirement applicable to all International Students

International students undertaking a VET program are required to successfully complete or demonstrate competency in at least 50% of course requirements in each study period that they are enrolled into.

KCBT has implemented the following strategy to ensure that students meet the above requirements and the course progress.

- Sends regular reminders within the delivery period of each unit of competency.
- Provides additional support for enhancing students, such as conducting one-to- one sessions by trainers.
- Provides extra time for completing learning tasks and, where necessary assessments.
- Provides opportunity to meet with the Student Support Coordinator to discuss their issues and problems related to course progress.
- Guides students in accessing professional services such as counsellors and medical practitioners for further assistance.

If a student is identified as not making satisfactory course progress in a second consecutive compulsory study period in a course, KCBT notifies the student in writing of its Intention to report the Student to the Department of Home Affairs (DoHA) for unsatisfactory progress.

5.2.2 Where KCBT determines that a student has failed to meet the applicable course-progress requirement, KCBT issues a written notice as soon as practicable stating the proposed reporting reason, the evidence supporting the decision and the student's right to access KCBT's internal complaints and appeals process within 20 working days. If, after this period, students have not:

- lodged an appeal;
- withdrawn from the course;
- completed an appeals process resulting in the appeal being denied; or

- notified KCBT in writing that they do not wish to access the KCBT internal appeals process and/or submit an internal appeal
- have not responded to the NIR letter on or before the due date of appeal.

The Compliance Manager checks the notice and service record, student results, intervention history, internal and external appeal status, and the relevant permitted reporting ground in National Code Standard 8.14. PRISMS reporting proceeds only when one of those grounds is substantiated, and a designated manager has authorised the action. The reporting date, reason and supporting evidence are retained in the student's file

5.2.3 Students are required to maintain their course progress and attendance/participation requirements throughout the KCBT appeal process. KCBT notifies the student in writing of the outcome of the appeal process and if the student's enrolment is to be cancelled.

5.3 Managing Students "at risk"

5.3.1 Student Support Coordinator via the KCBT Course Progress Monitoring procedure identifies those students considered to be "at risk" of not completing their course progress within the expected duration of their course of study.

The Student Support Coordinator contacts students identified as being at risk, and sends the student an intervention strategy meeting request to:

- show the student's assessment outcomes and class attendance/participation for each term to date;
- record the actions taken to assist and support the student and their study needs,
- discuss and provide the student with an agreed individual intervention study plan (if/where applicable); and
- ensure relevant Trainers are informed of follow-up actions and support the process.

The Compliance Manager verifies regulatory thresholds, individual case evidence, appeal status, permitted CoE changes and PRISMS readiness and approves material changes to study plans and schedules, authorises final course-progress reporting decisions and escalates significant or systemic risks to the CEO.

5.4 The Intervention Strategy

5.4.1 An Intervention meeting and an agreed intervention strategy plan are developed in consultation with the student and other relevant KCBT training and support staff – the outcome is to have an agreed individual study plan in place that provides details of specific assistance and/or advice given to the student to address the issues preventing the student from achieving competency and a plan for the way forward for the student to complete their enrolled studies at KCBT successfully. Progress is reviewed at the nominated milestones and the outcome, further support or escalation is recorded. Where the student cannot be contacted or declines participation, staff document reasonable contact attempts and continue to consider practicable support.

5.4.2 An Intervention Strategy plan may include consideration of the following:

i. Arrange extra learning support and advice on study habits and time management, including class attendance and submission of assessments by due dates;
ii. Refer the student for further English-level assessment testing.
iii. Refer the student for an English Language Course (deferring the student's current

enrolment/course(s) with KCBT);

iv. Arrange external counselling for assistance with personal issues.
v. Provide opportunities for students to be reassessed or to re-enrol in units.
vi. Provide advice regarding course suitability and transfer to an alternative course where/if appropriate.
vii. Arrange to vary or reduce the enrolment load where possible; or

Any proposal to vary study load, reassessment timing, unit sequencing, delivery arrangements, enrolment status or course pathway is considered individually against the approved TAS, course duration, required scheduled contact hours, training product requirements, unit availability, student needs and relevant ESOS provisions.

5.4.3 KCBT discusses proposed support and study plans with the student, considers their views and seeks written acknowledgment of agreed actions. Where a student declines a meeting, does not sign or disputes an action, KCBT records the student's position, contact attempts, information provided, available alternative supports and the reason for any subsequent decision. Staff maintain appropriate privacy and make adjustments in consultation with the student where required, without compromising assessment standards.

5.4.4 The Student Support Coordinator or the nominated KCBT representative ensures that all meeting discussions and outcomes are documented including:

i. KCBT Intervention Strategy Plan,
ii. KCBT Student Record (outlining their understanding of the intent and outcome of the meeting/s and discussion/s held)
iii. Complete an agreed KCBT Individual Student Study Plan,
iv. Ensure all documentation is completed correctly and signed by the student and all attendees throughout the meeting/s.

5.4.5 The Student Support Coordinator ensures that copies of paper-based documentation and/or electronic documents are uploaded to the student management system (Wisenet).

5.4.6 The Student Support Coordinator reviews the students' progress against the agreed intervention strategy meeting outcome/s and/or individual study plan for the remainder of the student's study period and/or duration of the Intervention Strategy Plan/ individual study plan.

5.4.7 Where a student's progress has been unsatisfactory for two consecutive study periods (Terms), a Notice of Intent to Report– for unsatisfactory course progress/Participation is issued to the student by KCBT.

5.4.8 Students who do not appeal against the decision or whose appeal is not upheld are issued a Notice that KCBT intends to report the student to the Department of Home Affairs (DHA) through PRISMS for unsatisfactory Course Progress (a breach of their student visa conditions).

5.5 Appeals

5.5.1. A student receiving an intention-to-report notice has 20 working days to access KCBT's internal complaints and appeals process. KCBT gives the student clear reasons for the decision, information on submitting an appeal and an opportunity to present their case with a support person. KCBT commences assessment of a properly lodged appeal within 10 working days of receipt and finalises the matter as soon as practicable. An impartial reviewer considers the

evidence and provides a written outcome with reasons. The appeal and outcome are recorded, and the related reporting process is managed in accordance with National Code Standards 8.14 and 10.

5.5.2. Students who do not wish to access and/or submit an appeal to KCBT are to notify KCBT of their decision not to appeal.

5.5.3. Students may lodge an appeal on the following grounds:

i. inaccurate calculation and recording of the student's results, participation, records, events or account balance; and/or
ii. compassionate or compelling circumstances.

5.5.4. Students must submit their appeal in **writing using the KCBT Appeal Form** to the Student Support Coordinator for processing in accordance with the KCBT Appeals Policy and Procedures (available via the KCBT website).

5.5.5. When an appeal is **upheld** for compassionate or compelling circumstances, the student is notified in writing by KCBT and the student is not reported to the Department of Home Affairs and their enrolment continues to be in effect. The student may be placed on an Intervention Strategy plan and/or Individual Study Plan for future study periods and/or their CoE may be extended.

5.5.6. When an appeal is unsuccessful, KCBT advises the student within 10 working days after concluding the internal review of their right to access an external complaint and appeals process and supplies the details of the appropriate external body. The student is issued with a Notice that their enrolment is to be cancelled and that KCBT will report the student to the Department of Home Affairs (DoHA) for unsatisfactory course progress via the PRISMS system.

5.5.7. The student will then have 10 working days to appeal this decision with the Ombudsman should they wish to do so via: https://www.ombudsman.gov.au/

5.6 Reporting unsatisfactory course progress in PRISMS

5.6.1 KCBT only reports an international student for unsatisfactory course progress or participation in PRISMS after:

- the internal and external appeals processes have been completed, and the original decision has been upheld; or
- the student has chosen not to access the internal appeals process within the 20-working-day period; and/or
- the student has chosen not to access the external appeals process within 10 working days; or
- the student withdraws from the internal or external appeals process, by notifying the registered provider in writing.

5.7 Completion within the expected course duration of study

5.7.1 Throughout the appeal process, the student must maintain their full-time enrolment study load in each study period (term) to ensure that they are able to complete their enrolled course of study within the scheduled course duration of study.

5.7.2 Students who are required to re-enrol into units that they did not successfully complete as previously scheduled are assessed for an extension as per the intervention plan.

5.7.3 An extension is approved only where supported by demonstrable compassionate or compelling circumstances, an implemented or currently developing intervention strategy for unsatisfactory progress, or an approved deferral or suspension.

6 RELATED POLICIES AND OTHER RELEVANT DOCUMENTS

- *KCBT Enrolment Policy/Procedures*
- *KCBT Complaints and Appeals Policy/Procedures*
- *International Student Code of Conduct*

7 RELEVANT LEGISLATION

- *Education Services for Overseas Students Act 2000*
- *National Code of Practice for Providers of Education and Training to Overseas Students 2018*
- *2025 Standards for Registered Training Organisations.*
- *National Vocational Education and Training Regulator Act 2011*

Version Control and Accountable Officers

Policy Category	Student Support
Responsible Officers	Campus Manager
Implementation Officers	Student Support Coordinator Admin Campus Manager
Review Date	Oct 2026
Approved by	
CEO	

Version	Authored by	Brief Description of the changes	Date Approved	Effective Date
3	CEO	Reviewed and updated	Jan 2024	Jan 2024
4	CEO	Updated with Standards for RTOs 2025	Oct 2027	Oct 2027