



POLICY

INTERNATIONAL STUDENT OVERSEAS VISA REQUIREMENTS

Purpose

These policies and processes outline the progress of studies for a student for the Duration of their CoE (Confirmation of Enrolment) and include the Monitoring of Course Progress and the Monitoring of Attendance.

Attendance monitoring and reporting must be in place for students studying ELICOS courses and schools.

Firbank Grammar School t/a Firbank Grammar staff will constantly monitor student assessments and workloads and record them on the student file.

Policy

Firbank Grammar will monitor every student's enrolment load a minimum of once per study period (semester) to ensure students can complete the course in the duration as per the Confirmation of Enrolment (COE).

International students in Australia must meet course requirements which include satisfactory progress with course work in order to retain a student visa. The Victorian Certificate of Education (VCE) at years 11 and 12 requires satisfactory achievement of all subject outcomes.

For students in preparatory to year 10 achieving satisfactory course progress requires the student to be achieving at a standard deemed appropriate by the School at the relevant year level. This standard is assessed by the class/subject teacher via a range of assessment tasks and is subject to review by the Director of Learning.

Class/Subject Teachers will ensure that students are aware of satisfactory completion requirements at the beginning of each study period (semester).

Teachers will discuss any concerns with students and offer assistance as situations arise, to help prevent students falling behind in their course progress. Teachers will constantly monitor the progress of students and report any concerns to the International Student Co-Ordinator.

Any student that fails a unit in their course may be considered 'at risk' of not completing the course in the expected duration and intervention strategies will be implemented.



Students may take a normal, reduced or increased study load in each study period, as long as the workload is monitored to ensure the student completes the course within the duration specified on the CoE.

The expected course duration for overseas students should not differ from the expected duration for domestic students. Firbank Grammar will only extend the duration of a CoE:

- Under compassionate or compelling circumstances, when it is clear the student will not be able to complete by the end date of the CoE.
- where intervention strategies have been implemented for students at risk of not completing satisfactory course progress
- where there is an approved deferment or suspension of study

Student progress is assessed and recorded via online reporting and end of Semester Transcript Reports each semester. Any intervention required is acted upon and discussed with students as needed.

Compassionate or compelling circumstances may be deemed as serious illness; bereavement of a closely related family member (evidence will be required); natural disasters; traumatic experience or political upheaval in the home country.

Should students refuse to maintain a minimum number of subjects as designated by the School; the student will be firstly counselled and then warned of impending visa implications.

If there are compelling or compassionate reasons, Firbank Grammar may grant the student a less than 'full time' workload. This would be monitored as part of the students' intervention strategy.

Firbank Grammar will issue a new CoE should the students need to extend the duration of their course.

Intervention strategies are tailored to meet each student's individual needs. Formal intervention strategies and counselling of the student will be implemented.

Intervention Strategies could include:

- attending academic skills programs
- attending tutorial or study groups
- receiving individual assistance / mentoring
- attending counselling
- receiving assistance with personal issues which are influencing progress.
- being placed in a suitable alternative subject within a course or a suitable alternative course; or



- a combination of the above and a reduction/increase in course load.

NOTE: A student is expected to complete their course within the duration of their COE **unless** compassionate and compelling circumstances are approved where the student was unable to attend classes e.g. due to illness or Firbank Grammar was unable to offer a pre-requisite unit; the student is under an intervention strategy identified as at risk of not meeting course progress or the student has an approved deferment or suspension of studies granted refer *Deferring or Suspending a Student's Enrolment Policy and Procedure.*

Procedure

The progress of each student is monitored, recorded and assessed for each subject in which they are enrolled.

Student progress must be monitored to ensure they are on track to complete within the duration of their CoE. This is recorded via Synergetic.

Firbank Grammar will only extend the duration of a CoE.

- Under compassionate or compelling circumstances, when it is clear the student will not be able to complete by the end date of the CoE.
- Where intervention strategies have been implemented for students at risk of not completing satisfactory course progress
- As approved deferment or suspension of study

Staff are to firstly encourage students to increase their workloads to 'catch up' on any missed units. The School is open 5 days per week to further assist students. Teachers are to consult with the International Student Co-Ordinator - Wellbeing before increasing or decreasing student workloads.

Where Firbank Grammar decides to extend the duration of the student's study due to any of the conditions above, the school will report via PRISMS and/or issue a new CoE if required. PRISMS will indicate to the user if a new CoE is required. This reporting must be done within 14 days of the determination that the student will need to change/extend the duration of their CoE.

CoE changes performed by Admission staff.

- When the student is required to repeat units in a term or study period, Admissions staff will be notified by the International Student Co-Ordinator in writing whether or not a change to the student CoE and/or an update in PRISMS is required.
- Any record of variations to student enrolment must be kept in the student's file and updated in PRISMS as applicable.
- Any record of online and distance education study must be kept on students' files.



A student CAN enrol in less than a 'full-time' load in any Semester if:

- there are compassionate or compelling reasons for reducing the load.
- the reduced load is part of the provider's intervention strategy.
- the student has studied, or plans to study, extra units in another semester.
- the student has only a few units left to complete, and these do not constitute a full-time load.
- Pre-requisite units are not available in that study period.

Monitoring Course Progress

Firbank Grammar will assess, monitor and record student results on completion of each unit and the progress is monitored by the International Student Co-Ordinator. The ESOS framework and DHA visa conditions require that students maintain satisfactory academic progress in their course.

Unsatisfactory progress is defined by the School as not achieving the outcomes for a unit of study.

Firbank Grammar advises the course and study requirements of each study period clearly to students on commencement. Any variations are advised to students in writing as soon as they are known.

Teachers will discuss any concerns with students and offer assistance as they arise to help prevent students falling behind in their course progress. Teachers will constantly monitor the progress of students and report any concerns to the International Student Co-Ordinator - Wellbeing as soon as identified.

Any student that fails a unit of their course may be considered 'at risk' of not completing the course in the expected duration and intervention strategies commenced at any point, if approved by the Principal. This is at the discretion of the Principal.

For the purpose of course progress Firbank Grammar defines a study period as 1 semester.

The School will at the minimum monitor and record student's course progress on completion of each unit of competency or a minimum of once per study period (study period = 1 Semester). Students are notified in writing as soon as it is identified they are 'at risk' of not achieving a satisfactory result for a unit (Warning Letter 1). They will be given an opportunity to redeem that result. Students will be required to meet with the International Student Co-Ordinator - Wellbeing to discuss what action/intervention strategies are to be taken.

Intervention strategies are tailored to meet each student's individual needs. Formal

intervention strategies and counselling of the student will be implemented.

Intervention Strategies could include:

- attending tutorials/study groups
- receiving individual assistance
- attending counselling
- receiving assistance with personal issues which are influencing progress.
- receiving mentoring
- being placed in a suitable alternative subject within a course or a suitable alternative course; or
- a combination of the above and a reduction in course load.

Should students not achieve a Satisfactory result after the first warning letter a second letter will be sent (Warning Letter 2). Students will be required to meet with a Teacher / International Student Co-Ordinator - Wellbeing - to discuss further intervention strategies to be taken.

Students who are identified as having unsatisfactory course progress over two consecutive study periods will be reported to DHA for unsatisfactory course progress. Students in this instance will be issued with an Intention to Report Letter for not making satisfactory progress outlining to them they have 20 working days to access the School's International Students complaints and appeals process. All records will be kept in student files.

Procedure

1. Students who fail to achieve the specified outcomes for any unit of study will be deemed as 'at risk', receive a warning letter and offered counselling/intervention strategies.
2. Students who continue to fail to achieve the specified outcomes for more than one unit of study units in any given study period will be deemed as 'at high risk' and receive a 2nd warning letter and required to attend counselling/undertake intervention strategies.
3. Students who fail more than one units of study over two consecutive study periods will receive an 'Intention to Report Letter'.
4. Students are given 20 days from the date of the letter to initiate an internal or external appeal.
5. Student enrolment will be maintained during an appeals process. Refer International Students Complaints and Appeals Policy and Procedure NC Standard 10.

Intervention Strategy

The teacher will monitor, record and assess student course progress on completion of each unit. Details are to be kept on the student academic file and recorded in

Synergetic.

At any time, when a teacher becomes aware of issues or has concerns regarding the student's progress they should first speak to the student (ensuring that all communication is recorded in the student's individual file) and then advise the International Student Co-Ordinator - Wellbeing of these concerns.

At any time during the study period if a student is identified by their teacher as 'a possible risk', the student will be given a verbal warning and offered counselling and assistance. This must be documented in the students' file and advice provided to the International Student Co-Ordinator - Wellbeing.

If a student has failed to achieve satisfactory results in any unit, they must be sent 'at risk of being reported' for unsatisfactory course progress warning letter and advice they are required to meet with the International Student Co-Ordinator - Wellbeing to discuss / action intervention strategies. Students may take a support person to this meeting.

The warning letters will also advise students unsatisfactory results may lead to them being reported to DHA and the possible cancellation of their visa. Students will also be told of their rights to appeal such a decision and provided with a copy of the International Students Complaints and Appeals Policy.

Intervention Strategies to be discussed may include but not limited to -

- Identify what support strategies would best suit the situation and planning implementation.
- Academic and personal support/counselling offered to the student internally or externally as appropriate.
- Planned regular follow up and feedback from the teaching staff to track progress and keep communication open.
- Advice on alternate units/courses if considered more suitable/appropriate for the student.
- Resitting assessment tasks
- Any other support appropriate to the individual circumstances.
- All records MUST be kept in the student file via the community portal.

If a student from Preparatory to year 10 is at risk of failing to achieve satisfactory course progress the following interventions will be taken by the school:

- Depending on the extent of the student's lack of progress the student's academic ability may be assessed by the Director of Student Services via Psychometric testing.
- The Head of Differentiated Education will develop an Independent Learning Plan for the student in consultation with the student's teachers.



- The Parent/LSP will be informed of the course of action taken by the School via a letter and follow up interview with the Head of Differentiated Education.

The student will then be provided with a written notice of 'Intention to Report' to DHA, informing them that they are able to access the International Student Complaints and Appeals process, and that they have 20 working days in which to do so.

The Notice of Intention to Report issued must describe intervention so far, warning letters already sent and what has taken place and the intention to report the student. It also must detail their right to appeal against the decision and provide advice on what the student must do regarding their visa.

A student may appeal on the following grounds:

- The School's failure to record or calculate the student's marks accurately,
- compassionate or compelling circumstances
- The School's documented policies and procedures that have been made available to the student.

If a student chooses to access the provider's International Students complaints and appeals process, the School must maintain the student's enrolment while the complaints and appeals process is ongoing as per our Complaints and Appeals Policy and Procedure.

If the appeal shows that there was an error in calculation, and the student actually made satisfactory course progress (successfully completed more than 50% of the course requirements over two consecutive study periods) the School does not report the student, and there is no requirement for intervention.

If the appeals process shows that the student has not made satisfactory progress, but there are compassionate or compelling reasons for the lack of progress, ongoing support must be provided to the student through Firbank Grammar School's intervention strategy, and the School does not report the student.

NOTE: Firbank Grammar School will only await the outcome of our internal and one external appeals process before reporting a student for unsatisfactory course progress (if found in favour of the School).

If the student chooses not to access the International Students complaints or appeals processes within the 20-working day period or withdraws from the process

OR

On completion of the appeals process unsatisfactory course progress is confirmed, they will be reported to DET and DHA via PRISMS within 5 working days of finalising

the decision to report, for unsatisfactory course progress.

When a student is reported for unsatisfactory course progress DHA will consider all the information available and if they decide to consider cancellation, DHA will send a Notice of Intention to Consider Cancellation (NOICC) prior to a decision being made to cancel the student's visa. Students will be given an opportunity to respond to the NOICC and explain their situation.

Monitoring Attendance

Firbank Grammar policy is that students should attend all classes (100%) of their course to gain optimum learning. Students must attend all timetabled classes and required official school functions. Students must attend all camps and excursions as part of Firbank's curriculum.

However, if students have valid reasons for absence a minimum of 80% for each study period (semester) of their course contact hours must be maintained to avoid being reported to the Department of Education and Training (DET) / Department of Home Affairs (DHA).

The School monitors overseas student course attendance by regularly analysing student attendance reporting and systems (synergetic) to assess whether students will meet the minimum attendance requirement of 80% of their course.

The School believes good attendance is important in order to achieve the desired educational outcomes. Maintaining satisfactory attendance is a student visa requirement.

Parents/ LSP or Students must contact the School every time they will be absent prior to the regular class time, via email, phone or Firbank App if the student cannot attend due to illness.

Students who do not advise the School of absences will be contacted by the International Student Co-Ordinator - Wellbeing.

Firbank Grammar will report students for non-attendance via PRISMS as per the conditions outlined in this policy. An outcome of reporting a student for non-attendance via PRISMS is that the student's visa may be cancelled.

Firbank Grammar will at the minimum contact and counsel students who:

- have been absent for more than five consecutive days without approval; or
- are at risk of not attending for at least 80 per cent of the scheduled course contact hours.



All phone conversations, copies of letters, emails and notices relating to attendance will be kept in the student file. Student attendance is monitored daily by teachers. Student absences are tracked and monitored at the end of each week. All absences due to illness should be accompanied by a medical certificate.

Any absences longer than 5 consecutive days without approval will be investigated as a matter of urgency.

- The International Student Co-Ordinator-Wellbeing will attempt to contact the student.
- If the student is not able to be contacted their Welfare Guardian will be contacted
- The International Student Co-Ordinator-Wellbeing will counsel students on the importance of notifying the School when absent.
- If contact cannot be made, the International Student Co-Ordinator-Wellbeing will discuss this with the Principal and the relevant authorities will be notified (e.g. police, DHA, next of kin)

Once a student's attendance drops below the defined levels and there is no possibility of the student reaching that level by the end of the study period the formal process will begin.

Attendance is monitored by the use of internal reporting systems via Synergetic.

Intention to Report (Less than 80% Attendance)

As soon as Firbank Grammar is aware a student will not achieve 80% attendance in the study period (semester), the School will send students an 'Intention to Report letter' which shall inform the student that they have 20 working days in which to access the School's International Student complaints and appeals process. The student will be given another copy of the International Students Complaints and Appeals Policy with the Intention to Report Letter.

NOTE: Firbank Grammar will only await the outcome of our internal and one external appeal process before reporting a student for unsatisfactory attendance (if found in favour of the School).



If a student chooses NOT to access the International Student complaints and appeals processes within the 20-working day period, withdraws from the process or the process is completed and the decision is in support of Firbank Grammar, the School will notify the Secretary of DET via PRISMS that the student is not achieving satisfactory attendance as soon as practicable (within 5 working days).

Firbank Grammar *may* decide not to report a student for 80% attendance where the School feels the student is a genuine student and can confirm the student is attending AT LEAST 70% of the scheduled course contact hours *and* maintaining satisfactory academic performance, where the School is satisfied, they are a genuine student and where they provide:

- documentary evidence demonstrating compassionate or compelling circumstances for their absences e.g., medical illness.
- supported by a medical certificate, **AND** attendance has not fallen below 70%, **AND** Academic progress is satisfactory.

Where a student with low attendance is able to demonstrate (and provide evidence of) compassionate or compelling circumstances, the Principal will assess whether a temporary suspension of studies is in the best interest of the student. Refer Deferment and Suspension Policy.

In all circumstances if the student's attendance drops to below 70%, students will be reported to DET/DHA via PRISMS.

Definitions

'Medical certificate' means a certificate issued by a registered medical provider such as hospitals, doctors, dentists, physiotherapists, chiropractors, optometrists, ophthalmologists, psychiatrists and psychologists. Firbank Grammar does not accept certificates from alternative medical practitioners such as herbal practitioners, acupuncturists, Chinese therapists, massage therapists, iridologists, psychics etc.

'Satisfactory course attendance' means attendance of at least 80% and above of scheduled class contact hours for the study period and meet course requirements which include satisfactory progress with course work.

'Study period' refers to a semester. 1 Study Period is equivalent to 1 Semester.

'Compassionate or compelling circumstances' are generally those beyond the control of the student and which have an impact upon the 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 student was unable to attend classes.
- bereavement of close family members such as parents or grandparents
- major political upheaval or natural disaster in the home country requiring emergency travel and this has impacted on the students' studies.



or

- a traumatic experience which could include:
involvement in or witnessing a serious accident; and witnessing or being the victim of a serious crime and this has impacted on the student (these cases should be supported by police or psychologists' reports) or where the School was unable to offer a pre-requisite unit.
- Any other circumstance would require evidence to be considered as compassionate or compelling.

If a student ceases attending a course or does not return from leave, and/or is unable to be contacted, under Section 19(1) of the ESOS Act, Firbank Grammar will notify DET and DHA via PRISMS of termination of the students' studies within 14 days of the event via a Student Course Variation. The School in this instance does not have to give students access to the appeals process. Students would not be entitled to a refund unless at the discretion of the Principal.

Record Keeping

Firbank maintains evidence of compliance with this policy by maintaining records of activities undertaken by the School in accordance with this policy, any written agreements entered into by the School and copies of all CAAW letters.

The School manages all records in accordance with our Records Management Policy and Procedure which is aligned with the Public Record Office Victoria Recordkeeping Standards and the Records, Retention and Disposal Schedule for Non- Government Schools guidelines.

Related Policies and Documents

- Child Safety and Wellbeing Policy
- Child Safety and Wellbeing Code of Conduct
- Child Safety and Wellbeing Reporting Obligations Policy
- Records Management Policy and Procedure
- International Students Complaints and Appeals Policy
- [VCE Satisfactory Completion and Levels of Achievement](#)



Approval

Policy Issue date	April 2024
Document updated by	International Operations Department
Document reviewed by	Director of International Operations
Document approved/endorsed by	Principal
Endorsed date	May 2024
Next Review date	May 2029

