

COURSE PROGRESSION AND RISK INTERVENTION POLICY & PROCEDURE

Introduction

The Kings Own College International (KOIC) is committed to ensuring all students meet course progression requirements in accordance with the Standards for Registered Training Organisations (RTOs) 2025, the National Code of Practice (NCP) 2018, and the English Language Intensive Courses for Overseas Students (ELICOS) Standards 2018. This policy outlines procedures for monitoring course progress, identifying students at risk, implementing intervention, timely reporting to relevant authorities and supporting students in completing their courses successfully.

Purpose

The purpose of this policy is to ensure that all students enrolled at KOIC, including those in ELICOS and VET programs, meet required course progression standards. This policy outlines the process for identifying students at risk, implementing intervention strategies and ensuring compliance with relevant legislative and regulatory frameworks.

Scope

This policy applies to all international and domestic students enrolled in KOIC courses, as well as staff responsible for monitoring and managing course progress.

For ELICOS students, attendance and academic progress are monitored together as part of overall student engagement and progression monitoring; however, attendance intervention and reporting processes may also be managed separately under the ELICOS Student Attendance Policy where applicable.

Policy Statement

KOIC is committed to monitoring course progress for all students and providing timely and targeted support for those who may be disengaged, experiencing difficulty or at risk of unsatisfactory progress. KOIC ensures that students complete their courses within the expected duration and comply with academic and regulatory requirements.

Indicators of disengagement may include:

- repeated absence from scheduled training sessions
- failure to engage with online learning platforms
- non-submission of assessments
- reduced participation in learning activities.

KOIC will:

- Monitor and evaluate course progress for all students.
- Identify students at risk of not meeting satisfactory course progress.
- Implement and document intervention strategies for at-risk students.
- Ensure timely reporting for international students who fail to meet course progression requirements.

Definitions

At Risk	Failing more than 50% of units in a study period.
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Confirmation of Enrolment (CoE)	A document issued to international students by CRICOS-registered providers through PRISMS. The CoE is required to apply for a student visa and confirms a student's acceptance into a registered course.
Contact Attempt	A documented effort to reach the student by phone, email, SMS, or post.
Intervention Strategy	A documented plan to assist students in improving course progress.
Unresponsive Student	A student who has failed to engage with scheduled training and has not responded to multiple contact attempts.
Satisfactory Course Progress	Achieving a competency in at least 50% of the units in a study period.
Study Period	One term of the course
Termination of Enrolment	The administrative process of ending a student's active enrolment in their training program.

Regulatory and Legislative Requirements

- ESOS Act 2000
- ELICOS Standards 2018
- ESOS National Code 2018: Specifically, Standard 8 & 11
- NVR Act 2011
- Standards for RTOs 2025; Quality Area 2 - VET Student Support, Outcome Standard 2.3

Course Progression and Risk Intervention Procedure

1. Monitoring Student Progress

Upon enrolment, all students receive a study plan and timetable showing the levels/modules (ELICOS) or units (VET) to be completed in every study period.

The student is assessed throughout the course, in accordance with the requirements of the course. Trainers and assessors (VET) and teachers (ELICOS) record student progress after each assessment.

At the end of each study period, the relevant Director of Study reviews progress for all students to determine whether the student's course progress for that study period has been satisfactory or unsatisfactory.

In addition to end-of-term reviews, early identification of at-risk students is supported through monitoring of assessment outcomes and engagement patterns throughout the term.

Early intervention may occur prior to formal end-of-study-period review where a student:

- misses scheduled classes without explanation
- fails to submit assessments
- demonstrates declining participation or engagement
- records attendance below 85%
- fails formative assessments or progress tests
- fails to access online learning systems for an extended period
- demonstrates behaviours indicating possible wellbeing or support concerns.

2. Responsibilities

- Marking/assessing students' assessments is the responsibility of the trainer and assessor.
- Reviewing students' academic results and determining the need for intervention is the responsibility of the Director of Studies.
- VET Students can access their results and feedback through the eLearning Portal, or from their trainers/teachers or the Director of Studies. ELICOS student will be provided their results directly from their teachers. Students are encouraged to contact their trainers/teachers as soon as their results are available, as they are the primary point of contact for any assessment-related issues.

3. Identifying Students at Risk

3.1 VET Students

- Unsatisfactory course progress is formally defined as failing more than 50% of the units across two consecutive terms (i.e., one full semester).
- KOIC structures its academic year into two semesters, each comprising two terms. Student progression is monitored at the end of each term (i.e., every 3 months).
 - **Warning Letter 1** is issued after the first term (3 months) if a student fails more than 50% of units.
 - **Warning Letter 2** is issued after two consecutive terms (i.e. one semester), if academic performance has not improved and the student continues to fail more than 50% of units.
- The Director of Studies reviews students' academic results at the end of each study period to determine whether a student is at risk of not achieving satisfactory course progress for a study period. If a student failed more than 50% of the units for the study period, the student is considered to be 'at risk' of not meeting satisfactory course progress and the Director of Studies will implement an intervention strategy.

3.2 ELICOS Students

For ELICOS students, progression is evaluated through ongoing assessment of performance across all macro skills; reading, writing, speaking, and listening in accordance with the scheduled course structure and level benchmarks.

Each ELICOS level is typically delivered over a 10-week study period, which is considered one term. Students are expected to transition to the next level after achieving satisfactory benchmarks across all macro skills. These benchmarks are outlined in KOIC's ELICOS Level Descriptors.

Progression decisions are based on documented ELICOS assessment benchmarks, macro skill outcomes, formative and summative assessment results, and teacher observations recorded within KOIC's student management and academic systems.

A student is considered 'at risk' of not meeting satisfactory course progress if they:

- Demonstrate poor academic performance (e.g., limited improvement or failure to meet learning outcomes)
- Consistently score below the required level for progression or are unable to transition to the next proficiency level within the expected timeframe.
- Additional indicators include low attendance (below 80%), lack of engagement in class activities and assessments, or failure to meet the conditions of an existing intervention plan.

Teachers monitor each student's performance throughout the course and provide regular feedback, with the Director of Studies (ELICOS) reviewing overall progress at the end of each study period. Where concerns are identified, an intervention strategy is implemented promptly to support the student in achieving satisfactory course outcomes.

4. Intervention Strategies

Intervention Strategy is an action plan adapted in an attempt to determine and reduce the cases of academic failure. It is developed to offer student with additional assistance in promoting success in their studies.

Prior to implementing an Intervention Action Plan, KOIC will identify contributing factors impacting the student's course progress or engagement. Contributing factors may include:

- LLND challenges
- attendance or engagement concerns
- welfare or wellbeing issues
- financial hardship
- accommodation or employment pressures
- cultural adjustment challenges
- digital literacy issues
- personal or medical circumstances
- unsuitable course selection or enrolment pathways.

This review assists KOIC to provide targeted and appropriate support strategies.

Any student who has failed more than 50% of the units delivered in a single study period is deemed to be 'at risk' of not meeting course progress requirements and an intervention strategy will be activated to assist the student in improving their course progress.

Intervention strategies may include:

- Additional tutorials or coaching sessions
- Adjustments to the study plan
- Referral to counselling or student support services
- Reassessment opportunities or extended deadlines
- Where concerns relate to academic integrity, plagiarism, collusion or inappropriate use of generative artificial intelligence (GenAI) tools, intervention strategies may also include:
 - academic integrity counselling
 - supervised assessment arrangements
 - additional study skills support
 - referral under the KOIC Academic Integrity Policy and Procedure.

5. Culturally and Linguistically Responsive Student

KOIC will offer meetings and written plans in the student's preferred language where practicable, using qualified interpreters or bilingual staff.

KOIC will:

- Consider cultural norms around help-seeking when proposing counselling or welfare referrals.
- Provide study-skills workshops that are contextualised to the Australian VET/ELICOS environment for students from different educational backgrounds.
- Document all culturally specific adjustments on the Intervention Action Plan.

Where academic disengagement or behavioural indicators suggest potential welfare, mental health or safety concerns, the matter may be escalated to the Student Services Officer or managed in accordance with the Critical Incident Policy and Procedure where appropriate.

6. Intervention Strategy Procedure

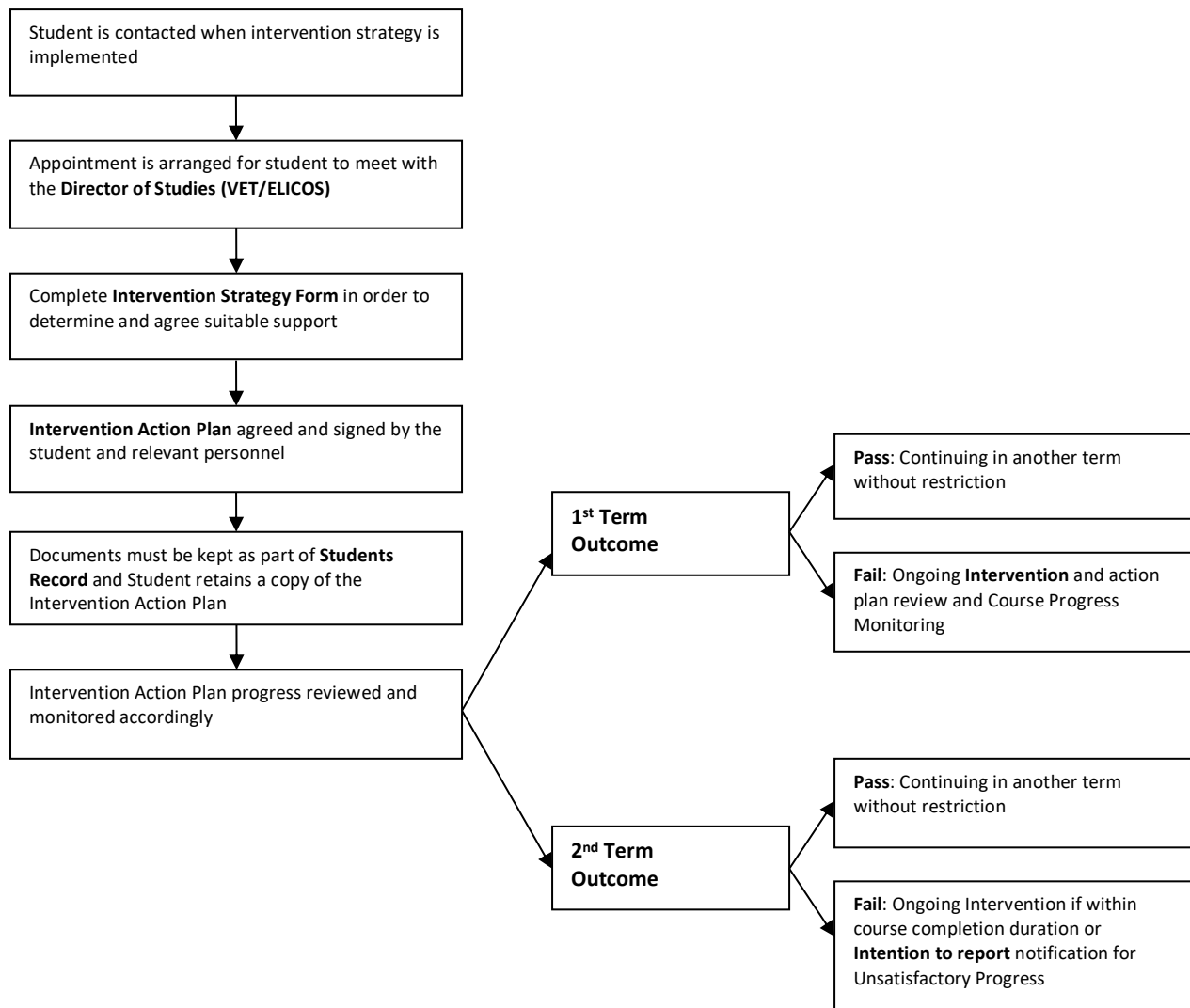
Students who have been advised that the Intervention Strategy has been implemented or are experiencing difficulties are able to meet with their Director of Studies to seek advice on what steps can be taken to increase the likelihood of academic success.

- An appointment must be made with the Director once the intervention strategy has been implemented or for a student to discuss the problems they are experiencing.
- At the appointment, with assistance from the Student Services Officer (SSO) the student will be provided with the **KOIC Intervention Strategy [Students at Risk] Form** for completion.
- The student may then be referred to the relevant Director of Studies who can help to work out the academic course progress action plan to assist the student.
- Once a suitable intervention strategy has been implemented, the student will sign and receive copies of the agreed intervention plan and related documents.
- Students are expected to actively participate in agreed intervention strategies. Refusal to engage, repeated non-attendance at intervention meetings, or failure to comply with agreed action plans may be considered when reviewing ongoing enrolment status and reporting obligations.
- All records will be stored electronically and in paper form in the student file identifying any amendments made to the student's course status and study plan.

For non-academic issues the Director of Studies can refer the student to the Student Services Officer (SSO) who can plan for additional services such as professional counselling. (See *KOIC Student Handbook*).

Where a student continues to demonstrate unsatisfactory progress despite intervention strategies, the matter may be escalated through additional academic review meetings, revised intervention planning, welfare referrals, or compliance review prior to any reporting or enrolment termination decision.

7. Intervention Strategy Procedure Flow Chart



8. Unresponsive Students

When a student is identified as unresponsive, the administration team will begin a structured communication sequence. This includes three documented contact attempts using available contact methods, spaced over a period of up to four weeks. Where there is no response after two attempts, a formal warning letter is sent to the student's last known postal address, giving them a final deadline to respond. If the student remains unreachable, the CEO (or delegate) will approve the termination of the student's enrolment.

Following termination, the student's records are updated in the student management system and archived in accordance with the Records Management Policy. If the student is entitled to any AQF certification, this will be issued and sent via registered mail. Trainers are notified and instructed to inform KOIC if the student makes future contact.

All disengagement, intervention and reporting records for overseas students are retained for two (2) years after the student ceases to be an accepted student, in accordance with National Code 2018.

All intervention, warning, communication and support records for both domestic and international students will be retained in accordance with the KOIC Records Management Policy and applicable legislative requirements.

9. Reporting Unsatisfactory Progress for International Students

International students who fail more than 50% of units across two consecutive study periods in VET courses, or who demonstrate poor academic performance and/or attendance below the 80% threshold in ELICOS courses, and fail to comply with their intervention plan requirements, will be issued an Intention to Report Letter.

International students enrolled in ELICOS courses may be identified as at risk where they consistently demonstrate poor academic performance, low attendance, lack of engagement, or fail to comply with intervention requirements. Attendance and academic progress may be monitored together as part of overall student engagement and progression; however, attendance intervention and reporting processes may also be managed separately under the ELICOS Student Attendance Policy where applicable.

○ Intention to Report Letter

Intention to Report Letter applies to international students who have failed more than 50% of the units in two consecutive study periods and is notice of KOIC's intention to report the student to the Department of Home Affairs (DHA) for unsatisfactory course progress. Or demonstrate poor academic performance, attendance below 80%, or fail to comply with their intervention plan.

- Students have twenty (20) working days from the date of the Intention to Report Letter to appeal the decision under KOIC's Complaints and Appeals Policy & Procedure.
- If the appeal is unsuccessful, not lodged or the student withdraws from the appeals process, the student is reported to the Department of Home Affairs (DHA) via PRISMS.

10. Completion with CoE Duration for International Students

International students must complete their course within the expected duration specified on their CoE, and the duration of their course must not exceed the course duration registered in CRICOS.

- KOIC may only extend the duration of the course where it is clear that the student will not complete the course within the expected duration. Extensions are only granted as a result of:
 - compassionate or compelling circumstances
 - approved deferment or suspension granted by KOIC
 - intervention strategy implementation.
- All course variations affecting the course completion date will be reported to the DHA through PRISMS and the supporting documents kept in the student's file.

11. Support for Domestic Students

Domestic students identified as at risk will also receive intervention strategies and support tailored to their individual needs.

12. Appeals

Students (both international and domestic) may appeal decisions related to course progress on the following grounds:

- KOIC has not calculated or recorded results or marks accurately or correctly
- KOIC has not calculated or recorded their attendance accurately or correctly
- Compassionate or compelling circumstances
- KOIC has not implemented the intervention strategy and/or other policies and procedures as outlined.

Appeals must be lodged in writing within twenty (20) working days of the decision. Full information can be found in *KOIC's Complaints and Appeals Policy & Procedure*.

Procedure Summary Table

Step/ Action	Responsible	Timeframe	Reference/Use
1. Assessment Records (VET), Macro Skill Progress Logs (ELICOS), Attendance Rolls	Trainers and Assessors (VET), Teachers (ELICOS)	Continuous during study period	Assessment Records, Attendance Rolls
2. End-of-study-period progress review to flag students who: fail > 50 % of units (VET) meet ELICOS "at-risk" indicators	Director of Studies (DoS)	Within 5 business days of study period end	Academic results summary; at-risk list
3. Identify "at-risk" students and issue Warning Letter 1	Director of Studies (DoS) / Student Services Officer (SSO)	If >50% fail after 3 months (first term)	Warning Letter 1 filed in SMS and student file

4. Escalate continuing risk and issue Warning Letter 2	Director of Studies (DoS) / Student Services Officer (SSO)	If >50% fail after 4 month (second term)	Warning Letter 2 filed
5. Schedule meeting and activate Intervention Strategy (complete Intervention Action Plan, adjust study plan, arrange support)	Director of Studies (DoS) / Student Services Officer (SSO)	Within 10 business days of warning	Signed Intervention Action Plan; meeting notes
6. Monitor & review intervention progress; provide extra tutorials, counselling, deadline extensions as needed	Director of Studies (DoS) / Trainers or Teachers	At least once each subsequent term	Progress notes in SMS; updated plan
7. Unresponsive student protocol – three documented contact attempts (e-mail, phone, SMS)	Student Services Officer (SSO)	3 attempts over 4 weeks	Communication log in SMS
8. Send Formal Warning Letter for non-response / non-engagement	Student Services Officer (SSO)	After 2 nd fail contact attempt	Letter copy in student file
9. Intention to Report Letter (international students) for two consecutive unsatisfactory periods or breach of intervention	Compliance Officer / Director of Studies (DoS) / Student Services Officer (SSO)	Immediately after criteria met	Letter copy; PRISMS draft
10. Appeal window – accept, record and process appeal (20 working days)	Compliance Officer / Student Services Officer	From date of Intention to Report	Appeals register; evidence files
11. Final decision & reporting / termination approved.	CEO or delegate	After appeal period lapses or appeal resolved	CEO approval note; PRISMS submission; SMS status update
12. Update enrolment status, archive student records, and if eligible, issue AQF certificate	Student Services Officer (SSO)	Immediately after decision; certificate within 5 business days	Archived file; postal record; certificate copy
13. Notify trainers/teachers and relevant staff of outcome	Compliance Officer / Student Services Officer	Within 2 business days of status change	Internal e-mail / memo

Roles and Responsibilities

Role	Responsibility
Compliance Officer	- Ensure alignment with legislative and regulatory requirements, including timely reporting to the DHA via PRISMS for international students. - Oversees annual review of policy and procedures to ensure continuous improvement.

Student Services Officer (SSO)	- Assists students in understanding course progression requirements and available support services. - Coordinates meetings for students with the DoS and other relevant staff for intervention strategies. - Ensures accurate record-keeping of intervention actions and progress.
Director of Studies (DoS) ELICOS / VET	- Monitors student progress across all study periods. - Reviews academic results to identify students at risk of unsatisfactory progress. - Implements and oversees intervention strategies for students at risk. - Approves course duration adjustment or extensions in compliance with PRISMS requirements.
Trainers and Assessors / Teachers (ELICOS and VET)	- Assess and record student performance in accordance with unit requirements. - Provide timely feedback to students on their progress. - Liaise with DoS to identify students who may require intervention.
Students	- Engage actively in their studies to meet course requirements. - Attend scheduled intervention meetings and adhere to action plans. - Maintain communication with teachers (ELICOS), trainers and assessors (VET) and KOIC staff regarding academic or personal challenges impacting progress. - Arrange interpreters or bilingual support where requested to ensure culturally appropriate communication.

Policy Implementation

This policy will be implemented through staff induction, ongoing training, and incorporation into administrative procedures. Staff will be provided access to relevant templates, communication logs, and student support referral procedures.

Monitoring and Review

KOIC is dedicated to continuously improving its processes by:

- Annually reviewing data on course progress and intervention outcomes to improve policies and procedures.
- KOIC will also review intervention data, attendance trends, student withdrawals, appeals outcomes and progression patterns to identify systemic issues and opportunities for improvement across training, assessment, student support and academic practices.
- Providing staff regular training on monitoring and intervention strategies.

KOIC will review the effectiveness of this policy every two years, or in response to a high incidence of 'at-risk' cases. Records of contact attempts and enrolment terminations will be audited as part of regular internal reviews to ensure compliance with the Standards for RTOs 2025.

Version Control

Version	Date	Description	Approved by	Approval date	Author	Review date
V2.0	Jan 2025	Policy re-developed from Course Progress Monitoring Policy and Procedure and	CEO	20 Feb 2025	Compliance Officer	Jan 2026

		Intervention Strategy Policy and Procedure				
V3.0	Jun 2025	Updated in line with the new standards for RTOs 2025	CEO	28 July 2025	Compliance Officer	Jun 2027
V3.1	May 2026	Re-brand of policy to KOIC and Enhanced intervention monitoring, ELICOS progression controls, student support escalation, academic integrity provisions and continuous improvement processes.	CEO	15 May 2026	Compliance Officer	May 2028

Policy and Document Information

Author:	Compliance Officer
Policy owner:	Compliance Officer
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