

Course progress and attendance monitoring for international students (VET and ELICOS)

Approved by: Executive Director Education Enablement

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Section 1. Purpose

- 1.1 The purpose of this procedure is to ensure TAFE NSW's compliance with the following legislation:
 - a [Education Services for Overseas Student Act 2000 \(ESOS Act\)](#)
 - b [National Code of Practice for Providers of Education and Training Overseas Student Act 2018 \(National Code\)](#)
 - c [English Language Intensive Courses for Overseas Students 2018 \(ELICOS Standards\)](#)
- 1.2 This procedure outlines the processes for monitoring the attendance and course progress of international students enrolled in:
 - a Vocational Education and Training (VET)
 - b English Language Intensive Courses for Overseas Students (ELICOS)
- 1.3 This procedure is aligned with the [Course Progress and Attendance Monitoring for International Students \(VET and ELICOS\) Policy](#). The policy provides a comprehensive framework that governs the execution of this procedure, promoting consistency, compliance and accountability.

Section 2. Scope and Audience

- 2.1 This procedure applies to:
 - a International students on student visas enrolled in Vocational Education and Training (VET), and English Language Intensive Courses for Overseas Students (ELICOS) at TAFE NSW.
 - b All TAFE NSW staff, who are involved in managing and supporting international students.

Section 3. Procedure

- 3.1 TAFE NSW will monitor the course progress and attendance of international students enrolled in Vocational Education and Training (VET), or English Language Intensive Courses for Overseas Students (ELICOS) in accordance with the ESOS Act, National Code 2018 (Standard 8) and ELICOS Standards (P4.1(d)). Monitoring and any subsequent actions are intended to support students to complete their course within the timeframe specified in their Confirmation of Enrolment (CoE).
- 3.2 The expected duration of study specified on the overseas student's Confirmation of Enrolment (CoE) must not exceed the Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) registered duration for the course. The International Student Conversion & Admissions Lead will run a Course Duration Comparison Report from PRISMS monthly to ensure compliance. Any anomalies identified are to be raised to the Products & Pathways Manager for rectification. Details of the internal process are documented in the International Unit's "How Do I Process International Student Course Application - VET and Higher Education Guide."

- 3.3 All international students must be informed of the requirements for satisfactory course progress and attendance before commencing their course through:
 - a Information provided on the TAFE NSW website.
 - b Verbal communication during compulsory student orientation
 - c In writing as part of their written agreement and orientation pack.
- 3.4 This procedure will be made publicly available on the TAFE NSW website.

Attendance monitoring for VET students

- 3.5 TAFE NSW monitors attendance for all VET international students to support course progress, manage student safety and welfare, and support the reporting of non-commencements.
- 3.6 Teachers will record student attendance during every class. Where teachers assess that poor attendance is contributing to course progress concerns, the teacher informs ICEC staff who will determine if any intervention strategies are required.
- 3.7 In all other circumstances, teachers will use attendance as an indicator for any additional support and course progress monitoring that a student may require.

Attendance monitoring for ELICOS students

- 3.8 An ELICOS study period for reporting on attendance is 20 weeks or the period of the student's CoE, whichever is shorter. If an English course is extended, attendance will be calculated over the total period of enrolment, including the extension.
- 3.9 Satisfactory attendance for ELICOS international students is defined as at least 80% of scheduled contact hours for the duration of the course.
- 3.10 Unsatisfactory attendance is defined as less than 80% of scheduled contact hours for the duration of the course.
- 3.11 ELICOS teachers will:
 - a Record attendance in the roll at least once in every class period.
 - b Immediately advise the Head Teacher/Academic Manager (ELICOS Centre) of any student under 18 who is more than one hour late so the guardian can be contacted.
 - c Advise the Head Teacher/Academic Manager (ELICOS Centre) of any student under 18 who has been absent for three consecutive days, or any student over 18 who has been absent for five consecutive days. The Head Teacher/Manager (ELICOS Centre) contacts the student and/or guardian for under 18s.
 - d Tally attendance in weeks 1, 3, and 5 of each 5-week session.
- 3.12 Head Teacher/Academic Manager (ELICOS Centre) will:
 - a. Identify and notify ELICOS students who have been absent for more than five consecutive days without approval (three days for under 18 students) or who are 'at risk' of not meeting attendance requirements before their attendance falls below 80%.

- b. Issue a Warning Letter (Attendance) to the student. The student must be interviewed and counselled by the Head Teacher/Academic Manager.
 - c. Maintain records of all contact and counselling with students 'at risk' of not meeting attendance requirements in the student's file.
 - d. If attendance issues persist, up to two additional warning letters over the enrolment period will be sent.
 - e. If a student's attendance falls below the point where an overall average of 80% cannot be achieved within the reporting period, and no evidence of compassionate or compelling circumstances is provided, or if attendance falls below 70%, a Notice of Intention to Report Letter (Attendance) will be issued to the student. The student will be advised of their right to appeal within 20 working days. Refer below to clauses 3.55-3.62 for the appeals process.
 - f. If a student lodges an appeal, they are required to continue to attend classes as per their student visa requirements.
- 3.13 For ELICOS students under 18 years of age, a copy of all correspondence will be sent to the guardian-carer and parents via the student's education agent.
- 3.14 For students over 18 years of age, a copy of all correspondence will be sent to the student's education agent only if the student has signed authority at the time of enrolment giving permission to do so.
- 3.15 Refer to clauses 3.61-3.64 for information about reporting students for unsatisfactory attendance.

Course progress monitoring for VET and ELICOS students

- 3.16 Satisfactory course progress for international students at TAFE NSW is defined as being awarded a Pass or Competent grade in at least 50% of the units enrolled in each study period. This ensures that students are maintaining an adequate level of achievement throughout their course.
- 3.17 A study period is defined as one semester (VET) or 20 weeks (ELICOS). The course requirements for the purposes of this procedure are measured in terms of units that are expected to be completed by a full-time student within the study period. This definition helps to standardize the expectations and progress measurements for all students.
- 3.18 TAFE NSW must identify students who do not achieve satisfactory progress in a study period as 'at risk' of not meeting course progress requirements. These students must be supported through an Intervention Strategy. Refer to clauses 3.28-3.38 for the Intervention Strategy process.
- 3.19 Any international student identified as 'at risk' and provided with an Intervention Strategy who continues to achieve less than 50% pass in enrolled units in the next consecutive semester are deemed as having unsatisfactory progress.

Identifying VET and ELICOS students 'at risk'

- 3.20 TAFE NSW will undertake the following actions to identify students 'at risk' of exceeding their CoE end date.
- a VET Enrolments:
 - i. At the end of each study period (one semester), TAFE NSW International Customer Experience Coordinators (ICECs) will run a course progress report in the student management system (EBS/PeopleSoft).
 - ii. The TAFE NSW International Customer Experience Team Lead will liaise with faculty staff to identify students who have failed to submit assessments or have been deemed Not Competent (NC) in more than 50% of their units. These students will be classified as 'at risk'.
 - iii. If no system report is available, ICECs will share a list of VET students with Delivery teams to manually identify students 'at risk'.
 - b ELICOS Enrolments:
 - iv. At the end of each 5-week study period, ELICOS teachers will generate a proficiency report for each student.
 - v. Students not meeting the required proficiency level will be identified as 'at risk'.
- 3.21 The TAFE NSW International Student Officer will notify all students identified as 'at risk' of not meeting their course progression requirements. Notifications are sent by email, inviting students to contact their ICEC to set up an Intervention Strategy. The intention of the Intervention Strategy is for students to receive support to meet course progress requirements in the next study period.
- 3.22 Any VET or ELICOS student who demonstrates competency in more than 50% of the units undertaken in the study period in which they were identified as 'at risk', or in the following study period, will no longer be considered 'at risk'. These students must continue to receive support to meet their course progress requirements.

Intervention Strategy for VET students

- 3.23 International students identified as 'at risk' must be invited by email to meet with their TAFE NSW International Customer Experience Coordinators. The purpose of these meetings is to identify the reasons for the student's failure to meet course progression requirements.
- 3.24 The TAFE NSW International Customer Experience Coordinators must complete a Learning Agreement with the student 'at risk'. The student must sign the Learning Agreement after meeting with their coordinator.
- 3.25 The TAFE NSW International Customer Experience Coordinators must liaise with relevant teaching sections, counselling, and other support staff to coordinate assistance and support for the student 'at risk'.
- 3.26 The TAFE NSW International Customer Experience Coordinators must monitor the student's attendance and progress by liaising with the teaching sections.

- 3.27 The International Customer Experience Coordinators must organise regular fortnightly follow-up meetings with the student to monitor their course progress.
- 3.28 Evidence of meetings and other contacts with the student and teaching and support staff, such as notes, emails, and phone calls, must be retained and kept in the student's file.
- 3.29 Evidence from the student's assessment tasks, participation in tuition activities, or other indicators of academic progress, indicating the student is 'at risk' of not meeting requirements, must be collected and retained by the TAFE NSW International Customer Experience Coordinators in the student's file.
- 3.30 Any VET student who demonstrates competency in more than 50% of the units undertaken in the next study period will no longer be considered 'at risk', and the intervention strategy may be cancelled.
- 3.31 Any student identified as 'at risk' and provided with an intervention strategy during the study period who then achieves less than 50% competency in enrolled units will be in breach of their student visa conditions. These students must receive a Notice of Intention to Report Letter (Course Progress) due to not meeting course progress or attendance requirements.
- 3.32 Students must be advised of their right to appeal the decision within 20 working days in the Intention to Report Letter. Refer to clauses 3.55-3.62 for information about appeals.
- 3.33 Students are to continue with their training and education while the appeal is being assessed.

Intervention Strategy for ELICOS students

- 3.34 The following information outlines the steps to support international students identified as 'at risk' of not meeting course progress or attendance requirements. It includes counselling, coordination of support, monitoring progress, and handling appeals. The goal is to ensure these students receive the necessary assistance to improve their academic performance and comply with student visa conditions.
- 3.35 International students identified as 'at risk' will be counselled by their class teacher.
- 3.36 The class teacher will create a Learning Agreement in conjunction with the student, who, upon agreement, is required to sign the document.
- 3.37 The teacher will liaise with the Head Teacher/Academic Manager (ELICOS Centre, counselling and other support staff to coordinate assistance for the student.
- 3.38 The Head Teacher/Academic Manager (ELICOS Centre) will monitor the students' attendance and progress.
- 3.39 The class teacher will organise regular fortnightly follow-up meetings to monitor course progress, retaining evidence (such as notes, emails and phone calls) of all meetings and contacts in the student's file.
- 3.40 Evidence from assessment tasks, participation in tuition activities, or other indicators of academic progress showing the student is 'at risk' will be collected and retained in the student's file.

- 3.41 Students demonstrating competency in more than 50% of the units in the next study period will no longer be considered "at risk," and the intervention strategy may be cancelled.
- 3.42 If a student identified as 'at risk' and provided with an intervention strategy during the study period achieves less than fifty percent (50%) competency in enrolled units, they will breach their student visa conditions. As a result, they must receive a Notice of Intention to Report Letter (Course Progress) for not meeting course progress or attendance requirements.
- 3.43 The Intention to Report Letter must inform students of their right to access the TAFE NSW internal complaints and appeals process within 20 working days. Refer to for appeals information.
- 3.44 Students are to continue with their study while the appeal is being assessed.

Students with unsatisfactory progress

- 3.45 Identify any international student who has not demonstrated satisfactory course progress for two consecutive study periods (two semesters) as not meeting TAFE NSW course progression requirements. These students will be unable to complete their course within the duration specified on their Confirmation of Enrolment (CoE).
- 3.46 Record unsatisfactory course progress when a student fails to pass 50% or more of the units attempted in a study period and is deemed Not Competent (NC) in those units.
- 3.47 Recognise this situation as a breach of the student's visa condition. The student must receive a Notice of Intention to Report (NOIR) with advice on the right to appeal the decision within 20 working days. Refer to clauses 3.48- 3.55 for appeals information.

Appeals

- 3.48 Students will be advised of their right to appeal a decision of unsatisfactory course progress or attendance requirements, in writing, at the same time they are notified of the decision. Students must be advised they have 20 working days to lodge their appeal.
- 3.49 Appeals must be lodged in writing, to the contact listed on the students Notice of Intention to Report (NOIR) who must commence assessment of the appeal within 10 working days of it being lodged by the student.
- 3.50 Students involved in an appeal must be treated with respect, the matter handled confidentially and in alignment with privacy expectations set out in the [Privacy Policy](#). Students will not be treated differently, less favourably, or victimised because they have lodged an appeal.
- 3.51 Students are given the opportunity to present their case at no cost and any relevant circumstances or information they put forward, will be taken into consideration. If they request it, they may have a support person attend any relevant meetings that may occur that relate to the appeal.
- 3.52 The ICEC lead and the specific faculty Head Teacher will assess the students appeal and determine the outcome.

- 3.53 The ICEC lead will inform the student of the appeal outcome in writing within a reasonable timeframe and include the reasons for the outcome and any rectification that will be undertaken as a result.
- 3.54 TAFE NSW will take immediate steps to commence any rectifications required as a result of an appeal outcome found in the favour of the student.
- 3.55 If the original decision is upheld, the student will be informed of their right to lodge an external complaint with the [NSW Ombudsman](#).
- 3.56 All records relating to the appeal will be retained on the student's file for a period of two years after the student ceases to be an accepted student.

Reporting students for unsatisfactory progress or attendance

- 3.57 The TAFE NSW International Student Officer (ISO) will report a breach of course progress or attendance to the Department of Home Affairs via Provider Registration and International Student Management System (PRISMS) only when:
 - a Any internal and external complaint or appeal processes accessed by the student have been completed, and the breach has been upheld.
 - b The international student has chosen not to access the internal or external appeals process.
 - c The international student withdraws from the internal or external appeals process.
- 3.58 The TAFE NSW International Student Officer (ISO) will notify the student in writing that they have been reported to the Department of Home Affairs for unsatisfactory progress or attendance. The notification will advise the student to contact the Department of Home Affairs and provide those contact details.
- 3.59 The International Student Customer Experience Coordinators will retain copies of these documents in the students' files.

Section 4. Monitoring

- 4.1 The Responsible Officer will receive feedback and monitor the effectiveness of this procedure and the provisions therein, making recommendations for amendments to the Accountable Officer as required.
- 4.2 This procedure will undergo formal review every two years, or where legislative or TAFE NSW operational changes necessitate it.

Section 5. Responsibilities

Position	Responsibility
Executive Director Education Enablement (Accountable Officer)	Oversight of the development, review and amendment of this procedure, with the authority to approve revisions to the procedure to ensure alignment with regulatory and legislative requirements and current TAFE NSW operations.
Director, International (Responsible Officer)	Supports the Accountable Officer in the development, monitoring, review, amendment of this procedure, to ensure alignment with regulatory and legislative requirements and current TAFE NSW operations.
International Unit (and teams therein)	In alignment with the legislative requirements and TAFE NSW policy and procedure, they are responsible for the assessment, management and administration of course progress monitoring, intervention strategies and attendance monitoring and reporting, including managing student appeals and maintaining PRISMS reporting.
International Customer Experience Team	Monitor progress and manage intervention strategy with international students and the teachers.
Teachers/Head Teachers/Manager (ELICOS Centre)	Adhere to the requirements of this procedure and the associated policy, specifically in relation to monitoring and recording attendance and course progress processes and supporting international students to meet their attendance and progress obligations.
International students	Access and where relevant adhere to the requirements of this procedure and the associated policy.

Section 6. Governance information

Governance	Details
Related policies	This procedure is governed by the following: Course Progress and Attendance Monitoring for International Students (VET and ELICOS) Policy
Related documents	This procedure is to be read together with: International Student Management Policy
Accountable Officer	Executive Director Education Enablement
Responsible Officer	Director, International

Governance	Details
Content Manager number	DOC20/64393
Next review date	2 years from the approval date, unless legislation states otherwise

Section 7. Definitions

Word	Definition
Accepted student	<p>A student (whether within or outside Australia):</p> <p>(a) who is accepted for enrolment, or enrolled, in a course provided by TAFE NSW; and</p> <p>(b) who is, or will be, required to hold a student visa to undertake or continue the course.</p>
International student (overseas student)	<p>A currently enrolled international student studying on a student visa must be, enrolled in full-time CRICOS approved course/s.</p> <p>A person (whether within or outside Australia) who holds a student visa, other than one exempted by the ESOS Regulations 2001. Students in other classes of visa are not included.</p>
Intervention Strategy/Learning Agreement	<p>International Student Intervention Strategy is to provide a structured framework to support international students who are 'at risk' of not meeting course progress or attendance requirements.</p> <p>It provides timely and appropriate support to help students improve their academic performance and attendance. Tailored intervention strategies, such as Learning Agreements, are developed and implemented to address the specific needs of at-risk students. All interventions are documented and regularly reviewed to ensure continuous support and improvement.</p>
Provider	<p>An institution (as defined in the ESOS Act) or other body or person in Australia that provides or seeks to provide courses to overseas students. To provide courses, a provider must comply with State or Territory approval requirements and become registered on CRICOS.</p>
Student Visa	<p>A visa granted under the Migration Act 1958 to overseas students. The Department of Home Affairs administers the Act and issuing of visas.</p>
Study period	<p>One semester for VET students, 20 weeks for ELICOS students</p>

Word	Definition
Unsatisfactory progress	Failure to pass at least 50% of enrolled units in a study period

Section 8. Document history

No.	Effective	Approved by	Amendment
1	5 June 2020	Chief Delivery Officer	Initial procedure
2	June 2025	Executive Director, Education Enablement	Amendments arising from a formal review of the procedure and in response to changes to the TAFE NSW operating model.