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# **COURSE PROGRESS AND INTERVENTION POLICY AND PROCEDURE**

## **1.0 Purpose**

- 1.1 This policy applies to international students only.
- 1.2 Australian Airline Pilot Academy Pty Ltd has implemented the Department of Education, Skills and Employment (DESE) /Department of Home Affairs (DHA) Course Progress Policy and Procedure. In accordance with the National Code of Practice for Providers of Education and Training to Overseas Students 2018, Australian Airline Pilot Academy Pty Ltd will proactively monitor, review, assess and contact students who are at risk of failing to meet course progress requirements. The college will implement an intervention strategy for any students at risk. Students who continue to breach the course progress requirements may be reported to DESE through PRISMS. Students will be advised that unsatisfactory course progress in two consecutive study periods for a course could lead to the student being reported to DHA and cancellation of his or her visa, depending on the outcome of any appeals process.

## **2.0 Intent**

- 2.1 The intent of this policy is to provide students, staff and management a clear process for the monitoring, reviewing, assessing and proactively identifying students at risk of not meeting progress requirements under Standard 8 of the National Code 2018.
- 2.2 The process will also detail the requirements for achieving satisfactory course progress, assessing satisfactory course progress, actioning the intervention strategy, determining point at which student has failed to meet satisfactory course progress and the process for notifying students and the complaints and appeals process and finally notifying regulatory authority in the case of students who have breached the course progress requirements.

## **3.0 Course progress requirements**

- 3.1 We monitor, record and assess the progress of all students to ensure that they meet the expected duration of their course as stipulated in their CoE. This includes checking the course progress for each unit of competency for successful completion within timelines of program.

- 3.2 Our course outlines provide detail schedule of the lessons and tests and is backed by roster sheet which is updated on a weekly basis by Operations Manager.
- 3.3 AAPA is a CASA approved both Part 141 and Part 142 training provider therefore all the course syllabuses have been approved by CASA. Students commencing full time training must enrol in the units of competency as defined in the course outlines provided to students on the first day of the training.
- 3.4 Due to the nature of the aviation training and prerequisite training prior to the next stage, students do not have the flexibility to choose the units that they would like to study first therefore enrolment load for each student is strictly controlled by AAPA.
- 3.5 All the assessments for individual students are recorded in AAPA program management system.
- 3.6 In the case of unsatisfactory course progress and our decision to report a student, the student's enrolment will be maintained until the external complaints process is complete and the decision of provider has been upheld. At this point in time the student will be reported to DESE via PRISMS.
- 3.7 In the case of unsatisfactory course progress, we allow only one (1) external appeal process before we report student.

#### **4.0 Procedure**

- 4.1 A copy of this Course Progress and Intervention Policy and Procedure is made available to staff and students in the RTO tab, AAPA Flight Crew Notice Page.
- 4.2 AAPA must register the choice through PRISMS via ticking the box selecting the DESE / DHA Course Progress Policy and Procedures.
- 4.3 Our marketing materials detail the requirements for achieving satisfactory course progress. This is provided to prospective students in print or through referral to an electronic copy prior to enrolment.
- 4.4 The Course Progress and Intervention Policy are detailed at induction session with all students and also detailed at trainers meetings; we also provide a copy on our website.
- 4.5 Unsatisfactory academic course progress performance is defined as failing more than 50% of units in two consecutive study periods. A 'study period' is considered as 24 weeks.

- 4.6 Trainers will identify and report students to Head of Operations who they believe are not progressing and at risk of breaching progress policy. They will also report on class attendance levels.
- 4.7 An assessment of course progress is made by Head of Operations at the end point of each study period. We also monitor on an ongoing weekly basis. The reason we monitor on a weekly basis is so we can proactively move forward with assessing cases in a timely manner, and if necessary we will activate the intervention program at any point before end of first study period.
- 4.8 Student attendance is also recorded by trainers on the attendance roll. Standard 10 does not require us to report students to regulator on attendance; however, under this policy, students must attend 100% of classes for which they are enrolled considering the assessment requirements in aviation industry.
- 4.9 Head of Operations is able to quickly identify students at risk via several documents:
- 4.9.1 Assessment form is a working document and details the current study which is updated via ipad by trainers for each completed task.
- 4.9.2 The data is transposed into CPMS and will provide percentage based outcomes for each student – our system is configured to run reports on student progress or attendance.
- 4.10 The data can be verified by running a monthly report from the student management system and by checking the student course outline.
- 4.11 A student is deemed at risk of breaching course progress requirements when they have failed to achieve competency in at least 70% of the units being studied in a study period and/or if they have failed a prerequisite unit competency in a study period.
- 4.12 With AAPA Management Committee's approval, Head of Operations will contact students at risk formally by sending out a warning letter and organise a face to face meeting between the Head of Operations / Chief Flying Instructor and the student to discuss the possible activation of intervention program if needed and agreed terms of intervention strategy will be discussed and formally agreed. The student must acknowledge and accept intervention plan.
- 4.13 In the case that the intervention program is needed, the activation of program and agreed terms of intervention strategy will be discussed and formally agreed. Once an

intervention strategy has been activated for a student, all documentation must be retained on the students file.

4.14 The strategies that we offer to help students meet course progress requirements would include any of the following but not limited to the following:

- 1) Discuss opportunities for special makeup classes designed for intervention students only.
- 2) Counselling sessions with the Head of Operations / Chief Flying Instructor
- 3) Individual case management.
- 4) Receiving counselling with our consulting external counsellor (this would be related to personal issues which are affecting student's progress)
- 5) A reduction in course load – in this case the program would be updated with new training plan and study/assessment mode.
- 6) Opportunity for re-assessment
- 7) Re-affirming to students that unsatisfactory course progress in two (2) consecutive study periods which is 2 x 24 weeks may result in student being reported to DESE/DHA through PRISMS which could result in DHA making a decision to cancel the student's visa depending on outcome of appeals process.

4.15 The intervention program will be monitored closely by the Head of Operations Manager / Chief Flying Instructor and staff involved in the intervention.

4.16 Evidence of the intervention program and measures used to assist student will be documented and kept on the students file.

4.17 Students that do not follow the intervention strategy will be reminded of the possible implications via a formal letter from RTO Manager with a statement that we may report the student to DESE through PRISMS for failing to meet satisfactory course progress and that this could result in DHA making a decision to cancel the student's visa.

4.18 The outcomes of intervention programs will be discussed at management meetings for analysis and improvement.

4.19 During the course of intervention process, the Head of Operations / Chief Flying Instructor must arrange weekly meetings with the student, where parties will discuss the ongoing corrective action.

4.20 In the circumstances that a student fails to meet 50% in two consecutive study periods, the student will be informed via a written letter titled '**intent to report**' of our intention to

report the student for unsatisfactory progress and their right to access our complaints and appeals process as per Standard 8 and that they have **20 working days** in which to do so prior to our reporting the student to DESE through PRISMS, this is drafted and sent by RTO Manager with AAPA Management Committee's approval.

4.21 If the student indicates that they wish to appeal AAPA Management Committee decision, they can go through AAPA internal appeal process.

4.22 Appeals must be lodged within **20 working days** of the date of the notice intent to report.

4.23 If the internal appeal outcome is still not to student's satisfaction, student has the opportunity to lodge the external appeal to Overseas Student Ombudsman. At the same time of the external appeal lodgement, student must inform AAPA by sending an email to [rto@aapa.net.au](mailto:rto@aapa.net.au).

4.24 The notification to student will be.

4.25 Appeals: If the decision is to affirm the registered provider's decision, then AAPA will upon receiving formal documentation of decision take appropriate actions. This will occur within **5 working days** of receiving formal decision

4.26 However, if the decision is to remit the registered providers decision, then AAPA will upon receiving formal decision then take appropriate actions, for example, document a corrective action, correct the issue and provide outcome to student in writing and refund student the cost of appeal process.

4.27 In the situation that a student is identified as a potential risk and may not complete the course within the expected duration as specified on the student's CoE, AAPA may under certain circumstances extend the duration of the students course, which include compassionate or compelling circumstances. In this case, a new CoE will be issued and student will be informed they need to contact DHA with regard their visa requirements.

4.28 Reasons for (student) appealing our decision to report student:

1) Compassionate or compelling circumstances (documentary evidence is required and the AAPA Management Committee must provide a decision in reflection of circumstances).

2) Serious injury or illness, where a medical certificate is provided stating student was unable to attend class.

3) Bereavement of close family member such as, parent or grandparent (a death certificate should be provided where possible).

- 4) Major political upheaval or natural disaster in home country requiring their emergency travel which has impacted their studies.
  - 5) A traumatic experience for example: a crime committed against student, student witnessed a crime and this has impacted students study and is supported by police report or psychologists report.
  - 6) AAPA has failed to record the result accurately.
  - 7) AAPA did not implement the intervention strategy or other policies accordingly in line with stated sections of policies and procedures.
- 4.29 Students that do not meet satisfactory course progress after the intervention process has been completed and after all complaints and appeals processes have been finished may be reported to DESE through PRISMS for failing to meet satisfactory course progress. This could result in DHA making a decision to cancel the student visa.
- 4.30 PRISMS will generate a Section 20 notice which AAPA Executive Chairman will sign and date. Copy of such notice will be sent to student and a receipt of acknowledgement with student signature and date must be returned. Copy of section 20 will be placed on student file.
- 4.31 The 20 working days' notice for student to access our complaints and appeals process is counted from the date of the receipt of acknowledgement from the student.
- 4.32 As part of our course progress and intervention policy, once the 20 working days have passed (allow for procedural fairness), we will report the student through PRISMS within 5 days of finalising the decision to report where:
- a) The student has chosen not to access the complaints and appeals processes within 20 working day period;
  - b) The student withdraws from the process or;
  - c) The process is completed and results in a decision supporting the registered provider.
- 4.33 If the student has been identified for a second but not consecutive study period as not making satisfactory course progress we **will not** report the student.
- 4.34 In regard the complaints handling and appeals process, students have the opportunity to formally present their case at no cost. The availability of this complaints and appeals process does not remove the right of the student to take action under Australia's consumer protection laws.

4.35 If a student is dissatisfied with the decision made by appeals process, they may lodge a complaint with Department of Education.

***Students who have received a Section 20 notice must report to DHA within 28 days of date on notice to explain their breach or their visa will be automatically cancelled.***

**5.0 Associated documents:**

Intent to Report Letter – Progress

Intervention Letter – Progress

Warning Letter – Progress 70%

**6.0 Associated standards**

Refer to: [National Code 2018 Standard 8, Standard 9]

Responsibility: AAPA Management Committee

Approved by: AAPA Executive Chairman

**Amendments:**

<b>Date</b>	<b>Version number</b>	<b>Description of amendment</b>	<b>Authorised officer making amendment</b>
23.10.19	1.1	Update the National Code	Henry Chia
01.08.20	1.2	Update on DESE / DHA	Henry Chia