



# CRICOS

## Site Visits

### Common discussion issues

2017

# DSA - Mid-term Review (MTR)



- A **compliance check** occurs at the approximate mid-point of each provider's individual registration period.
- x54 MTRs to be conducted in Semester 1, 2017.
- x15 MTRs to be conducted in Semester 2, 2017.
- MTR is designed to:
  - inform providers of their **level of compliance** with legislation
  - **give feedback** on any issues identified in current documents/practices.
- MTR is comprised of a **desk audit** (PRISMS data, school website, requested documents) and a **site visit** (where deemed appropriate).
- Affected schools will receive an **email from IQ(S) Manager if they are to be reviewed** within that term.
- A Senior Education Officer from the IQ(S) Unit will then contact the school:
  - Specifying any **documentation required**
  - Proposed **site visit date** (if relevant)

# Mid-term compliance review cont.

- Key documents for submission include:
  - **Enrolment pack** (if not already included on school website)
  - Samples of **written agreements** issued for specified students
  - Samples of **current agent agreements** (where agents are used)
- Providers are given:
  - Hard copy **written feedback about the findings of the desk audit** at the site visit
  - An **electronic copy of all feedback after the site visit** (where relevant)
  - **Opportunity to resolve non-compliances** and re-submit evidence after the site visit.
- **Phone and email support** is available to schools from the IQ(S) Unit throughout the MTR process
- The **outcome of the MTR** will be taken into account at the time of the school's next renewal of registration.

# DSA - Renewal of Registration (RR)

- RR needs to be **completed before the end of the existing registration period** (registrations are between 2 and 5 years).
- x5 RR to be completed in Semester 1, 2017.
- x13 RR to be completed in Semester 2, 2017.
- Providers are contacted, in writing, approximately **4 months prior** to the expiry of their registration with an **invitation to apply for a renewal of registration**.
- The RR requires a **specific application form** to be completed.
- **Key documents** that need to be submitted with the application include:
  - marketing materials (including fee schedule)
  - student handbook
  - staff policy & procedures manual
  - recently issued student written agreements
  - agent agreements
  - homestay documents
  - student orientation program

# Renewal of Registration cont.

- Submitted documents are **assessed** against both State and Commonwealth legislation.
- Schools are allowed a **maximum of three (3) submissions** (which includes the initial submission).
- **Detailed written feedback** is given after the first two (2) submissions. **A decision about compliance is made on the final submission.**
- Providers who are **not compliant** after the final submission are issued a **Show Cause Notice**.
- **Phone/email support** is available from the IQ(S) Unit throughout the process.
- If the application **demonstrates compliance** with both State and Commonwealth legislation, the IQ(S) Unit will make a **favourable recommendation** to the Commonwealth.
- Following its own assessment, the **Commonwealth will make a final decision** regarding the provider's renewal of registration.

# Standard 1



Ensuring **legal entity name** and **CRICOS code** is on all pre-enrolment materials/correspondence for overseas students - website, handbooks, fee schedule, application form, prospectus, subject/year level guides, email signature blocks

# Standard 2



- Fee schedule - current and includes a statement indicating that fees are for the **current year only** and are **subject to change**.
- Applications are assessed for suitability in accordance with entry requirements policy. Ensure mindfulness that selection needs to be based on a likelihood of **academic success**.
- School takes **ownership of its enrolments** - right to turn down applications if students are unsuitable (parent pressure, agent pressure, transfers from other schools).
- Version control of documents - staff handbook = student handbook = website.
- Onshore visa conversions - especially tourist/visitor visas.

# Standard 3



- Written agreements **signed by principal** (or delegate) before being sent to parent.
- All details **pre-populated by the school** based on information received during **application phase**.
- **Current** version of refund policy.
- **Specific conditions** are included to address particular needs e.g. Absences due to cultural festivals or family events; late return from holidays, disclosure of medical or learning difficulties; schoolies week.



# Standard 4



- Agents are only used for **marketing, recruitment and facilitating enrolments** - should not be creating CoEs for the school, issuing written agreements; invoices to be managed by the school.
- Agent agreements only with **school agents** (not parent agents).
- Agent agreements are **current**.
- **Monitoring procedures** are being actioned (agents and sub-agents).
- Current school information on **agent website** e.g. Fee information, student handbooks, performance data.
- Overseas parents must remain involved in **all communications** – agents must not be the voice for parents.

# Standard 5



- Unnecessary acceptance of welfare responsibility when suitable **relatives are onshore**.
- Parent nominated friends are to be **assessed** for suitability and **monitored** in the same way that other homestay families are monitored.

# Standard 6



- Orientation program - important opportunity to **communicate expectations** especially in relation to **course progress, attendance,** and communicating significant **personal circumstances**.

# Standard 10



- Condition of CRICOS registration to **monitor**, give **intervention** and **report** (where required).
- Awareness of course progress definition.
- Identification of 'at risk' students at the **end of each semester** -> **intervention strategies** and **communication** to parents about their child's 'at risk' status.
- Notification of intention to report letter must be issued where the student has failed to meet the benchmark in **2 consecutive semesters**.

# Standard 10



- Any appeal considered must address the course progress failure that has **already occurred**. It mustn't be accepted on the basis of what the student or parent promises for the future, or on what the school can offer for future semesters.
- Unsuccessful internal appeal -> student must be offered **external appeal**.
- Where the student is unsuccessful in their appeal (internal/external), the provider **must report** the student for breach of visa condition via PRISMS.

# Standard 11



- Condition of CRICOS registration to **monitor**, give **intervention** and **report** (where required).
- Awareness of course attendance requirement.
- Identification of 'at risk' students **throughout each semester** -> **intervention strategies** and **communication** to parents about their child's 'at risk' status.
- Notification of intention to report letter must be issued where the student has failed to meet the benchmark at **anytime in the semester**.

# Standard 11



- Any appeal considered must address the course attendance failure that has **already occurred**. It mustn't be accepted on the basis of what the student or parent promises for the future, or on what the school can offer for future semesters.
- Consideration can be given to **compassionate and compelling** circumstances. Attendance not to fall below **70%** where these exist.
- Unsuccessful internal appeal -> student must be offered **external appeal**.
- Where the student is unsuccessful in their appeal (internal/external), the provider **must report** the student for breach of visa condition via PRISMS.

# PRISMS



- **Student address details** must be recorded in PRISMS – especially where the school does not hold welfare responsibility i.e. no CAAW.
- **Student course variations (SCVs)** e.g. non-commencement, deferral, suspension, cancellation, transfer, visa breach, change in study duration
  - 14 days to report for students under 18 years
  - 31 days to report students 18 years +
- **Outcome of refunds payable** under student default and visa refusal must be reported in PRISMS within 7 days of the provider obligation period (4 weeks).
- **Financial payments** received each month must be reported in PRISMS within 31 days of the end of the calendar month.