ENROLMENT POLICY

1.Purpose

St Catherine's School ("St Catherine's', 'STC' or the 'School') is committed to ensuring that students are enrolled in the school in a manner that is fair and transparent.

The School is committed to maintaining accurate records that comply with the School's legal obligations in relation to school enrolment.

The enrolment policy sets out the principles and framework governing the basis on which students are admitted to the school. The policy, together with the policy associated documents listed in section 9, should be read and understood by parents and those responsible for implementing the policy.

2. Scope

This Policy applies to the enrolment procedures of all sections of the School: the Early Learning Centre; Junior School, Senior School, the Boarding House and International Students. In drafting this policy, the School has taken notice of its obligations to promote the principles and practices of Australian democracy including a commitment to: elected government; the rule of law; equal rights for all before the law; freedom of religion; freedom of speech; and association and the values of openness and tolerance.

3. Policy Statement

- 3.1 St Catherine's is a non-selective, non-denominational School; although based on Christian values and heritage, the School seeks to embrace a variety of faiths and international cultures
- 3.2 The School is a non-selective, non-denominational school committed to ensuring students are admitted in a manner that is fair, transparent and non-discriminatory.
- 3.3 The School will publish clear criteria as the basis on which admissions are made.
- 3.4 The School values diversity across the School community and this principle shapes the way in which the school's admissions criteria are applied.
- 3.5 The School keeps and retains accurate records of enrolments that comply with its commonwealth and state legal and regulatory requirements.
- 3.6 The enrolment register, Synergetic, is a permanent record of the students admitted to the school. The School is required to implement processes and procedures to ensure that the register is up to date. The enrolment register determines those students for whom attendance must be registered and monitored.
- 3.7 Should the School or Boarding House be oversubscribed in one or more age groups, a waitlist may be maintained. The principles of fairness and transparency that apply throughout the enrolment policy also apply to the procedures relating to the management of the waiting list.
- 3.8 Children of compulsory school age (six years and up to the age of seventeen years) resident in Victoria are required to be in full-time attendance at school or be in registered home schooling. Non-government schools have no legal restriction in relation to a minimum age or a maximum age at the point of enrolment.

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- 3.9 Within the meaning of the Equal Opportunity Act (Vic.) and the Disability Discrimination Act 1992 (Cth.), schools are not permitted to discriminate on the grounds of disability. The legislation permits an exception to be made in relation to sex, race, religious belief, age or age group
- 3.10 Schools, amongst other organisations, have a positive duty to take reasonable and proportionate measures to eliminate discrimination
- 3.11 When enrolling a student with a disability, schools are required to consider what reasonable adjustments need to be made to the learning environment or to the delivery of learning to assist that student.
- 3.12 The School requires proof of age and enrolment name for each enrolment. Such documentation could be in the form of a birth certificate or passport.
- 3.13 Under the Australian Education Act 2013 (Cth.) the School is required to collect Student Background Characteristics Data as part of the enrolment process and report the data to the VCAA or other testing agent when requested.
- 3.14 Although there is no legislation regarding permanent records covering non- government schools, the School is under a general obligation to retain permanently, any documents that might be relevant to future legal proceedings. Student enrolment records may be audited by either state or commonwealth authorities in order for the authorities to monitor payments made on the basis of student numbers or on the basis of the enrolment of particular categories of students.
- 3.15 Records of enrolment are required for annual data returns to the Australian Government for the Australian Government Census of Non-Government Schools under Australian Education Regulation 2013 (Cth.) (s.77). They are also required for annual data returns to the Victorian Government for the Victorian Census under the Victorian Government Funding Agreement for Non-Government Schools.
- 3.16 Legislative privacy requirements govern how personal, sensitive and health information must be collected, used, disclosed and stored as part of the enrolment process. A privacy notice must be provided with the enrolment form.
- 3.17 The School is required to request and record the immunisation status, called Child History Statement, for each primary student prior to enrolment.
- 3.18 The School is required to request and record the visa status when enrolling a student on a visa, that is any student who holds, or is a dependent of a person who holds, a permanent, bridging or temporary visa.
- 3.19 The School is also required to request and record the visa status when enrolling international students (formerly known as full fee paying overseas students (FFPOS)) who are those who hold a visa that is specifically related to studying in Australia, or a bridging visa attached to a substantive visa with those provisions.
- 3.20 Exchange students enter Australia on a student visa, for which reciprocity must be maintained. The student is enrolled as a student within the School.
- 3.21 Students attending the School on a cultural visit enter Australia on a tourist visa, are visitors to the School and are not enrolled students.

4. Roles and Responsibilities

4.1 The Principal is responsible for authorising the enrolment policy and for approving the criteria for admission.

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- 4.2 The Principal is responsible for ensuring the implementation of the enrolment policy is fair, transparent and non-discriminatory.
- 4.3 The Registrar is responsible for ensuring an enrolment register [and waiting list] is accurately maintained.
- 4.4 The Registrar is responsible for ensuring this policy is implemented in accordance with commonwealth and state privacy legislation.
- 4.5 The Registrar is responsible for:
 - a. Ensuring that procedures are implemented so that parents are guided through the enrolment process from enquiry to admissions
 - b. Ensuring that procedures are in place to record the basis on which a child does or does not fulfil the admissions criteria together with the school's decision to offer a place or not
 - c. Ensuring that procedures are in place for the management, storage, and retrieval of enrolment data:
 - i. proof of the child's identity, specifically date of birth and enrolment name
 - ii. immunisation status
 - iii. visa status
- 4.6 The Deputy Principal School Operations is responsible for ensuring that the school reports data relating to the characteristics of students at the School to the School community at least once a year.

5. Terms of Enrolment

- 5.1 The St Catherine's student cohort comprises both day students and boarders, who may be residents of Australia or international students, Full-Fee Paying Overseas Students.
- 5.2 While the School has an open Admissions platform with no compulsory entrance examination, students are tested on receipt of the Application Fee to identify their scholastic needs prior to the confirmation of a place and waiting lists may apply. Applicants are encouraged to disclose any additional learning needs prior to Enrolment to ensure the best possible support is provided to both students and teachers with the express purpose of enhancing students' access to the curriculum and achieving their learning potential.
- 5.3 Students are expected to participate in the academic program, align themselves with School Values and Policies, comply with compulsory activities and avail themselves of co-curricular opportunities. These expectations are agreed to prior to confirmation of enrolment.
- 5.4 The conditions of enrolment are subject to the St Catherine's School Business Practices, which are accepted by the applicant prior to enrolment. The Business Practices are an annual document which reflect the operation requirements of that year and may alter accordingly. The current Business Practices applies to all enrolments irrespective of the year of enrolment. Parents accepting an offer at St Catherine's School will both be required to sign an enrolment contract which will form the basis of the legal acceptance by the parents of the condition of their daughter's enrolment. Both parents are required to sign the contract unless in the case of one parent being deceased or there are legal measures established between the two parents.
- 5.5 The letter of confirmation of enrolment includes statements that outline the conditions for a student admission and continuing enrolment at St Catherine's School.
- 5.6 Students who are transferring to St Catherine's School will be required to submit to the School, documents of determining their academic achievements when placing them in an appropriate

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- year level. Students entering VCE mid-stream from another system, such as O Levels or International Baccalaureate, will be required to provide documentation to facilitate obtaining appropriate credit for courses previously undertaken.
- 5.7 Students are placed into classes and courses based on the criteria and processes outlined in the Subject Selection Policy.
- 5.8 St Catherine's School will provide all necessary documentation to students, parent and external bodies required in the processing of a student enrolment.
- 5.9 Students entering St Catherine's School at Year 11and/or Year 12, are assessed, based on their previous schooling and academic background, as to their suitability to undertake a particular course of study.
- 5.10 Students entering from either an alternative Australian education system, or from overseas, who have completed all or part of a Year 11 equivalent, submit an application to VCAA through VASS for credit in the corresponding course of study undertaken elsewhere.

6. Additional Terms of Enrolment – Boarding House Acceptance

- 6.1 Students can be considered for entry into STC's Boarding House once they have met the enrolment criteria as set out in this Enrolment Policy and are aged 13 years or above.
- 6.2 An interview with the Head of Boarding may be required prior to an offer to enter the Boarding House being made. Applicants must sign the School's Boarding Acceptance Agreement to accept a place in the Boarding House.

7. Additional Terms of Enrolment – Overseas Students

- All accredited education providers in Australia are governed by a wide range of regulations and standards that are defined under the ESOS Act and the National Code 2018. The Act and Code serve to ensure that the high standards of Australian education providers are maintained and that students coming to Australia can be assured of quality education and transparency and fairness from education providers.
- In practice, education providers like St Catherine's School are required to provide clear policy statements in relation to all aspects of the delivery of education to international students.
- Application forms can be accessed on the St Catherine's School website.
- It is important that every student considering applying to St Catherine's School should carefully read and ensure they understand the implications of these policies. If you need assistance with understanding the various policies, please contact our Admissions Office, or you may consider the use of an International Education Agency.
- Further information on the ESOS act can be accessed at https://internationaleducation.gov.au/Regulatory-Information/Pages/National-Code-2018-Factsheets-.aspx

7.1 Use of International Education Agencies

St Catherine's School (STC) welcomes the use of Agencies when families are sourcing education in Australia and will work with authorised agents when required.

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- The School may enter into an agreement with an external party (Agent) for the express purpose of facilitating the enrolment of International Students.
- STC will not outsource any enrolment duties to any other institution and will process all CoE an CAAW documentation in PRISMs through the STC Admissions department.
- Agencies applications will only be accepted if the agent maintains ethical and honest processes and is working in the best interest of the student. All agency activities must, at all times, maintain confidentiality, transparency and act in good faith at all times.
- STC will not engage with or will cease to engage with an agent if it becomes aware that: There is a conflict of interest such as:
 - Double charging of fees to the student's family and the school
 - Financial interest in the arrangement by the agent
 - Personal relationships between an agent and employee of the school
- The agent does not have the appropriate knowledge and understanding for the Australian international education and training agent code of ethics.
- Misleading advice has been provided to the student, the students family or the school
- Dishonest recruitment practices have been engaged in or previously engaged in
- The agent is found to be creating CoE's in PRISMS for non-bona fide students or facilitating enrolments knowing there will be non-compliance of visa conditions.
- Agents are expected to communicate in the first instance directly with the Registrar and
 provide all requested paperwork in a timely manner in order to secure enrolment of the
 International Student. Payment will only be made to the agent upon completion of the
 students second semester of attendance at the school.
- STC will have a written agreement with each agent and keep a register of all agencies and key contacts within them. Details will be maintained in PRISMs and will also be available on the school website.
- In practice, education providers like St Catherine's School are required to provide clear policy statements in relation to all aspects of the delivery of education to international students.
- Application forms can be accessed on the St Catherine's School website.
- It is important that every student considering applying to St Catherine's School should carefully read and ensure they understand the implications of these policies. If you need assistance with understanding the various policies, please contact our Admissions Office, or you may consider the use of an International Education Agency.
- Further information on the ESOS act can be accessed at https://internationaleducation.gov.au/Regulatory-Information/Pages/National-Code-2018-Factsheets-.aspx

7.2 English Language Requirements

- All prospective International Students are required to complete and submit their results from an AEAS English Proficiency Test.
- Enrolment in EAL is available only to students who have approved EAL status. A student may
 be eligible for EAL status if they have been a resident in Australia or New Zealand or other
 predominantly English-speaking country for no more than seven years or they are a student
 of Aboriginal or Torres Strait Islander descent whose first language is not English. The period

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of seven years is to be calculated cumulatively over the student's whole life. The calculation of time spent in Australia is made from the date of last arrival plus any previous periods of time spent in Australia or any predominantly English-speaking country. Time spent out of Australia during school vacations should be included in the accumulation towards the seven years because there would have been no disruption to education during these periods English has been the student's major language of instruction for a total period of not more than seven years over the period of their education. Students may be eligible to receive assistance by means of EAL teachers employed by the School to assist students in their development of English proficiency. EAL students who meet the necessary Government or VCAA criteria are expected to attend EAL classes.

- The School will not accept an International Student enrolment where the School deems that the student's language skills or academic performance would not make an enrolment at St Catherine's beneficial to the International Student.
- Refer to the International Student & EAL Policy for further information.

7.3 Recognition of prior learning and granting course credit

- After receiving a Confirmation of Enrolment Letter, international students who are aiming to undertake studies for the Victorian Certificate of Education (VCE), which is typically completed by students in Years 11 and 12, are able to apply for course credits with the endorsement of the Principal.
- Students can only apply for course credit towards the Victorian Certificate of Education (VCE).
- Course credit is available for studies equivalent to the VCE, completed overseas or interstate.
 Students are not required to apply for course credit for VCE units satisfactorily completed
 overseas (VCE Offshore) as these are automatically recognised by the Victorian Curriculum
 Assessment Authority (VCAA). Course credit for equivalent studies undertaken by students
 overseas may be granted for VCE Units 1 and 2 only. Course credit for equivalent studies
 undertaken by students interstate may be granted for VCE Units 1 and 2 as well as Units 3
 and 4. Please refer to the VCAA website for further information.
- The School will assess the eligibility of the student to apply for course credit and will assist the student with completing an application to the VCAA if deemed eligible. The VCAA confirms the eligibility and grants course credit for the purposes of the VCE.
- If course credit is granted, VCAA will provide the student with a record of this decision through the Victorian Assessment Software System (VASS).
- The School will decide whether to endorse the granting of course credit; the granting of course credit must not result in a breach of the student visa requirement to be enrolled in fulltime study. The School will provide the student a written record of this decision.
- If the granting of course credit is endorsed and results in a change to the student's enrolment details the School will:
 - a. Issue a new Confirmation of Enrolment Letter
 - b. Update the Provider Registration and International Student Management System (PRISMS), within 31 days of the approved change to the student's course (such as a change to the duration of the student's enrolment in a course)

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c. Revise the Confirmation of Appropriate Accommodation and Welfare (CAAW) and the Overseas Student Health Cover (OSHC) (if applicable).

7.4 International Students - Record Keeping Requirements

- The School utilises Provider Registration and International Student Management System (PRISMS) to inform the regulatory bodies of any changes to International Students enrolment details.
- St Catherine's School will keep a detailed records and copies of all communication including application records, Conditional Letter of offer and Written Agreements, and payment receipts provided in the school's database. The School will review the student and family information 6 monthly to confirm that all details of the student and family are current and correct.
 Information reviewed will be:
 - Current residential address
 - Phone and email contact details of the parents (and student if required)
 - Any accommodation and welfare arrangements
- This process along with all PRISMs record keeping requirements will be undertaken through the Admissions Office and communicated through to the Registrar for updating in the database.
- All original enrolment records, including electronic and hard copies will be kept for a minimum of 7 years (with a summary of the information kept indefinitely on the database).
- All departure/exit record will be destroyed 25 years from the student's date of birth. Specific
 details regarding the retention and destroying for data at St Catherine's School can be found
 in the whole school data retention policy.
- Timelines relating to the retention of records are taken from the School's Records
 Management Policy which includes reference to the 'Records Retention and Disposal
 Schedule for Non-Government Schools' released by the Australian Society of Archivists Inc.

7.5 Accommodation and Welfare Arrangements

- In accordance with the STC International Student Welfare Policy, the School will only consider enrolment in the following situations:
 - If the student is aged under 13 years when the student is accompanied by a parent (mother and/or father) or legal guardian.
 - If the student is aged 13 years and above, and not accompanied by a parent or legal guardian, the School will approve welfare arrangements, with the student residing in the Boarding House.
- St Catherine's School will sight documentation to verify that the student is at least 13 years of age before entering into an agreement or arrangement for the provision of boarding house or homestay accommodation to an overseas student or issuing a CAAW letter.
- Approved welfare arrangements must remain in place until the student finishes schooling at St Catherine's.
- If the school is responsible for approving the student's welfare and accommodation
 arrangements, the school issues a CAAW letter, which gives an undertaking to approve
 appropriate accommodation, support and welfare arrangements for the student for the
 duration of the student's enrolment at the School.

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- St Catherine's School does not provide onsite Boarding facilities during the term breaks and
 encourages girls to return home to their families during the term breaks. However, homestay
 arrangements can be made with the school via the Registrar and the International Student
 Coordinator if required. Further information is available in the International Student Welfare
 Policy, the Student Accommodation Policy, and the Homestay Policy.
- The School will not delegate, outsource or contract out the responsibility for approving the
 accommodation and providing support and general welfare arrangements for a student who is
 under the age of 18. As a condition of the student visa, students under 18 years of age are
 required to have suitable accommodation and welfare arrangements, which must be
 approved by the School.

7.6 International Students - Deferring, Cancelling or Suspending Enrolments

Suspension, deferring or cancelling may be due to a number of factors and not necessarily behavioural. Reasons may be permanent or temporary in nature and initiated by the student or St Catherine's School.

A student enrolment may be varied, extended, or conversely, cancelled, suspended or deferred on compassionate or compelling grounds at the discretion of the Principal.

Compassionate or compelling grounds may include, but is not limited to, medical, behavioral or personal issues, or academic progress which the School deems to have the capacity to impact on the suitability of the student's ongoing enrolment arrangements.

The reasons that programs may be deferred, suspended or cancelled may include but are not limited to:

- Delays in receiving student visas
- Failure to pay school fees
- Failure to meet attendance requirements
- Failure to comply with school rules (misbehaviour)
- Illness or bereavement of close family members such as grandparents or parents
- Illness of the student where a medical certificate state they are unable to commence
- Moving away from school approved accommodation without consultation with the School

A request must be made by the student or family in writing directly to the Registar (for deferment, cancelation or suspension prior to commencing studies). Full details of the reason for a deferment, suspension of cancelation, discussions undertaken as a result of the request and the outcome of the request will be recorded against the student profile on the school database.

Any suspension, deferment or cancelation made by the school to the student will be done so in writing with a full explanation of the reasoning behind the decision. Any decisions made by the school that the student is not happy with can be raised formally through the schools Complaints and Appeals process.

Where deferment, suspension of cancelation may affect a student visa the Registrar will contact the Department of Home Affairs via PRISMs and alter the students records in the school database and PRISMs to reflect the correct status of the study arrangements.

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If there is a complaint or appeals process relating to the deferment, suspension or cancelation of the course the PRISMs records will not be updated until a resolution has been decided and agreed on by all parties; unless there is a risk to the student's health, wellbeing or welfare or others are parties are put at risk.

Where a student is suspended from school the period of suspension will not be calculated in attendance calculations.

The school will direct the students to contact the Department of Home Affairs for advice on any visa implications as a result of cancellation, deferment or suspension.

In the event that a student's cancellation, withdraw or deferral of enrolment has implications regarding their ongoing accommodation, to ensure the welfare of the student is maintained, the School will review and monitor the suitability of the student's accommodation arrangements until the student: has accepted a position at another registered provider who will take responsibility for the accommodation of the student; the International student leaves Australia; or the International student makes alternative accommodation arrangements that satisfy immigration requirements.

St Catherine's maintains an ongoing Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) registration. In the event of St Catherine's discontinuance of its CRICOS registration the School will not accept an International Student's enrolment beyond the School's CRICOS registration period.

7.7 International Students - Payment of Course Fees and Refunds

- Non-refundable and refundable payments associated with a student enrolment as well as the process for applying for a refund is outlined in the St Catherine's School International Business Practices.
- Conditions in which a student is eligible for a refund is outlined in the St Catherine's School International Business Practices
- An itemised list of Enrolment Fees, Administration Fees, and Tuition Fees are provided in the International Student Business Practices and the Schedule of Fees and Charges.
- The Enrolment Fees and Administration Fees are non-refundable.
- All fees must be paid in Australian dollars. Refunds will only be reimbursed in Australian dollars.
- Refunds will only be paid to the person who enters into the written agreement and are not transferable.
- Notifications of withdrawal from a course, or applications for refunds, must be made in writing
 and submitted to the Principal with one study period's notice (ie one semester or two terms) in
 advance.
- No refund or reduction of fees will be made in respect of absence because of sickness or any other cause.
- It is a Department of Home Affairs requirement that at no time should fees be outstanding.
- If the student changes visa status, (for example becomes a temporary or permanent resident), she will be entitled to pay local fees from the date that the evidence of changes,

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(including changes to parent/guardian and student visas, where applicable) are received by the School.

 Please refer to the International Student Business Terms and Conditions and International Enrolment Agreement for further terms and conditions regarding enrolment at the School.

7.8 Student Default because of Visa Refusal

- If a student produces evidence of visa refusal (or provides permission for the school to verify visa refusal with the Department of Home Affairs) and fails to start a course on, or withdraws from the course on or before the agreed starting day, the school will refund within 4 weeks of receiving a written claim from the student:
 - The Total amount of Tuition Fees received by the school before the student's default day, minus the lesser of:
 - 5% of the amount of course fees received, or
 - AUD \$500
- If a student whose visa has been refused withdraws from the course after it has commenced, the school will retain the amount of Tuition Fees proportionate to the amount of the course the student has undertaken and will refund of any unused Tuition Fees received by the school with respect to the student within the period of 4 weeks after the day of student default.
- (Calculation of the refund due in this case is prescribed by a legislative instrument (s.10 of Education Services for Overseas Students (Calculation of Refund) Specification 2014).

7.9 Refunds in Case of Student Default

- One complete study period's (one semester or two terms) notice in writing of the intention to withdraw is required.
- Where less than one study period's (one semester or two terms) notice of withdrawal is
 provided by the parents/guardians to the School, the School will refund the amount of unused
 Tuition Fees less one study period's fees, and any non-refundable payments that have been
 made on behalf of the student.
- Any refund amount owing will be paid by the School within 4 weeks of receiving a written claim from the parents/guardians.

7.10 Refunds in the Event of a Provider Initiated Cancellation of Enrolment

No refund of Tuition Fees will be made where a student's enrolment is cancelled for any of the following reasons:

- Failure to maintain satisfactory course progress. (Refer Course Progress and Attendance Policy);
- Failure to maintain satisfactory attendance. (Refer Course Progress and Attendance Policy);
- Failure to maintain approved welfare and accommodation arrangements. (Refer Accommodation and Welfare Policy);
- Failure to pay course fees; or
- Any behaviour as identified in the Student Code of Conduct resulting in enrolment cancellation by the School.

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7.11 Provider Default

Any default by the School must be compliant with the current provisions of the ESOS Act 2000 and the ESOS Regulations 2001.

- If for any reason the school is unable to offer a course on an agreed starting day for the
 course, and the student for some reason cannot be placed or refuses placement in an
 alternative course arranged by the School, a full refund of any unspent pre-paid tuition fees
 paid to the school will be made within 14 days of the agreed course starting day.
- If for any reason the school is unable to continue offering a course after the student
 commences the specified course, and the student for some reason cannot be placed or
 refuses placement in an alternative course arranged by the school, a full refund of any
 unspent pre-paid tuition fees paid to the School will be made within 14 days of the school's
 course default day. Calculation of the refund due in this case is prescribed by a legislative
 instrument (s.7 of Education Services for Overseas Students (Calculation of Refund)
 Specification 2014).
- In the event that the School is unable to fulfil its obligations of providing an agreeable alternative course for the student, or a refund, the student will receive assistance from the Australian Government's Tuition Protection Service. For information on the TPS, please see: https://tps.gov.au/StaticContent/Get/StudentInformation
- This Policy, and the availability of complaints and grievances processes, does not remove the right of the student to take action under Australia's consumer protection laws.

7.12 Attendance and Course Progression

 The Department of Home Affairs requires students to attend 80% of classes and achieve satisfactory course progress.

7.12.1 Academic Progress

The School will monitor, record and assess the course progress of each student each semester. Students who have begun part-way through a semester will be assessed after one full period of attendance.

To demonstrate satisfactory course progress, students will need to achieve, at the end of each semester, an average mark (across all subjects taken in the semester) of 50% or higher, as well as a 50% or higher in English or English as a Second Language.

Active participation in school life, a positive attitude to learning and consistent demonstration of effort can also be considered as course progress for students who are struggling with an academic commitment. Demonstrated effort could include:

- · Making measurable improvement gains over the semester;
- Attending additional English language classes;
- Attending additional voluntary tutoring sessions;
- Seeking help from teachers;
- Thorough attempts and timely submission of all homework and assessment tasks; or

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 Evidence from parents and guardians that the student is spending significant time studying at home/boarding house/homestay.

If a student does not achieve an average mark of 50% or higher, as well as 50% or higher in English or English as a Second Language in an assessment period, the Deputy Principal – Head of Senior School, or Head of Junior School and/or International Student Coordinator will meet with the student to develop an intervention strategy for academic improvement.

This may include:

- Tutorial assistance;
- · Assistance with formulating a study plan and development of study skills; or
- Support in establishing short and long term goals that focus on improved learning.

A copy of the student's individual strategy and progress reports in achieving improvement will be forwarded to parents.

The student's individual strategy and progress reports in achieving improvement will be monitored by the Deputy Principal – Head of Senior School, or Head of Junior School and/or International Student Coordinator, and records of student response to the strategy will be kept.

If the student does not improve sufficiently academically, and achieve satisfactory course progress by the end of the next assessment period, the School will advise the student of its intention to commence the process of reporting the student for unsatisfactory course progress.

7.12.2 Attendance Requirements

Students are required to attend 80% of the scheduled course contact hours. Student attendance is checked and recorded twice daily; assessed regularly and recorded and calculated over each semester. Late arrivals are also recorded and included in attendance calculations.

All absences from School should be accompanied by a medical certificate, or an explanatory communication from the student's parent or legal guardian, or evidence that leave has been approved by the School. Any absences longer than three consecutive days without approval will be investigated.

Students at risk of breaching the School's attendance requirements will be counselled and offered any necessary support when they reach an attendance of 90% or less during the assessment period.

If it is found that the student fails to maintain attendance in accordance with this clause then the School will commence the process for reporting the student for unsatisfactory attendance to Department of Home Affairs.

7.12.3 Completion within Expected Duration of Study (Course Progression)

Part of the assessment of the course progress at the end of each semester will include an assessment of whether the student's progress is such that they are expected to complete their course within the duration of the course.

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The School will only extend the duration of the student's study if the student will not complete their course in the expected duration due to:

- Compassionate or compelling circumstances;
- Student participation in an intervention strategy as outlined above; or
- An approved deferment or suspension of study has been granted in accordance with clause
 6.6 Deferment, Suspension and Cancellation below.

Where the School decides to extend the duration of the student's study, the School will report via PRISMS and/or issue a new Confirmation of Enrolment Form, if required.

7.13 Student Transfer Policy

STC does not seek enrolments of students who are currently enrolled at other Schools in Australia.

When there is an enquiry from a student who is currently studying in Australia, the School will ascertain the length of time the student has been studying at her current registered provider, either by asking the student and requesting attendance records and checking on PRISMS.

Subject to all other requirements within STC's Enrolment Policy, St Catherine's will accept an enrolment from a student who has been enrolled at the current registered provider for more than six months, provided that:

- The original registered provided can provide a copy of the Student's most recent report, and a copy of her CoE letter and CAAW (if applicable);
- The original registered provider has provided a written letter of release; and
- The parents or the legal guardian have completed and signed an International Enrolment Form

When a student has been enrolled at her current registered provider for less than six months, and subject to all other requirements within STC's Enrolment Policy, STC will only facilitate a transfer from another registered provider if:

The original registered provider has ceased to be registered, or the course in which the student is enrolled has ceased to be registered; or

- The original provider has had a government sanction imposed on its registration; or
- A government sponsor (if applicable) considers a transfer to be in the student's best interests;
- The original registered provider has provided a written letter of release; and
- The parents or the legal guardian have completed and signed an International Enrolment Form.

7.14 Transferring from St Catherine's School to another Registered Provider

Students can apply in writing to the Principal, via the International Student Coordinator, to enable them to transfer to another education provider.

A letter of release will be provided by the School only if:

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- · A written offer from another registered provider has been sighted;
- The student's parents or legal guardian have provided written confirmation that they support the transfer; and
- Where STC has issued a CAAW, written confirmation that the new provider will accept responsibility for approving the student's accommodation, support, and general welfare arrangements if they are aged 15 years or over.

If a student has not completed the first six months of the course of study at STC, additional conditions apply and STC will only provide a letter of release to students before completing the first six months of their course in the following circumstances:

- The student has changed welfare and accommodation arrangements and is no longer within a reasonable travelling time of the school;
- It has been agreed by the School the student would be better placed in a course that is not available at STC; or
- · Any other reason stated in STC policies.

STC will not provide a letter of release to students in the first six months of their course in the following circumstances:

- The student's progress is likely to be academically disadvantaged;
- The School is concerned that the student's application to transfer is a consequence of the adverse influence of another party;
- The student has not had sufficient time to settle into a new environment in order to make an informed decision about transfer;
- The student has not accessed school support services which may assist with making adjustments to a new environment, including academic and personal counselling services; or
- School fees have not been paid for the current study period.

Applications to transfer to another registered provider may have visa implications. The student is advised to contact the Department of Home Affairs as soon as possible to discuss any implications.

If a letter of release is provided by STC it will give information about whether the student has demonstrated a commitment to studies during the course, had a good attendance record for the course, and paid all fees for the course.

All applications for transfer will be considered within 10 working days and the applicant notified of the decision.

Students whose request for transfer has been refused will be notified in writing of the reasons for refusal and may appeal the decision in accordance with STC's International Students Complaints and Appeals Policy below and STC's Complaints and Grievances Policy available on the School's website.

7.15 Overseas Students Complaints and Appeals

7.15.1 Internal Complaints Resolution

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In the first instance, STC requests there is an attempt to informally resolve the issue through mediation/informal resolution of the complaint.

Students should contact the International Student Coordinator or Head of Year in the first instance to attempt mediation/informal resolution of the complaint. The Deputy Principal(s) or the Head of Junior School may also be consulted to assist in the informal resolution of the complaint.

If the matter cannot be resolved through mediation, the matter will be referred to the Principal and STC's Complaints and Grievances Policy will be followed as a formal complaint procedure. For detailed information refer to STC's Complaints and Grievances Policy available on the School's website.

If the grievance procedure finds in favour of the student, STC will immediately implement the decision and any corrective and preventative action required.

STC undertakes to finalise all grievance procedures relating to international students within 20 working days.

For the duration of the appeals process, the student is required to maintain enrolment and attendance at all classes as normal unless directed otherwise by the Principal (or their delegate).

Records of the complaint or appeal, and the process outcome will be recorded by STC.

7.15.2 External Appeals Process

If the student wishes to lodge an external appeal, or complain about the decision of the internal complaints procedure, she can contact the Overseas Students Ombudsman. The Overseas Students Ombudsman offers a free and independent service for overseas students who have a complaint or want to lodge an external appeal about a decision made by their private education provider. See the Overseas Students Ombudsman website www.ombudsman.gov.au or phone 1300 362 072 for more information.

Once a mediator has recommended a course of action, both parties would be expected to abide by the recommendation and cease further dispute.

7.15.3 Additional CRICOS registration requirements

In circumstances where there is a change of Principal at the School, the VRQA will be notified a per regulatory requirements by the Director of Business (or their delegate) and the new Principal will be required to sign a Fit and Proper Person CRICOS Declaration Form.

8. Communication of Policy

This policy is accessible to all staff, students, contractors, volunteers, parents/guardians, visitors, external stakeholders and other members of the School community via the portal. The School also communicates this policy through newsletters and inductions.

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9. Policy Review

This policy will be reviewed for effectiveness:

- As part of St Catherines policy review schedule;
- As required, with changes to current legislation, research, policy and best practice;
- Upon receipt of staff and parent/guardian feedback.

10. Related Legislation

- Education and Training Reform Act 2006 (Vic.)
- Education and Training Reform Regulations 2007 (Vic.)
- Victorian Registration and Qualifications Authority (VRQA) Minimum Standards
- Equal Opportunity Act (Vic.) 2010
- Disability Discrimination Act 1992 (Cth.)
- Disability Standards for Education 2005 (Cth.)
- Australian Education Act 2013 (Cth.)
- Australian Education Regulation 2013 (Cth.).

11. Associated Documents

Specific procedural guidelines pertaining to this Policy are referred to in the policy and protocol documents listed:

- Enrolment Application (Residential)
- Enrolment Application (International)
- Business Practices (Resident)
- Business Practices (International)
- Enrolment contract (Residential)
- Enrolment contract (ELC/Prep Conditional)
- Enrolment contract (International)
- Enrolment Contract (Scholarships)
- Acceptance Agreement (Boarding House)
- Subject Selection Policy
- Records Management Policy
- Privacy Policy
- International Student and EAL Policy
- International Student Welfare Policy
- Student Accommodation Policy
- Homestay Policy
- International Student Compliance Letter
- International Student Meeting Record
- International Student Intervention Strategy Checklist
- International Student Intention to Report Letter

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