

RUSSELL COLLEGE



CENTRE FOR LEARNING

RTO:46143 CRICOS:04221K

Russell College – CRICOS Policy & Procedures Manual



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SECTION 1 — CRICOS GOVERNANCE, PURPOSE & PROVIDER RESPONSIBILITIES

1.1 Purpose of This Section

This section establishes the **governance foundations** that underpin Russell College’s obligations as a CRICOS provider. It defines: - the purpose of the CRICOS Compliance Manual; - the governance model and accountability structure; - key roles and decision-making authorities; - CRICOS registration requirements; - provider responsibilities under the ESOS Act and National Code; - the College’s approach to risk, quality assurance, and continuous improvement.

This section is the **legal and compliance anchor** for all other sections of the manual.

1.2 Scope of CRICOS Approval

Russell College is approved to: - deliver CRICOS-registered VET qualifications; - enrol students on student visas (subclass 500); - provide full-time study as defined under Commonwealth legislation; - maintain accurate enrolment and reporting through PRISMS; - meet all requirements of the ESOS Act, National Code, and RTO Standards.

The College must only deliver **approved courses**, at **approved delivery locations**, in **approved delivery modes**, as listed on CRICOS.

1.3 Governance Framework

CRICOS governance at Russell College operates under a three-tier model:



1. Executive Governance (CEO/PEO)

Responsible for: - overall CRICOS compliance; - strategic oversight; - approval of policies, high-risk decisions, and PRISMS-authorized actions; - ensuring appropriate staffing and financial resources.

2. Compliance Governance (Compliance Manager)

Responsible for: - monitoring adherence to ESOS & National Code requirements; - internal audits and self-assurance; - PRISMS accuracy; - policy maintenance and document control; - agent governance oversight; - student welfare/safety escalations.

3. Operational Governance (Admissions, SSO, Academic, Admin)

Responsibilities include: - day-to-day compliance activities; - enrolment processing; - GTE/GS screening; - student support and welfare management; - training and assessment operations; - maintaining student records.

1.4 CRICOS Provider Responsibilities

Under the ESOS Act and National Code, Russell College must:

1. Provide accurate, accessible information

All marketing, website content, Written Agreements, and pre-enrolment information must be accurate and not misleading.

2. Recruit students ethically

Assess GS/GTE, protect students from exploitation, and ensure suitability for enrolment.

3. Deliver quality training and support

Meet all RTO and CRICOS requirements, support student welfare, monitor progress, and intervene when needed.

4. Maintain accurate PRISMS reporting

Report: - CoE creations; - variations (deferrals, suspensions, cancellations); - non-commencements; - changes to student details; - completions.



5. Ensure student safety and wellbeing

Provide emergency support, welfare monitoring, mental health escalation pathways, and critical incident response.

6. Maintain adequate staff, resources, and facilities

Ensure trainers, equipment, classrooms, tools, and systems meet CRICOS and WHS standards.

7. Comply with monitoring and audit requirements

Participate in ASQA audits and provide evidence of effective governance and student protection.

1.5 Risk Management Principles

CRICOS compliance risk is managed using: - **risk assessments** for enrolment, delivery, agents, and student welfare; - **regular internal audits** (Section 20); - **corrective action systems** to fix issues quickly; - **data integrity checks** across aXcelerate and PRISMS; - **governance reporting** to the CEO.

Risk categories include: - student safety/welfare risk; - reputational risk; - regulatory risk; - operational risk; - financial risk; - academic quality risk.

1.6 Decision-Making Authority Matrix (Simplified)

Area	Authority
CRICOS registration changes	CEO
PRISMS updates	Compliance / Admissions
Policy approval	CEO
Student welfare escalations	SSO + Compliance
High-risk enrolment decisions	CEO + Compliance
Agent termination	CEO

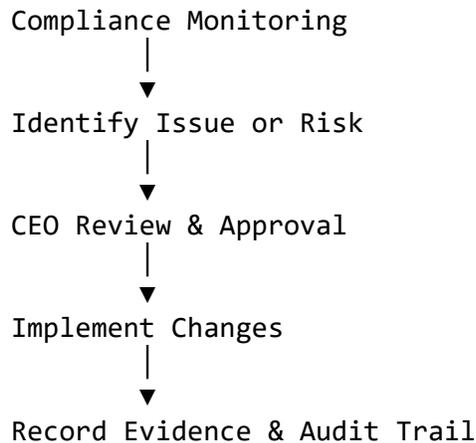
A complete matrix is expanded in Section 17.



1.7 HOW-TO: CRICOS Governance Workflow

1. **Compliance Manager monitors obligations** weekly and monthly.
2. Identifies risks, non-compliance, or required updates.
3. Reports to CEO with recommendations.
4. CEO authorises changes to policy, PRISMS access, or delivery.
5. Admin updates documents and communicates changes.
6. Evidence stored in governance folder.

1.8 ASCII Flowchart — CRICOS Governance System



1.9 Diagram Flow (Text Version)

Monitor → Identify → Approve → Implement → Record



1.10 Evidence Requirements

Russell College must retain: - policy versions; - internal audit reports; - PRISMS reports; - governance meeting notes; - risk register updates; - Corrective Action Register entries; - trainer and staff capability evidence.

Retention: **7 years** minimum.

1.11 Section Summary

This section establishes the compliance foundation for all other CRICOS operations. It ensures that: - governance is clear; - responsibilities are assigned; - risks are managed; - PRISMS and ESOS obligations guide all decisions.

SECTION 2 — MARKETING & AGENTS (FULL VERSION)

2.1 Purpose

This section outlines WHAT Russell College must do and HOW it must do it to ensure full compliance with National Code Standards 1–4 governing: - Marketing practices - Website and advertising accuracy - Use of CRICOS codes - Ethical agent recruitment - Agent training, monitoring, and termination - Misconduct escalation and reporting

This section ensures students receive accurate, ethical, transparent information before enrolling.

2.2 Policy Statement

Russell College will: - Ensure ALL marketing is accurate, factual, and not misleading. - Use CRICOS codes correctly. - Maintain strict marketing approval workflows. - Only allow agents to distribute **approved** materials. - Monitor agent performance. - Maintain a compliant agent register. - Provide students with truthful, accessible information.

No agent may create or modify marketing materials.



2.3 CRICOS Marketing Requirements

All marketing must: - Include Russell College's CRICOS provider code. - Use correct CRICOS course codes. - Use approved course titles and durations. - Include truthful images and claims. - Never reference migration incentives. - Never guarantee employment.

2.4 HOW-TO: Marketing Approval Workflow

1. Marketing drafts content.
2. Compliance checks ESOS & NC accuracy.
3. CEO approves final version.
4. Admin adds to Version Register.
5. Materials published and distributed.
6. Outdated materials withdrawn.

2.5 ASCII Flowchart — Marketing Approval

Draft → Compliance Check → CEO Approval → Publish → Version Control → Distribute

2.6 Agent Management Requirements (NC Standard 4)

Russell College must: - Recruit ethical, reputable agents. - Use written agent agreements. - Train agents annually. - Monitor agent behaviour and performance. - Terminate agents who breach requirements.

2.7 HOW-TO: Agent Recruitment Procedure

1. Initial enquiry from agent.
2. Screening using Agent Application Form.
3. Reference checks.
4. CEO approval.
5. Execution of Agent Agreement.
6. Add agent to Agent Register.
7. Provide training and marketing materials.

2.8 Agent Monitoring Procedure

- Annual agent audit.
- Review student feedback.
- Check conversion rates.
- Check visa refusal trends.
- Monitor PRISMS accuracy.
- Review marketing compliance.

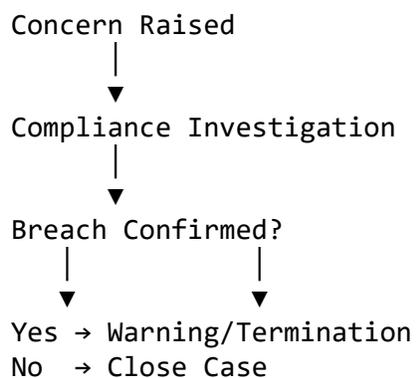
2.9 Agent Misconduct Triggers

- Misleading marketing.
- Unapproved materials.
- Recruitment of unqualified students.
- Fraudulent documents.
- Dishonest behaviour.

2.10 Misconduct Escalation Pathway

1. Identify misconduct.
2. Issue a warning or request an explanation.
3. Conduct an investigation.
4. Termination if serious breach.
5. Report to stakeholders if needed.

2.11 ASCII Flowchart — Agent Misconduct





2.12 Agent Register Requirements

Must include: - Agent name/company - Country/Region - Agreement start/end dates - Training records - Audit results - Notes on performance

2.13 Required Evidence

- Signed agent agreements
- Training materials
- Monitoring reports
- Audit results
- Corrective actions
- Marketing approvals

SECTION 3 — STUDENT RECRUITMENT, ENROLMENT & GS/GTE REQUIREMENTS

3.1 Purpose

This section outlines WHAT Russell College must do and HOW it must do it to ensure compliant recruitment and enrolment of international students, aligned with: - ESOS Act - National Code Standards 2 and 3 - Genuine Student (GS) / Genuine Temporary Entrant (GTE) requirements - Ethical recruitment and transparency obligations

This section protects students from misinformed enrolment and ensures the College only accepts students who are likely to succeed.

3.2 Policy Statement

Russell College will: - conduct ethical and transparent recruitment; - ensure all pre-enrolment information is accurate; - assess GS/GTE suitability using evidence-based methods; - issue CoEs only when all requirements are met; - ensure students understand course expectations, fees, and visa obligations; - maintain complete and accurate enrolment records.

Only students who meet GS/GTE criteria and are academically and financially prepared may be enrolled.

3.3 Mandatory Pre-Enrolment Information

Before enrolment, the College must provide students with: - course information (CRICOS code, duration, AQF level); - entry requirements; - campus location and facilities; - mode of delivery; - tuition and non-tuition fees; - refund policy; - complaints and appeals procedures; - WBT requirements (if applicable); - living cost estimates; - support services available.

The student must acknowledge receipt of this information.

3.4 GS/GTE Assessment Requirements

Every prospective student must undergo a Genuine Student (GS) / Genuine Temporary Entrant (GTE) assessment.

GS/GTE ensures the student: - intends to study in Australia temporarily; - has academic capacity to succeed; - has sufficient financial capacity; - has clear course relevance to future goals; - has no concerning visa history.

Evidence used for GS/GTE assessment may include:

- Statement of Purpose (SOP);
- bank statements / income evidence;
- academic transcripts and English proficiency;
- CV or employment history;
- travel or visa history;
- interview notes.

The College must retain all GS/GTE documentation.

3.5 HOW-TO: GS/GTE Assessment Procedure

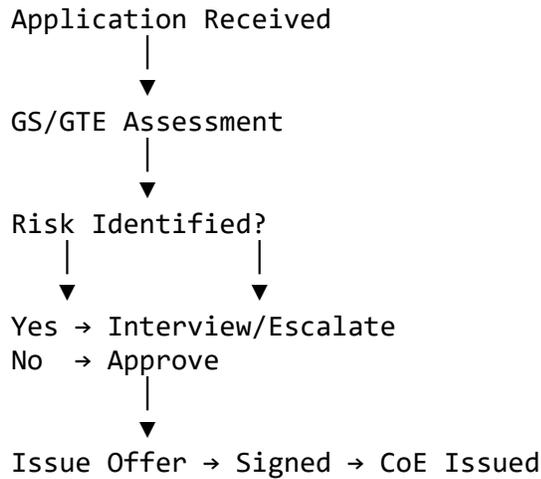
1. Receive student application.
2. Admissions screens documentation for completeness.
3. Conduct GS/GTE assessment using GS/GTE Form.
4. Interview student if required.
5. Escalate complex cases to Compliance Manager.
6. Approve or decline application.



7. Record decision and evidence.

A CoE cannot be issued until GS/GTE is satisfied.

3.6 ASCII Flowchart — GS/GTE Process



3.7 Offer Letter & Written Agreement Requirements

Before issuing a CoE, the student must: - receive an Offer Letter; - receive the Written Agreement; - sign and return the Written Agreement; - pay required fees or deposits.

The Written Agreement must include:

- all fees and refund terms;
- start/end dates;
- CRICOS course code;
- conditions of enrolment;
- complaints and appeals processes;
- WBT requirements (if applicable).

The College must keep a signed copy for 7 years.



3.8 CoE Issuance Rules

A CoE may only be issued when: - GS/GTE is approved; - the student has signed the Written Agreement; - required fees have been paid; - passport details are validated; - all required documents are collected.

Admissions updates PRISMS and stores the CoE.

3.9 Visa Conditions (Student Awareness)

Students must be informed of visa obligations, including: - maintain enrolment in a full-time registered course; - maintain satisfactory course progress and attendance (if monitored); - maintain valid OSHC; - update contact details within 7 days; - work limitations under visa conditions.

This is mandatory during orientation and pre-enrolment.

3.10 Required Evidence

The College must retain: - GS/GTE evidence; - copies of passport and visa; - financial capacity evidence (if used); - signed Written Agreement; - Offer Letter; - CoE issuance records; - communication with student.

Retention period: **7 years**.

SECTION 3 — STUDENT RECRUITMENT, ENROLMENT & GS/GTE REQUIREMENTS (CONTINUED)

3.11 English Language Requirements

Russell College must ensure that international students meet the minimum English proficiency requirements for their qualification level. Evidence may include: - IELTS, PTE, TOEFL, or equivalent test results; - completion of an approved ELICOS program; - completion of prior studies in English.

Admissions must record the evidence and store it in the student's file.



3.12 Academic Entry Requirements

The College must validate that the student has the academic background required for the qualification. Acceptable evidence includes: - Year 12 certificate or equivalent; - Academic transcripts from previous study; - Verified statements of attainment; - Credit transfer evidence (if applicable).

Where entry requirements are not met, the application must be declined or alternative pathways offered.

3.13 Financial Capacity Requirements

Students must demonstrate they can support themselves during their study. Evidence may include: - bank statements; - sponsor letters; - proof of income; - OSHC purchase.

This supports GS/GTE decision-making and must be documented.

3.14 Acceptance & Fee Payment Procedure

Before enrolment is confirmed: 1. Student signs Written Agreement. 2. Student pays the required fee/deposit. 3. Finance verifies payment. 4. Receipt is issued. 5. Admissions prepares CoE.

The CoE may only be issued once all mandatory acceptance steps are complete.

3.15 PRISMS Data Entry Requirements

Admissions must ensure: - all personal details are accurate; - passport number, nationality, and DoB match documents; - course start and end dates match the Written Agreement; - any changes are updated within required timeframes.

The Compliance Manager must audit PRISMS monthly.

3.16 Transfer from Another Provider

Russell College must only enrol a student transferring from another provider when: - they have completed 6 months of their principal course; - or they have a release from their current provider; - or their previous provider is no longer CRICOS registered.



Evidence must be kept for 7 years.

3.17 Letter of Offer Requirements

The Offer Letter must include: - CRICOS course code; - duration and structure; - tuition and non-tuition fees; - refund policy summary; - WBT requirements; - delivery location; - mode of study; - key policies.

3.18 Orientation Requirements

Orientation must cover: - visa conditions; - academic expectations; - welfare and support services; - emergency contact information; - complaints and appeals; - safety and campus facilities.

Students must sign an Orientation Attendance Record.

3.19 Enrolment Refusal

The College may refuse enrolment when: - GS/GTE concerns exist; - forged or misleading documents are submitted; - the applicant does not meet academic/English requirements; - the applicant cannot demonstrate financial capacity.

Reasons for refusal must be documented.

3.20 Required Evidence (Summary)

Admissions must store: - Application form - GS/GTE assessment - Identity documents - Financial capacity evidence - Academic entry evidence - Signed Written Agreement - Offer Letter - CoE - Orientation attendance.

Retention: **7 years.**

SECTION 4 — STUDENT SUPPORT FRAMEWORK (CORE REQUIREMENTS)

4.1 Purpose

This section outlines the core support services that Russell College must provide to all CRICOS students under **National Code Standard 6**, ensuring: - student wellbeing - safety and access to support services - early identification of students at risk - culturally appropriate guidance - documented welfare procedures.

This is the foundation for more advanced support procedures detailed later in Section 15.



4.2 Policy Statement

Russell College provides accessible, equitable, and culturally appropriate support services to all international students, including: - academic support - welfare and wellbeing support - accommodation guidance - emergency and after-hours assistance - orientation and ongoing transition support.

Support services must be **free**, confidential, and well-documented.

4.3 Student Support Officer (SSO) Role

The SSO is responsible for: - assisting students with personal, academic, and administrative issues - providing referrals to medical, counselling, and community services - completing Welfare Support Records - escalating high-risk cases - ensuring students understand visa requirements.

The SSO must be available during campus hours.

4.4 Types of Support Provided

1. Academic Support

- study skills guidance
- trainer consultations
- access to resources

2. Administrative Support

- CoE and enrolment questions
- payment and finance enquiries
- timetable support

3. Personal & Welfare Support

- stress and adjustment issues
- cultural transition help
- accommodation difficulties

4. Emergency Support

- calling 000 when needed
- crisis response as per Section 10



4.5 HOW-TO: Student Support Procedure

1. Student requests support (in person, email, phone).
2. SSO triages support need.
3. SSO meets student within **48 hours**.
4. Support plan created if needed.
5. Referrals provided.
6. Follow-up scheduled.
7. Evidence recorded and filed.

4.6 Orientation Requirements

Orientation must include: - campus tour - emergency and safety information - visa conditions - academic expectations - support services overview - complaints and appeals access.

All students must sign an Orientation Attendance Record.

4.7 Students at Risk

Students may be considered at risk due to: - academic struggles - personal issues - absence from class - financial hardship - welfare concerns.

Early referral to the SSO is required.

4.8 Referrals to External Services

SSOs may refer students to: - medical clinics - psychologists and counsellors - community legal aid - multicultural support services - emergency housing.

All referrals must be documented.

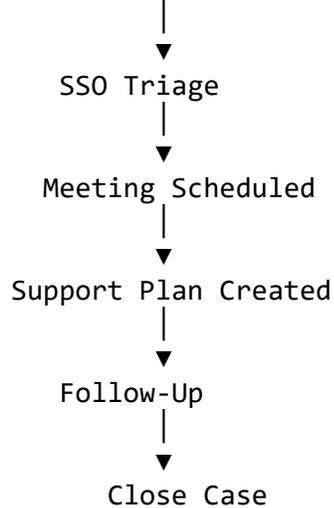
4.9 After-Hours Support

Students must have access to: - after-hours emergency contact number - instructions for contacting police, fire, ambulance (000) - critical incident response team (see Section 10)



4.10 ASCII Flowchart — Student Support

Student Requests Support



4.11 Evidence Requirements

The College must retain: - support meeting notes - attendance at orientation - referral records - Welfare Support Plans

Retention period: **7 years**.

SECTION 5 — ATTENDANCE MONITORING (IF APPLICABLE)

5.1 Purpose

This section outlines the attendance monitoring requirements for CRICOS students **only where the qualification or delivery model requires it**, consistent with National Code Standard 8.

While attendance monitoring is **not mandatory** for all VET CRICOS courses, it becomes compulsory if: - the course is subject to licensing or regulatory attendance minimums; - the course learning outcomes cannot be achieved without attendance; - the provider elects to monitor attendance for quality or safety reasons.



If attendance is not monitored for a particular course, this must be stated clearly in the Course Delivery Plan.

5.2 Policy Statement

Where Russell College elects or is required to monitor attendance, it will: - track attendance accurately; - identify students at risk of falling below required levels; - intervene early to support student success; - document and escalate ongoing concerns; - meet reporting obligations if attendance forms part of visa compliance.

Attendance records must be: - accurate; - up to date; - accessible for audit; - stored for 7 years.

5.3 Attendance Requirements (If Applicable)

Where attendance monitoring applies, the following rules are used: - Full-time CRICOS students must attend **20 scheduled hours** per week. - Absences must be recorded daily. - Trainers must mark attendance accurately in the SMS (aXcelerate).

Courses requiring attendance monitoring must specify: - hours per week; - acceptable absence threshold; - how attendance contributes to academic progression.

5.4 HOW-TO: Attendance Recording Procedure

1. Trainer records attendance for each scheduled session.
2. Admin verifies accuracy weekly.
3. Attendance concerns are flagged when a student:
 - misses consecutive classes;
 - shows patterns of irregular attendance;
 - falls below threshold.
4. SSO contacts the student.
5. Intervention plan created if required.
6. All evidence stored in student file.

5.5 Students at Risk (Attendance)

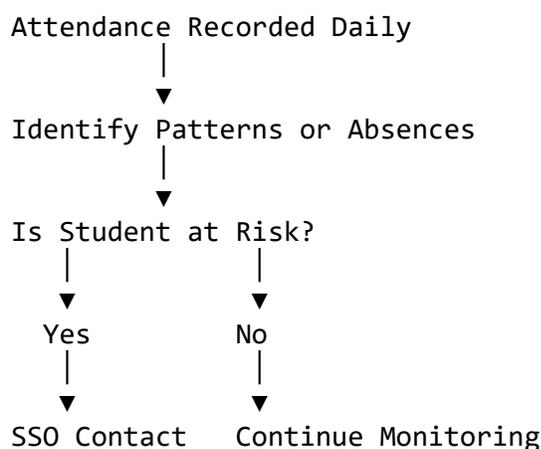
Students may be considered at risk if they: - demonstrate repeated absences; - fail to respond to contact attempts; - provide inconsistent medical certificates; - risk academic progression due to non-attendance.

These students must be referred to the SSO within **48 hours**.

5.6 Attendance Intervention Procedure

1. Identify attendance risk.
2. Contact student by phone, email, and SMS.
3. Conduct meeting with SSO.
4. Develop Attendance Intervention Plan.
5. Refer to counselling or support services if needed.
6. Monitor progress weekly.
7. Escalate persistent non-attendance.

5.7 ASCII Flowchart — Attendance Monitoring





Intervention Plan

Follow-Up & Review

5.8 Reporting Requirements (If Attendance Is Monitored)

If attendance monitoring forms part of compliance for a specific course: - student must be warned in writing before reporting; - all intervention attempts must be documented; - PRISMS reporting may occur if student fails to re-engage.

5.9 Evidence Requirements

Where attendance is monitored, the College must keep: - attendance rolls; - intervention plans; - communication logs; - medical certificates; - warning letters.

Retention: **7 years.**

SECTION 6 — ACADEMIC PROGRESS MONITORING & INTERVENTION

6.1 Purpose

This section outlines the requirements for monitoring, supporting, and intervening with international students who are at risk of not achieving satisfactory course progress, consistent with **National Code Standard 8**.

International students must be monitored systematically to: - identify early signs of academic difficulty; - provide support before performance declines; - meet visa-related academic obligations; - ensure training and assessment remains fair and equitable.

6.2 Policy Statement

Russell College will: - monitor academic progress each study period; - identify students at academic risk early; - intervene with structured support strategies; - document all actions,



meetings, and outcomes; - notify students in writing when they are at risk; - only report students to PRISMS after all support and appeal options have been exhausted.

6.3 Definitions

Study Period

A defined period of study used to measure academic progress. For most VET courses, this is a **term or unit cluster**.

Satisfactory Academic Progress

A student is considered to be progressing satisfactorily when: - they are competent in at least **50% of units** attempted in a study period; or - they are meeting delivery-specific progress benchmarks.

At Risk

A student is deemed “at risk” when they: - fail an assessment task twice; - fall below 80% unit/module completion trajectory; - fail 50% or more units in a study period; - are identified by a trainer as struggling.

6.4 HOW-TO: Academic Progress Monitoring Procedure

1. Trainers assess and record outcomes in aXcelerate.
2. Admin verifies completeness weekly.
3. Academic Manager reviews student progress each study period.
4. Students not meeting benchmarks are flagged as **At Risk**.
5. SSO schedules an Academic Progress Meeting.
6. An Intervention Plan is created.
7. Follow-up meetings track progress.
8. Escalation occurs if performance does not improve.

6.5 Early Identification

Trainers must notify the Academic Manager and SSO when a student: - submits poor-quality work consistently; - misses assessments; - displays literacy/numeracy challenges; - appears disengaged or distressed.



Early intervention prevents escalation.

6.6 Academic Progress Meeting

The SSO and Academic Manager meet with the student to: - discuss challenges; - determine root causes (academic, personal, language, welfare); - outline support strategies; - set expectations and timeframes.

A written record must be stored in the student file.

6.7 Academic Intervention Strategies

Strategies may include: - additional tuition or catch-up classes; - LLN support; - adjusted training plans; - resubmission opportunities; - referral to welfare or counselling; - modified timetable (if compliant); - supervised study sessions.

6.8 Formal Academic Warning

A written warning must be issued when: - the student fails 50% or more units in a study period; or - fails to engage after earlier intervention.

Warning must outline: - risk of visa breach; - required improvement; - timelines; - right to access support.

6.9 Unsatisfactory Academic Progress (2 Consecutive Periods)

A student may be reported to PRISMS when: - they are assessed as Not Competent in **50% or more** of units in **two consecutive study periods**; - the College has provided all support options; - the student has been formally warned; - the student has been offered the right to appeal.

Reporting cannot occur until internal and external appeals are exhausted.



6.10 Notification of Intention to Report (NOIR)

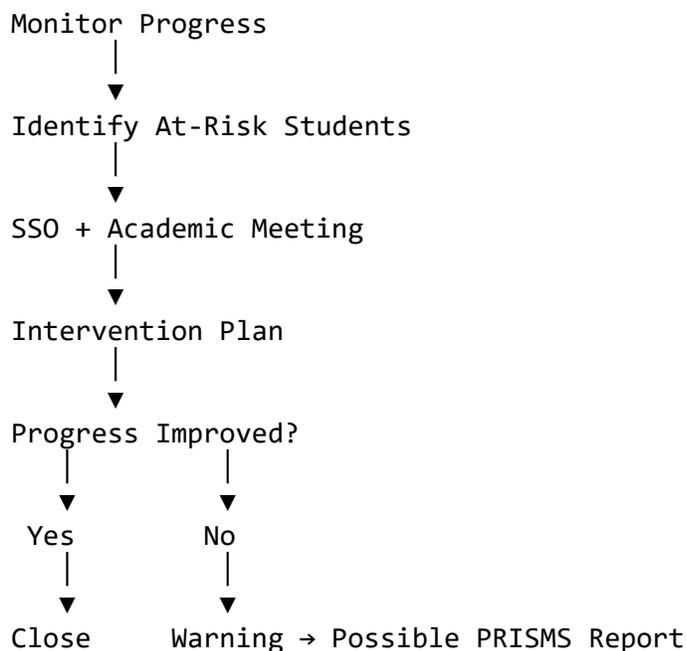
Before reporting, the College must issue a **Notice of Intention to Report**, which includes: - specific reasons for intended reporting; - evidence of interventions provided; - student's right to appeal within 20 working days; - internal and external appeal instructions.

6.11 Appeals

A student may appeal if: - the College made a procedural error; - there is evidence of compassionate or compelling circumstances; - the intervention strategy was not implemented properly.

The student maintains enrolment during the appeal.

6.12 ASCII Flowchart — Academic Progress



6.13 Required Evidence

The College must retain: - trainer reports; - assessment outcomes; - Academic Intervention Plans; - warning letters; - appeal records; - PRISMS reporting evidence.



Retention period: **7 years**.

SECTION 7 — DEFERRAL, SUSPENSION & CANCELLATION OF ENROLMENT

7.1 Purpose

This section outlines WHAT Russell College must do and HOW it must do it when: - a student requests a deferral, suspension, or cancellation; or - the College initiates a suspension or cancellation due to misconduct or academic failure.

All actions must comply with **National Code Standard 9** and be reported through PRISMS where required.

7.2 Policy Statement

Russell College will: - only approve deferral or suspension when compassionate or compelling circumstances exist; - document all evidence and decisions; - notify students of decisions in writing; - inform students of their right to appeal; - maintain full PRISMS compliance; - follow procedural fairness when the College initiates a suspension or cancellation.

7.3 Definitions

Deferral

Delay of course start date (student-initiated).

Suspension

Temporary pause of enrolment (student-initiated or provider-initiated).

Cancellation

Ending the enrolment entirely.

All require PRISMS action.

7.4 Student-Initiated Deferral or Suspension

Students may request a deferral or suspension due to **compassionate or compelling circumstances**, such as: - serious illness or injury; - death of a close family member; - major personal crisis; - visa delays outside the student's control; - natural disasters; - trauma.

Required evidence may include:

- medical certificates;
- AFP/police reports;
- death certificates;
- legal documents;
- other supporting evidence.

7.5 HOW-TO: Student-Initiated Variation Procedure

1. Student submits the Variation Request Form.
2. Student provides supporting evidence.
3. SSO assesses welfare impact.
4. Compliance reviews documentation.
5. CEO approves or rejects request.
6. Admissions updates PRISMS.
7. Student receives written outcome.
8. Evidence stored in student file.

7.6 Provider-Initiated Suspension or Cancellation

Reasons may include: - non-payment of fees; - misbehaviour or misconduct; - breach of enrolment conditions; - failure to meet visa requirements; - repeated academic failure (see Section 6); - criminal behaviour.

Provider-initiated changes must follow procedural fairness.

7.7 Procedural Fairness Requirements

Before a suspension or cancellation is finalised: - the student must receive a written notice; - the student must be given at least **20 working days** to appeal; - the appeal must be heard fairly; - the student must remain enrolled during the appeal.

7.8 Notice of Intention to Suspend or Cancel (NOISC)

A NOISC must include: - the reason for suspension/cancellation; - evidence supporting the decision; - how it affects the student's visa; - how to lodge an appeal; - deadlines and appeal rights.

7.9 Appeals Process

Students may appeal if they believe: - the decision is incorrect; - the College made an error; - evidence was not considered; - compassionate or compelling circumstances apply.

During the appeal: - the student remains enrolled; - PRISMS reporting is paused; - assessment access remains open.

7.10 PRISMS Reporting Requirements

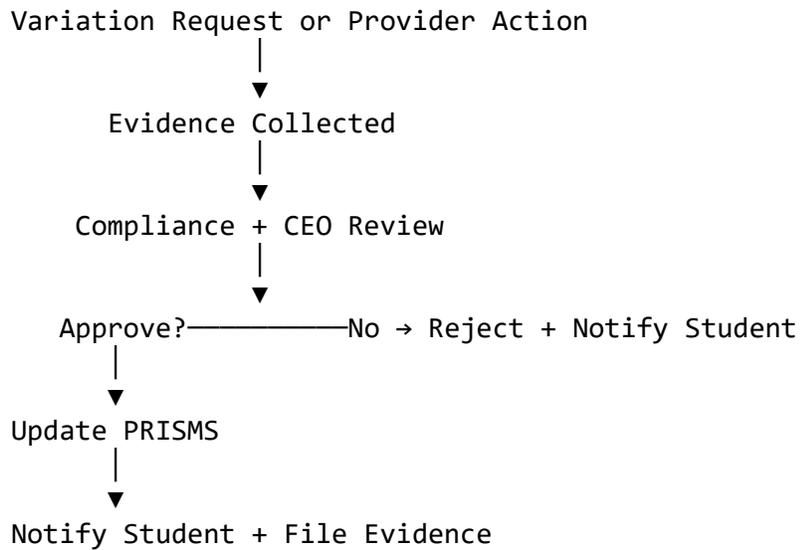
Report through PRISMS when: - a deferral is approved; - a suspension is approved or initiated; - a cancellation is approved or initiated; - a student fails to commence; - a student returns from suspension.

All PRISMS updates must match aXcelerate data.

7.11 HOW-TO: PRISMS Update Workflow

1. Compliance confirms approved action.
2. Admissions logs into PRISMS.
3. Update CoE with correct variation category.
4. Upload evidence where required.
5. Generate confirmation notice.
6. Store documentation.

7.12 ASCII Flowchart — Deferral/Suspension/Cancellation



7.13 Required Evidence

- Variation Request Forms
- supporting documentation
- appeal records
- NOISC letters
- PRISMS confirmations
- file notes and communication logs

Retention: **7 years.**

SECTION 8 — COMPLAINTS AND APPEALS

8.1 Purpose

This section outlines WHAT Russell College must do and HOW it must do it to ensure all international students have access to a fair, transparent, and accessible **complaints and appeals process**, consistent with **National Code Standard 10**.

This protects students' rights and ensures procedural fairness in all decisions affecting enrolment, welfare, academic outcomes, and visa-related reporting.

8.2 Policy Statement

Russell College will: - provide a free, accessible complaints and appeals process to all students; - resolve complaints in a timely, fair, and transparent manner; - ensure students are not disadvantaged for lodging a complaint; - maintain detailed records of all complaints and outcomes; - permit access to an **independent external appeals body** at no cost for the initial review; - maintain student enrolment during the appeals process.

8.3 What Students May Complain About

Students may lodge complaints concerning: - academic matters; - staff behaviour; - support services; - training resources or delivery; - bullying, harassment, or discrimination; - fees and charges; - decisions affecting enrolment status; - agent misconduct; - administrative errors.

Any complaint must be handled respectfully and confidentially.

8.4 Appeals

Students may appeal decisions relating to: - academic results; - course progress interventions; - deferral, suspension, or cancellation of enrolment; - fees or refunds; - misconduct findings.

Students must be informed of: - their right to appeal internally; - their right to access external review; - timelines for all stages.

8.5 HOW-TO: Internal Complaints Procedure

1. **Receipt of Complaint** – verbal or written.
2. **Acknowledge Complaint** within 2 business days.
3. **Initial Review** by Student Support Officer.
4. **Formal Investigation** by Compliance Manager.
5. **Interview Parties** (if required).
6. **Decision Made** with reasons documented.
7. **Written Outcome** provided to student.
8. **Records Filed** in Complaints Register.

Timeframe: **10 working days**.

8.6 HOW-TO: Internal Appeals Procedure

1. Student lodges an Appeal Form.
2. Admin acknowledges within 2 business days.
3. Appeal panel formed (CEO + Compliance + independent staff).
4. Review evidence and interview student.
5. Make decision within **10 working days**.
6. Issue written outcome.
7. Record outcome in Appeals Register.

If the appeal is successful, corrective actions must be implemented immediately.

8.7 External Appeals

If the internal process does not resolve the matter, the student may access: - **Overseas Students Ombudsman (OSO)** or - another approved external appeals body.

The College must: - provide contact details for OSO; - continue the student's enrolment during the external appeal (unless serious risk exists); - comply with the final decision of the external reviewer.



8.8 Maintaining Enrolment During Appeals

During **internal or external appeals**, the College must: - not cancel or suspend the student's enrolment; - allow continued study (unless student safety is compromised); - not report the student to PRISMS.

The only exception is where the student poses an immediate risk to: - safety; - wellbeing; - integrity of the College.

8.9 Complaints and Appeals Register Requirements

The College must maintain two registers: - **Complaints Register** - **Appeals Register**

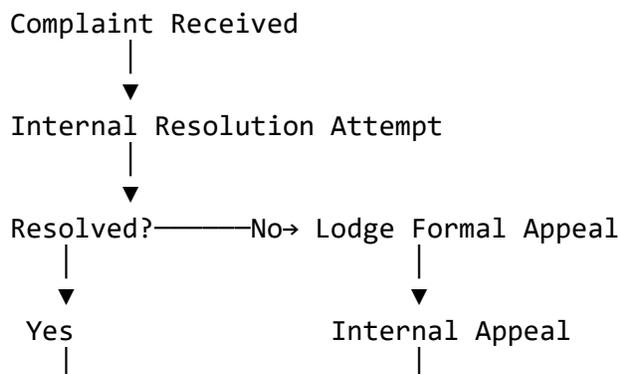
Each entry must include: - student name and ID; - date received; - nature of complaint or appeal; - actions taken; - investigation outcomes; - dates of resolution; - corrective actions.

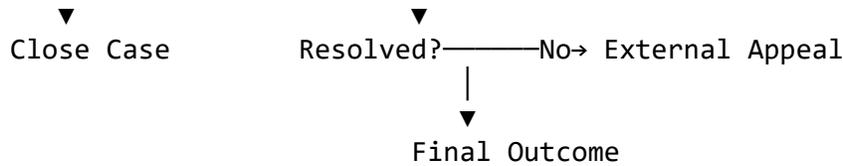
8.10 Templates Required

- Complaint Form
- Appeal Form
- Acknowledgment Letters
- Outcome Letters
- Investigation Notes Template

All templates must be version-controlled.

8.11 ASCII Flowchart — Complaints & Appeals Process





8.12 Required Evidence

The College must retain: - complaint forms and emails; - interview notes; - appeal forms and evidence submitted; - panel deliberations; - final outcomes; - PRISMS updates (if applicable).

Retention: **7 years**.

SECTION 9 — WORK-BASED TRAINING (WBT) PROCEDURES

9.1 Purpose

This section outlines WHAT Russell College must do and HOW it must do it to ensure all Work-Based Training (WBT) is compliant with: - ESOS Act - National Code Standards 2, 6 & 11 - WHS legislation - RTO Standards (Training & Assessment)

WBT must be safe, properly supervised, documented, and genuinely contribute to unit/qualification outcomes.

9.2 Policy Statement

Russell College will: - approve only safe and compliant WBT sites; - ensure all WBT aligns with unit requirements; - provide clear instructions to students and hosts; - monitor students throughout placement; - ensure host supervisors are suitable and briefed; - intervene if safety or performance issues occur; - maintain complete documentation and evidence.

9.3 When WBT Is Required

WBT is required when: - the Training Package specifies mandatory workplace hours; - unit competency can only be demonstrated in an operational environment; - industry expectations require practical workplace tasks.

WBT cannot occur unless: - a host site is approved; - all documentation is completed; - student is oriented to safety procedures.

9.4 HOW-TO: WBT Approval Procedure

1. Identify units requiring WBT.
2. Conduct Host Site Safety Audit.
3. Review supervision arrangements.
4. Confirm insurance cover.
5. Approve site (Academic Manager + Compliance).
6. Execute WBT Agreement.
7. Train student on expectations.
8. Notify host of student schedule.

9.5 Host Site Requirements

A host site must: - provide a safe workplace (WHS compliant); - allocate a qualified supervisor; - allow assessors access for workplace visits; - sign attendance logs and observation forms; - communicate concerns promptly.

9.6 Student Requirements

Students must: - attend all scheduled WBT shifts; - follow host rules and WHS instructions; - behave professionally; - notify College and host of absences immediately; - complete all workplace tasks required.



9.7 WBT Documentation

Mandatory documents:

- Host Site Agreement
- Host Site Safety Checklist
- WBT Schedule
- Supervisor Contact Details
- Student Briefing Record
- Workplace Attendance Log
- Workplace Observation Evidence
- Incident Reports (if any)

All documents must be stored for **7 years**.

9.8 Monitoring & Support During WBT

Russell College must: - maintain weekly contact with each student; - conduct at least **one workplace visit** per placement; - verify attendance through logs; - ensure workplace evidence is collected accurately; - intervene early if issues arise.

9.9 Welfare & Safety Considerations

If a student: - feels unsafe, - is bullied, - is injured, - is exploited, - or receives inappropriate treatment,

Russell College must act immediately by: 1. Removing the student from the site (if needed). 2. Conducting a WHS review. 3. Reassigning to a new placement. 4. Filing an incident report.

9.10 Non-Attendance or Misconduct in WBT

If a student misses shifts without notice: 1. SSO contacts student. 2. Warning issued if pattern continues. 3. Academic intervention initiated if WBT is required for competency. 4. In severe cases → provider-initiated suspension (Section 7).

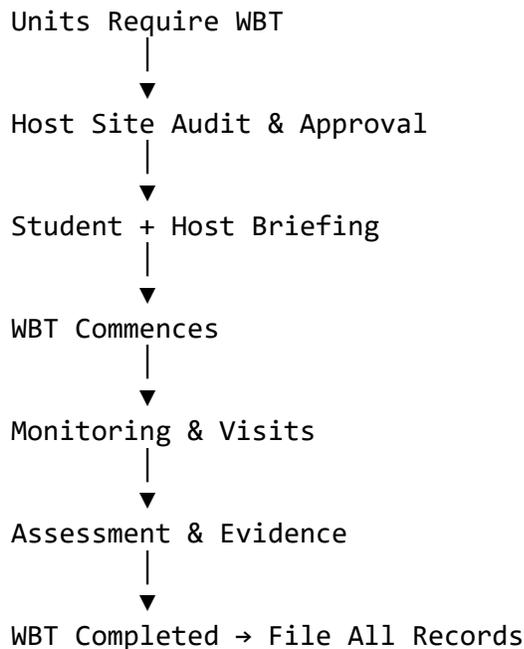


9.11 Assessment in the Workplace

Assessors must: - observe workplace tasks directly OR - validate third-party reports from supervisors; - ensure evidence meets the Rules of Evidence; - document outcomes in the Workplace Assessment Record.

Assessment must only be performed by qualified assessors.

9.12 ASCII Flowchart — WBT Process



SECTION 10 — CRITICAL INCIDENT MANAGEMENT

10.1 Purpose

This section outlines WHAT Russell College must do and HOW it must respond to **critical incidents** affecting international students, including serious events that threaten the safety, welfare, or wellbeing of individuals or the broader community. This is a core requirement of **National Code Standard 6**.

A critical incident may require immediate emergency services involvement and must always be documented, escalated, and reviewed.

10.2 Definition of a Critical Incident

A critical incident is a **traumatic event or serious situation** that may involve: - serious injury or death of a student or staff member; - missing student (unable to be contacted); - serious mental health crisis or risk of self-harm; - serious physical or sexual assault; - major accident on campus or WBT site; - natural disaster or building emergency; - violent behaviour or threat to safety; - police or emergency services involvement; - any event likely to impact student welfare or College operations.

Any staff member may declare a critical incident.

10.3 Critical Incident Team (CIT)

The CIT consists of: - **CEO/PEO (Incident Commander) - Compliance Manager (Deputy Commander) - Student Support Officer (Welfare Lead) - Campus Manager (Facilities & Safety Lead) - Admin Support (Communications)**

The CIT must respond immediately when notified.

10.4 Immediate Response Procedure

1. **Ensure safety first** — call 000 where necessary.
2. **Remove people from danger** (evacuate if required).
3. **Provide first aid** (if trained staff available).
4. **Notify the CEO and Compliance Manager immediately.**
5. **Activate Critical Incident Team.**
6. **Secure the area** to preserve safety and privacy.
7. **Record all actions and observations.**

10.5 HOW-TO: Critical Incident Management Workflow

1. Critical incident identified.
2. Emergency response initiated (000 if required).
3. CIT notified and assembled.
4. Student safety confirmed.
5. Communications sent to relevant parties.
6. Internal report completed within 24 hours.
7. Ongoing support provided to affected students.



8. PRISMS reporting completed if necessary.
9. Review conducted and improvements identified.

10.6 Mandatory Reporting

The College must notify: - **Police or emergency services** — immediately, if life or safety is threatened. - **Next of kin/emergency contact** — when appropriate and safe. - **ASQA** — if the incident affects the College's ability to deliver services. - **PRISMS** — if the incident results in enrolment changes.

10.7 Welfare Follow-Up

After the immediate incident: - daily or weekly welfare checks may be required; - referrals to professional services must be offered; - a Welfare Support Plan must be created for affected students; - attendance and progress requirements may be adjusted temporarily.

10.8 Missing Student Protocol

A student is considered missing when: - they have been absent for 48+ hours without explanation; - repeated attempts to contact them fail; - host or WBT supervisor reports concern.

Steps: 1. Attempt contact (phone, email, SMS, messaging apps). 2. Contact emergency contact if no response. 3. Escalate to Compliance Manager. 4. If high risk → police welfare check. 5. Record all actions.

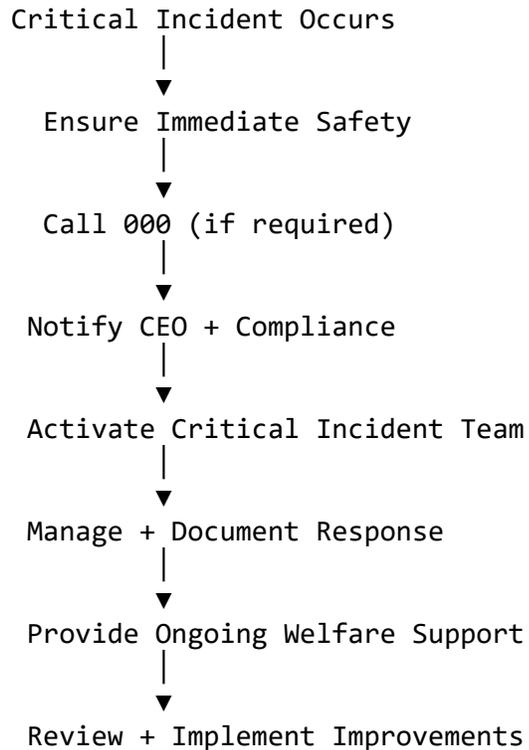
10.9 Documentation Requirements

The College must complete and retain: - Critical Incident Report Form; - witness statements (if applicable); - communication logs; - welfare notes and follow-ups; - copies of all notifications and actions taken; - PRISMS records (if applicable).

Retention period: **7 years**.



10.10 ASCII Flowchart — Critical Incident Response



SECTION 11 — MARKETING, WEBSITE & BRANDING COMPLIANCE

11.1 Purpose

This section ensures that all marketing, advertising, website content, social media, printed material, and branding used by Russell College complies with: - **National Code Standard 1** (Marketing Information and Practices) - **ESOS Act** requirements for truthful representation - **CRICOS accuracy rules** (course codes, durations, fees) - **RTO Standards** for marketing integrity

Marketing must always be *accurate, ethical, consistent, and not misleading*.



11.2 Policy Statement

Russell College will: - provide accurate, factual marketing information at all times; - ensure CRICOS codes are correct on all materials; - ensure no marketing implies migration outcomes or visa guarantees; - maintain strict version control of all materials; - require CEO approval before publishing or distributing content; - ensure agents only use *approved* materials.

11.3 CRICOS Marketing Rules

Marketing **must include**: - Russell College's CRICOS provider code; - the CRICOS course code for each course; - correct course name, duration, and delivery location.

Marketing **must NOT include**: - false or misleading claims about outcomes; - guarantees of migration or employment; - statements that conflict with government requirements; - unapproved agent-generated materials.

All materials must be checked against CRICOS listings.

11.4 Website Compliance Requirements

The website must clearly and accurately display: - provider CRICOS code; - course CRICOS codes; - tuition and non-tuition fees; - intake dates; - delivery locations; - entry requirements; - student support information; - complaints and appeals process; - refund policy.

The website must be reviewed **monthly** for accuracy.

11.5 Social Media Compliance

Social media content must be: - approved before posting; - accurate and consistent with CRICOS listings; - compliant with ESOS Act rules; - monitored weekly for comments requiring intervention.

Agents may not create or post College-branded content.

11.6 HOW-TO: Marketing Approval Workflow

1. Marketing drafts material.



2. Compliance checks CRICOS accuracy and ESOS compliance.
3. CEO approves final version.
4. Document added to Marketing Version Register.
5. Material published or distributed.

No content may bypass this workflow.

11.7 Marketing Version Control

Every piece of marketing must be version-controlled.

The register must record: - document name/title; - version number; - date approved; - approving officer (CEO); - location where published.

Old versions must be removed from circulation.

11.8 Use of Russell College Branding

Branding must remain **consistent**, including: - logo placement; - colour palette; - typography; - style guidelines; - tone of voice.

Agents must follow branding rules and cannot modify materials.

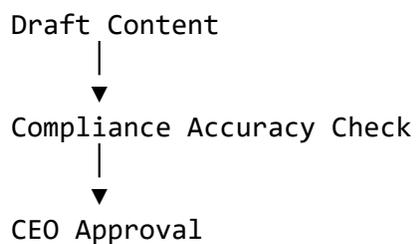
11.9 Third-Party Platforms

Any listing on: - education portals, - comparison websites, - agent websites, - partner institutions,

must be approved by the College and monitored for accuracy.

Unapproved listings must be removed immediately.

11.10 ASCII Flowchart — Marketing Compliance





Version Control

Publication / Distribution

11.11 Evidence Requirements

The College must retain: - approved marketing materials; - version registers; - website audit logs; - social media approval evidence; - agent training on marketing compliance.

Retention: **7 years.**