SGANZ COVID-19 INTERIM POLICY

POLICY STATEMENT AND PURPOSE

1. This Policy outlines the principles and supplementary policy measures in place for SGANZ educational delivery, welfare support, and students, staff, education agents and other stakeholders impacted by COVID-19.

2. This Policy will be updated as required and will remain in effect until otherwise approved by the SGA Board of Directors or delegate.

SCOPE

3. This Policy applies to all teaching staff, non-teaching staff and education agents of SGANZ.

4. This Policy applies to all third-party course delivery arrangements and agreements where another legal entity delivers SGANZ's registered courses, either in full or in part.

5. This Policy applies to all international and domestic students enrolled in an accredited course delivered and awarded under SGANZ license, including accredited Higher Education, Foundation and English Language Intensive Course for Overseas Students (ELICOS) courses:

    a) **Sector 1:** As a TEQSA-registered **higher education** provider under the TEQSA Act (2011) (Cth) and regulated by TEQSA under the Higher Education Standards Framework (2021); and as a registered **tertiary education** provider under the New Zealand Education Act (1989) and regulated by the NZQA under the New Zealand Qualifications Framework (2011). This includes relevant courses at the following entities where SGANZ is trading as:

        i. Taylors College (Perth),

    and where SGNZ is trading as:

        ii. Taylors College (Auckland).

    b) **Sector 2**: As a CRICOS-registered provider of **Foundation Programs** under the ESOS Act (2000) and regulated by TEQSA under the National Code of Practice for Providers of Education and Training to Overseas Students (2018) and the National Standards for Foundation Programs; and as a registered **private training establishment** under the New Zealand Education Act (1989) and regulated by the NZQA under the New Zealand Qualifications Framework (2011). This includes relevant courses at the following entities, where SGANZ is trading as:

        i. Taylors College (Perth)

        ii. ANU College (ANUC)

    iii.   SGANZ as a party to a joint venture arrangement trading as the University of Sydney Foundation Program (USFP),

and where SGNZ is trading as:

    v.   Taylors College (Auckland)

    vi.   University of Waikato College (delivered on behalf of the University of Waikato).

c) **Sector 3:** As a CRICOS-registered provider of **ELICOS Programs** under the ESOS Act (2000) and regulated by TEQSA under the National Code of Practice for Providers of Education and Training to Overseas Students (2018) and the National Standards for ELICOS Programs; and as a registered **private training establishment** delivering **Pre-Foundation and English Language Preparation** programs under the New Zealand Education Act (1989) and regulated by the NZQA under the New Zealand Qualifications Framework (2011). This includes relevant courses at the following entities, where SGANZ is trading as:

    i.   Taylors College (Perth)

    ii.   Taylors College (Sydney)

    iii.   ANU College (ANUC),

    and where SGNZ is trading as:

    iv.   Taylors College (Auckland)

    v.   University of Waikato College (delivered on behalf of the University of Waikato).

6. This Policy does not apply to the policies of SGANZ's partners or where SGANZ is a third party to another registered provider of education.

7. To the extent of any inconsistency between the SG Global Coronavirus (COVID-19) Special Situations Refund Policy and the SGANZ Interim COVID-19 Policy, the provisions of the SGANZ Interim COVID-19 Policy will apply.

POLICY PRINCIPLES

8. SGANZ's COVID-19 Interim Policy is based on the following broad principles:

a) Proactive and early consultation with colleges, governing bodies and regulatory authorities

b) Transparency in decision-making

c) Adjustments to policy provisions are fair, equitable, and comply with regulatory requirements, while recognising that regulatory requirements within the COVID-19 context may change.

d) Educational materials, resources and technologies:

    i.   Meet accessibility standards and are flexible for all students

    ii.   Comply with universal design principles

    iii.   Standardise assurance of learning across modes of delivery.

e) Students engaging in enhanced delivery have comparable and equitable learning

experiences, assessment and outcomes to on-campus students, including equivalent opportunities to interact with teaching staff.

f) Students enrolling in an SGANZ course are required to comply with all course and provider requirements, regardless of their decision to continue with, defer or withdraw from the course before, or at the conclusion of, the course.

g) Students and staff are supported with customised solutions to enable successful learning and teaching outcomes, respectful and productive learning and working environments, and access to enhanced wellbeing initiatives.

h) The promotion and maintenance of a culture of sustained academic scholarship. SGANZ is committed to actively supporting the scholarly activities undertaken by its academic staff with the aim of continually improving the quality of teaching and students' learning experiences. As a registered higher education provider, SGANZ cultivates a scholarly environment and provides teaching and learning that engages with knowledge and inquiry commensurate to the levels of the courses offered.

PROCEDURES

Operational

Communications – Students, Staff and Third Parties (including Agents)

9. Any COVID-19 communications pack, marketing material and/or update for students, staff and third parties including agents or guardians, will require completion of a compliance review by GQCR and approval by the Managing Director SGANZ, prior to distribution.

Privacy (including Third Party Agreements and Third Party Sources)

10. SGA Cyber Security Incident Response Policy and Procedure

11. SGA Student Privacy Policy

12. Unless otherwise agreed, and with permission of relevant parties, SGANZ does not permit sharing of personal staff or student data collected as part of the use and maintenance of its online delivery platforms and/or tools with third party sources, by a university partner, or by a partner operating under a third-party agreement with other parties. This includes, but is not limited to:

a) Contact information

b) Health information

c) Information and data related to staff recruitment, induction, development, performance management or other employment-related processes

d) Course work (video, audio, text or images) or course progress information

e) Assessment and examination scores or grades

f) Narratives that may be written and presented by students as part of course work, assessment tasks or examinations

g) Student records related to attendance, grievances, complaints, appeals or suspension.

13. SGANZ provides IT resources to support its learning and teaching activities and business services.

14. SGANZ strictly prohibits unauthorised access to, or interference with, its IT resources. This includes installation of unauthorised software and/or hardware onto SGANZ networks or systems, or use of unauthorised content / content unrelated to the educational or business operations of SGANZ.

15. Students and staff are required to use their designed SGANZ email address in the course of engaging in any communication related to SGANZ's educational or business operations. Private email accounts are not to be used for any SGANZ-related business.

16. Students and staff are responsible for their own accounts, and are permitted to access only those IT resources for which they have been authorised.

17. All online platforms utilised by SGANZ as part of its educational and business operations require secure login. Password and login details are not to be shared with any other person.

Academic

Academic Integrity

18. SGA Academic Honesty Policy

19. The provisions of SGA's Academic Honesty Policy will apply to all students enrolled in a Higher Education, Foundation or ELICOS course with SGA.

20. All teaching staff have mastery in what constitutes recognisable scholarship in their discipline, in the scholarship of learning and teaching, in the strategies employed by SGA for promoting academic integrity and in managing allegations of academic misconduct. This is reinforced through regular appropriate professional development.

21. All students are given guidance and training in the academic writing and referencing conventions of their discipline, as well as instruction in what constitutes good scholarship and academic misconduct. This guidance and training is provided in orientation programs, is reinforced in early classes and provided on an ad hoc basis as required.

22. Assessment tasks and examinations are designed and conducted wherever possible in ways which eliminate or minimise the opportunity for students to engage in academic misconduct.

23. All text-based assessment tasks are to be submitted via Turnitin. Exams are conducted where possible online using proctoring/supervision software.

24. Procedures in SGA's Academic Honesty Policy that require a member of staff to discuss allegations of academic dishonesty with a student (including those involving a support person) are to be conducted via video or teleconference until further notice.

Admissions and Enrolment

25. SGANZ Admissions Policy and Procedure

26. SGANZ Enrolment Terms and Conditions

27. Students may enrol in a Foundation, ELICOS or Higher Education course delivered and awarded by an SGANZ College, offered via enhanced delivery through virtual classrooms.

28. Students applying to undertake a Foundation, ELICOS or Higher Education course delivered and awarded by an SGANZ College, offered via enhanced delivery through virtual classrooms during the COVID-19 period, will be allowed to complete one of the following alternative English language tests:

   a) IELTS Indicator tests

   b) TOEFL iBT Home tests

   c) Duolingo English tests, and

   d) English tests up to three years old.

29. Applicants from level 3 high risk countries will also be required to submit a more recent English test that meets the minimum requirements for entry prior to being issued with an electronic confirmation of enrolment (eCoE) and student visa once they are able to move onshore for face-to-face teaching.

30. The SGANZ Interim COVID-19 Policy does not substitute for visa regulations. Students are required to check and meet English language visa regulations before applying for a student visa to move to onshore study in Australia.

31. Students are required to refer to the course rules for their program of study and ensure they meet English language requirements for any professional entry provisions for their program of study.

32. Once IELTS and other approved English testing centres reopen, alternative English language tests will not be accepted.

33. Duolingo English, TOEFL iBT, IELTS Indicator and English tests up to three years old can only be used if there is no access to IELTS. Evidence of lack of access to IELTS needs to be provided as part of a request to accept alternative tests.

Attendance

34. Students are to be encouraged and supported to maximise their attendance by complying with the standard attendance requirements in the virtual environment. Additional support strategies may be developed to ensure students have equitable access to the virtual environment, with particular regard for students with limited or no internet or computer access.

35. Onshore and offshore students must attend classes as per the terms and conditions of their enrolment. When a student is attending a campus in person, they must follow all official government-issued health rules and guidance for the campus location, including the COVID-19 safe practices being promoted on that campus.

36. Virtual class and relevant learning activity scheduling is to be responsive to time-zone differences and student accessibility requirements

37. Teaching staff will complete an attendance register for each virtual class and relevant learning activities, which will be subject to daily monitoring.

38. The provisions of the SGA Student Progression, Exclusion and Graduation Policy and Procedures will apply where attendance in the virtual environment is deemed unsatisfactory.

39. In instances where a student under the age of 18 does not attend a virtual class or a relevant learning activity, the teacher is required to inform the Program Manager, either during the class or immediately at the conclusion of the class.

Assessment

40. Assessment extensions may be granted for up to 21 days in cases involving COVID-19 isolation.

41. Where possible, assessment tasks will be rescheduled.

42. Assessment tasks may be redesigned for administration in the virtual environment, in line with the principles of universal design for learning, and ensuring assessment tasks are fair, equitable, and remain comparable to assessment tasks undertaken by on-campus students.

43. All assessment items will be submitted electronically with the exception of examinations.

44. Examinations will be conducted where possible through online proctoring/supervision software.

45. Feedback on assessment items will be provided electronically. Students may make appointments with teaching staff via telephone or email to arrange individual review of marked assessment work.

46. Requests for review or appeal of grade review decisions will be assessed on a case by case basis and additional grounds for requesting review or appeal may be considered.

Cancellation, Refund and Deferral

47. SGANZ Deferment, Suspension, Withdrawal or Cancellation of Enrolment Policy

48. SGANZ Cancellation and Refund Policy

49. SG Coronavirus (COVID-19) Special Situations Refund Policy (internal document only)

50. Where a student commences studies offshore (via enhanced delivery through virtual classrooms) and is unsuccessful in obtaining a visa to enable their transition to onshore/on-campus delivery at the conclusion of the COVID-19 period, SGANZ may refund the unused portion of tuition fees to that student. Students are required to demonstrate 80% attendance to qualify for a refund in the event they are unsuccessful in obtaining a visa.

51. Case by case consideration of students affected by COVID-19 impacts will be undertaken under the provisions of the SG Coronavirus (COVID-19) Special Situations

Refund Policy and the SGANZ Cancellation and Refund Policy.

52. Refunds may be offered in line with the visa and withdrawal from study restrictions in Annexure 1. Refund requests must be submitted within three months of the date of withdrawal from / cancellation of enrolment. Refund requests submitted after three months of the date of withdrawal from / cancellation of enrolment will be rejected.

53. All legally permissible visa application attempts should be exhausted before the provisions of Annexure 1 are enacted.

54. Students who choose not to submit Administrative Reviews of Visa Decision will be considered as not meeting Immigration Entry Requirements.

Course Design

55. Any changes to course design and/or mode of study in the online/enhanced delivery environment requires the approval of the SGA Board of Directors or delegate.

Critical Incident

56. The SGANZ COVID-19 Incident Response Workflow (Workflow) has been developed to supplement the requirements of the SGA Critical Incidents Involving Students Policy and Procedure.

57. In cases where students or a staff member advise they feel unwell and display COVID-19-type symptoms, or a student or staff member advises close contact with a traveller as defined in the Workflow, the provisions of the Workflow override the provisions of the SGA Critical Incidents Involving Students Policy and Procedure.

58. The Workflow applies to staff and students of SGANZ.

Disability and Equity

59. SGA Student Disability Policy and Procedures.

60. SGANZ will ensure equitable access for all students to course materials and resources, learning technologies, learning and teaching activities, teaching staff and assessment requirements.

Learning Support

61. SGANZ will provide training and support in the use of virtual platforms and tools to support students to adjust to learning in the online environment.

62. Library and course resources are available online and can be accessed by students through the Learning Management System.

63. Educational resources, materials and technology meet accessibility standards and are available to all students in accessible and flexible format.

64. SGANZ will utilise a number of initiatives to positively engage students in the online environment and actively encourage their participation.

65. Participation and engagement initiatives in the online environment will:

    a) Create safe, inclusive, mutually respectful and empowering learning spaces

    b) Be designed to respond to individual student learning needs, including those who are vulnerable, those requiring adjustment to support participation in and completion of their academic studies, and those identified as being at risk

    c) Provide opportunity for early intervention when problems arise

Progression, Exclusion and Graduation

66. Students who are required to participate in additional support initiatives such as tutorials, study groups, academic skills programs, counselling or mentoring under the provisions of the SGA Student Progression, Exclusion and Graduation Policy and Procedure will be assessed on a case by case basis, and may be required to undertake support initiatives by video or teleconference.

Student Support

67. Students undertaking their studies via enhanced delivery through virtual classrooms will be required to complete an online orientation program.

68. SGANZ will ensure that student communication is timely and accessible, including via email, telephone, apps, the Learning Management System, video-conferencing tools, online forums and virtual classrooms.

69. Students will be contacted regularly by student support staff to determine any additional and individual support needs.

70. Students may contact student support staff via email or telephone to arrange individual appointments for academic or general counselling. Students may be provided with an external referral for professional counselling as required.

Wellbeing and Safety (including students aged under 18)

71. SGANZ Student Disability Policy and Procedure

72. SGANZ Safety and Wellbeing of Under-18 Students Policy and Procedure

73. SGANZ Standards of Conduct Policy

74. SGANZ Student Complaints and Appeals Policy and Procedure

75. Provision of COVID-19-specific health and safety communication is to be culturally and cohort-appropriate, and have specific regard to the English language requirements of the course in which students are enrolled.

76. Online bullying (cyberbullying) is a pattern of repeated behaviours between people with ongoing contact in virtual settings via the internet or mobile devices.

77. SGANZ does not tolerate any form of online bullying or harassment, including but not limited to:

   a) Sending or posting of insulting or threatening messages, or inappropriate images

   b) Excluding or isolating others in online chat rooms, forums or other forms of online communication

   c) Sharing of another person's personal information online, including unflattering or private images

   d) Sending or posting of insulting or threatening messages, or inappropriate images

   e) Excluding or isolating others in online chat rooms, forums or other forms of online communication

   f) Sharing of another person's personal information online

   g) Assuming the identity of another person online and representing them in a negative manner, or manner that may damage their relationship with others

   h) Any form of behaviour that constitutes harassment on the grounds of personal characteristics such as race, gender, pregnancy, marital status, age, disability, sexual orientation, gender identity or breastfeeding

   i) Any racially offensive, pornographic or sexually explicit or suggestive images.

Records Management

78. In response to COVID-19:

   a) SGANZ will maintain accurate and comprehensive documentation on student files, including evidence of vaccination status that SGA is required to collect.

   b) All student files and vaccination records will be stored and maintained in electronic format only, in secure electronic storage systems that comply with the requirements of the SGA Records Management Policy and Procedures.

DEFINITIONS

79. For the purposes of this Policy:

   c) **ANUC**: ANU College

   d) **College Director**: the most senior staff member for the College (or their delegate).

   e) **CRICOS:** Commonwealth Register of International Courses for Overseas Students

   f) **Deferral:** as defined in the SGANZ Deferment, Suspension, Withdrawal or Cancellation of Enrolment Policy

   g) **Education Agent:** as defined in the SGANZ Agent Management Policy

   h) **ELICOS:** English Language Intensive Courses for Overseas Students

   i) **ESOS**: Education Services for Overseas Students

   j) **Inherent Requirements:** the essential components of a program or course that demonstrate the abilities, knowledge and skills required to achieve the core learning outcomes of the course, while preserving the academic integrity of SGANZ's learning, assessment and accreditation processes. The inherent requirements are the abilities, knowledge and skills needed to complete the program that must be met by all students.

k) **NZQA:** New Zealand Qualifications Authority

l) **NZQF:** New Zealand Qualifications Framework

m) **Program Manager:** the senior staff member of the College responsible for the operational leadership of a program or course

n) **SGA:** Study Group Australia Pty Limited

o) **SGANZ:** Study Group Australia Pty Limited and Study Group NZ Limited

p) **Suspension**: as defined in the SGA Deferment, Suspension, Withdrawal or Cancellation of Enrolment Policy

q) **TCP**: Taylors College Perth

r) **TCS**: Taylors College Sydney

s) **TEQSA**: Tertiary Education Quality and Standards Agency

t) **Third party agreement:** as defined in the SGA Third Party Delivery Policy and Procedure

u) **Third party source:** a supplier or service provider providing business services to SGANZ

v) **USFP**: University of Sydney Foundation Program

RELATED DOCUMENTS

Policies

80. SGANZ and SG policies related to this policy are listed under each policy clause.

Legislation and Standards

81. This Policy has been developed in line with requirements set out in the:

a) *Education Services for Overseas (ESOS) Act 2000 (Cth) (and its amendments)*

b) *Education Training and Reform Act 2006 (Cth) (and its amendments)*

c) *Education Training and Reform Regulations 2017 (Cth) (and their amendments)*

d) *The New Zealand Education Act (1989) (and its amendments)*

e) Education Services for Overseas Students (Foundation Program Standards) Instrument 2021

f) Higher Education Standards Framework 2021 (Threshold Standards)

g) National Code of Practice for Providers of Education and Training to Overseas Students 2018 (the National Code)

h) the Australian Qualifications Framework (AQF)

i) the New Zealand Qualifications Framework (NZQF)

j) the National Standards for ELICOS Programs

k) TEQSA's Guidance Notes

l) other Commonwealth and State legislation and regulatory frameworks and standards including the *Privacy Act 1988*

m) other New Zealand legislation and regulatory frameworks and standards including the *Privacy Act 2020*.

POLICY GOVERNANCE

Policy review

82. This Policy will remain in force until terminated or varied by the SGA Board of Directors or delegate.

Records management

83. Records in association with this Policy will be kept in accordance with SGA's Records Management Policy and Procedures. Confidential documents related to the implementation of the Policy will be maintained according to relevant privacy requirements.

Document approval

Document ID	SGANZ COVID-19 Interim Policy		
Policy Owner(s)	Head of Governance, Quality, Compliance and Risk		
Endorsed	SGANZ Executive Team	Date Endorsed	16 November 2021
Approved	SGANZ Managing Director	Date Approved	16 November 2021

Document history

Commencing Date	Summary of Changes	Next Review Date
7 April 2020	Introduction of policy supplementation to support SGANZ response to COVID-19 impacts	In force until terminated or varied
24 April 2020	Amendment by Managing Director SGANZ under delegation – English language testing and introduction of trial period	N/A
1 May 2020	Amendment by Managing Director SGANZ under delegation – exam invigilation	N/A
22 May 2020	Amendment by Managing Director SGANZ under delegation – English language test revisions, and application of time limits to refund requests	N/A
4 June 2020	Amendment by Managing Director SGANZ under delegation – refunds – application and enrolment fees	N/A
29 July 2020	Amendment by Managing Director SGANZ under delegations – alternative English language tests	N/A
16 November 2021	Amendment by Managing Director SGANZ under delegations - deleted references to 'trial period'. Deleted references to FISC. Other minor process or policy framework related updates made during consultation.	N/A

ANNEXURE 1: VISA AND WITHDRAWAL FROM STUDY RESTRICTIONS ON REFUND OFFERS

Withdrawal Reason Key: ✓Refunded X Not refunded	Enrolment Fee ($335)	Fees for current term or semester (including tuition fee deposit)	Fees for Next Term or Semester	Fees for Future Terms or Semesters
Visa rejection due to…				
Student default (including fraud)	x	x	x	✓
Standard visa refusal	x	✓	✓	✓
Change of student risk category	x	✓	✓	✓
Fraud	x	x	x	x
Agent default (including fraud)	x	✓	✓	✓
Visa/immigration service error	x	✓	✓	✓
Provider default	✓	✓	✓	✓
Student withdrawal from studies due to…				
Student does not pass our GTE assessment[1]	x	✓	✓	✓
Change of mind	x	x	x	✓
Deferring their enrolment to a different term	x	✓	✓	✓

1 Applicable in situations where students have met all Study Group academic entry requirements (and pre-GTE screening) but are not eligible to receive an eCoE based on GTE issue.