



SG ANZ COVID-19 INTERIM POLICY

POLICY STATEMENT AND PURPOSE

1. This Policy outlines the principles and supplementary policy measures in place for SG ANZ 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 SG ANZ.
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, English Language Intensive Course for Overseas Students (ELICOS) and High School 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 (2015); 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. Flinders International Study Centre (FISC),
 - ii. Taylors College (Perth),and where SGNZ is trading as:
 - iii. 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. Flinders International Study Centre (FISC)

- ii. Taylors College (Perth)
- iii. ANU College (ANUC)
- iv. SGANZ as a party to a joint venture arrangement trading as University of Sydney Foundation Program (USFP),

and where SGNZ is trading as:

- v. Taylors College (Auckland).

- 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 SGNZ is trading as:

- i. Flinders International Study Centre (FISC)
- ii. Taylors College (Perth)
- iii. Taylors College (Sydney)
- iv. ANU College (ANUC),

and where SGNZ is trading as:

- v. Taylors College (Auckland).

- d) **Sector 4:** As a registered **School provider** under the Education and Training Reform Act (2006), regulated by the VRQA under the Education and Training Reform Regulations (2017), including relevant courses, where SGNZ is trading as:
- i. Taylors College (Sydney).

6. This Policy does not apply to the policies of SGANZ's partners or where SGNZ 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 SG ANZ *Interim COVID-19 Policy*, the provisions of the SG ANZ *Interim COVID-19 Policy* will apply.

DEFINITIONS

8. For the purposes of this Policy:

- a) **ANUC:** ANU College
- b) **College Director:** the most senior staff member for the College (or their delegate). May also be referred to as Centre Director, Principal, Campus Director or Head of College
- c) **CRICOS:** Commonwealth Register of International Courses for Overseas Students
- d) **Deferral:** as defined in the *SGANZ Deferment, Suspension, Withdrawal or Cancellation of Enrolment Policy*
- e) **Education Agent:** as defined in the *SGANZ Agent Management Policy*

- f) **ELICOS:** English Language Intensive Courses for Overseas Students
- g) **ESOS:** Education Services for Overseas Students
- h) **FISC:** Flinders International Study Centre
- i) **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.
- j) **NZQA:** New Zealand Qualifications Authority
- k) **NZQF:** New Zealand Qualifications Framework
- l) **Program Manager:** the senior staff member of the College responsible for the operational leadership of a program or course
- m) **Suspension:** as defined in the *SGANZ Deferral, Suspension, Withdrawal or Cancellation of Enrolment Policy*
- n) **TCP:** Taylors College Perth
- o) **TCS:** Taylors College Sydney
- p) **TEQSA:** Tertiary Education Quality and Standards Agency
- q) **Third party agreement:** as defined in the *SGANZ Third Party Delivery Policy and Procedure*
- r) **Third party source:** a supplier or service provider providing business services to SG ANZ
- s) **Trial period:** the period determined from time to time by SGANZ management in which students may enrol in a High School, Foundation, ELICOS or Higher Education course delivered and awarded by an SGANZ College, offered via enhanced delivery through virtual classrooms, on a trial basis
- t) **USFP:** University of Sydney Foundation Program

POLICY PROVISIONS

Principles

9. SGANZ's COVID-19 Enhanced Delivery 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 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 for a trial period are required to comply with all course and provider requirements during the trial period, regardless of their decision to continue with, defer or withdraw from the course before, or at the conclusion of, the trial period.
- 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.

POLICY ADJUSTMENT

Corporate

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

10. 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 SG ANZ, prior to distribution.

Critical Incident

11. The SGANZ COVID-19 Incident Response Workflow (Workflow) has been developed to supplement the requirements of the SGANZ Critical Incidents Involving Students Policy and Procedure.
12. In cases where students or a staff member advises 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 section 6.2 of the *SGANZ Critical Incidents Involving Students Policy and Procedure*
13. The Workflow applies to staff and students of SGANZ.

Disability and Equity

14. *SGANZ Student Disability Policy and Procedure*
15. SGANZ will ensure equitable access for all students to course materials and resources, learning technologies, learning and teaching activities, teaching staff and assessment requirements.

Privacy (including Third Party Agreements and Third Party Sources)

16. SGANZ Cyber Security Incident Response Policy and Procedure

17. SGANZ Student Privacy Policy

18. 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

Use of Technology

19. SG ANZ provides IT resources to support its learning and teaching activities and business services.

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

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

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

23. 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.

Wellbeing and Safety (including U18 Students)

24. *SGANZ Student Disability Policy and Procedure*
25. *SGANZ Safety and Wellbeing of Under-18 Students Policy and Procedure*
26. *SGANZ Standards of Conduct Policy*
27. *SGANZ Student Complaints and Appeals Policy and Procedure*
28. 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.
29. Online bullying (cyberbullying) is a pattern of repeated behaviours between people with ongoing contact in virtual settings via the internet or mobile devices.
30. 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.

Academic

Academic Integrity

31. *SGANZ Academic Honesty Policy*
32. The provisions of SGANZ's *Academic Honesty Policy* will apply to all students enrolled in a Higher Education, Foundation, ELICOS or High School course with SGANZ.
33. 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 SGANZ for promoting academic integrity and in managing allegations of academic misconduct. This is reinforced through regular appropriate professional development.
34. 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.

35. 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.
36. All text-based assessment tasks are to be submitted via Turnitin.
37. Procedures in SGANZ'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.

Attendance

38. Students are to be encouraged and supported to maximise their attendance 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
39. Virtual class and relevant learning activity scheduling is to be responsive to time-zone differences and student accessibility requirements
40. Teaching staff will complete an attendance register for each virtual class and relevant learning activities, which will be subject to daily monitoring.
41. The provisions of the *SGANZ Student Progression, Exclusion and Graduation Policy and Procedure* will apply where attendance in the virtual environment is deemed unsatisfactory.
42. In instances where an under-18 student 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

43. Assessment extensions may be granted for up to 21 days in cases involving COVID-19 isolation.
44. Where possible, assessment tasks will be rescheduled.
45. 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.
46. All assessment items will be submitted electronically with the exception of examinations.
47. Examinations will be conducted through online proctoring.
48. 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.

49. 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.

Benchmarking / External Referencing

50. SGANZ will adopt an externally-referenced continuous improvement approach to its online learning and enhanced delivery initiatives.

Course Design

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

Discontinuation and Teach-out

52. Any requirement to transition or teach out a course in the online environment will be required to comply with course delivery mapping requirements, including content and mode of study.

Learning Support

53. 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.

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

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

Participation and Engagement

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

57. 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

58. 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 *SGANZ 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

59. Students undertaking their studies via enhanced delivery through virtual classrooms will be required to complete an online orientation program.
60. 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.
61. Students will be contacted regularly by student support staff to determine any additional, individual support needs.
62. 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.

Operational

Admissions and Enrolment

63. *SGANZ Admissions Policy and Procedure*
64. *SGANZ Enrolment Terms and Conditions*
65. Students may enrol in a High School, Foundation, ELICOS) or Higher Education course delivered and awarded by an SGANZ College, offered via enhanced delivery through virtual classrooms, for a Trial period.
66. Any changes to SGANZ Enrolment Terms and Conditions with regard to the Trial period for High School, Foundation, ELICOS or Higher Education course delivered and awarded by an SGANZ College, offered via enhanced delivery through virtual classrooms, are to be communicated in accordance with the requirements of clause 9 of this Policy.
67. Procedural requirements for application for admission and enrolment, with regard to the trial period for High School, Foundation, ELICOS or Higher Education course delivered and awarded by an SGANZ College, offered via enhanced delivery through virtual classrooms, will be updated in the Admissions Procedure X.
68. Students applying to undertake a High School, Foundation, ELICOS, or Higher Education course delivered and awarded by an SGANZ College, offered via enhanced delivery through virtual classrooms during the COVID period, will be required to complete one of the following 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.

69. Password English language tests are not to be used during the COVID period.
70. 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 a confirmation of enrolment (COE) and student visa once they are able to move onshore for face-to-face teaching.
71. 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.
72. 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.
73. Once IELTS test centres are available, alternative English language tests will not be accepted.
74. The Duolingo English Test can only be used if there is no access to IELTS and evidence of this lack of access needs to be provided as part of a request to accept alternative tests.

Cancellation, Refund and Deferral

75. *SGANZ Deferment, Suspension, Withdrawal or Cancellation of Enrolment Policy*
76. *SGANZ Cancellation and Refund Policy*
77. *SG Coronavirus (COVID-19) Special Situations Refund Policy (internal document only)*
78. 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, SG ANZ 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.
79. 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 *SG ANZ Cancellation and Refund Policy*.
80. 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.
81. All legally permissible visa application attempts should be exhausted before the provisions of Annexure 1 are enacted.
82. Students who choose not to submit Administrative Reviews of Visa Decision will be considered as not meeting Immigration Entry Requirements.
83. Students who enrol in a High School, Foundation, ELICOS or Higher Education course delivered and awarded by an SGANZ College, offered via enhanced delivery through virtual classrooms, for a Trial period, and who continue with their enrolment after the

Trial period, are liable for all tuition and other course-related fees.

84. Students who enrol in a High School, Foundation, ELICOS or Higher Education course delivered and awarded by an SGANZ College, offered via enhanced delivery through virtual classrooms, for a Trial period, and who cancel their enrolment before, or at the conclusion of, the Trial period, are eligible for refund of tuition, application and enrolment fees.
85. Students who enrol in a High School, Foundation, ELICOS or Higher Education course delivered and awarded by an SGANZ College, offered via enhanced delivery through virtual classrooms, for a Trial period, and who cancel their enrolment before, or at the conclusion of, the Trial period, are not required to provide a reason for their withdrawal, but are required to demonstrate at least 80% attendance.
86. Students who enrol in a High School, Foundation, ELICOS or Higher Education course delivered and awarded by an SGANZ College, offered via enhanced delivery through virtual classrooms, for a Trial period, may elect to suspend their course of study until the next intake, up to 21 days after commencement.

Records Management

87. In response to COVID-19:

- a) SGANZ will maintain accurate and comprehensive documentation on student files.
- b) All student files will be stored and maintained in electronic format only, in secure electronic storage systems that comply with the requirements of the *SGANZ Records Management Policy and Procedure*.

RELATED DOCUMENTS

Policies

88. SGANZ and SG policies related to this policy are listed under each policy clause.
89. The SGANZ Quality Assurance Framework for Virtual Classrooms also applies.

Legislation and Standards

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

- a) Education Services for Overseas (ESOS) Act 2000 (Cwth) (and its amendments)
- b) Education Training and Reform Act 2006 (Cwth) (and its amendments)
- c) Education Training and Reform Regulations 2017 (Cwth) (and their amendments)
- d) The New Zealand Education Act (1989) (and its amendments)
- e) Higher Education Standards Framework 2015 (Threshold Standards)
- f) National Code of Practice for Providers of Education and Training to Overseas Students 2018 (the National Code)

- g) the Australian Qualifications Framework (AQF)
- h) the New Zealand Qualifications Framework (NZQF)
- i) the National Standards for ELICOS Programs
- j) the National Standards for Foundation 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 1993.

POLICY GOVERNANCE

Policy review

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

Records management

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

Document approval

Document ID	SGANZ COVID-19 Enhanced Delivery Policy		
Policy Owner(s)	Head of Governance, Quality, Compliance and Risk		
Endorsed	N/A	Date Endorsed	N/A
Approved	SGANZ Board of Directors	Date Approved	7 April 2020

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 SG ANZ under delegation – English language testing and introduction of trial period	N/A
1 May 2020	Amendment by Managing Director SG ANZ under delegation – exam invigilation	N/A
22 May 2020	Amendment by Managing Director SG ANZ under delegation – English language test revisions, and application of time limits to refund requests	N/A

4 June 2020	Amendment by Managing Director SG ANZ under delegation – refunds – application and enrolment fees	N/A
29 July 2020	Amendment by Managing Director SG ANZ under delegations – alternative English language tests	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 error (including fraud)	x	x	x	✓
Standard visa refusal	x	✓	✓	✓
Change of student risk category	x	✓	✓	✓
Fraud	x	x	x	x
Agent error (including fraud)	x	✓	✓	✓
Visa/immigration service error	x	✓	✓	✓
Study Group error	✓	✓	✓	✓
Student withdrawal from studies due to...				
Student does not pass our GTE assessment ¹	x	✓	✓	✓
Change of mind	x	x	x	✓
Change of programme dates	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 CoE based on GTE issue.