

# Student Transfer Policy and Procedure

## Purpose

1. This Policy outlines the principles governing the process for assessing overseas student transfer requests in Global Higher Education (GHE) courses in accordance with Standard 7 of the National Code of Practice for Providers of Education and Training to Overseas Students 2018 (The National Code).
2. The purpose of this policy and procedure is to establish the conditions under which a student transfer may be granted.

## Scope

3. This Policy applies to all international students in GHE higher education courses.

## Definitions

4. Definitions for key terms are presented in the Glossary of Terms which may be accessed on the GHE website at <https://www.globalhe.edu.au/policy>

## Suite documents

5. This Policy is linked to the Admissions Policy & Procedure, the Enrolment Policy & Procedure, and to the Academic Progress Policy and Procedure where relevant.

## Policy

### Principles

6. Under Standard 7 of the National Code, international students must remain with their original education provider for the first six months of their principal course.
7. Where a student enrolls in packaged programs, which includes enabling programs such as English Language, the principal course is the final course in the offer.
8. GHE will accept an application from students wishing to transfer to the Institute or transfer from the Institute to another education provider after six months of study in their principal course.
9. In accordance with clauses 6 and 7, students are restricted from transferring to another Australian education provider from the Institute if they have yet to complete the first six months of their principal course, except where the following circumstances occur:
  - a) the releasing provider, or the course in which the overseas student is enrolled, has ceased to be registered;
  - b) the releasing provider has had a sanction imposed on its registration by the ESOS agency that prevents the overseas student from continuing their course at that registered provider;
  - c) the releasing provider has agreed to the overseas student's release and recorded the date of

effect and reason for release in PRISMS;

- d) any government sponsor of the overseas student considers the change to be in the overseas student's best interests and has provided written support for the change.
10. To be eligible to apply for a transfer from GHE to another provider within the first six months of a student's principal course or during their enrolment in prerequisite courses within a package of courses, a student must have met the conditions of offer and be able to demonstrate one or more of the circumstances detailed in Clause 11 below to justify the transfer.
11. Students will be granted a release if they have not met the condition(s) of their offer. Before a request for a release can be considered, the student must meet at least one of the following conditions:
- a) provide evidence that they have attempted and not successfully completed their enabling program e.g. ELICOS.
  - b) demonstrate compassionate or compelling personal reasons or academic circumstances. It would normally be expected that such circumstances were unexpected and beyond the control of the student. For a request to be considered, the student must provide relevant supporting documentary evidence which might include a personal statement and a statement of support from an independent professional (e.g. medical, legal, counsellor, academic).
  - c) the student will be reported in PRISMS because they are unable to achieve satisfactory course progress at the level they are studying, even after the academic support intervention strategies have been followed as detailed in the Academic Progress Procedure; or
  - d) being in the best interests of the student where:
    - GHE fails to deliver the course as outlined in the written agreement with the student; or
    - there is evidence that the student's reasonable expectations about their current course are not being met; or
    - there is evidence that the student was misled by GHE or an education migration agent regarding the Institute or its course and the course is, therefore, unsuitable to the student's needs and/or study objectives; or
    - an appeal (internal or external) on another matter results in a decision or recommendation to release the student.

If a release is granted, it will be at no cost to the student.

12. A release will not be granted where:
- a) The student has not completed the first four weeks of the course in which they are enrolled; or
  - b) GHE forms the view that the student is trying to avoid being reported to the Department of Home Affairs for failure to meet the Institute's attendance or academic progress requirements; or
  - c) The transfer may jeopardise the student's progression through a package of courses; or
  - d) The transfer would be detrimental to the student's future study, welfare, and/or career objectives; or
  - e) The student applies for a release from a course provided by the Institute to transfer to a course provided by another Registered Provider and the Institute considers the other course to be the same, similar or equivalent; or

- f) The student has not accessed GHE's student support or welfare services after having been requested to do so; or
  - g) The documents provided by the student do not, in the view of GHE, adequately support grounds upon which the transfer is requested; or
  - h) The student has outstanding debts to GHE.
13. All records related to student transfers will be maintained for a period of at least two years after the student ceases to be an accepted student of GHE, or longer in accordance with the Records and Data Management Policy.

## Procedure

14. Where a student requests a transfer within the period of six months of commencement of their principal course GHE will assess the request for transfer against this policy and procedure. Students seeking to apply to transfer prior to completing the first six months of their principal course with GHE are required to apply in writing on the approved Application for Transfer between Registered Providers Form and have attached supporting documents as well as the offer letter for the proposed new education provider.

Process	Responsibility	Timeline
<p><i>Complete the Application Form.</i> Students must complete, sign, date and lodge the Application Form with the Student Support Officer.</p> <p>The following documents must be attached to the Application Form: An explanation of the reasons behind their request to transfer to another Provider and how they will benefit from the transfer; and the offer letter from the other Provider confirming that a valid enrolment offer has been made unconditionally at that Provider; and documented evidence as detailed under Clause 11 must be attached or outlined in the letter of application. Failure to present evidence may adversely affect the outcome of the Application. If all the above documentary requirements are not met the application will be rejected.</p>	Student	Prior to any transfer and prior to payment of any tuition fees to another education provider.
<p><i>Interview appointment.</i> Upon receipt of the Application Form and supporting documents, GHE will make an appointment with the student to attend an interview with the Student Counsellor.</p>	Student Services	Within 2 working days from receipt of application.
<p><i>Interview.</i> The Student Counsellor will interview the student to determine: The circumstances surrounding the release; how the student may benefit from a transfer to another education provider; and whether the transfer would</p>	Student Counsellor	Within 5 working days from receipt of application

be detrimental for the student or their future studies. If the student fails to respond or attend an interview within the timeframe, the assessment will progress in the absence of that information.		
<i>Consider the student's options.</i> The Student Counsellor will consider the options available to the student to achieve their learning goals, including any support services offered by GHE to assist students to adjust to study and life in Australia.	Student Counsellor	Within 2 working days of the interview
<i>Refer student to support services.</i> Where it is in the student's interests, refer the student to appropriate support services for: Academic skills support; Additional English support; Increased monitoring; A mentor program; Referral to personal counselling; Consideration of reduction in unit load.	Student Counsellor	Within 2 working days of the interview
<i>Recommendation.</i> A recommendation to the Head of Student Services is made as to whether a transfer would be detrimental to the student or their future studies and whether a release should be granted.	Student Counsellor	Within 2 working days of the student's interview.
<i>Review of recommendation.</i> Considers the Application and supporting documents considering: the student's educational goals and individual circumstances; and the recommendation made by the Student Counsellor; and whether the transfer would be detrimental to the student or their future studies.	Head of Student Services	
<i>Final decision.</i> Make and record a decision as to whether to grant a release and recorded in the student's file.	Academic Director	Within 8 working days of the receipt of application.
<i>Final Decision Communicated: Successful Outcome.</i> Students will be advised in writing of the outcome of the application and a release will be recorded in PRISMS. The written correspondence will contain: Confirmation the release has been granted; Advice that the student's Electronic Confirmation of Enrolment has been cancelled and they must contact the Department of Home Affairs to seek advice on whether a new student visa is required; Advice that the student may apply for a refund in accordance with the Refund Policy.	Student Services	Within 10 working days of the receipt of application.

<p><i>Final Decision Communicated: Unsuccessful Outcome.</i></p> <p>If the decision is not to grant a release, office staff should immediately write to the student enclosing: The reasons for the decision not to grant a release; advice the student may freely transfer after completion of 6 months of their principal course; and information on the student's right to appeal the decision in accordance with the Student Complaints, Grievances and Appeals Policy and Procedure.</p>	Student Services	Within 10 working days of the receipt of application.
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15. If the student is not satisfied with the decision not to grant a release, the student has the right to appeal the decision in accordance with the Student Complaints, Grievances and Appeals Policy and Procedure. In the event of an appeal, GHE will maintain the student's enrolment in the course or courses in which they are enrolled to study until the appeals process is completed. An appeal must be lodged, in writing, to the Academic Director within 20 working days from the date of the refusal letter.
16. If the decision is to not grant a release, the student's enrolment will be maintained, and they will be advised to continue with their studies. If the student does lodge an appeal, no changes are to be made to PRISMS until the appeal has been heard and the time for subsequent appeals is exhausted.

## Responsibilities

17. GHE is committed to the welfare of its students and provides appropriate support to ease the transition into life and study in Australia. Where students experience difficulties or obstacles in achieving their learning goals GHE will counsel students and provide support.
18. Student Services will maintain records of all applications for transfer in the relevant student file. Where a transfer has been approved the file will be retained for not less than two years from the date the student ceases to be enrolled with GHE.

## Associated information

Related Internal Documents	Admissions Policy Academic Progress Policy and Procedure Enrolment Policy and Procedure Privacy Policy Records and Data Management Policy Application for Transfer between Registered Providers Form Student Academic Integrity and Academic Misconduct Policy Student Complaints, Grievances and Appeals Policy Student Appeals Procedure Student Disability Policy Student Diversity and Equity Policy Student Non-Academic Conduct and Misconduct Policy Student Fees, Charges and Refunds Policy and Procedure Glossary of Terms
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<b>Related Legislation, Standards and Codes</b>	<i>Tertiary Education and Quality Standards Agency Act 2011</i> <i>Higher Education Standards Framework (Threshold Standards) 2021</i> <i>Education Services for Overseas Students Act 2000</i> <i>National Code of Practice for Providers of Education and Training to Overseas Students 2018</i>
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<b>Policy Custodian</b>	Chief Executive Officer
<b>PinPoint DocID</b>	XXXX (once uploaded)

## Change history

<b>Version Control</b>	Version 1.0	
<b>Change Summary</b>	3-Jan-24	V1.0 Draft to meet Standard 7 National Code.

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