



Transferring Between Registered Providers Policy

1. Introduction

1.1 Purpose

The purpose of this policy is to clarify the requirements, rights, and responsibilities of Greenwich College Pty Ltd in relation to international students transferring between registered providers. The policy is informed by the ESOS legislative framework and the National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code), specifically Standard 7. It ensures that all transfer requests are assessed on their individual merits, with primary consideration given to the best interests of the student, while supporting informed student choice and maintaining the integrity of the student visa framework. For the purposes of this policy, the student's best interests are assessed on an individual basis, considering the student's circumstances and the requirements of the National Code.

1.2 Scope

This policy applies to all Greenwich College staff involved in student recruitment, enrolment, and student administration. It specifically governs the assessment and approval of overseas student transfer requests to and from another registered provider.

2. Policy

This policy ensures that Greenwich College does not inappropriately restrict overseas student transfers and that all transfer requests are managed in a fair, transparent, and compliant manner. This policy is intended to ensure overseas students are appropriately restricted from transferring between registered providers, while maintaining compliance with the student visa framework.

The policy and associated procedures apply to transfer requests made both before and after the completion of six (calendar) months of a student's principal course of study.

For the purposes of this policy, a student's principal course of study is defined in accordance with the National Code as the final course of study in the student's enrolment package.

Greenwich College recognises overseas students as consumers and supports them to exercise informed choice, while acknowledging that some students may require additional support when transitioning between providers.

2.1 Six (Calendar) Months of the Principal Course

Under the National Code, overseas students who have completed six (calendar) months of their principal course of study do not require a release from their current provider in order to transfer to another registered provider.

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greenwichcollege.edu.au
info@greenwichcollege.edu.au

ABN 31 114 584 940
CRICOS Code 02672K
RTO 91153

Sydney Pitt Street Campus
Level 2, 396 Pitt Street, Sydney
NSW 2000, Australia • +61 2 9264 2223

Brisbane Campus
Level 3, 119 Charlotte Street, Brisbane
QLD 4000, Australia • +61 7 3040 4417

Sydney Mary Street Campus
Level 2, 72 Mary Street, Surry Hills
NSW 2010, Australia • +61 2 8317 0502

Gold Coast Campus
56 Nerang Street, Southport
QLD 4215, Australia • +61 7 5606 7133

Melbourne Campus
Level 8, 120 Spencer Street, Melbourne
VIC 3000, Australia • +61 3 8609 0000

Perth Campus
13 Beechboro Road South, Bayswater
WA 6053, Australia • +61 8 6187 9625

Adelaide Campus
Level 4, 27 Currie Street, Adelaide
SA 5000, Australia • +61 8 6333 0338

For the purposes of this policy, the six (calendar) month period is calculated from the commencement date of the student's principal course, as recorded on the student's Confirmation of Enrolment (CoE). The six (calendar) month period includes scheduled holidays, term breaks, and non-teaching periods. The six (calendar) month transfer restriction applies to all courses undertaken prior to the principal course in a packaged enrolment.

Where a student has not completed six (calendar) months of their principal course, Greenwich College will assess the transfer request in accordance with National Code Standard 7 to determine whether an early transfer is in the student's best interests.

Completion or non-completion of six (calendar) months of the principal course is not, in itself, a sufficient basis for approving or refusing a transfer request.

2.2 Students Transferring to Greenwich College

Greenwich College will not enrol an overseas student who has not completed six (calendar) months of their principal course with another registered provider unless one of the circumstances outlined in National Code Standard 7.4 applies. Any assessment of an exception under National Code Standard 7.4 is completed prior to enrolment. These circumstances include where:

- the original provider has ceased to be registered, or the course in which the student is enrolled is no longer registered or being delivered
- the student has been released by the original provider via PRISMS
- a government sponsor considers the transfer to be in the student's best interests and provides written support
- a sanction has been imposed on the original provider that prevents the student from continuing their course.

Where a release is required, Greenwich College will only enrol the student once the release has been recorded in PRISMS. All supporting documentation will be retained on the student's file. Greenwich College will not actively recruit overseas students where doing so would conflict with its obligations under Standard 7 of the National Code.

2.3 Students Transferring from Greenwich College

Where an overseas student has not completed six (calendar) months of their principal course, Greenwich College will assess the transfer request in accordance with National Code Standard 7.2, considering the student's individual circumstances and whether an early transfer is in the student's best interests.

An overseas student seeking to transfer to another registered provider before completing six (calendar) months of their principal course must submit a written request for release and provide a valid written offer of enrolment from the receiving provider. The student must also

supply any supporting documentation relevant to the grounds for transfer, including evidence of compassionate or compelling circumstances where applicable.

A transfer request will not be considered complete until all required documentation has been submitted. Greenwich College will assess and provide a written outcome for a complete transfer request within ten working days (not calendar days), consistent with the restriction period under the National Code. Transfer decisions are made by authorised Student Services staff in accordance with this policy.

Circumstances that are considered when assessing a transfer request include, but are not limited to:

- the student is unable to achieve satisfactory course progress at their current level of study, despite engaging with Greenwich College's intervention strategy in accordance with Standard 8 (Overseas student visa requirements)
- evidence of compassionate or compelling circumstances
- Greenwich College has failed to deliver the course as outlined in the written agreement
- the student's reasonable expectations about their current course are not being met
- evidence that the student was misled by Greenwich College or by an education or migration agent regarding the provider or its course, resulting in the course being unsuitable to the student's needs or study objectives
- an internal or external appeal on another matter results in a decision or recommendation that the student be released.

No single factor will be determinative. Each request will be assessed holistically.

Where the overseas student is under 18 years of age:

- written consent from the student's parent or legal guardian must be provided; and
- written confirmation must be obtained from the receiving provider confirming that it accepts responsibility for approving the student's accommodation, support, and general welfare arrangements in accordance with National Code Standard 5.

A release will not be granted until all under-18 requirements have been met. Greenwich College will not charge students for approving a release.

2.4 Refusal of Transfer Request

A transfer request may be refused only where, after assessment of the student's individual circumstances, it is determined that the transfer is not in the student's best interests.

A refusal decision will:

- not be based solely on whether the student has completed six (calendar) months of their principal course
- not be based on assumptions about migration, residency, or visa outcomes

- be communicated to the student in writing
- include clear and detailed reasons for the decision
- advise the student of their right to access the internal and external appeals process.

2.5 Appeals

Students have the right to appeal a refusal decision in accordance with the Greenwich College Student Complaints and Appeals Policy. Greenwich College will provide students with a written statement of the outcome of any internal appeal, including detailed reasons for the decision, in accordance with National Code Standard 10.2.6. Any appeal is managed in accordance with National Code Standard 10.

2.6 PRISMS Reporting

Where a release is approved, Greenwich College will record the release in PRISMS as required. Where a student withdraws from a course of enrolment, Greenwich College will notify the relevant government department through PRISMS within fourteen calendar days, in accordance with the ESOS Act.

Greenwich College will not finalise any PRISMS reporting related to a refused transfer request until the internal appeals process has been completed and the outcome confirmed, or until the student withdraws from the appeal.

2.7 Refund of Fees

Where a student transfers to another provider, any refund of fees paid to Greenwich College will be managed in accordance with the Greenwich College Cancellation and Refund Policy.

2.8 Education agent commissions

Greenwich College will comply with National Code Standard 4.7 and 4.8 and will not pay education agent commissions for the recruitment of overseas students who have commenced studying with another registered provider, except where an applicable exception under the National Code applies.

3. References

Related Greenwich College Policies and Procedures

This policy should be read in conjunction with the following Greenwich College policies and procedures:

- Student Complaints and Appeals Policy
- Cancellation and Refund Policy
- Under 18 Years Student Management and Supervision Procedure
- Overseas Student Support Services Policy (where applicable)

Legislative and Regulatory Framework

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greenwichcollege.edu.au
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- Education Services for Overseas Students Act 2000
- National Code of Practice for Providers of Education and Training to Overseas Students 2018

3.1. Change History

Version Control Number	Date	Summary of Changes
v1.0	23 March 2016	Initial release
v1.1	1 January 2018	Legislative alignment update
v1.2	1 September 2019	Minor policy revisions
v1.3	15 April 2021	Compliance update
v1.5	5 April 2023	Operational amendments
v1.6	10 August 2023	Administrative update
v1.7	10 October 2023	Clarification of transfer processes
v2.0	27 February 2026	Major policy review
V2.1	6 March 2026	Updated to reflect ESOS Act amendments (Dec 2025) and National Code amendments (Jan 2026), including clarification of six (calendar) month transfer restrictions, decision timeframes, and education agent commission requirements for onshore transfers.

4. Review

This policy is reviewed at least every two (2) years and may be reviewed earlier in response to changes in legislation, the National Code, or operational requirements.

The review is managed by the National Student Services Manager and Greenwich College Compliance Manager and approved by the General Manager.