



# ***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 with respect to international students transferring from one provider to another. This policy is set out in the ESOS legislative framework and related regulations, including the National Code of Practice for Providers of Education Services for Overseas Students Act 2000 (National Code 2018) Part D Standard 7. This policy ensures that all transfer requests are assessed on their individual merits, with primary regard to the best interests of the student, while supporting student choice and maintaining the integrity of the student visa framework.

### 1.2. Scope

This policy applies to all Greenwich staff involved in student recruitment, enrolment and student administration, and specifically to 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 transfer requests are managed in a fair, transparent and compliant manner.

This policy and the associated procedures address transfer requests made both before and after completion of six 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 Months of the Principal Course

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

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

Completion or non-completion of six months of the principal course is not, of itself, a ground 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 months of their principal course with another provider unless one of the circumstances outlined in National Code Standard 7.4 applies, including where:

- the original provider has ceased to be registered or the course is no longer registered or 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 is recorded in PRISMS. All supporting documentation will be retained on the student's file.

Greenwich College will not actively recruit overseas students where this 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 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 months of their principal course must submit a written request for release to Greenwich College and provide a valid written offer of enrolment from another registered provider. The student must also provide 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 provided. Greenwich College will assess and provide a written outcome of a complete transfer request within 10 working days, having regard to the restriction period under the National Code.

Circumstances that may be considered when assessing a transfer request include (but are not limited to):

- the overseas student is unable to achieve satisfactory course progress at the level they are studying, even after engaging with Greenwich College's intervention strategy in accordance with Standard 8 (Overseas student visa requirements);
- there is evidence of compassionate or compelling circumstances;
- Greenwich College has failed to deliver the course as outlined in the written agreement;

- there is evidence that the overseas student's reasonable expectations about their current course are not being met;
- there is evidence that the overseas student was misled by Greenwich College or by an education or migration agent regarding the provider or its course, and the course is therefore unsuitable to the student's needs and/or study objectives;
- an internal or external appeal on another matter results in a decision or recommendation to release the overseas student.

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 will accept responsibility for approving the students' accommodation, support and general welfare arrangements in accordance with National Code Standard 5.

A release will not be granted until these requirements are satisfied.

## 2.4. Refusal of Transfer Request

A transfer request may be refused where, after considering the student's individual circumstances, Greenwich College reasonably determines that the transfer is not in the student's best interests.

A refusal decision will:

- not be based solely on the student having completed, or not completed, six 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 Greenwich College Student Complaints and Appeals Policy. Greenwich College will ensure that students are provided with a written statement of the outcome of any internal appeal, including detailed reasons, in accordance with National Code Standard 10.2.6.

## 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 14 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 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.

## 3. References

- Education Services for Overseas Students Act 2000
- National Code of Practice for Providers of Education and Training to Overseas Students 2018
- Student Complaints and Appeals Policy
- Cancellation and Refund Policy
- Under 18 Years Student Management and Supervision Procedure

### 3.1. Change History

Version Control Number	Date	Next Review Date
v1.0	23 <sup>rd</sup> March 2016	23 <sup>rd</sup> March 2017
v1.1	1 <sup>st</sup> January 2018	1 <sup>st</sup> January 2019
v1.2	1 <sup>st</sup> September 2019	1 <sup>st</sup> September 2020
v1.3	15 <sup>th</sup> April 2021	15 <sup>th</sup> April 2022
v1.5	5 <sup>th</sup> April 2023	5 <sup>th</sup> April 2024
v1.6	10 <sup>th</sup> August 2023	10 <sup>th</sup> August 2024
v1.7	10 <sup>th</sup> October 2023	10 <sup>th</sup> October 2024
v2.0	27 <sup>th</sup> February 2026	1 <sup>st</sup> July 2026

<b>POLICY NAME</b>	Transferring Between Registered Providers Policy
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<b>APPROVAL AUTHORITY</b>	General Manager
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