

## Student Transfer Policy

### 1. Purpose

The purpose of this policy is to provide a structured approach to the assessment and management of student transfer requests. ILSC Australia and Greystone College are committed to ensuring that transfer decisions are made fairly, consistently and in the best interests of students, while supporting academic success, student wellbeing and informed participation in education.

This policy sets out the circumstances under which a transfer may be supported, the process for assessing requests, and the requirements for maintaining accurate records and appropriate oversight of transfer activities.

### 2. Scope

This Policy applies to:

- International students studying under a Student Visa;
- Requests to transfer to another registered provider;
- Applications for transfer from another registered provider to ILSC Australia and/or Greystone College where applicable;
- Staff involved in admissions, enrolment, compliance, academic administration and student support; and
- Education agents and third-party representatives acting on behalf of ILSC Australia and/or Greystone College.

### 3. Definitions

**Compassionate or Compelling Circumstances:** Circumstances beyond the student's control that have a significant impact on the student's ability to continue studying, including but not limited to serious illness, injury, bereavement, family hardship, or other exceptional circumstances.

**Education Agent:** A person or organisation, whether in Australia or overseas, that is not a permanent full-time or part-time employee of ILSC and/or Greystone College and who recruits, provides enrolment information, advice or assistance to, or otherwise deals with overseas students or prospective overseas students on behalf of the College.

**PRISMS:** The Provider Registration and International Student Management System used to issue COEs and report changes to international students' enrolment details.

**Student Transfer:** The movement of an international student between registered providers, including requests to transfer from ILSC Australia and/or Greystone College to another registered provider, or an application to transfer from another registered provider to ILSC Australia and/or Greystone College.

**Registered Provider:** An education provider registered on the Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) and authorised to deliver education to international students studying on a student visa.

#### 4. Policy Statement

ILSC Australia and Greystone College are committed to assessing student transfer requests fairly, consistently and in the best interests of students.

Transfer decisions will be made on an individual basis, taking into account the student's circumstances, academic progression, welfare considerations, course suitability, and any supporting evidence provided. ILSC Australia and Greystone College will ensure that transfer requests are managed transparently and that students receive clear information regarding transfer requirements, outcomes, and available appeal options.

ILSC Australia and Greystone College will not support practices that encourage transfers for inappropriate commercial purposes or that are otherwise inconsistent with the student's best interest.

#### 5. Transfer Restrictions

International students are subject to restrictions on transferring to another registered provider during the first six (6) months of their principal course of study.

Where applicable, ILSC Australia and Greystone College will assess transfer requests in accordance with legislative and regulatory requirements relating to transfers between registered providers.

Requests made during any restricted transfer period will be assessed on a case-by-case basis, taking into consideration the student's circumstances, supporting evidence and whether the proposed transfer is in the student's best interests.

#### 6. Circumstances supporting a transfer to another provider

ILSC Australia and Greystone College may support a transfer request where, following assessment of the student's circumstances, it is satisfied that the proposed transfer is in the student's best interests.

Circumstances that may support a transfer include, but are not limited to:

- Compassionate or compelling circumstances, supported by appropriate evidence, that significantly affect the student's ability to continue studying with the College;
- Documented welfare or well-being concerns where a transfer is considered likely to better support the student's educational participation or overall wellbeing;
- Evidence that the proposed course provides a more appropriate academic pathway that is aligned with the student's educational and career objectives;
- Circumstances where ILSC Australia and/or Greystone College are unable to reasonably meet the student's educational needs; or

- Other circumstances where ILSC Australia and/or Greystone College determine that the transfer would support the student's educational success and wellbeing.

## 7. Circumstances where a transfer may not be supported

ILSC Australia and Greystone College may refuse a transfer request where it reasonably determines that the transfer is not in the student's best interests.

Examples may include:

- The proposed transfer may adversely impact the student's academic progression or completion outcomes;
- The proposed course does not represent a logical progression of study;
- The transfer request appears to be made primarily to avoid academic progress, attendance or engagement requirements rather than representing a genuine educational pathway;
- The student has not provided sufficient evidence to support the request;
- The stated reasons for transfer do not demonstrate a clear educational or welfare benefit;
- ILSC Australia and Greystone College are able to meet the student's educational needs through existing courses, support services or study pathways; or
- ILSC Australia and Greystone College reasonably believe the transfer is not genuine or may disadvantage the student's future educational outcomes.

## 8. Assessment of transfer requests

Students seeking a transfer must submit a written request and provide supporting documentation relevant to their circumstances.

ILSC Australia and Greystone College will assess transfer requests having regard to:

- The student's stated reasons for transfer;
- Supporting evidence;
- Academic history and progression;
- Attendance and engagement records where relevant;
- Welfare considerations raised by the student;
- Future study plans; and
- Any other factors relevant to the circumstances.

ILSC Australia and Greystone College may request additional information or supporting documentation where required to assess the transfer request.

## 9. Transfer decisions and administration

ILSC Australia and Greystone College will provide students with written notification of the outcome of their transfer request.

Where a transfer is approved, ILSC Australia and/or Greystone College will undertake any required administrative actions, including updates to student records, PRISMS reporting where applicable, and record management activities.

Where a transfer is not approved, the student will be advised of the reasons for the decision and any available review or appeal options.

Transfer requests will normally be assessed and students notified of the outcome within 14 working days of all required information being received.

### 9.1. Fees and Refunds

Approval of a transfer request does not automatically entitle a student to a refund of tuition fees or other charges.

Any applicable refund entitlement arising from a student transfer, withdrawal or cancellation of enrolment, including any applicable cancellation fees, will be assessed in accordance with the *Cancellation and Refund Policy-Student and Provider Default* and any applicable student agreement.

Students remain responsible for any outstanding fees and charges incurred prior to the effective date of withdrawal or transfer.

## 10. Transfer Requests to ILSC Australia and/or Greystone College

ILSC Australia and Greystone College recognise that students may seek transfer from another registered provider as a result of provider default, course cessation, changes to course availability, or other circumstances impacting their ability to continue their studies with the current provider.

ILSC Australia and Greystone College may consider applications from international students seeking to transfer from another registered provider.

Applications will be assessed in accordance with applicable legislative and regulatory requirements and may include consideration of:

- The student's educational goals and study pathway;
- Previous academic history and progression;
- Supporting documentation provided by the student;
- Applicable transfer restrictions;
- The student's capacity to meet course entry requirements;
- Circumstances affecting the student's current enrolment, including where the current provider is unable to continue delivering the course or has experienced a provider default situation; and
- Any other information considered relevant to the application.

ILSC Australia and Greystone College reserve the right to decline an application where the proposed transfer is not considered to be in the student's best educational interests or where enrolment would be inconsistent with legislative, regulatory or organisational requirements.

## 11. Education Agent Responsibilities

Education agents representing ILSC Australia and Greystone College must act ethically, honestly, professionally and in the best interests of students.

Education agents must not:

- Pressure students to transfer providers;
- Provide misleading information regarding transfer opportunities;
- Encourage students to undertake non-genuine study pathways;
- Influence transfer decisions for personal or commercial benefit; or
- Engage in conduct that may adversely affect student welfare or educational outcomes.

## 12. Education Agent Commission Restrictions

ILSC Australia and Greystone College are committed to ensuring that student transfer decisions are made in the interests of the student and not for commercial gain.

Accordingly, ILSC Australia and Greystone College will not pay, offer, provide or authorise an education agent commission, monetary benefit, non-monetary benefit or other consideration in connection with the recruitment of an overseas student who transfers from another registered provider after commencing studies in Australia, except where expressly permitted under applicable legislation.

In assessing applications from students seeking to transfer from another registered provider, ILSC Australia and Greystone College will ensure that enrolment and recruitment practices comply with applicable legislative requirements relating to education agents and commission arrangements.

ILSC Australia and Greystone College prohibit any arrangement intended to circumvent legislative restrictions relating to education agent commissions and student transfers.

Any breach of this requirement may result in corrective action, including suspension or termination of an education agent agreement.

## 13. Complaints and Appeals

Students who are dissatisfied with a transfer decision may access ILSC Australia and Greystone College Complaints and Appeals Policy.

Students will not be disadvantaged as a result of raising a complaint or lodging an appeal.

## 14. Related Legislation and Standards

- National Code 2018
- ESOS Act 2000
- Standards for RTOs 2025
- ELICOS Standards 2018

## 15. Policy Review

This policy will be reviewed at least every year, or earlier if required, to ensure alignment with changes in legislation, regulatory standards, compliance requirements, or organisational operations. Earlier reviews may be undertaken in response to audits, incidents, or identified opportunities for improvement.

### 15.1. Details

| Policy Title     |               | Student Transfer Policy                                             |                                                                                                                                                                                                                            |                                                                                                                                                                                                                                     |
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| Approved by      |               | Vice President Australia Operations / Director of Quality Assurance |                                                                                                                                                                                                                            |                                                                                                                                                                                                                                     |
| Next Review Date |               | July 2027                                                           |                                                                                                                                                                                                                            |                                                                                                                                                                                                                                     |
| Version          | Date          | Effective Date                                                      | Comment/Note                                                                                                                                                                                                               | Author/Reviewed by                                                                                                                                                                                                                  |
| 3.0              | February 2021 | February 2021                                                       | Policy governing student change of provider requests, release decisions and associated refund arrangements for ELICOS and VET students.                                                                                    | Not formally documented                                                                                                                                                                                                             |
| 4.0              | 09-Jul-2026   | 31-Jul-26                                                           | Comprehensive review undertaken to align with current student transfer requirements, education agent commission restrictions and organisational policy framework. Document restructured using the revised policy template. | Director of Quality Assurance, in liaison with National Director-GC, National Director ELICOS & Pathway, National Director-Campus Operations, Global Sales Director, Vice President-Sales, Acting National Student Services Manager |
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