

Student Transfer Between Registered Providers Policy and Procedure

1. Purpose

This policy outlines the process for assessing and managing requests from overseas students seeking to transfer between registered providers.

Princeton International College ensures that all transfer decisions are fair, transparent, consistent, and made in the best interests of the student, while maintaining compliance with visa conditions and regulatory requirements.

This policy is implemented in accordance with:

- ESOS Act 2000 (as amended)
- National Code of Practice for Providers of Education and Training to Overseas Students 2018 (Standard 7 – Overseas Student Transfers)
- Standards for RTOs 2025

This policy and procedure is made available to staff and students through the College's policies and procedures framework, student handbook and administrative support systems to ensure transparency and accessibility.

2. Policy Statement

Princeton International College ensures that:

- Students are provided with accurate and ethical information prior to enrolment
- Transfer requests are assessed fairly, consistently, and without bias
- Students are not misled or disadvantaged in relation to transfer decisions
- Staff and education agents are aware of and comply with transfer requirements
- All decisions are documented, evidence-based, and auditable
- Education agents engaged by Princeton International College act ethically, honestly and in the best interests of students. The College does not pay education agent commission for recruiting overseas students who have commenced with another registered provider, except where permitted under applicable legislation. Further details are outlined in the Education Agent Management Policy.

3. Six-Month Restriction

In accordance with the National Code and the ESOS legislative framework, Princeton International College will not knowingly enrol an overseas student who is seeking to transfer from another

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registered provider before the student has completed six (6) months of their principal course of study, unless the transfer is permitted under an allowable exception.

This restriction applies to overseas students studying in Australia whose student visa is linked to a principal course and is intended to ensure that students are not encouraged or inappropriately influenced to change providers shortly after commencing their studies.

For the purpose of this policy:

- the principal course is the main course of study for which the student visa has been granted
- the six-month period is calculated from the date the student commences their principal course, not from the date of visa grant or arrival in Australia

Where a student has not yet completed six (6) months of their principal course, Princeton International College will only proceed with enrolment if one of the following applies:

- a valid Letter of Release has been provided by the student's current registered provider; or
- an allowable exception applies under the National Code or ESOS framework, such as where:
 - the original provider has ceased to be registered
 - the original provider has had sanctions imposed that prevent the student from continuing the course
 - the student is government-sponsored and written support for the transfer has been provided
 - other circumstances exist that are recognised under the applicable regulatory framework and are supported by appropriate evidence

Princeton International College will take reasonable steps to verify the student's enrolment status, principal course details, and commencement date through PRISMS and any other relevant documentation before making a decision.

The College will not:

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- knowingly enrol a student in breach of the six-month transfer restriction
- issue a Confirmation of Enrolment (CoE) unless it is satisfied that the student is eligible to transfer
- encourage students to transfer in circumstances where the regulatory requirements have not been met

This restriction is also communicated to relevant staff, student administration personnel, marketing staff, and education agents to ensure that all advice given to prospective students is accurate, ethical, and consistent with regulatory obligations.

By applying this restriction carefully and consistently, Princeton International College ensures that:

- enrolment practices remain compliant
- students are treated fairly
- transfer requests are assessed based on evidence rather than convenience
- the College upholds the intent of the National Code and protects the integrity of overseas student enrolment processes

4. Post Six-Month Period

Where an overseas student has completed six (6) months of their principal course of study, the restrictions relating to transfer between registered providers no longer apply under the National Code.

In these circumstances:

- the student is not required to provide a Letter of Release from their current provider
- Princeton International College may assess and process the student's application in accordance with its standard enrolment and admission procedures
- the student's application will still be subject to all usual entry requirements, document checks, and suitability assessments relevant to the course they are applying for

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- the College may proceed to issue an offer and, where appropriate, a Confirmation of Enrolment (CoE), provided all other admission requirements have been met

Before proceeding with enrolment, Princeton International College will still verify through PRISMS and supporting documentation that the student has in fact completed six (6) months of their principal course.

This step is important to ensure that the College:

- does not knowingly enrol a student in breach of the transfer requirements
- has sufficient evidence on file to support its enrolment decision
- maintains compliance with the ESOS framework and internal admission controls

Once the six-month period has been confirmed, the student will be treated in the same way as any other applicant seeking admission to the College, and no further release documentation is required.

5. Definitions

Principal Course:

The main course of study for which the student visa has been granted.

Six Months of Principal Course:

Six calendar months from the commencement date of the principal course.

Letter of Release:

A formal document issued by the current provider approving the student's transfer to another registered provider.

6. Procedure

All transfer requests are managed by authorised staff members, including the Student Support Officer, Administration Officer and CEO where required, and are assessed in accordance with this policy and procedure.

7. Incoming Students (Transfer to Princeton International College)

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7.1 Application Requirements

Students who are currently studying with another registered provider in Australia and wish to transfer to Princeton International College must complete the full enrolment process in accordance with the College's Enrolment Policy and Procedure.

As part of the application, students are required to submit all relevant documentation to enable a thorough assessment of their eligibility and compliance with transfer requirements. This includes:

- A completed and signed enrolment application form, ensuring all personal, academic and contact details are accurate and current
- A copy of the student visa grant notice, to confirm visa status, conditions and the principal course associated with the visa
- A copy of the student's current Confirmation of Enrolment (CoE), to verify the current provider, course details and enrolment status
- Relevant academic records or transcripts, where applicable, to assess the student's course progression and suitability for the intended course
- A valid Letter of Release from the current provider, where the student has not yet completed six (6) months of their principal course, unless an exception applies under the National Code

All required documentation must be submitted and verified before any decision is made.

Princeton International College will not issue a Confirmation of Enrolment (CoE) until the application has been fully assessed and approved.

Incomplete applications or missing documentation may result in delays or refusal to proceed.

7.2 Verification Process

Upon receipt of the application, the Administration Officer will conduct a detailed verification process using PRISMS and supporting documentation.

This includes:

- Accessing PRISMS to confirm the student's enrolment history
- Verifying the principal course of study associated with the student visa
- Confirming the course commencement date
- Calculating whether the student has completed six (6) months of their principal course
- Cross-checking information provided in the visa grant notice and CoE

This step ensures that the College does not knowingly enrol a student in breach of the six-month transfer restriction and that all regulatory requirements are met prior to enrolment.

7.3 Where Six Months Completed

Where the student has completed six (6) months of their principal course:

- The student will be eligible to transfer without requiring a Letter of Release
- The application will proceed through standard enrolment and admission processes

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- A new CoE may be issued upon successful enrolment

7.4 Where Six Months Not Completed

Where the student has not completed six (6) months of their principal course, Princeton International College will only proceed with enrolment where one of the following conditions is met:

- A valid Letter of Release has been obtained from the current provider
- The current provider has ceased to be registered
- Sanctions have been imposed on the provider preventing course delivery
- The student is a government-sponsored student and written approval has been provided
- The student demonstrates compassionate or compelling circumstances, supported by appropriate evidence

All supporting evidence must be documented and retained in the student file.

7.4 Where Six Months Not Completed

Where the student has not completed six (6) months of their principal course, Princeton International College will only proceed with enrolment where one of the following conditions is met:

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- The current provider has ceased to be registered
- Sanctions have been imposed on the provider preventing course delivery
- The student is a government-sponsored student and written approval has been provided
- The student demonstrates compassionate or compelling circumstances, supported by appropriate evidence

All supporting evidence must be documented and retained in the student file.

7.6 Refusal of Enrolment

If the student does not meet the required conditions:

- The application will not proceed
- The student will be advised in writing that they are unable to transfer at this time
- The student may be encouraged to reapply after completing six months of their principal course

8. Outgoing Students (Transfer from Princeton International College)

8.1 Application Process

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Students wishing to transfer to another registered provider must submit a formal request to Princeton International College.

The student must provide:

- A written request to transfer, outlining the reasons for seeking release
- A valid Offer of Enrolment from the receiving provider
- A statement explaining the reasons for transfer, including how the transfer supports their goals
- Any relevant supporting documentation, particularly where compassionate or compelling circumstances are claimed

All applications must be complete before assessment begins.

8.3 Assessment Principles

Each application will be assessed individually and fairly, taking into consideration:

- The best interests of the student
- The academic suitability of the proposed course
- The student's welfare and support needs
- The alignment of the transfer with the student's long-term goals
- The student's compliance with visa conditions, including course progress and attendance

All decisions will be evidence-based and documented.

Princeton International College will not apply blanket restrictions or predetermined decisions when assessing transfer requests. Each application will be considered on its individual merits, supported by evidence, and assessed in the best interests of the student.

8.4 Grounds for Granting Release

A Letter of Release may be granted where it is determined that the transfer is in the student's best interests, including but not limited to:

- Princeton International College is unable to deliver the course
- A government sponsor supports the transfer
- There are compassionate or compelling circumstances
- The student was misled by the provider or an education agent
- The transfer will provide better academic or support outcomes
- An internal or external appeal outcome supports the student's request

8.5 Compliance Checks

Before making a decision, the College will:

- Review any outstanding fees or financial obligations

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- Assess the student's academic progress and course progress, engagement, and where applicable, attendance records
- Ensure the student is not attempting to avoid reporting or compliance requirements
- Confirm the student understands the visa implications of transferring providers

9. Granting a Letter of Release

Where a request is approved:

- The Letter of Release will be issued at no cost to the student
- The student will be advised to contact the Department of Home Affairs regarding any visa implications
- The student's enrolment status will be updated in PRISMS
- A formal Letter of Release will be issued and retained on file

10. Refusal of Release

A request for transfer may be refused where:

- The transfer is not in the best interest of the student
- The current course is appropriate, and available support has not yet been utilised
- The student is attempting to avoid academic or course progress, engagement or other compliance requirements (including attendance where applicable)
- The receiving provider or course is not suitable

Students will be provided with:

- A written decision outlining the reasons for refusal
- Information about their right to appeal

11. Appeals

Students may access Princeton International College's internal complaints and appeals process where they are dissatisfied with a decision relating to a transfer request, Letter of Release outcome or any action taken under this policy.

Students have the right to lodge an internal appeal within twenty (20) working days from the date of the written outcome notification.

All appeals will be managed in accordance with Princeton International College's Complaints Handling Policy and Procedure and Appeals Handling Policy and Procedure.

During the internal appeals process:

- the student's enrolment will remain active until the internal appeals process is completed

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- the student will continue to have access to classes, learner support and student support services where applicable
- Princeton International College will maintain communication with the student regarding the appeal process and any required supporting documentation
- no final PRISMS reporting or release-related action will be finalised until the internal appeals process has been completed, unless otherwise permitted under legislation

Where an internal appeal outcome supports the student:

- Princeton International College will implement the outcome without delay
- relevant student records and PRISMS information will be updated where required
- the student will be advised in writing of the outcome and any further steps or conditions applicable

Where the internal appeal is unsuccessful:

- the student will be provided with written reasons for the decision
- the student will be informed of their right to access an external appeals process where applicable
- the student will be provided with information regarding available external complaint or dispute resolution services

Nothing within this policy removes the student's right to take action under Australia's consumer protection laws.

12. Record Management

Princeton International College will maintain accurate, complete and up-to-date records in relation to all transfer requests made by overseas students, whether the request is approved, declined, withdrawn, or otherwise finalised.

Records maintained by the College will include, but are not limited to:

- the student's written request to transfer, where applicable
- completed application forms and any supporting documents provided by the student
- copies of visa grant notices, Confirmation of Enrolment (CoE), academic records, and any Letter of Release received or issued
- file notes, meeting notes, email correspondence, and any other communication relating to the request
- evidence considered in making the decision, including compassionate or compelling circumstances, welfare concerns, academic suitability, and compliance checks
- the final decision made by the College, including the reasons for approval or refusal

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- a copy of any written notification provided to the student
- details of any appeal lodged and the outcome of the appeal process
- any PRISMS updates or reporting actions taken in relation to the transfer request

All records must be:

- securely stored in the student management system and/or student file
- protected from unauthorised access, alteration, loss or misuse
- readily accessible for internal monitoring, audit, regulatory review and compliance purposes
- retained in accordance with legislative, regulatory and organisational record-keeping requirements

Princeton International College will ensure that record-keeping practices support transparency, consistency and audit readiness, and that sufficient evidence is available to demonstrate that transfer decisions have been made fairly, appropriately and in accordance with this policy and applicable legislation.

13. Staff Responsibilities

All staff involved in providing advice to students, assessing transfer requests, making decisions, issuing documentation, or updating PRISMS must carry out their responsibilities in accordance with this policy and procedure.

This includes, but is not limited to, Student Support Officer, Administration Officer and any other authorised personnel involved in student administration or CRICOS compliance processes.

Staff responsibilities include:

- applying this policy consistently, fairly and without bias
- ensuring that students are provided with clear, accurate and timely information about transfer restrictions, process requirements and possible outcomes
- assessing each application on its individual merits, based on supporting evidence and the student's circumstances
- ensuring that decisions are made in the best interests of the student while also meeting the College's regulatory obligations
- verifying relevant information through PRISMS, student records, visa documentation and any other reliable sources
- maintaining confidentiality and protecting the privacy of student information at all times
- documenting all relevant actions, communications, considerations and outcomes accurately and in a timely manner
- ensuring that no student is knowingly enrolled in breach of the six-month principal course restriction

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- ensuring that education agents, recruitment staff and student support staff understand the limitations on transfer between providers and provide correct advice to students
- referring students to appropriate support services where welfare, academic or personal issues are identified during the assessment of a transfer request
- ensuring that PRISMS updates and related administrative actions are completed accurately and within required timeframes where a release is granted or other action is required

Princeton International College expects all staff involved in transfer matters to act ethically, professionally and in good faith, and to uphold the intent of the National Code by making decisions that are transparent, evidence-based and student-focused.

Where required, staff will receive induction, guidance, and ongoing updates to ensure they understand current regulatory requirements and their responsibilities under this policy.

The CEO maintains overall responsibility for governance oversight, compliance monitoring and PRISMS-related decision-making associated with transfer requests and release processes.

14. Continuous Improvement

Princeton International College is committed to reviewing and improving its transfer processes on an ongoing basis to ensure they remain effective, fair, and compliant with current regulatory requirements.

As part of the College's continuous improvement framework, transfer requests and related outcomes will be monitored regularly to identify:

- recurring student concerns or common reasons for transfer requests
- any delays, inconsistencies or gaps in the administration of the process
- opportunities to improve student information, staff guidance, templates or forms
- any compliance issues, audit findings, complaints, appeals outcomes or regulatory updates affecting transfer practices
- trends that may indicate a need for improved student support, clearer pre-enrolment information, or enhanced staff training

Where an issue, trend or opportunity for improvement is identified, the matter will be:

- documented in the Continuous Improvement Register, where appropriate
- assigned to the relevant staff member or manager for action
- monitored through to completion
- reviewed for effectiveness once the action has been implemented

Examples of continuous improvement actions may include:

- updating transfer request forms, templates or decision letters
- improving staff guidance or training on transfer restrictions and student advice
- strengthening record-keeping practices or PRISMS verification processes

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- improving communication with students and education agents about transfer conditions
- reviewing related policies where legislative or regulatory changes occur

This policy and procedure will also be reviewed periodically, and earlier if required, to ensure alignment with:

- amendments to the ESOS Act
- changes to the National Code
- changes to the Standards for RTOs
- internal audit findings, complaints, appeals or operational needs

Through this process, Princeton International College aims to ensure that transfer decisions remain fair, well-documented, student-centred and compliant, and that the College continues to strengthen its governance and administrative practices over time.