



International Student Transfer Between Registered Providers Policy and Procedures

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1. PURPOSE

This policy establishes the principles and procedures by which Barton Business School (BBS) evaluates transfer requests from international students. The policy aims to prioritise the academic progress and welfare of international students, safeguard the integrity of BBS's enrollment process, and ensure compliance with the [Education Services for International Students \(ESOS\) Act 2000](#) and Standard 7 of the [National Code of Practice for Providers of Education and Training to Overseas Students 2018 \("National Code 2018"\)](#).

2. SCOPE

This policy applies to all international students seeking to transfer their enrollment to or from BBS's course of study. It also applies to relevant BBS staff involved in evaluating transfer requests.

3. DEFINITIONS

Refer to BBS's *Glossary of Terms*.

4. POLICY

- a. BBS is committed to following guidelines regarding the enrolment of students transferring from other registered providers' courses. BBS must not knowingly enrol any student who wishes to transfer prior to completing six months of their principal course of study, unless the following circumstances apply:
 - i. The releasing registered provider has granted permission for the international student's release and has appropriately documented the date of effect and reason for the release in the Provider Registration and International Student Management System ("PRISMS").
 - ii. The original registered provider is no longer registered, or the course in which the student is enrolled has ceased to be registered.
 - iii. The original registered provider has received a sanction on its registration by the Tertiary Education Quality and Standards Agency (TEQSA) that impedes the student from continuing their studies.
 - iv. The government sponsor of the student deems the change to be in the student's best interest and has provided written support for the transfer.
- b. All international students who are currently enrolled at BBS and within six months of starting their primary course must seek approval from BBS if they wish to transfer to a different provider.

- c. Transfer requests must only receive approval from BBS if it is determined that the transfer is in the best interest of the student, based on the following criteria:
 - i. *Compassionate or compelling circumstances*: The presence of substantiating evidence demonstrating compassionate or compelling circumstances that warrant the transfer.
 - ii. *Inadequate course progress*: The student's inability to achieve satisfactory course progress despite engaging with BBS's intervention strategy, indicating that the current study level is considered inappropriate.
 - iii. *Breach of Student Agreement*: BBS's failure to fulfill its obligations to provide the course as outlined in the terms specified in the Student Agreement.
 - iv. *Unfulfilled student expectations*: Evidence suggesting that the student's reasonable expectations regarding their current course are not being met.
 - v. *Misinformation or Misinterpretation*: Evidence indicating that the student has misconstrued the information provided by BBS, resulting in the course being unsuitable for their requirements and study objectives.
 - vi. *Appeal decision or recommendation*: A decision or recommendation resulting from an internal or external appeal process that supports the release of the student.
- d. Claims of compassionate or compelling circumstances, which necessitate the provision of substantiating documentary evidence, may encompass the following instances at BBS:
 - i. *Severe illness or injury*: The student or a close family member experiencing a severe illness or injury that significantly impacts the student's ability to continue their studies at BBS.
 - ii. *Unforeseen incidents or accidents*: Unforeseen incidents or accidents, such as accidents, that hinder the student's ability to continue their studies at BBS.
 - iii. *Traumatic events*: Traumatic events, such as assaults or accidents witnessed or experienced by the student, that have a significant impact on their ability to pursue their studies at BBS.
 - iv. *Natural disasters or significant civil/political events*: Natural disasters or significant civil or political events, such as wars or political upheavals, either internationally or in the student's home country, that obstruct the student's ability to begin or continue their studies at BBS.

To support these claims, it is essential to provide substantiating documentary evidence that validates the circumstances described. This evidence may include medical reports, police reports, official government documentation, or any other relevant supporting materials.

- e. Transfer requests from BBS must be denied under the following circumstances:
 - i. *Within six months of study*: If the transfer request is made within a timeframe of six months from the start of their principal course with BBS, and it becomes evident that the student does not fulfill the criteria specified in section 4.c.

- ii. *Outstanding debts or fines:* If the student has any outstanding debts or fines that have not been resolved.
- iii. *Change of intended course, financial hardship, or lower tuition fees:* If the student decides to change their intended course, cites financial hardship, or expresses a desire to transfer to another institution with lower tuition fees.
- iv. *Lower academic level:* If the student requests a transfer to a course that is considered to be at a lower academic level than their current principal course of study.
- v. *Failure to meet Genuine Student criteria:* If the actions of the student have led BBS to conclude that they do not meet the criteria of being a Genuine Student or Genuine Temporary Entrant. These actions may include not attending orientation events, having a low attendance rate, failing to utilise support services, and making significant changes to their academic direction, or evading reporting to the Department of Home Affairs (DoHA) due to failure to fulfill course requirements.
- vi. *Exclusion or suspension:* If the student has been excluded or suspended from their course.
- vii. *Underutilisation of support services:* If the student has not fully used the support services offered by BBS.
- viii. *Prior acceptance and payment:* If the student has already accepted and paid for a course with another registered provider.
- ix. *Work commitments or employment demands:* If the student cites work commitments or employment demands as a reason for wanting to transfer.
- x. *Misalignment of student choices:* If BBS maintains the belief that the student has made choices subsequent to their enrollment, such as accommodation, employment, or travel, that do not align with the stipulations of their primary course.
- xi. *Disadvantageous for academic advancement:* If BBS does not concur with the notion that the transfer is advantageous for the student's academic advancement or their aspirations for future studies.

5. PROCEDURES

5.1. TRANSFER TO BBS FROM ANOTHER REGISTERED PROVIDER

- a. BBS accepts transfer students through the following procedure:
 - i. If the applicant has completed more than six months of their primary course of study, the application must proceed using the standard admissions procedure (refer to the *Admission Policy and Procedures*).
 - ii. If the applicant has not remained enrolled and has not completed the first six months duration of their main course of study, they must be notified that they must

submit documentation from their original provider to substantiate their release.

This documentation is required to support their application for transfer.

- iii. To strengthen the application, a conditional Letter of Offer may be provided, explicitly stating that the offer is contingent upon the receipt of proof of release.
- iv. If the applicant fails to provide appropriate proof of release, the application process must be terminated, and the student must be informed that they are ineligible to transfer at this time.

5.2. FROM BBS TRANSFER TO ANOTHER REGISTERED PROVIDER

- a. To initiate a transfer to another registered provider before completing six months of study at BBS, students must follow the designated process. This involves submitting a Student Transfer Request Form, which serves as a formal request for transfer.
- b. Applications must only be assessed if they are submitted complete with all required supporting documentation to facilitate the evaluation process.
- c. In addition to the completed form, applicants must provide a clear and comprehensive explanation of the reason for the transfer request.
- d. The following supporting documents are required:
 - i. A certified copy of the student's current visa.
 - ii. A copy of the registered provider's Letter of Offer.
- e. All transfer requests must be evaluated on a case-by-case basis, taking into account the student's circumstances and determining whether the transfer would be advantageous for the student.
- f. BBS is committed to processing all transfer requests promptly and efficiently. Therefore, all requests must be processed within a maximum of fifteen (15) working days from the date of submission.
- g. If the application is successful, a Letter of Release must be issued within fifteen (15) working days from the receipt of the completed application.
- h. If a release is granted, it must be at no cost to the international student. BBS must also advise the international student to contact the [Australian Department of Home Affairs \(Immigration and Citizenship\)](#) to seek advice on whether a new student visa is required.
- i. In the event that the application is unsuccessful, the applicant must be notified that the request has been refused. The applicant must also receive a detailed explanation of the reasons for the refusal.
- j. When a transfer request is denied, the student must be granted a period of twenty (20) working days to use BBS's *Student Complaints and Appeals Policy and Procedures*.
- k. BBS must refrain from finalising the student's refusal status in PRISMS until any of the following conditions are met:
 - i. the appeal process results in favor of BBS;
 - ii. the student chooses not to use the complaints and appeals processes within the twenty (20) working day period; or

- iii. the student voluntarily withdraws from the process.
- l. BBS must ensure that all details pertaining to the transfer application, including the outcome of the application, are carefully documented and preserved in the student's record.
- m. It is important to note that, permission to transfer to another registered provider does not imply a commitment to issue any reimbursement. Refunds must be governed by the *Student Fees and Refund Policy and Procedures*, which will operate independently from this policy.

5.3. ROLES AND RESPONSIBILITIES

- a. The Student Administration team must:
 - i. Verify that transfer applications are submitted with all required documentation and information to ensure completeness and accuracy.
 - ii. Maintain accurate records of transfer requests, outcomes, and supporting documentation.
 - iii. Maintain confidentiality and security of transfer application records in compliance with data protection regulations.
 - iv. Collaborate with the Course Coordinator and the Dean to facilitate the smooth processing of transfer requests.
- b. The Course Coordinator must:
 - i. Evaluate transfer applications based on established criteria and policies.
 - ii. Communicate the decision on transfer requests to students and provide necessary guidance or assistance throughout the process.
 - iii. Issue a Letter of Release within fifteen (15) working days of receiving a completed application, if the application is approved.
 - iv. If the application is denied, inform the applicant of the reasons for the denial and provide information on the available channels for appealing the decision.
- c. The Dean must:
 - i. Review and approve transfer decisions made by the Course Coordinator.
 - ii. Ensure compliance with institutional policies and regulatory requirements in the transfer process.
 - iii. Oversee the issuance of the Letter of Release within the specified timeframe.
 - iv. Collaborate with the Course Coordinator to address exceptional or complex transfer cases that require higher-level decision-making.
 - v. Uphold fairness and transparency throughout the transfer process.

6. COMPLAINTS AND APPEALS

BBS acknowledges the importance of providing students with a fair and transparent mechanism to address any concerns or disputes arising from decisions made under this policy and procedure. Students who wish to raise a complaint regarding the transfer decision or any aspect of the transfer process can submit a formal complaint following the guidelines outlined in the *Student Complaints and Appeals Policy and Procedures* within twenty (20) working days from the receipt of the decision.

7. RECORD-KEEPING

- a. Records must be maintained for all international student transfers between registered providers.
- b. As per the [National Code 2018](#), Standard 7.7, all application material and correspondence must be placed on the student's file.
- c. BBS must maintain a record of all requests from overseas students for two years after the overseas student ceases to be an accepted student.

8. VERSION CONTROL

Document title	International Student Transfer Between Registered Providers Policy and Procedures	
Approved By	Board of Directors (BoD) Academic Board (AB)	
Date of Review	This document is to be reviewed every two years at a minimum from the date of final approval.	
Related Documents	<ul style="list-style-type: none"> • Academic Progression and Student At Risk Policy and Procedures • Admission Policy and Procedures • Enrolment Policy and Procedures • Student Deferment, Suspension, and Cancellation of Enrolment Policy and Procedures • Student Complaints and Appeals Policy and Procedures • Student Fees and Refund Policy and Procedures • Student Handbook • Student Letter of Offer and Student Offer Acceptance Form • Student Agreement Template • Student Wellbeing and Support Policy and Procedures 	
Related Legislation and References	<ul style="list-style-type: none"> • Higher Education Standards Framework (Threshold Standards) 2021 • National Code of Practice for Providers of Education and Training to International Students 2018 • Education Services for International Students Act 2000 	
Version	Notes	Date Approved
1.0	<ul style="list-style-type: none"> • Minor changes were made by the AB in section 4, 4.e, 5.1, and addition of record keeping section. 	
2.0	<ul style="list-style-type: none"> • Document approved by the AB subject to minor change of adding hyperlink for National Code. 	25/08/2023
2.0	<ul style="list-style-type: none"> • Document approved with no further changes by BoD. 	11/09/2023
2.1	<ul style="list-style-type: none"> • Changes were made to Section 5.2 (h) to meet the National Code 2018 by AB. 	20/09/2024
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