

Policy Name:	Transfer between Registered Providers
Policy Number:	7-CRICOS-2011
Current Version:	04 – 01/07/2014
Next Revision Date:	July 2015
Purpose:	To ensure PGA IGI compliance to standard 7 in relation to the transfer of students.
Scope:	All Staff and Students
Exceptions:	Domestic Students
Policy Owner:	Dean and Executive Officer
Related policies and legislation:	<ul style="list-style-type: none"> • Education Services for Overseas Students (ESOS) Act 2000 (https://www.aei.gov.au/ESOS) • The National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2007 (https://www.aei.gov.au/Regulatory-Information/Education-Services-for-Overseas-Students-ESOS-Legislative-Framework/National-Code/Documents/National_Code_2007_pdf.pdf) • For further detailed information on the legislative requirements in the National Code 2007, see National Code Explanatory Guide (https://aei.gov.au/Regulatory-Information/Education-Services-for-Overseas-Students-ESOS-Legislative-Framework/National-Code/Pages/default.aspx)
Internal procedures guided by this policy:	N/A
Published Location	▪ Y:\Administration - Compliance\DEEWR CRICOS\Polices & Procedures

Revision History

Revision Date:	Status: (Draft/Final)	Summary of Changes	Prepared/Approved By:	Revision #:
03/02/2011	Draft	Formatting	Institute Coordinator	01
07/04/2011	Final	Formatting	Institute Coordinator	02
18/05/2011	Final	Audit review	Institute Coordinator	03
01/07/2014	Final	Updated staff titles, government departments	Systems Administrator/Dean and Executive Officer	04

Glossary of Terms/Definitions

Appeal	An appeal is a process for requesting a formal change to a decision.
CRICOS	Commonwealth Register of Institutions and Courses for Overseas Students
DeptEd	Department of Education (former Department of Education, Employment and Workplace Relations)
DIBP	Department of Immigration and Border Protection
ESOS	Education Service for Overseas Students
PGA IGI	PGA International Golf Institute
Principal Course of Study	The principal course of study refers to the main course of study to be undertaken by an overseas student where a student visa has been issued for multiple courses of study. The principal course of study would normally be the final course of study where the overseas student arrives in Australia with a student visa that covers multiple courses.
PRISMS	Provider Registration and International Students Management System (PRISMS). This site provides Australian education providers with the Confirmation-of-Enrolment (CoE) facilities required for compliance with the Education Services for Overseas Students (ESOS) Legislation
Registered Provider	As defined in section 5 of the ESOS Act, the registered provider for a course for a state, means an approved provider that is registered on CRICOS as a provider for the course for the state.
Registration	The process whereby a provider is recommended by a designated authority for registration under the ESOS Act to provide a specified course in that state to overseas students; and the provider is registered by the Secretary of DeptEd on CRICOS. Registration includes re-registration.
Release Letter	A letter supplied by a current provider of education indicating their agreement to release a student, who is 1) on a student visa, and 2) within the first six months of their principal course, to transfer to study at another institution.

Procedure Measures

Procedure Measures	Target
Compliance to NC standard 7 in relation to transferring students and accurate records in relation to transfer applications.	100%

Distribution

All Directors
 All Staff
 All International Students

INTRODUCTION

The PGA IGI is restricted from enrolling transferring students for the first six months from the commencement of the student's principal program of study except in certain circumstances. Where a PGA IGI student is seeking to transfer we must assess the student's request to transfer within this restricted period.

When transferring to another education provider or if a student wants to continue in another course with the PGA IGI the student must:

- demonstrate a commitment to previous studies;
- have paid all fees due;
- have maintained the required academic performance levels;
- have maintained the required attendance levels;
- be eligible to apply for another student visa (student advised to seek advice from the DIBP)

1.0 Accepting International Students from another Registered Provider

The PGA IGI will not seek to enrol a student wishing to transfer from another registered provider prior to the student completing six months of their principal program of study except where:

- the original registered provider has ceased to be registered or the program in which the student is enrolled has ceased to be registered;
- the original registered provider has provided a written letter of release;
- the original registered provider has had a sanction imposed on its registration by the Australian Government or state or territory government that prevents the student from continuing his or her principal program; or
- any government sponsor of the student considers the change to be in the student's best interest and has provided written support for that change.

2.0 TRANSFER OF ENROLMENT FROM THE PGA IGI

2.1 Within the First Six Months of a Principal Program

The National Code 2007 requires that within the first six months of their principal program, students must complete, sign, date and lodge an Application for Transfer between Registered Providers. This request should be submitted to the Dean and Executive Officer. We believe in supporting the interests of our international students and we endeavour to ensure that any request to transfer to another provider allows them to exercise choice. Our assessment of such requests will take into consideration the individual circumstances of each student. We will provide a letter of release in cases where one of the following can be clearly demonstrated:

- if the student wishes to change course in order to get access to greater support (may be through the services offered by another provider which the PGA IGI is not able to provide. In such a case, the student must provide evidence of the support being provided by the alternate provider.
- if the student can provide evidence that his or her reasonable expectations about the current course are not being met;
- if the student demonstrates that they are experiencing a threat to their physical or mental health or safety by remaining at the PGA IGI and demonstrates clearly how this will be alleviated through a transfer;
- the student is not coping in the program, despite having undertaken an individually tailored intervention strategy at the PGA IGI with no sign of improvement in their academic performance;
- the student is required to move interstate;
- the program of study is not consistent with the documented program requested on the student's application;
- the student can provide evidence that he or she was misled by the PGA IGI or an approved education agent regarding the PGA IGI or its program, which constitutes a breach of the ESOS Act;
- an appeal (internal or external) on a matter that may reasonably result in the student wishing to seek a transfer supports the student;
- compassionate/compelling circumstances (documented in writing and with any applicable supporting evidence supplied) which necessitate transfer to another provider.

2.2 Prior to commencing the Principal Program

Prior to the student commencing their principal program with the PGA IGI, requests for transfer to another provider will not require a Letter of Release from the PGA IGI as the student's enrolment status is classed as 'not studying'. At this stage the student can cancel their enrolment and change providers.

The student will be made aware that the terms and conditions of our refund policy will apply. The PGA IGI will inform the student that they should contact the DIBP to obtain advice on their decision to change providers. The Student Services and Administration Coordinator will register the cancellation of enrolment on PRISMS, and place a copy of all related documents in the student's file.

2.3 Transfer of enrolment from the PGA IGI after six months of study in the principal program

If requested by a new provider and after a student has completed six months of study in their principal program, the PGA IGI will provide a Letter of Transfer with information on the following to the new provider:

- Program/s studied;
- Progress with each course/unit within our program;
- Length of time with the PGA IGI;
- Payment of fees for the program.

3.0 STUDENT TRANSFER PROCEDURE

3.1 Transfer to the PGA IGI

Students wanting to transfer to the PGA IGI must complete an application form and submit this with all the required documents and also provide a Letter of Release from their current provider. A letter of release from the applicant's current provider will only be required if the request to transfer is made *before six (6)* months of the principal course has been completed. The letter must be an original or certified copy; we will not accept photo or facsimile copies. A transferring student must provide proof that they have a commitment to previous studies and that they have paid all course fees. To support their transfer application a student must provide:

- Academic transcript
- Attendance reports
- Letter of Release (only required if less than 6 months of the principal course has been completed)

The Student Services and Administration Coordinator will process the application and enrol the student as per our enrolment process. The student will be advised that they need to seek advice from the DIBP in relation to their transfer. In the following cases the Dean and Executive Officer will need proof of the following and will contact the state registering body for additional assistance to ensure compliance with Standard 7;

- The original registered provider has ceased to be registered or the program in which the student is enrolled has ceased to be registered;
- The original registered provider has had a sanction imposed on its registration by the Australian Government or state or territory government that prevents the student from continuing his or her principal program; or
- Any government sponsor of the student considers the change to be in the student's best interest and has provided written support for that change.

The Student Services and Administration Coordinator will place all documents relating to a transfer request in the student file.

3.2 Transfer from the PGA IGI

In requesting a transfer to another education provider a student must complete a transfer application form and submit this to the Student Services and Administration Coordinator and provide detailed reasons for their transfer request (The onus is on the student to prove that it will be detrimental to them in some way to remain in the program). The application must also be submitted with a valid Letter of Offer from the receiving provider.

The Student Services and Administration Coordinator will forward the student transfer request to the Dean and Executive Officer of the PGA IGI for an assessment and decision. Within 14 days of receipt of a transfer application the Dean and Executive Officer will notify the student in writing of the outcome of their application. If a student transfer is approved, a release letter will not be issued until all financial obligations/outstanding fees with the PGA IGI have been finalised.

When a letter of release is provided, it will be at no cost to the student and will advise the student to seek advice from the DIBP as to whether a new student visa is required. The PGA IGI may exceed decision timeframes if it requires additional information or for incomplete applications. The Student Services and Administration Coordinator will place all documents relating to a transfer request in the student file.

Note: No Release Letter is required where

The student has completed at least 6 calendar months' study in their principal program;

- The student is government sponsored and that government sponsor provides written support for the change as it considers the change to be in the student's best interests;
- The PGA IGI has ceased to be registered or the program in which the student is enrolled has ceased to be registered;
- The PGA IGI has a sanction imposed on it that prevents the student from continuing his or her principal program.

The letter of release provided to the student will document the following information for the new provider:

- Student name and student number;
- Course/s studied;
- Date of entry and release;
- Progress within each course/ or unit of study;
- Length of time with the PGA IGI;
- Payment of fees for the program.

Refusal of Transfer Request

Where the PGA IGI has not approved a transfer request the student will be provided with written reasons for refusing the request. If the student is not satisfied with the decision as to whether or not to grant a Transfer Between Registered Providers or believes the decision was not made in accordance with this procedure, the student has the right to appeal (within ten working days) on the decision to the Dean and Executive Officer of the PGA IGI. In this event we will maintain the student's enrolment until the appeals process is completed.

Note: What does 'maintain the student's enrolment' mean? The PGA IGI must maintain the student's enrolment while the complaints and appeals process is ongoing i.e. make no changes to the student's enrolment status on PRISMS, but this does not necessarily mean that a student must remain in class. Where this is not practical, the student may be provided class work and supervision to continue his or her studies external to the classroom.

Circumstances under which a transfer/letter of release will not be granted may include but are not limited to:

- student has simply changed their mind about their program of study;
- if the student has not accessed PGA IGI support services for assistance with study or personal issues such as living a long distance away from campus, travel difficulties, difficulties adjusting to life in Australia;
- the demands of academic work at the PGA IGI, i.e. where a student having been provided with either/or academic counselling, reasonable adjustment for assessment items and submission extensions refuses to accept/access support services;
- the PGA IGI forms the view that the student is trying to avoid being reported to DIBP for failure to meet its academic progress and attendance requirements;
- the student does not have a valid enrolment offer from a CRICOS registered provider;
- the student has outstanding fees;
- the course for which the student is intending to enrol in with the other provider, is similar to or the same as the course in which the student is currently enrolled;
- the student is experiencing home stay or other accommodation problems, i.e. where a student has been provided with either/or counselling, accommodation/home stay assistance or refuses to accept/access support services;
- the student is experiencing course schedule conflict with personal, work, or other non-study commitments;
- the PGA IGI believes that a transfer at this time could be considered detrimental to the student.

This policy will be reviewed annually and revision history updated.