

Student Transfer between Providers Policy and Procedures

1. Purpose

This policy ensures Insight Academy manages requests from international students seeking to transfer between CRICOS-registered providers in accordance with the Education Services for Overseas Students Act 2000 (ESOS Act) 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 Insight Academy staff involved in student recruitment, enrolment, and student support.
- All current and prospective international students of Insight Academy.

3. Policy Statement

Insight Academy will manage student transfer requests in a manner that is transparent, fair, and fully compliant with legislative and regulatory requirements. All transfer decisions will be guided by the following principles.

Guiding Principles:

- **Student-Centred Approach** – Decisions will always take into account the best interests of the student, including their academic progress, wellbeing, and future study goals.
- **Transparency and Fairness** – Students will be informed of the reasons for transfer outcomes, given written notice of decisions, and provided access to the appeals process.
- **Equity and Non-Discrimination** – No student will be disadvantaged or discriminated against in the consideration of a transfer request. Transfer processes will be applied consistently and impartially.

- **Record-Keeping and Accountability** – All decisions and correspondence will be documented, retained, and available for audit to ensure accountability and continuous improvement.

4. Procedures

When a student seeks to transfer either to or from another registered provider, Insight Academy follows a structured process to ensure compliance and fairness.

4.1 Request Submission

Students must submit a transfer request in writing, supported by relevant documentation such as a valid Letter of Offer from another registered provider.

4.2 Acknowledgement and Eligibility Check

Upon receipt of a request, the Student Support Officer acknowledges the application and checks whether the student has completed at least six months of their principal course. If this requirement is not met, the officer assesses whether any of the exemptions under Standard 7 of the National Code apply (e.g., course closure, sanctions, government sponsor support) and requests approval from the Operations Manager.

4.3 Assessment of Applications

The Insight Academy student support team in consultation with the Operations Manager assesses whether the request meets any acceptable grounds for transfer. These may include compassionate or compelling circumstances, evidence that the course is unsuitable, misrepresentation by Insight Academy or an agent, Insight Academy's failure to deliver as agreed, or the student being unable to achieve satisfactory course progress despite intervention.

Transferring from another registered provider: Insight Academy will not knowingly enrol a student wishing to transfer from another registered provider's course before the overseas student has completed six months of his or her principal course unless one or more of the following conditions apply:

- the releasing registered provider or the course in which the student is enrolled has ceased to be registered.
- the releasing registered provider has had a sanction imposed on its registration by the ESOS agency that prevents the student from continuing his or her principal course at that registered provider.
- the releasing registered provider has agreed to the overseas student's release and recorded the date of effect and reason for release in PRISMS.
- 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.

Transferring to another registered provider: For Insight Academy students seeking to transfer to another registered provider's course of study before completing six months of their principal course, the transfer request will be assessed and granted in any of the following circumstances:

- the student will be reported because they are unable to achieve satisfactory course progress at the level they are studying, even after engaging with Insight Academy's intervention strategy to assist the overseas student in accordance with Standard 8 (Overseas student visa requirements).
- there is evidence of compassionate or compelling circumstances.
- Insight Academy fails to deliver the course as outlined in the student agreement.
- there is evidence that the student's reasonable expectations about their current course are not being met.
- there is evidence that the student was misled by Insight Academy or an education or migration agent regarding Insight Academy, or its course and the course is therefore unsuitable to their needs and/or study objectives.
- an appeal (internal or external) on another matter results in a decision or recommendation to release the student.

4.4 Consideration of Refusal Grounds

A transfer to another provider's course of study will not be granted where:

- The transfer may jeopardise the student's progression through a package of courses.

- The student has recently started studying the course and the full range of support services are yet to be provided or offered to the student. In this case, the student will be requested to wait a further 4 weeks before applying for a transfer to another registered provider during which time the full range of support services will be provided to the student.
- The student is trying to avoid being reported for failure to meet the provider's attendance or academic progress requirements.
- There are no legitimate compassionate or compelling circumstances.

4.5 Decision and Communication

A decision is made within 10 working days. If approved, a Letter of Release is issued at no cost to the student. If refused, the reasons for refusal are provided in writing, and the student is informed of their right to appeal as per the *Feedback, Complaints and Appeals Policy and Procedures*. Where the appeal outcome is in the student's favour, a Letter of Release is issued. PRISMS is only updated after all appeal opportunities are finalised.

4.6 Related Fees and Refunds

Any refunds relate to the course withdrawal and transfer between providers will be governed by the *Fees, Charges and Refunds Policy and Procedures*.

4.7 Visa Advise

Students who transfer are advised to contact the Department of Home Affairs (DHA) to confirm any visa implications and whether a new student visa is required. To find out more about visa requirements, students may contact DHA on 131881 or visit the DHA website:

<https://immi.homeaffairs.gov.au/visas/getting-a-visa/visa-listing/student-500>

Standard Operating Procedure: Fee Collection and Refund Management

Step	Procedure Description	Responsible Person(s)	Supporting Documents
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1	Student submits transfer request with supporting evidence (valid Letter of Offer from new provider).	Student	Course Withdrawal Form
2	Acknowledge receipt and check eligibility (completed 6 months of principal course; exemptions under Standard 7).	Student Support Officer	Student File documents, PRISMS system
3	Assess grounds for transfer (compassionate/compelling circumstances, course not delivered as agreed, misrepresentation, unsatisfactory progress despite intervention, appeal outcomes).	Student Support Officer, Operations Manager	Course Withdrawal Form, any supporting evidence provided
4	Consider refusal grounds (avoiding reporting, insufficient support services provided yet, jeopardising package courses, no valid grounds).	Student Support Officer, Operations Manager	Course Withdrawal Form, any supporting evidence provided, student records
5	Decision made and communicated in writing within 10 working days. If approved, Letter of Release issued at no cost.	Student Support Officer	Release Letter
6	If refused, provide reasons and advise right to appeal. Maintain refusal in PRISMS only after appeals exhausted (20 days).	Student Support Officer	Outcome communication email + Feedback, Complaints and

			Appeals Policy and Procedures
7	Advise student to contact Department of Home Affairs (DHA) regarding visa implications.	Student Support Officer	Outcome communication email

5 Supporting Documents

- Student Handbook
- Course Withdrawal Form
- Complaints and Appeals Form
- Release Letter

6 Related Policies

- Student Information Policy and Procedures
- Student Enrolment and Written Agreement Policy and Procedures
- Feedback, Complaints and Appeals Policy and Procedures
- Fees, Charges and Refunds Policy and Procedures
- PRISMS Management Policy and Procedures
- Document Management and Records Retention Policy and Procedures
- Legal and Regulatory Compliance Policy and Procedures

7 Roles & Responsibilities

CEO: Oversight of policy compliance.

Operations/ RTO Manager: Approves or refuses transfer requests.

Compliance Consultant: Reviews compliance with National Code/ESOS Act.

Student Support Officer: First point of contact for students, ensures advice and records.

Admin Officer: Updates PRISMS and manages fee/refund matters.

8 Legislative Background

This policy is guided by the following legislative and regulatory frameworks:

- Standards 7 – Overseas student transfers, Std 8 – Overseas student visa requirements and 10 – Complaints and Appeals of the National Code of Practice for Providers of Education and Training to Overseas Students 2018 under the Education Services for Overseas Students Act 2000 (ESOS Act).
- Standards 2.6, 4.3 & 4.4 of the Outcome Standards for NVR Registered Training Organisations 2025 under the National Vocational Education and Training Regulator Act (Cth).

9 Monitoring and Improvement

This policy is reviewed annually or earlier in response to changes in regulatory requirements or audit outcomes. Review activities including, audit findings, and student, staff as well as industry feedback.