

Policy & Procedure

Assessment of Overseas Student Transfer Requests

1. Purpose

This policy and procedure outlines the framework for assessing requests from overseas students seeking to transfer into or out of Alphington Grammar School in compliance with the **Victorian Registration and Qualifications Authority (VRQA)** standards and the **National Code of Practice for Providers of Education and Training to Overseas Students 2018**.

2. Scope

This policy applies to:

- All overseas students enrolled under a student visa.
- All staff involved in admissions, student support, compliance, and administration.

3. Policy Statement

Alphington Grammar School ensures that:

- Overseas student transfer requests are assessed fairly, transparently, and consistently.
- Transfers are managed in accordance with Standard 7 of the National Code.
- Students are not disadvantaged by the transfer process.
- Decisions are documented and auditable for VRQA compliance.
- This Policy is made available to staff and overseas students on the School website.

4. Definitions

- **Overseas Student:** A student studying in Australia on a student visa.
- **Principal Course:** The main course of study to be undertaken by the student.
- **Letter of Offer:** A formal offer issued by another provider.
- **Release:** Formal approval for a student to transfer to another provider.
- **PRISMS:** Provider Registration and International Student Management System.

5. Policy Principles

Alphington Grammar School will:

- Assess all transfer requests within **10 working days**.
- Not knowingly enrol a student wishing to transfer from another provider within the first 6 months of their principal course (or for the school sector, until after the first six months of the first registered school sector course), except where any of the following apply:
 - the releasing registered provider, or the course in which the overseas 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 overseas student from continuing his or her 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 overseas student considers the change to be in the overseas student's best interests and has provided written support for the change
- Provide written outcomes with reasons.

- Maintain records of all transfer decisions.
- Ensure no financial or academic penalties are unfairly applied.
- Alphington Grammar School will only release the CoE and CAAW upon receipt of confirmation of an application for approved accommodation and welfare services and payment of course fees, from the new institution.

6. Procedure

6.1 Incoming Transfer Requests (Students transferring INTO Alphington Grammar School)

Step 1: Application Submission

- Student submits:
 - Valid Letter of Offer issues by Alphington Grammar School
 - Evidence of enrolment with current provider.
 - Academic records.
 - Evidence of release from the current registered provider (if the student has not completed six months of their principal course).
 - For students under 18 years of age: written confirmation from a parent or legal guardian supporting the transfer.

Step 2: Verification

- Admissions staff verify:
 - Student visa status.
 - Course progression.
 - Validity of release from current provider (via PRISMS)
 - For students under 18: current welfare arrangements, including whether the student holds a Confirmation of Appropriate Accommodation and Welfare (CAAW) approved by the releasing registered provider.

Step 3: Assessment

- Confirm whether:
 - The student has completed 6 months of their principal course; OR
 - Has a valid release from their current provider; OR
 - An exception under Standard 7 of the National Code 2018 applies (e.g. the releasing provider has ceased to be registered, sanctions have been imposed on the releasing provider's registration, or a government sponsor considers the transfer to be in the student's best interests and has provided written support).

Step 4: Welfare Arrangements — Students Under 18 Years of Age

- If the school enrolls a student under 18 years of age who has welfare arrangements approved by another school, the receiving school must:
 - negotiate the transfer date for welfare arrangements with the releasing registered provider to ensure there is no gap
 - inform the student of their visa obligation to maintain their current welfare arrangements until the transfer date, or have alternative welfare arrangements approved, or return to their home country until the new approved welfare arrangements take effect.
 - Have written confirmation that the overseas student's parent or legal guardian supports the transfer for students under 18 years of age
 - Where the overseas student is not being cared for in Australia by a parent or suitable nominated relative, the receiving provider must confirm it accepts responsibility for approving the student's

accommodation, support and general welfare arrangements in accordance with Standard 5 (Younger overseas students).

Step 5: Decision

- If compliant → proceed with enrolment.
- If non-compliant → decline and provide written reasons.

Step 6: PRISMS Reporting

- Issue Confirmation of Enrolment (CoE) only after requirements are met.
- For students under 18 for whom the school is approving welfare arrangements, generate the CAAW in PRISMS with a start date aligned to the negotiated transfer date so that there is no gap in approved welfare arrangements.

6.2 Outgoing Transfer Requests (Students transferring OUT of Alphington Grammar School)

Step 1: Application Submission

Student submits:

- Written request for release.
- Letter of Offer from another CRICOS-registered provider.
- For students under 18 years of age: written confirmation from a parent or legal guardian supporting the transfer; AND where Alphington Grammar School has approved the student's welfare arrangements (CAAW), written confirmation that the receiving registered provider will accept responsibility for approving the student's accommodation, support and general welfare, or evidence the student will be cared for by a parent or suitable nominated relative approved by the Department of Home Affairs.

Step 2: Assessment Criteria

Release will be granted where the School has assessed that:

- The course is unsuitable for the student.
- There is evidence of compassionate or compelling circumstances.
- Alphington Grammar School has failed to deliver the course as agreed.
- There is clear evidence the transfer is in the student's best interest.
- The overseas student will be reported because they are unable to achieve satisfactory course progress at the level they are studying, even after engaging with that registered provider's intervention strategy to assist the overseas student in accordance with Standard 8 (Overseas student visa requirements)
- there is evidence that the overseas student's reasonable expectations about their current course are not being met
- there is evidence that the overseas student was misled by the registered provider or an education or migration agent regarding the registered provider 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 overseas student.

Release will normally be refused where:

- The transfer is considered detrimental to the student (for example, the transfer may jeopardise the student's progression through a package of courses).
- The student has outstanding fees.
- The student is attempting to avoid being reported for unsatisfactory academic progress or attendance.

- For a student under 18, the requirements in Step 1 relating to parental consent and welfare arrangements have not been met.

Step 3: Decision Timeline

- Outcome provided within **10 working days**

Step 4: Notification

- Student receives written notification including:
 - Outcome (approved/refused).
 - Reasons for decision.
 - That the release (if granted) will be at no cost to the overseas student
 - Inform the overseas student to contact Immigration to seek advice on whether a new student visa is required.
 - Information about the student's right to access the school's complaints and appeals process within 20 working days, in accordance with Standard 10 of the National Code 2018.

Step 5: Welfare Arrangements — Students Under 18 Years of Age

- Where Alphington Grammar School has approved the student's welfare arrangements, the school must:
 - negotiate the transfer date for welfare arrangements with the receiving registered provider to ensure there is no gap; and
 - maintain the student's approved welfare arrangements, and not end the CAAW in PRISMS, until the receiving provider's approved welfare arrangements take effect, alternative welfare arrangements are approved, or the student has returned to their home country.
 - Have written confirmation that the overseas student's parent or legal guardian supports the transfer for students under 18 years of age
 - Where the overseas student is not being cared for in Australia by a parent or suitable nominated relative, the receiving provider must confirm it accepts responsibility for approving the student's accommodation, support and general welfare arrangements in accordance with Standard 5 (Younger overseas students).
- The school must inform the student of their visa obligation to maintain their current welfare arrangements until the transfer date, or have alternative welfare arrangements approved, or return to their home country until the new approved welfare arrangements take effect.

Step 5: PRISMS Update

- If approved → release recorded in PRISMS (and, for under-18 students with an AGS-approved CAAW, welfare end dates are aligned with the negotiated transfer date).
- If refused → no PRISMS action until the appeal period has lapsed or the appeal process is finalised in favour of the school.

6.3 Appeals Process

- Students may appeal within **20 working days** of decision.
- Appeals are managed under the Alphington Grammar School Complaints and Appeals Policy.
- Student enrolment is maintained during the appeal process.
- PRISMS status is not updated until appeal is finalised.

7. Documentation and Record Keeping

Alphington Grammar School will maintain:

- Transfer request forms.
- Supporting documentation.
- Assessment records.
- Outcome letters.
- PRISMS records.

Retention period: **Minimum 2 years after student ceases enrolment.**

8. Compliance Requirements

This policy aligns with:

- National Code 2018 – Standard 7 (Overseas Student Transfers)
- ESOS Act 2000
- VRQA Guidelines for VET Providers
- Student visa conditions

9. Roles and Responsibilities

Admissions Officer

- Collect and verify documentation.
- Conduct initial assessment.

International Student Coordinator

- Ensure decisions meet regulatory requirements.
- Oversee PRISMS reporting.
- Provide guidance to students.
- Assist with appeals process.

10. Monitoring and Review

- Policy reviewed annually or upon regulatory change.
- Internal audits conducted to ensure VRQA compliance.
- Continuous improvement actions documented.

11. Related Documents

- Enrolment Policy
- Complaints and Appeals Policy
- Course Progress Policy
- Student Handbook