

POLICY AND PROCEDURE		
Ref. to Legislative Frameworks: National Code 2018: Standard 7 HESF 2021 (TEQSA): Domain 1 - Standards 1.1 / 1.3; Domain 2 - Standard 2.3; Domain 6 - Standard 6.1 Education Services for Overseas Students Regulations 2019: Section 11, Item 12	Transfer of International Students between (HE) Registered Providers	
Version: 8	Approved By: Chief Executive Officer (CEO)	Issued on: 19/08/2026 Review by: 19/08/2028

Revision History

Current Version	Description of Change	Developer	Effective Date
8	Consolidated the separate Policy and Procedure documents into a single Higher Education document; Title updated with (HE): Policy for transfer of VET students now governed by AAPoly's separate VET transfer policy. Updated legislative references to National Code 2018 Standard 7, ESOS Regulations 2019 and the TEQSA Higher Education Standards Framework (HESF) 2021. Updated terminology from 'exceptional circumstances' to 'compassionate or compelling circumstances', consistent with current National Code guidance. Noted that onshore transfer applications are non-commissionable. Realigned staff responsibilities with AAPoly's current Student Selection and Admission Policy and Procedure.	CEO	19/08/2026
7	Amended the policy and procedure and added a Termination of Studies document for the procedure to be carried out by Student Services in updating PRISMS.	Compliance Manager	24/12/2019
6.2	Added references to National Code 2018.	General Manager — Operations and Risk Management	23/12/2017

1 PURPOSE

This policy and procedure define the principles and process that Academies Australasia Polytechnic (AAPoly) uses to assess requests from Higher Education (HE) international students to transfer from and to AAPoly in accordance with Standard 7 of the National Code 2018.

2 POLICY STATEMENT

Under Standard 7 of the National Code 2018, AAPoly must not knowingly enrol a student wishing to transfer from another registered provider's course prior to the student completing six (6) calendar months of their principal program of study, except in the limited circumstances set out in this document.

AAPoly will determine the circumstances in which it will provide or refuse to grant a release to a current AAPoly student and will assess the request in accordance with this Policy and Procedure.

This policy and procedure apply only to transfer requests made within the restricted period, where a release recorded in PRISMS is required before the student can transfer. AAPoly will not prevent a student from transferring to another provider once the student has completed the restricted period. A request made after the restricted period is a withdrawal, not a release, and is addressed under the Course Deferment, Suspension and Withdrawal Policy and Procedure, not this document.

Students have the right to appeal any decision made under this policy and procedure, in accordance with the Student Complaints and Appeals (HE) Policy and Procedure.

3 SCOPE

This Policy and Procedure applies to international students enrolled in HE programs conducted by AAPoly who wish to transfer to another Registered Provider in Australia, and to students seeking to transfer to AAPoly from another Registered Provider within the restricted period.

4 DEFINITIONS

Application for Transfer Between HE Registered Providers	An application by an AAPoly HE student wanting to transfer to another provider, or a potential student currently studying at another provider wanting to enrol in the AAPoly HE program.
Compassionate or Compelling Circumstances	Circumstances beyond a student's control that have a significant impact on their study, and which are considered on a case-by-case basis with supporting documentary evidence (e.g. medical, bereavement, illness or injury, major political upheaval or natural disaster in their home country, a traumatic experience such as serious accident or crime).
HESF	The Higher Education Standards Framework (Threshold Standards) 2021, administered by the Tertiary Education Quality and Standards Agency (TEQSA).
International Student	A person (whether within or outside Australia) who holds a Student Visa.

National Code	The National Code of Practice for Providers of Education and Training to Overseas Students 2018, established pursuant to Part 3 of the ESOS Regulation.
Principal Program	The main program of study to be undertaken by an international student where a Student Visa has been issued. The principal program is normally the final program of study where the overseas student arrives in Australia with a Student Visa that covers multiple programs.
Program / Course	A full-time registered Higher Education program registered on CRICOS for the attainment of a testamur or other higher education award, defined as 'course' in the ESOS Regulation.
PRISMS	The Provider Registration and International Student Management System, which provides Australian education providers with the Confirmation of Enrolment (CoE) facilities required for compliance with ESOS legislation.
Receiving Provider	The registered provider to which a student is seeking to transfer to.
PRISMS Release	Provider approval, recorded in PRISMS, permitting a student to transfer to another registered provider prior to completing six (6) calendar months of their principal program.
Sending Provider	The registered provider from which a student is seeking to transfer out.
Student Counsellor or equivalent	A student counsellor, student support officer or advisor, or welfare officer appointed by and working at AAPoly.
VEVO (Visa Entitlement Verification Online)	A free online service that gives visa holders, employers and other registered organisations access to visa entitlement and status information 24 hours a day.
Withdrawal	An application by an AAPoly HE student wanting to transfer to another provider after completing the six (6) months of their principal program

5 POLICY PRINCIPLES

- 5.1** Applying to transfer between HE registered providers does not preclude a student from the requirement to enrol on time. Non-enrolment will not automatically result in a release. It will, however, result in the student being reported via PRISMS for failing to enrol in the new semester.
- 5.2** An AAPoly student wishing a transfer to another HE registered provider must submit their request to AAPoly in writing. To be considered, the request must be supported by a valid enrolment offer from the proposed receiving provider.
- 5.3** AAPoly may consider granting a release if the course the student wishes to transfer to:
- better meets the study capabilities of the student;
 - better meets the long-term goals of the student, whether these relate to future work, education or personal aspirations; or
 - provides access to greater support; and
 - compassionate and compelling circumstances apply.

5.4 A release may also be granted where:

- the student claims, or can provide evidence, that their reasonable expectations about the current course are not being met;
- after engaging in intervention strategies, the student is still unable to achieve satisfactory course progress at the level they are studying and is to be reported for that reason;
- AAPoly fails to deliver the course as outlined in the student agreement (offer letter);
- an appeal (internal or external) on another matter results in a decision or recommendation to release the student;
- the student can provide evidence that they were misled by AAPoly, or by an education or migration agent, regarding AAPoly or its course, constituting a breach of the ESOS Act; or
- the student demonstrates compassionate or compelling circumstances that support the release.

5.5 AAPoly reserves the right to refuse a release request from a student who is not genuinely engaging with an intervention strategy with the intention of failing in order to be released.

5.6 AAPoly will continue to report on a student's course progress even where a release or withdrawal request is granted.

5.7 AAPoly may refuse to grant a release based on the following range of factors:

- the transfer may jeopardise the student's progression through a package of courses;
- the student has recently commenced the program, and the full range of support services has not yet been provided or offered (it is good practice to revisit the request within a timeframe negotiated with the student); or
- the student is seeking release primarily to avoid being reported to the Department of Home Affairs for failure to meet AAPoly's attendance or academic progress requirements.
- the student has any outstanding debt to AAPoly, including fees, loans or library fines;
- the student has not attached a copy of a valid letter of offer of unconditional enrolment from a CRICOS registered provider;
- the student has been excluded or suspended from their course;
- the request is based on timetable suitability or financial reasons, such as transferring to a provider with lower tuition fees;
- the student is applying to transfer to a course at a lower AQF level, or a non-AQF level, than that for which their student visa was issued; or
- AAPoly reserves the right to take into account other relevant factors, including a student's individual circumstances, which are not listed above.

5.8 AAPoly will not finalise the refusal of a student's release request until an appeal finds in favour of AAPoly, the student has chosen not to access the complaints and appeals process within twenty (20) working days, or the student withdraws from that process.

5.9 No release is required where:

- the student has completed the restricted period in their principal program; however the student will need to apply for withdrawal instead;

- the student's government sponsor provides written support for the change, considering the change to be in the student's best interests;
 - AAPoly has ceased to be registered, or the program in which the student is enrolled has ceased to be registered; or
 - AAPoly has a sanction imposed on it that prevents the student from continuing their principal program.
- 5.10** AAPoly does not charge any fee for processing a request for release or for issuing a release in PRISMS. Where a withdrawal is processed, the standard withdrawal administration fee may apply as specified in the Fee Payment and Refund Policy and Procedure. This fee is an administrative charge for processing the withdrawal and is separate from, and not a charge for, the release process.
- 5.11** A current AAPoly HE student who wishes to transfer to another provider within the first six (6) months must remain solely enrolled with AAPoly while their release application is assessed. The student must not commence study with a receiving provider until a release has been granted.

6 PROCEDURE

6.1 Transfer Between HE Registered Providers within the First Six (6) Months of the Principal Program (Students enrolled with AAPoly)

- 6.1.1** Where an AAPoly HE student is enrolled in the principal course, AAPoly will not allow the student to transfer out of AAPoly unless compassionate or compelling circumstances or other circumstances listed in this policy exist.
- 6.1.2** The Head of Student Services (HSS) receives requests from a student wishing to transfer to another provider within the first six (6) months of their principal program. The student must demonstrate compassionate or compelling circumstances justifying the transfer, supported by relevant documentation, including Statement of Purpose and Letter of Offer from another provider. Students must continue their enrolment until the request is approved.
- 6.1.3** An application for transfer requiring release on the grounds of compassionate or compelling circumstances must be accompanied by sufficient, specific and detailed supporting documentation, such as:
- medical certification stating the dates of consultation or attendance, the nature of the complaint or treatment (where relevant), and a statement in the health professional's own opinion (not the student's) that the student should be transferred;
 - a police report or statutory declaration; or
 - other relevant supporting documentation, including the offer letter from the new registered provider and a statement of reasons for seeking release.
- 6.1.4** All documentation will be held in confidence and stored securely to ensure the student's privacy.
- 6.1.5** The HSS assesses the supporting documentation and checks the student's fee status in the Student Management System within three (3) working days of receiving all supporting documentation. The student remains enrolled in their current course, and must not be concurrently enrolled elsewhere, while the application is being processed.
- 6.1.6** The HSS completes the Withdrawal from All Studies Checklist and uploads it to the Student Management System.
- 6.1.7** If the student is identified as having academic-related grounds for transfer, the HSS arranges a meeting with the Academic Supervisor. At this meeting, options

are discussed with the student, advice is provided on whether transferring is the best option, and referral to appropriate support services may be made. For any non-academic grounds, the HSS arranges a meeting with the student directly to discuss other ways to help and support the student.

- 6.1.8** The HSS's decision is communicated to the student in writing within ten (10) working days of receipt of a complete application and supporting documentation.
- 6.1.9** If the student is not granted a release, they have the right to access the complaints and appeals process within twenty (20) working days of the date of notification, as set out in the AAPoly Complaints and Appeals (Higher Education) Policy and Procedure.

6.2 Transfer from an External Provider to AAPoly

- 6.2.1** A prospective student studying with an external HE provider applies to transfer into AAPoly by completing AAPoly's enrolment application.
- 6.2.2** No release is required, and a student may transfer without restriction under Standard 7, where:
 - the student has completed at least six (6) calendar months of study in their principal program;
 - the student's government sponsor provides written support for the change, considering it to be in the student's best interests;
 - The sending provider has ceased to be registered, or the program in which the student is enrolled has ceased to be registered; or
 - The sending provider has a sanction imposed on it that prevents the student from continuing their principal program.

In all cases, AAPoly will record the transfer in PRISMS in accordance with its SCV reporting obligations and will not enrol, and will not permit continued enrolment of, a student who is concurrently enrolled with another registered provider.

- 6.2.3** An Admissions Officer assesses the application according to Student Selection and Admissions Policy and Procedure (Higher Education).
 - Where a student wishes to apply for course credit (RPL/CT), refer to the Academic Credit Transfer and Recognition of Prior Learning (HE) Policy and Procedure.
 - Where the student has not completed six (6) months of their principal program, the Admissions Officer advises the student that a release from their principal provider is required.
- 6.2.4** Where PRISMS indicates that the student has not completed six (6) months of their principal program and has not been released from their principal provider, the Admissions Officer must require the student to finalise their release before enrolment can proceed. If the release cannot be confirmed the student cannot be accepted into AAPoly and any fees already paid will be refunded.

7 RESPONSABILITIES

- **Head of Student Services (HSS)** receives, assesses and processes applications from AAPoly HE students for transfer to another HE registered provider within the first six (6) months of their principal program, including checking fee status and coordinating academic input. Records the decision, communicates it to the student in writing, and updates PRISMS accordingly. Ensures all supporting documentation is filed securely on the student's file.

- **Academic Supervisor (Course of Program Coordinator)** Meets with students identified as having academic-related transfer grounds (e.g. course progress) and advises on options, including referral to appropriate support services, consistent with the intervention-strategy and unsatisfactory-progress delegations. Reviews HSS decisions on transfer applications where academic matters are relevant.
- **Student Services Officer** ensures transfer documentation is filed on the student's file in AAPoly's Student Management System.
- **Group Admissions Manager** Sets and maintains AAPoly's HE admissions guidelines applicable to students transferring in from another HE registered provider.
- **Admissions Officer** processes applications from prospective HE students wishing to transfer from an external HE provider to AAPoly. Confirms release status (or exception) via PRISMS before accepting a student who has not completed six (6) months of their principal program, and confirms no concurrent enrolment exists. Checks visa status on VEVO for all onshore applications, verifies the English test score, and qualification evidence. Issues the Student Agreement (Offer Letter), eCoE, and retains documentary evidence on the student's file for at least two (2) years after the student ceases to be an accepted student.
- **Board of Directors** determines circumstances such as cessation of AAPoly's registration or a sanction affecting a HE student's principal program, which remove the requirement for a release.
- **Academic Board** provides governance oversight of admission and enrolment-variation matters connected with transfer decisions.

FEEDBACK

Please contact the Head of Student Services through email studentadmin@aapoly.edu.au to convey any queries or feedback about this policy. The Head of Student Services will respond to the inquiry or feedback in writing within two (2) weeks of receiving the email, unless an urgent or immediate response is required. Queries and comments will be recorded in the Continuous Improvement Register and form part of the policy and procedure review for quality assurance.

REFERENCES

Source	Document Title
Internal	Complaints and Appeals (Higher Education) Policy and Procedure
	Fee Payment and Refund Policy and Procedure
	Student Selection and Admission (HE) Policy and Procedure
	Delegations and Authorisations Policy
	Academic Credit Transfer and Recognition of Prior Learning (HE) Policy and Procedure
	Higher Education Student Handbook
External	National Code of Practice for Providers of Education and Training to Overseas Students 2018 — Standard 7
	Education Services for Overseas Students (ESOS) Regulations 2019
	Education Services for Overseas Students Act 2000
	Higher Education Standards Framework (Threshold Standards) 2021 (TEQSA)