

## Overseas Students Transfers Policy and Procedures

### Definitions:

**German School Johannes Gutenberg** is the name of school provider; CRICOS Provider ID: 02379D

**German International School Sydney (GISS)** is the trading name of the school

The "**written agreement**" consists of the completed Enrolment Form, including the acceptance of the Terms and Conditions, as well as the additional acceptance agreement for overseas students.

**Principal Executive Officer (PEO)** is the "Principal". The PEO may delegate a responsibility to an appropriate staff member.

**CAAW letter** – refers to the Certificate of Approved Accommodation and Welfare required for overseas students who are not residing with their parents, legal guardians or an DHA approved relative.

**CoE** – Certificate of enrolment which is issued in PRISMS

**PRISMS:** where all outcomes (approval / intention to refuse / refusal after appeal / withdrawal) and the effective date and reason for release (where applicable) are recorded.

**ESOS Framework** – The ESOS (Education Services for Overseas Students) Framework is a set of legislative requirements and standards, established under the Education Services for Overseas Students Act 2000 and the National Code, designed to protect the rights and welfare of overseas students studying in Australia and ensure the quality and integrity of education providers offering courses to international students.

**Principal course of study:** The main course of study covered by the student visa where multiple courses are listed; generally the final course on the visa.

**First six (6) calendar months:** six calendar months from the date the student commences their first registered school course.

**Restriction period:** The period during which a release/transfer is restricted under Standard 7 (including any preliminary course in a packaged arrangement).

**Privacy and confidentiality:** Personal information collected and used to assess transfer requests (including visa, welfare and academic records) will be handled securely and only disclosed to authorised parties where required to administer ESOS/PRISMS obligations or where otherwise permitted by law. Records will be stored securely with access limited to staff with a legitimate role in the process.

This policy and procedure is the German School Johannes Gutenberg's documented process for assessing overseas student transfer requests under the ESOS framework. It is made available to all relevant staff and to all overseas students and their parent/legal guardian via the German School Johannes Gutenberg's website and pre-enrolment information.

### Policy

German School Johannes Gutenberg will not knowingly enrol an overseas student wishing to transfer from another registered provider's course until after the first 6 months of their first school course, except in certain circumstances noted in the procedures below.

German School Johannes Gutenberg will consider requests from an overseas student seeking to transfer to another school as required by the National Code Standard 7.

The processing of applications to transfer to another school provider will be at no cost to the overseas student and parent/legal guardian.

## Procedure

### Transferring into German School Johannes Gutenberg within the first 6 months at another school (receiving provider)

1. If an overseas student requests a transfer into German School Johannes Gutenberg in the first 6 months of their first school course at another school, the transfer request must be made in writing using GISS online application form and must be submitted to the Registrar via the school's website.  
Additional documentation that must be submitted with the GISS online application form includes:
  - application for enrolment, signed by the Overseas Student's parent/legal guardian(s).
  - The last two school reports including confirmation of enrolment from the previous school
  - all requirements from the *Language Proficiency Requirements Policy*
  - Statement – no fees outstanding at previous school (if Independent School)
  - Passport copy and visa information
  - CoE of previous school and CAAW letter if applicable
  - documentation supporting/outlining grounds for transfer.
2. If the overseas student is within the first 6 months of their first school course at another school, the Registrar will only consider an application for enrolment if any of the following apply:
  - the releasing school provider, or the course in which the overseas student is enrolled, has ceased to be registered
  - the releasing school provider has had a sanction imposed on its registration by the ESOS agency that prevents the overseas student from continuing the course at that registered provider
  - 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
  - the releasing school provider has agreed to the overseas student's release and recorded the date of effect and reason for release in PRISMS.
3. The Registrar may request additional information to assess the request, including but not limited to:
  - documentation from the current school provider including a completion of a Student Transfer or Release Form
  - calling a representative of the current school provider
  - using PRISMS/VEVO to search for the overseas student's study details and history
  - contacting the DHA
  - other methods as necessary.
4. The PEO will make a decision about the transfer request within 3 weeks during term time from the date received or 2 weeks after the student interview and assessment.
5. Where a request is received during school holidays, the German School Johannes Gutenberg will acknowledge receipt within 5 business days and will finalise the decision within the stated timeframe calculated from the first day of term, unless an earlier decision is practicable.
6. The Registrar will inform the applicant of the result of the application in writing.
7. The PEO may make a conditional offer of enrolment.
8. The Registrar will provide the overseas student with all required pre-enrolment material with any conditional offer made. A conditional offer will include that the releasing provider approve the transfer request and release the student in PRISMS. Other conditions may be included.
9. If a conditional offer of enrolment is made, the written communication will:
  - confirm that the German School Johannes Gutenberg will accept responsibility for approving welfare and accommodation where necessary (if the overseas student requires a CAAW).

- inform the overseas student of their visa obligation to maintain their current welfare arrangements until the transfer date, or have alternate welfare arrangements approved or return to their home country until the new approved welfare arrangements take effect
  - note the date of the transfer.
10. The Registrar will confirm in PRISMS the overseas student's transfer has been approved by the releasing provider. If it has been approved in PRISMS, the Registrar will:
- negotiate the date of transfer of welfare and accommodation with the releasing provider
  - create a CoE in PRISMS and follow procedures in the *Younger Overseas Students Policy and Procedures* to create a CAAW, signed by the PEO
  - communicate in writing to the overseas student and parent/legal guardian that:
    - the condition of enrolment has been met and the enrolment will proceed or that the offer still remains conditional
    - provide the overseas student and parent/legal guardian with the new CoE and CAAW
    - inform the overseas student of their visa obligation to maintain their current welfare arrangements until the transfer date or have alternate welfare arrangements approved or return to their home country until the new approved welfare arrangements take effect.

### **Transferring out of German School Johannes Gutenberg within the first 6 months (releasing provider)**

1. If an overseas student requests a transfer from German School Johannes Gutenberg in the first 6 months of the first course, the transfer request must be made in writing using the School Leaving Form and must be submitted to the Registrar.

Additional documentation required to be submitted with the transfer request includes:

- An offer of enrolment from a receiving CRICOS registered school provider
  - written confirmation the parent/legal guardian supports the transfer if the overseas student is under 18
  - if the student has been issued a CAAW by German School Johannes Gutenberg, written confirmation that the receiving school provider will issue a CAAW, noting the date on which this will take effect
  - documentation supporting/outlining grounds for transfer.
2. German School Johannes Gutenberg will approve the transfer request of an overseas student in first six months of study of the first course if one or more of the following apply:
- German School Johannes Gutenberg, or the course in which the overseas student is enrolled, has ceased to be registered
  - German School Johannes Gutenberg has had a sanction imposed on its registration by the ESOS agency that prevents the overseas student from continuing their course
  - 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
  - German School Johannes Gutenberg has agreed that compelling or compassionate circumstances exist including but not limited to:
    - serious illness or injury
    - bereavement of close family members such as parents or grandparents (where possible a death certificate should be provided)
    - major political upheaval or natural disaster in the home country requiring emergency travel and this has impacted on the overseas student's studies
    - involvement in, or witnessing of a serious accident

- witnessing or being the victim of a serious crime, and this has impacted on the overseas student (these cases should be supported by police or psychologists' reports)
  - failure to offer a pre-requisite unit, or the overseas student has failed a prerequisite unit and therefore faces a shortage of relevant units for which they are eligible to enroll
  - failure to deliver the course as outlined in the written agreement
  - 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 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
3. The circumstances in which a transfer request will be refused may include, but are not limited to:
- supporting documentation not submitted or application incomplete
  - none of the grounds for a transfer apply
4. When assessing the transfer request, the Registrar may request additional information including but not limited to:
- requesting documentation (offer of enrolment) from the proposed new receiving CRICOS registered school provider
  - phoning and/or meeting with the proposed new receiving CRICOS registered school provider
  - using PRISMS/VEVO to search for the student and study history
  - contacting the DHA
5. The Registrar will communicate an intention to refuse a transfer request in writing. The communication will identify the reason/s for the intention to refuse and will advise the overseas student of the right to access the German School Johannes Gutenberg's *Complaints and Appeals Process* within 20 working days.
6. The PEO will review the transfer request; assess transfer requests fairly and consistently, having regard to the overseas student's best interests, the evidence provided, welfare/visa implications (including under-18 welfare continuity), and the requirements of National Code Standard 7; and decide whether to make an offer of enrolment within 2 weeks during term time from the date of receipt.
7. The Registrar will inform the overseas student and parent/legal guardian of the result of the request in writing.
8. Approved requests are at no cost to the overseas student and parent/legal guardian and written communication will include:
- that the overseas student must contact Immigration to seek advice on whether a new student visa is required
  - the transfer date.
9. The Registrar will finalise the transfer request in PRISMS.
- If the outcome of the transfer request is approval, finalisation in PRISMS will occur as soon as is practicable.
  - If the outcome of the transfer request is refusal, this finalisation will only occur once:
    - a complaint or appeal finds in favour of German School Johannes Gutenberg **OR**
    - a complaint and appeal has not been made within 20 working days **OR**
    - the student withdraws from the complaints and appeals process.
10. If the transfer request is approved, the Registrar will consult the Overseas Student Refunds Policy and Procedures to determine if a refund is required.

### Transferring into German School Johannes Gutenberg after the first 6 months of study

1. If an overseas student requests a transfer into German School Johannes Gutenberg after the first 6 months of their first course at another school, the transfer must be made in writing using the online Application Form and must be submitted to the Registrar.

Additional documentation that must be submitted with the Application Form includes:

- application for enrolment, signed by the Overseas Student's parent/legal guardian(s).
  - The last two school reports including confirmation of enrolment from the previous school
  - all requirements from the *Language Proficiency Requirements Policy*
  - Statement – no fees outstanding at previous school (if Independent School)
  - Passport copy and visa information
  - written confirmation the overseas student's parent/legal guardian supports the transfer if the overseas student is under 18.
2. The Registrar will check PRISMS to confirm the overseas student has completed 6 months of study in their first school course.
  3. The PEO will review the transfer request; assess transfer requests fairly and consistently, having regard to the overseas student's best interests, the evidence provided, welfare/visa implications (including under-18 welfare continuity), and the requirements of National Code Standard 7; and decide whether to make an offer of enrolment.
  4. The overseas student and parent/legal guardian will be informed of the result of the application in writing by the Registrar within 3 weeks of receipt of the application (during school term) or 2 weeks after student interview and assessment.
  5. Where a request is received during school holidays, the German School Johannes Gutenberg will acknowledge receipt within 5 business days and will finalise the decision within the stated timeframe calculated from the first day of term, unless an earlier decision is practicable.
  6. If the application for enrolment and transfer request is approved written communication will:
    - provide the overseas student with all required pre-enrolment material
    - provide an offer of enrolment (which may be a conditional offer subject to welfare arrangements being finalised)
    - confirm that German School Johannes Gutenberg will accept responsibility for approving welfare and accommodation if the student requires a CAAW
    - inform the overseas student of their visa obligation to maintain their current welfare arrangements until the transfer date, or have alternate welfare arrangements approved or return to their home country until the new approved welfare arrangements take effect
    - note the date of the transfer.
  7. Following receipt of the acceptance of the offer of enrolment from the overseas student and parent/legal guardian the Registrar will:
    - negotiate the date of transfer of welfare and accommodation with the overseas student's current school provider
    - create a CoE in PRISMS and follow procedures in the *Overseas Students Refunds Policy and Procedures* to create a CAAW and provide a copy to the overseas student and parent/legal guardian
    - communicate in writing to the overseas student and parent/legal guardian:
      - confirmation that enrolment will proceed or that the offer still remains conditional
      - that the overseas student's visa obligations require them to maintain their current welfare arrangements until the transfer date or have alternate welfare arrangements approved or return to their home country until the new approved welfare arrangements take effect remain.

## Transferring out of German School Johannes Gutenberg after the first 6 months

1. If an overseas student plans to transfer from German School Johannes Gutenberg to another school provider after the first 6 months of their first school course with the German School Johannes Gutenberg, documentation must be provided to the Registrar regarding the transfer of enrolment.

Documentation includes:

- cancellation/transfer of enrolment notification
  - completed School Leaving Form
  - offer of enrolment from the new school provider
  - written confirmation the parent/legal guardian supports the transfer if the overseas student is under 18
  - written confirmation that the receiving school provider will accept responsibility for approval of the student's accommodation, support and general welfare, noting the date on which this will occur, if a CAAW is required.
2. The Registrar will review the documentation to ensure German School Johannes Gutenberg has all information to complete PRISMS reporting requirements.
  3. The overseas student and their parent/legal guardian will be issued a letter by the Registrar informing them that:
    - all required documentation has been submitted
    - that the overseas student must contact Immigration to seek advice on whether a new student visa is required
    - the transfer date.
  4. The Registrar will record the transfer in PRISMS. The Registrar will also confirm and complete any other reporting requirements such as cancellation of CAAW.
  5. The Registrar will consult the written agreement as well as the *Overseas Students Refunds Policy and Procedures* for refund eligibility and required actions.
  6. If all required documentation is not submitted, the PEO will consult other relevant policies and procedures. Additional reporting in PRISMS and/or contact with the parent/legal guardian may be required.
  7. After an overseas student has completed six (6) calendar months of their first registered school sector course, Standard 7 transfer restrictions do not apply. German School Johannes Gutenberg will facilitate the transfer through required documentation and PRISMS reporting to ensure accurate records and welfare reporting (if applicable).

## Staff informed of policy and procedures

1. The GISS HR admin staff will make the *Overseas Students Transfers Policy and Procedures* available to staff at Employment Hero and students will be able to access the policy and procedures on the GISS website.

## Records maintained

1. The Registrar will maintain the following records in the overseas student's file for at least two (2) years after the overseas student ceases to be an accepted student and in accordance with any longer retention period required under the German School Johannes Gutenberg's record management framework:
  - all overseas student transfer requests (including approvals, intention to refuse, refusal after appeals or withdrawals) in PRISMS in accordance with the ESOS framework
  - details of the registered school provider
  - written approval from a parent/legal guardian confirming support for the transfer if the student is under 18

- decision of the transfer request if the request is made in the first 6 months of the first school course
- communication of the outcome of the request to the overseas student and parent/legal guardian if the student is under 18
- change to the overseas student's enrolment in PRISMS.

### Document Management

Policy name	Overseas Students Transfers Policy and Procedures
Version	1.1
School responsible	Principal
Board portfolio	Governance and Strategy
Related documents	Language Proficiency Requirements Policy Younger Overseas Students Policy and Procedures Overseas Students Refunds Policy and Procedures
Version history	Version 1.0 – 15 July 2025
Last Review / Update	Approved on 28/ February 2026
Next Review	Scheduled for February 2027
Approved by	Michael Cordes (Principal) and Tammie Christie (Director)

The information contained in this document is proprietary to the German International School Sydney. Any distribution or copying without the written consent of the German International School Sydney is prohibited.