IVANHOE GIRLS' GRAMMAR SCHOOL

OUR GIRLS SPEAK FOR THEMSELVES.

Policy Title	**International Students Transfer Policy**				
Policy Owner	Director of Corporate Services				
Effective Date	June 2026				
Approved by	Principal				
Review Date	June 2028				
Internal Only Document			Public Only Document	**X**	

1. Purpose

The purpose of this Policy is to provide guidelines to ensure that Ivanhoe Girls' Grammar School complies with its obligations under the ESOS Act and National Code in relation to accepting overseas student applications from another education provider, and in consideration of requests of current Ivanhoe Girls' students seeking to transfer to another provider. This policy also includes guidelines relating to Standard 11 of the National Code for Additional Registration Requirements.

2. Scope

This Policy applies to all international students seeking enrolment on or currently studying on a 500 Student Visa.

3. Student Transfer Policy Statement

Ivanhoe Girls' Grammar School will not knowingly enrol an overseas student seeking to transfer from another registered provider's course until after they have completed at least six months of study at their first registered school sector course.

With exception of restricted circumstances such as:

- 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 overseas student from continuing their course with that registered provider;
- The releasing provider has agreed to the overseas student's release and recorded the date of effect and the reason for release in PRISMS; and

- 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. This usually applies where the overseas students study in Australia is sponsored by the government of another country.

Students are required to remain with the provider for all their courses until after the first six months of the first registered school sector course. The six-month timeframe for the first registered school sector course will begin from the student's actual commencement date. No restrictions to transfer will apply after the first six months have lapsed.

Overseas students seeking transfer to another education provider must complete an International Student Transfer Request Form.

Ivanhoe Girls' Grammar School accepts responsibility to approve or decline a request for such a transfer and must adhere to its documented policies and procedures in making this decision. The procedures will set out the circumstances under which the release will be granted, the reasons that the request may be declined and the timeframe for finalising the request.

Where a transfer request has been agreed, the receiving provider will confirm acceptance of responsibility for welfare arrangements (if applicable). Providers must confirm an agreed transfer date, ensuring that there is no gap in welfare responsibilities between providers. The receiving provider must also inform the student of their visa obligation to maintain their welfare arrangements until the transfer date, or have alternative welfare arrangements approved, or return to their home country and not arrive back onshore until after the new approved welfare arrangements take place.

Ivanhoe Girls' will not actively recruit students within their first six months of study at their first registered school sector course or during any courses that form part of a package course. All transfer request outcome will be recorded on PRISMS.

4. Student Transfer Procedures

4.1 Student Transfer Request – Ivanhoe Girls' Student

The School will assess and reply to each student's application for a reporting release decision via PRISMS and according to the following procedures with the timeframe of ten working days.

A request for transfer will be granted and a reporting release decision via PRISMS issued at no cost to the student if:

- in the opinion of the International Student Coordinator, Director of Student Wellbeing and Head of Counselling Services, transfer to another provider would be in the best interests of the welfare of the student (examples could include:
  - 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 the Schools Intervention Strategy, in accordance with the National Code Standard 8 *(note the report on the overseas student's course progress should occur even if the transfer request is granted)*;
  - there is evidence of compassionate or compelling circumstances;
  - 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;

- the student has changed welfare and accommodation arrangements and is no longer within a reasonable travelling time of the School;
- the School does not provide the pre-requisite VCE subjects for the student's desired tertiary course;
- the student is experiencing personal difficulty or educational problems which cannot be addressed by the School's support services and resources;
- the School ceases to be CRICOS registered or the course in which the student is enrolled ceases to be registered;
- the School fails to deliver the course as outlined in the written agreement with the student, or there is evidence that the student's reasonable expectations about their current course are not being met;
- an appeal (internal or external) on another matter results in a decision or recommendation to release the overseas student and that it is in their best interest to do so;
- the School has had a sanction imposed on its registration by the Australian Government or Victorian state government that prevents the student from continuing their course; and
- any other reason stated in the policies of the School.

In order for a transfer request to be processed, the student must provide a written request to transfer which includes a letter from the receiving provider that a valid offer of enrolment has been made.

Students under 18 years of age MUST also have:

- written evidence that the student's parent(s)/legal guardian supports the transfer;
- written confirmation that the new provider will accept responsibility for approving the student's accommodation, support, and general welfare arrangements where the student is not living with a parent(s)/legal guardian or a suitable nominated relative; and
- if a release is granted, it must be at no cost to the overseas student and the releasing provider must advise the overseas student to contact Department of Home Affairs (DHA) to seek advice on whether a new student visa is required.

Ivanhoe Girls' Grammar School will NOT provide a letter of release to students in the first six months of their principal course in the following circumstances:

- The student's progress is likely to be academically disadvantaged
- Within the first term of study (or approximately nine weeks) of a course beginning. This minimum time will allow for a student to adjust to a new educational setting, deal with any homesickness issues, and give the student the opportunity to access and benefit from the school's support services
- The School is concerned that the student's application to transfer is a consequence of the adverse influence of another party) e.g. changing schools because friends go to another school, or student's agent claims that another school would be better)
- If the School believes that the student is trying to avoid being reported to DHA for unsatisfactory academic progress or course attendance (e.g. they have received one or more warning letters for non-attendance)

All applications for transfer will be considered within 10 working days and the applicant notified of the decision.

4.2 Refusal of Transfer Request

If a request for release is refused, the School will:

- Inform the student in writing, stating the reasons why the request was refused. The stated reasons must be restricted to the documented policies and procedures

- Inform the student of their right to appeal the decision in accordance with Ivanhoe Girls' Grammar School's Complaints and Appeals Policy. A student can appeal against a refusal to release or, if the School does not respond within the timeframe set out (being ten working days), through the provider's complaints and appeals process

The School will not finalise a student's refusal of transfer status in PRISMS until the appeal finds in favour of the School's decision, or the student has chosen not to access the complaints and appeals process within the twenty working day period, or the student withdraws from the process. The School will inform the student of this via the Release documentation.

4.3 Approval of Transfer Request

If a request for transfer is approved, the student will be informed in writing with the Letter of Release attached. The letter will state the last day of enrolment at Ivanhoe Girls' Grammar School and, if the student is under 18 years of age, state the date the School will cease being responsible for approving accommodation, support and general welfare arrangements for the student. On the last day of enrolment at the School, DHA will be advised via a PRISMS notification that our welfare responsibilities have ceased.

4.4 Record Keeping relating to Request for Release

The School will keep all records of Request for Transfer and Letter of Release for two years after the overseas student ceases to be an accepted student, including the process used to make a decision in relation to the request. This information will be filed in both Synergetic and the Student file on Teams.

4.5 Enrolling Transferring Students

The School will not knowingly enrol a student wishing to transfer from another registered provider's course prior to the student completing six months of study at the first registered school sector course, except where:

- The original registered provider has ceased to be registered or the course in which the student is enrolled has ceased to be registered
- The releasing registered provider has agreed to the overseas studen's release and recorded the date of effect and reason for release in PRISMS
- The original registered provider has a sanction imposed on its registration by the Australian Government or Victorian state government that prevents the student from continuing her principal course
- Any government sponsor of the student considers the change to be in the student's best inetrest and has provided written support for that change

When enrolling a transferring student who has welfare arrangements approved by the other provider, Ivanhoe Girls' must negotiate a transfer date for welfare arrangements with the releasing registered provider to ensure there is no gap in welfare. Admissions must:

- Ensure the approved homestay arrangement is in place and all welfare arrangements are actioned on the agreed transfer date
- Inform the student that they must maintain their current welfare arrangements until the transfer date, or have an alternative welfare arranged approved and in place, or return to their home country and not arrive back onshore until after the new approved welfare arrangements take place.

4.6 Registration Requirements for CRICOS – Procedures

Seeking Approval from a Relevant Designated State Authority (DSA)

In applying to register a full-time course at a location, the School must seek approval for the following:

- The course duration, including holiday breaks
- Modes of study, including online distance or work-based training
- The number of overseas students enrolled at the School, within the limit or maximum number approved by the ESOS agency for each location
- Arrangements with other education providers, including partners, in delivering a course or courses to overseas students

In seeking approval, the School must demonstrate any matters requested by the ESOS agency, including the DSA, which may include but are not limited to the following:

- The expected duration of the course does not exceed the time required to complete the course on the basis of full-time study
- The expected duration of the course includes any holiday breaks or any work-based training
- Any work-based training to be undertaken as part o the course is necessary for the student to gain the qualification and there are appropriate arrangements for the supervision and assessment of the students
- The course is not to be delivered entirely online or by distance learning
- The School or any partner engaged to deliver a course or courses to overseas students has adequate staff and education resources, including facilities, equipment, learning and library resources and premises as are needed to deliver the course to the overseas students enrolled at the school
- The maximum number of overseas students proposed by the provider for the location reflects the appropriateness of staff, resources and facilities for the delivery of the course.

Ivanhoe Girls' Grammar School will notify its ESOS agency (including the relevant DSA) of any changes to ownership or management and will submit for approval any proposed changes to the School's registration for a course **at least 30 days prior** to the time at which those changes are proposed to take effect.