

## STUDENT TRANSFER POLICY AND PROCEDURE

### POLICY

According to National Code Standard 1.3 and 7, registered providers should assess requests from students for a transfer between registered providers prior to the student completing six months of his or her principal course of study in accordance with the RTO documented procedures.

After the first six months of the principal course no restrictions apply if a student wants to transfer.  
And

According the Skills First VET Funding Contract 2018 JTI will ensure the smooth transfer of students to another RTO if directed by the Department of Education (Victoria).

### A. PURPOSE

This policy applies to international and domestic students.

In accordance with the National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2018, Job Training Institute Pty Ltd (JTI) will not knowingly enrol a student transferring from another education provider prior to the student **completing six months of their principal course.**

A student may apply to transfer to another provider after they have completed six months of their principal course. In the case of a package of courses for example, Cert III, Cert IV and finally Diploma, the principal course is the highest course – the Diploma.

The only exceptions are the circumstances outlined in B.2.2 *Application Process*, below.

This policy sets out the procedure for assessing requests from students to transfer into and out of Job Training Institute (JTI) prior to the student completing six (6) months of their principal course.

The circumstance in which we supply a release letter to students prior to completing six (6) months of their principal course will be assessed as detailed in this documented procedure.

The timeline for a response to an application for transfer into and out of JTI will be ten (10) business days from the date we have received the transfer application form. The form will be date stamped and signed as received by International Student Coordinator (ISC) or Student Support Officer (SSO) and in their absence the General Manager (GM) or Campus Manager.

This student transfer policy is made available to all students and staff and clearly details the circumstances in which a transfer will and will not be granted.

**Note:** JTI does not enrol international students under age of 18 years.

## B. PROCEDURE

### B.1 Transferring to JTI

#### Student request to transfer into JTI

This section of the transfer policy has been developed primarily to cater for international students holding a student visa and outlines the process regarding transfer between providers.

JTI will require the transferring student to complete the *Student Transfer Application form* and provide supporting evidence.

#### B.1.1 Application Process

Student wishing to transfer to JTI from another provider must complete the Student Transfer Application form, available on JTI website or available from the ISC.

Once completed, this document with supporting evidence must be submitted to the GM or Campus Manager for assessment. Application will be assessed within the timelines listed below.

#### B.1.2 Processing Timelines

The application will be assessed within ten (10) business days of student application. Students who are transferring from another provider and have not completed six (6) months of their principal course will require a letter of release/confirmation of release on PRISMS from previous provider and other appropriate documentation. All documentation whether supplied by student to ISC/SSO or in their absence the IDH must be placed in the student records.

#### B.1.3 Decision

A formal decision will be provided to student within the above timeline. The decision might be to:

1. approve transfer request
2. refuse transfer request or
3. To request more information from student and require a resubmission of application with further documentation.

#### B.1.3 Process

The student will need to provide formal evidence that they have completed 6 months of their principal course. If this is not provided, JTI will not enrol them unless they have a written letter of release/confirmation of release on PRISMS from their current provider or if the registered provider has written confirmation that the student's parent or legal guardian supports the transfer.

The ISC /SSO or in their absence the IDH will complete investigation to ensure the course detailed by student is in fact the principal course, this will be completed via checking dates on student visa and checking in PRISMS. In the case where the student has enrolled in a package of courses for example, Cert III, Cert IV and finally Diploma, the last course / highest qualification (Diploma) is the principal course.

Therefore, if the student has only completed the first qualification – Certificate III then this would not be considered as acceptable to enrol student without a letter of release/confirmation of release on PRISMS from prior provider or meeting other reasons as detailed below. When providers attempt to create a new Confirmation of Enrolment ([CoE](#)), PRISMS will usually advise them if the student has **not** completed six months of the principal course. PRISMS will alert that the student is enrolled elsewhere, but not identify the provider.

### B.1.4 Grounds for Accepting Students

There are several circumstances where a student transfer is acceptable before completing the 6 months:

1. In the case that the original registered provider has ceased to be registered or the course in which the student is enrolled has ceased to be registered, JTI would be able to enrol the student before they have completed six months of principal course.  
In assessing the application for transfer, JTI will further investigate the previous provider to ensure they indeed have ceased to be registered in providing the course in which the student was enrolled. Checks can be completed by going to DOE website: [www.cricos.education.gov.au](http://www.cricos.education.gov.au) or [training.gov.au](http://training.gov.au). Once JTI has completed investigations and verified that the provider has ceased to be registered or the course in which the student is enrolled has ceased to be registered, the next step is to interview student and then complete the enrolment process.
2. In the case that an international student wishes to enrol with JTI and they have not completed 6 months of principal course but have supplied a 'Letter of release/confirmation of release on PRISMS' from the other registered provider, JTI would accept this as evidence of release. The student will follow the standard enrolment procedures regarding entry requirements for the course of enrolment and supply appropriate documentation in support of their application.
3. In the case that an international student wishes to enrol with JTI and they have not completed 6 months of principal course, but have stated in their application that the original registered provider has had a sanction imposed on its registration by the Australian Government or state or territory government that prevents the student from continuing his or her principal course and the student has provided evidence to support this statement. In assessing the application for transfer, JTI would further investigate the evidence and if validated, would accept this as evidence and follow JTI student transfer policy to enroll the student. Sanctions on a registered provider can be verified from <http://www.asqa.gov.au/about/regulatory-decisions/asqa-decisions.html>
4. In the case where the international student is government sponsored and the student has requested a transfer to JTI without first completing the six months of principal course at the other registered provider, this transfer request would be approved with formal advice and approval from the government sponsor who has stated that they consider the changes to be in student's best interest. In this case, there is no need for a letter of release/confirmation of release on PRISMS from previous registered provider. Evidence will be attached to student file and detailed in PRISMS when creating CoE.

### B.1.5 Conditional Offer

In some cases, a student may not have completed six months of their principal course but may still wish to transfer to JTI. In this circumstance JTI will provide the student with a conditional offer letter which clearly details that the letter is only a Conditional Offer Letter contingent on student providing a Letter of release/confirmation of release on PRISMS from their current provider. Once the student

has provided a Letter of release/confirmation of release on PRISMS from their current provider, it will be validated by the ISC/Admissions officer.

### **Enrolment**

Once the transfer has been approved, the ISC/admissions officer will complete the final enrolment documentation and update PRISMS with student data creating the CoE.

### **Responsibilities & Action**

The Marketing Manager/GM or in their absence the Campus Manager/Coordinator is responsible for assessing applications for transfer and approving or not approving.

## **B.2 Transferring from JTI to another RTO**

### **B2.1 Students seeking to transfer to another Provider.**

Students wishing to transfer to another provider prior to completing six (6) months of their principal course and requesting a letter of release/confirmation of release on PRISMS must firstly access this policy to ensure they are aware of the requirements for release and then complete the *Student Release Application form* and attach **the letter of offer/confirmation of release** from the other registered provider and other supporting documentation.

### **B.2.2 Application Process**

The application and supporting evidence will be assessed in accordance with JTI student transfer policy.

In assessing the application, the following should be considered:

- 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
- If the student wishes to change course to get access to greater support (may be through the services offered by another provider, commercial or non-for-profit services or through access to family, friends or a cultural support network)
- If the student claims or can provide evidence that his or her reasonable expectations about the current course are not being met.
- If the overseas student is to be reported because they are unable to achieve satisfactory course progress at the level they are studying, even after engaging with JTI'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.
- JTI fails 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.

A letter of release/confirmation of release on PRISMS should be provided for a student where:

- there is evidence that the overseas student was misled by JTI or an education or migration agent regarding JTI or its course and the course is therefore unsuitable to their needs and/or study objectives, or

- An appeal (internal or external) on a matter that may reasonably result in the student wishing to seek a transfer supports the student.

Should the documentation be assessed as a valid enrolment offer in line with JTI policy and National Code Standards, JTI will grant the student a letter of release/confirmation of release on PRISMS – which will include the date of transfer and end of JTI responsibility for the student.

The student will formally acknowledge JTI decision and acceptance of release on the *release letter*. JTI will formally notify student of the date JTI will be canceling their CoE via PRISMS and that they should contact DHA to advice of the change in registered provider, as this may affect their student visa.

A letter of release/confirmation of release on PRISMS, if granted, is issued at no cost to student. Students will acknowledge receiving this notification via signing the *student release application form*. The letter of release/confirmation of release on PRISMS will include the following statements:

- JTI acknowledges that it has informed the student that from the date of this ‘Letter of release/confirmation of release on PRISMS’ that JTI is no longer the provider of the principal course of study for the student as identified within the Student Visa.
- JTI will be notifying the Department of Education (DOE) / the Department of Home Affairs (DHA) of this change by terminating the student’s CoE via PRISMS.
- The Student is advised to contact the Department of Home Affairs to seek advice if a new student visa is required. To find out more about visa requirements, visit the [DHA website](#) or call 131 881.

If a student transfers to another provider, any refunds of course fees paid to JTI will be in accordance with JTI refund policy.

### **B.2.3 Release Not Granted**

A release will not be granted under the following circumstances:

1. Student has not provided a letter of offer from another provide;r
2. Documentation is either inaccurate, incomplete;
3. Where it may jeopardize the students’ progress through a course;
4. Work commitments have been provided as a reason;
5. Travel to and from campus has been provided as a reason;
6. The student is using the release to avoid being reported to DHA for failure to meet JTI’s academic progress requirements;
7. Student does not want to study the enrolled course anymore;
8. There is a lack of sufficient documentation in support of their claim for compelling or exceptional circumstances;
9. It is considered detrimental to the student to allow release;
10. The student has outstanding fees owing to JTI.

If JTI intends to refuse the transfer request, they must inform the overseas student in writing of:

- the reasons for the refusal
- the overseas student’s right to access the provider’s complaints and appeals process, in accordance with Standard 10 (Complaints and appeals), within 20 working days.

JTI must not finalise the student's refusal status in PRISMS until the appeal finds in favor of the registered provider, or the overseas student has chosen not to access the complaints and appeals processes within the 20 working day period, or the overseas student withdraws from the process.

JTI must maintain records of all requests from overseas students for a release and the assessment of, and decision regarding, the request for two years after the overseas student ceases to be an accepted student.

#### **B.2.4 Complaints and Appeals**

If JTI does not allow a release, JTI will provide formal reason for decision and the student has the right to access JTI complaints and appeal process at no cost to student.

The written reasons should note the decision, the reasons for the decision, the factors taken into consideration and reflect the student's individual circumstances. The reasons for refusal should be sufficiently detailed to enable the student to make an informed decision as to whether to appeal the decision.

#### **B.2.5 Responsibilities and Action**

The marketing Manager/ GM or in their absence the Campus Manager is responsible for assessing applications for transfer and approving or not approving.

JTI must maintain records of all requests from students for a letter of release/confirmation of release on PRISMS and the assessment of, and decision regarding, the request on the student's file.

### **C. DOMESTIC STUDENTS**

JTI procedure for transferring students to another RTO is as follows:

1. Department notifies JTI of the requirement to transfer student/s
2. JTI will notify the student/s in writing no later than 5 business days of receiving the direction from the Department
3. This notification will be both in hard copy and electronic (email) format
4. JTI will source and identify suitable RTOs for the student ensuring reasonable access is available to public transport to enable the student to attend and continue their study
5. JTI will retain all associated records in accordance with our Records Retention Policy and will cooperate with the new RTO regarding information and transfer of student records in accordance with the Privacy Amendment Policy May 2015.

#### **Related documents:**

- Student Transfer Application
- Letter of Offer Conditional
- Letter of Offer
- Complaints and Appeals Policy
- Letter of release/confirmation of release on PRISMS within 6 Months
- Letter of Refusal for Release
- Skills First Funding Contract

