

Policy and Procedure – Transfer Between Registered Providers

Document

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Policy Owner	Admissions Manager
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Version Control

Issue Date:	Summary of Changes	Review Date
25/07/2001	Procedure updated	
18/05/2004	Formatting updated	
02/07/2007	Application for Transfer from another Institution is now called Transfers between Registered Providers and was updated as part of National Code 2007 implementation	
05/11/2007	Updated titles and procedure in line with current practice	05/11/2009
29/06/2010	Procedure update to comply with Standard 7	29/06/2012
14/07/2010	Review of Policy to comply with Standard 7	14/07/2012
02/08/2010	Reformat in-style	2/8/2012
29/07/2016	Policy and procedure re-written and student guidelines created	29/07/2018
01/01/2018	National Code 2018 released	01/01/2020
19/02/2019	Policy reviewed and updated	19/02/2021
15/12/2023	Policy reviewed and updated. Change of policy owner.	15/12/2025

1. Purpose and Scope

This document has been developed in accordance with *Standard 7 - Transfer between Registered Providers* of the National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2018 (the National Code 2018). Under the terms of this legislation, students on an international student visa are required to remain with their education provider for the first six months of study of their principal course. However, Standard 7 recognises overseas students as consumers and supports them in exercising choice whilst acknowledging that they may also be a group that requires support to transition to study in Australia. More information about the National Code can be found [here](#).

Navitas English is committed to abide by and implement a transfer policy in accordance with the National Code 2018. As such, this policy should be read in conjunction with the National Code. This Policy and Procedure applies to all students who are enrolled in or intending to enrol in courses delivered by Navitas English Services (CRICOS Provider Code 00289M).

2. Policy

This policy and procedure support the intent of Standard 7 and outlines the circumstances under which Navitas English Services Pty Ltd, trading as Navitas English, will consider a student request for a transfer:

1. Between Navitas English campuses and Hawthorn-Melbourne
2. From another registered provider to Navitas English
3. From Navitas English to another registered provider

Navitas English will consider applications for a transfer, as per the guidelines outlined in this policy, and advise the student of the outcome in writing within 10 working days from receipt of the application and all supporting documentation.

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

2.1 Transfer between Navitas English centres and Hawthorn-Melbourne

Students may change between Navitas English centres and Hawthorn-Melbourne at any time with the condition that the transfer is approved by the current and the new/receiving centres academic staff. The academic team of the receiving centre determines that the student has met the relevant entry requirement and there is space available for the student. The minimum duration of the study period is two weeks at the new centre.

Prior to the transfer, students must meet the minimum requirement for attendance of 80 per cent of the scheduled contact hours for their enrolled course and any relevant fee difference has been paid.

2.2 Transfer from another registered provider to Navitas English

Navitas English will not knowingly enrol students seeking to transfer from another registered provider's course prior to the overseas student completing six months of his or her principal course with another registered provider except where:

- a) the releasing registered provider, or the course in which the overseas student is enrolled, has ceased to be registered;
- b) 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;
- c) the releasing registered provider has agreed to the overseas student's release and recorded the date of effect and reason for release in PRISMS;
- d) 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 that change;

Students wishing to transfer to Navitas English from another registered provider before completing six months of the principal course must be released from their original registered provider before Navitas English can confirm the enrolment.

Overseas students may hold a packaged enrolment whereby the student holds a packaged student visa to study a preliminary English course at Navitas English followed by the principal course with another registered provider. The registered principal course provider is responsible for the approval in releasing an overseas student, irrespective of whether the overseas student has commenced the principal course of study or not.

Navitas English will issue a letter of offer to enable the overseas student to apply for release from the original registered provider for which they are enrolled in the principal course of study.

2.3 Transfer from Navitas English to another registered provider

Students who apply to transfer after accepting their enrolment offer, but before commencing studies, will not be approved except in extreme circumstances such as:

- a) Inability to secure an Australian visa;
- b) There is evidence of compassionate or compelling circumstances as defined in the [Navitas English Conditions of Enrolment](#).

Students who have commenced studies with Navitas English but have not completed six months of their principal course of study will not be granted approval to transfer to another registered provider except if:

- Navitas English or the course the students are enrolled in has ceased to be registered
- There is a sanction imposed on Navitas English's registration by the ESOS agency that prevents the student from continuing their studies
- If the student is sponsored by their government, and their sponsor provides a written support for the transfer acceptable to Navitas English.

Navitas English deems the following circumstances as reasonable grounds to refuse a student request for transfer within the first six months of the principal course of study:

- a) The transfer may jeopardise the student's progression through a package of courses;
- b) The student has had a change of mind;
- c) The student is experiencing adjustment difficulties moving to Australia;
- d) Fees are outstanding;
- e) The student is experiencing a course scheduling conflict with personal, work, or other non-study commitments;
- f) The student is experiencing homestay or other accommodation problems;
- g) The distance of the student's residential address from the campus at which they study is presenting difficulties;
- h) A desire to move to another registered provider to be with friends;
- i) Navitas English reasonably forms the view that the student is trying to avoid being reported to the Department of Home Affairs (DHA) for failure to meet the provider's attendance requirements and/or academic progress requirements;
- j) The course for which the student is intending to enrol in with the other provider, is similar to or the same as the course in which the student is currently enrolled at Navitas English;

- k) A similar or identical course as the course in which the student is intending to enrol in with the other provider is offered by Navitas English;
 - l) The transfer request is to study a program of an academic level that is considered lower than their current program, and Navitas English's support services have not been exhausted;
 - m) The intended course will not provide adequate preparation for further study, and/or not be recognised by higher education or VET providers as satisfying their entry requirements;
 - n) The student does not have a valid enrolment offer from a CRICOS-registered provider.
- Navitas English reserves the right to take into consideration other relevant factors which are not specified above.

For the purposes of the circumstances outlined in Section 2.3 of this policy, **evidence** means documents or other material which would satisfy a reasonable person that the claim and/or the circumstances appealed to are genuine.

Students who are unsuccessful in their request to transfer prior to completing six months of their principal course at Navitas English have the right to appeal the decision within 20 working days. In such cases, Navitas English will not finalise a refusal to an overseas student until when the student has had an opportunity to access Navitas English's complaints and appeals process. For further advice students should refer to the [Navitas English Policy and Procedure Complaints Handling and Appeals](#).

Students who have completed six months of their principal course of study with Navitas English and wishing to transfer to another registered provider as they have met the institution's published English score, or have achieved a satisfactory level of English through Navitas English's agreed pathways may be approved to transfer in accordance with the Navitas English Conditions of Enrolment.

Other circumstances in which Navitas English will grant approval for a transfer include but are not limited to the following:

- a) The overseas student will be reported because they are unable to achieve satisfactory course progress even after engaging with Navitas English's intervention strategy to assist the overseas student in accordance with *Standard 8 (Overseas Student Visa Requirements)*;
- b) There is evidence of compassionate or compelling circumstances as defined in the Navitas English Conditions of Enrolment;
- c) Navitas English is unable to deliver the course as outlined in the written agreement;
- d) There is evidence satisfactory to Navitas English that the overseas student's reasonable expectations about their current course are not being met;
- e) There is evidence that the overseas student was misled by Navitas English or a Navitas English education agent regarding Navitas English or the Navitas English courses and the course is therefore unsuitable to the student's needs and /or study objectives;
- f) An appeal (internal or external) on another matter results in a decision or recommendation to release the overseas student;
- g) Any government sponsor of the student considers the change to be in the student's best interest and has provided written, authorised support for that change;

If the student's application to transfer is unsuccessful, Navitas English will provide written advice as to why the request was denied. Once a transfer request is finalised, Navitas English will record all transfer request outcomes in PRISMS.

Approval to transfer to another registered provider request does not constitute automatic approval of a refund, nor a remission of debt for students who are on an instalment payment agreement.

Instalment payment students wishing to transfer to another registered provider will still be required to pay in accordance with the payment terms outlined on their instalment payment agreement unless:

- a) the student is entitled to a refund for reasons that are covered by the Navitas English Conditions of Enrolment, or

- b) the student is able to demonstrate compassionate or compelling circumstances as defined on the Navitas English Conditions of Enrolment.

Students wishing to apply for a refund, or remission of debt for instalment payments, need to submit their request separately and in writing. Such requests will be assessed in accordance with the Navitas English Conditions of Enrolments.

Overseas students may hold a packaged enrolment whereby the student holds a packaged student visa to study a preliminary English course at Navitas English followed by the principal course with another registered provider. The registered principal course provider is responsible for the approval in releasing an overseas student, irrespective of whether the overseas student has commenced the principal course of study or not.

3. Procedures

3.1 Transfer between Navitas English centres and Hawthorn-Melbourne

A *Centre Change Form* (NES 2.09 F1) needs to be completed and signed by the student and senior academic staff of the original and receiving centre for submission to the Navitas English admissions team. The review of the request will be made within 10 working days of receiving the completed request form. When the review is finalised and where applicable, e-COE reporting in PRISMS will be actioned accordingly.

3.2 Transfer from another registered provider to Navitas English

The student will need to submit a Navitas English application form to the Navitas English admissions team, with the relevant supporting documents outlined in the application form. An offer letter will be issued for the purposes of requesting release from the original principal provider.

If the student is a government sponsored student, the student will also need to provide the government sponsor's written support for that change in the form of a Financial Guarantee letter.

If the student is under 18 years of age:

- written evidence that the student's parent or legal custodian supports the transfer;
- written confirmation on the new responsible person for the student's accommodation, support and general welfare arrangements as per *Standard 5 (Younger Overseas Students)* should Navitas English not accept the responsibility.

Student will be made aware that a new visa may be required if the new course is in a different sector of the Australian education industry or if the student should apply for a new visa as the current visa is due to expire.

3.3 Transfer from Navitas English to another registered provider

A student requesting a transfer must satisfy Navitas English's requirement that they have a genuine and legitimate basis for such a request.

Students who are on a packaged visa are required to contact the registered provider of the principal course in the first instance. The registered provider of the principal course has the responsibility to release students on a packaged offer irrespective of whether the student has commenced study in the principal course or not.

To request a transfer to another registered provider, the student must submit a completed Change of Provider form.

The completed form needs to be submitted to Navitas English with a valid offer letter from the receiving provider and if the student is:

- 1) government sponsored, a written authorised support for the transfer from the Government sponsor,
- 2) under 18 years of age, a written evidence that the student's parent or legal custodian supports the transfer; and a written confirmation that the new provider will accept responsibility for approving a student's accommodation, support and general welfare arrangements as per *Standard 5 (Younger Overseas Students)*.

The AM will review the request and provide an outcome within 10 working days of receiving the completed request form. When the review is finalised and where applicable, e-COE reporting in PRISMS will be actioned accordingly.

Where a refund of fees is applicable, it will be reviewed and processed in accordance with the guidelines outlined in *Policy and Procedure Course Fee refund*.

Student will be made aware that a new visa may be required if the new course is in a different sector of the Australian education industry or if the student should apply for a new visa as the current visa is due to expire.

4. Responsibilities

The **Admissions Manager** is responsible for:

- Overall guidelines on Transfer Between Providers
- Assessing transfer requests and giving delegated authority to NE admissions team to action transfer to another provider in accordance with the policy and procedure

Centre Manager-Director of Studies are responsible for:

- Monitoring and proper application of these procedures
- Interviewing student and contacting agent (if required, in consultation with relevant Recruitment Manager) about Transfer Between Provider Request
- Providing detailed information to the AM as described in relevant Policy and Procedure, using Change of Provider Form

Admissions team is responsible for:

- Proper application of these procedures and processing of transfer requests in accordance with Navitas English policy and procedure
- Recording transfer request outcomes in PRISMS under delegated authority from the Principal Executive Office (PEO)

Recruitment Managers are responsible for:

- Liaison with agents, as applicable, including ascertaining agents' position with respect to recruitment of students who have not completed their first six months of their principal course of study and the mechanism of transfer between registered providers

5. Definitions

Academic team	Includes Centre Manager & Director of Studies and their nominated delegates, Senior Teachers
CRICOS	Commonwealth Register of Institutions and Courses for Overseas Students
DHA	Department of Home Affairs

e-COE	Electronic Confirmation of Enrolment
National Code 2018	The National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Student 2018
ESOS Act 2000	The Education Services for Overseas Students Act 2000
PRISMS	Provider Registration and International Student Management System
Principle Course	The main course of study to be undertaken where a student visa has been issued for multiple courses of study. The principal course of study would normally be the final course of study.

6. Review

This template document is reviewed every 2 years by the relevant manager to ensure alignment to appropriate strategic direction and its continued relevance to Navitas English's current and planned operations.

The next scheduled review of this document is listed in the Version Control section on Page 1.

7. Related documents

- Change of Provider Form
- Centre Change Form
- Policy and Procedure Complaints Handling and Appeals
- Navitas English Conditions of Enrolment
- Policy and Procedure Course Fee Refund
- Policy and Procedure Student Attendance
- Policy and Procedure Deferral, Suspension, and Cancellation