



## International Student Transfer Assessment Policy and Procedures

2020

<b>Approved:</b> Principal	<b>Date approved:</b> 2020
<b>Responsible Officers:</b> Manager, International Programs, Chief Financial Officer	<b>Policy Review Date:</b> December 2021

### Rationale

Billanook College accepts both onshore and offshore applications for places in our International Student Program necessitating the issuance of a Confirmation of Enrolment (CoE).

It is acknowledged that students may wish to transfer into Billanook College having commenced formal school studies with another Education Provider and circumstances may arise where students enrolled at Billanook College may have reasons for wishing to transfer out of the College to commence a course of study with another Education Provider.

### 1.0 Policy and Procedures – Inbound Transfers

1.1 As a CRICOS registered Education Provider, Billanook College acknowledges that it must not knowingly enrol a student seeking to transfer from another provider's course of study prior to the student completing a minimum of six months of the Principal course of study, that being the registered school sector course, except where any of the following circumstances apply:

- The releasing Education Provider, or the course in which the student is enrolled, has ceased to be registered on CRICOS
- The releasing Education Provider has had a sanction imposed on its registration by the ESOS Agency that prevents the student from continuing his or her course with that Education Provider
- The releasing Education Provider has agreed to the student's release, has issued written confirmation of same to Billanook College and has recorded the date of effect and reason for release in PRISMS. This circumstance is the most likely scenario to present in the case of inbound transfer requests in the School sector
- A government sponsor of the student considers the change to be in the best interests of the student and has provided written support of that change.

### 1.2 Response by Billanook College to Receipt of Onshore Transfer Application

1.2.1 The Manager, International Programs (MIP) will seek clarification from the applicant or their agent as to the Identity of the initial education provider and the commencement date of enrolment with that education

provider to test the 'minimum six month rule' in each case. An inspection of the Student Visa held by the applicant and a search of PRISMS data may also assist in this matter.

1.2.2 In the event that it can be verified that the student has completed at least six months of tuition with the initial education provider the following steps shall apply:

- a. All submitted documentation will be assessed by Billanook College Admissions staff.
- b. The applicant may be invited to attend an Application Interview with the Head of School and MIP.
- c. Permission may be sought by Billanook College from the parents for MIP to contact the current school of the applicant to investigate further the claimed reasons for the transfer out from that Education Provider.
- d. Billanook College may request an objective Assessment of English Language Proficiency (eg AEAS/EduTest Report) or implement internal assessment of proficiency.
- e. A final decision will be made by the MIP in accordance with published Enrolment Policies and Procedures on whether to issue a formal Offer of an enrolment place to the applicant.

1.2.3 In the event that the student has not completed the minimum six month period of enrolment with the initial education provider, Billanook College will seek written permission from the parent of the student to make contact with the initial education provider to be advised of their position on the ongoing enrolment of that student.

- a. Should the instruction from the initial education provider be that none of the circumstances in Point 1 (above) apply, then Billanook College shall advise the applicant or their agent that no further consideration of the Application is possible.
- b. Should the instruction from the initial education provider be that one or more of the circumstances listed in Point 1 (above) apply, Billanook College shall seek written confirmation of same and ask that proof be provided of the record on PRISMS of the intent to release.
- c. The application will then be considered through regular Enrolment Policies and Procedures. If the applicant is younger than 18 years of age Billanook College shall need written confirmation that the student's parent or legal guardian is supportive of the transfer. Such confirmation may take the form of the parent authorisation of the Enrolment Application Form for a place at Billanook College.

## **2.0 Policy and Procedures – Outbound Transfer**

*As a CRICOS registered Education Provider, Billanook College acknowledges that it must implement the following documented procedures for processing Requests for Transfers by currently enrolled International students to an alternative Education Provider. The processes involved shall vary in circumstances where:*

- The student has already completed a minimum six months of study at Billanook College.
- The student has not completed a minimum of six months of study at Billanook College.

### **2.1 Processing Request for Transfer – Minimum Six Months Study Already completed.**

2.1.1 Expressions of interest in transferring to an alternative Education Provider may be directed to Billanook College through :

- Written communication to the MIP by the Parent/Agent
- Verbal communication by the student
- Contact received from the Alternative Education Provider

2.1.2 While acknowledging that a Student does not require a Formal Release to seek a transfer to an alternative Education Provider once completing at least six months of their Principal course of study, Billanook College reserves the right to attempt to retain enrolments where considered appropriate through such measures as:

- MIP may informally engage the student and parent in exploration of factors behind the decision to apply for a school transfer.
- MIP shall issue the student/parent with a Request for School Transfer Proforma inviting documentation of the reasoning behind this Request for Transfer.
- MIP will consult with Head of School on those reasons and if Billanook College acknowledges that it is in the best interests of the student to transfer, instructions will be provided to the parent/local support person to complete the following:
  - (i) Student/Agent to obtain an Offer from the alternative Education Provider and submit a copy of that Offer Letter with the Letter of Withdrawal to the MIP. The Letter of Withdrawal is to be addressed to the College Principal and must specify a final date of study at Billanook College.
  - (ii) Billanook College shall then communicate directly with the alternative Education Provider in order to coordinate the transfer arrangements (CoE and CAAW).
  - (iii) Once transfer arrangements are confirmed, Billanook College will finalise all Homestay arrangements and ensure that the Education Provider holding the CAAW at the date of Billanook College homestay conclusion is assisting the student with all aspects of the Homestay relocation.
- Within five days of withdrawal from studies, Billanook College undertakes to have completed all necessary administrative processes including issuance of a Request for Refund Proforma to the Parent and entry of Student Transfer data on PRISMS. These processes shall be completed by the ISP Administrative Assistant (ISPAA) under direction of the MIP
- Billanook College shall issue the Parent with a final Statement of Account and copies of any Academic Transcripts previously issued upon parent request.

### **2.3 Processing Request for Transfer – Minimum Six Month of Study at Billanook College NOT completed.**

2.3.1 Billanook College acknowledges the commercial protection afforded by Standard 7 National Code (2018) preventing outbound student transfers within the first six months of the student undertaking their Principal course of study at the College.

It is acknowledged that in some cases requests for transfer within the first six months may be considered appropriate and in the best interests of the student, with such circumstances including but not limited to:

- a. the student can establish that the College has failed to deliver the course as outlined in the Written Agreement;

- b. the student can present evidence that their reasonable expectations related to their current course are not being met by the College;
- c. the student can provide evidence that he or she was misled by the College or by the Agent in the marketing and promotion of the Principal course of study and the course may therefore be considered as unsuitable to their needs or study objectives.
- d. the student has grounds to seek the transfer in order to gain access to Support Services not offered by Billanook College and;
- e. the student has successfully appealed (either Internally or Externally) on another matter and the decision on appeal includes permission to transfer to an alternative Education Provider.

2.3.2 In such cases Billanook College acknowledges the requirement under Standard 7 National Code (2018) to have published Request for School Transfer Procedures and to implement those procedures without prejudice and without any financial cost to the applicant.

Such procedures at Billanook College shall be as follows:

- a. The MIP receives informal notification of the expressed interest of the student to transfer to an alternative Education Provider through one of;
  - i. Written communication from the Parent/Agent
  - ii. Verbal communication by the student
  - iii. Contact received from the alternative Education Provider
- b. MIP shall then engage the Parent/Agent and or the student in discussions on the reasons for the requested transfer to an alternative Education Provider
- c. The MIP will then issue the student/parent with the Request for Transfer Proforma and require that to be completed and submitted within seven days. If the student is under the age of 18 years the student's parent or legal guardian must support the Request for Transfer. The Request for Transfer must be accompanied by a Formal Letter of Offer from the alternative Education Provider.
- d. Once received by the ISPAA, the contents of the Request for Transfer submission shall be shared with the relevant Head of School or other members of the College Leadership Team (CLT) for consideration of any reasons or evidence provided by the student. Such consultation shall be required to occur within seven days of the lodgement of the Request for Transfer and supporting documents.
- e. The MIP will then provide a formal written response to the Request for Transfer within five days stating:
  - The decision to grant or not grant the Request for Transfer
  - Clearly explaining in plain English the reasons for that decision including but not limited to the list of possible reasons in 4.1 (a – e) above.
- f. Once transfer arrangements are confirmed, Billanook College will finalise all Homestay arrangements and ensure that the Education Provider holding the CAAW at the date of Billanook College homestay conclusion is assisting the student with all aspects of the Homestay relocation.

g. Within five days of withdrawal from studies, Billanook College undertakes to have completed all necessary administrative processes including issuance of a Request for Refund Proforma to the Parent and entry of Student Transfer data on PRISMS. These processes shall be completed by the ISP Administrative Assistant (ISPAA) under direction of the MIP