International Student Transfer Policy

Scope

This policy applies to international students at Kaplan Business School and Kaplan Higher Education Pty Ltd (trading as Murdoch College and Kaplan International College Adelaide) and to international applicants seeking to transfer to either provider (Kaplan).

Purpose

The purpose of this policy is to provide information on the:

- transfer restriction period that applies before Kaplan can enrol an international student transferring from another registered provider;
- conditions under which Kaplan will consider an international student's request to transfer to or from another registered provider; and
- process students must follow when seeking to change education providers.

Policy Statement

This policy applies to international students studying with Kaplan on a student visa and sets out Kaplan's approach to student transfers in accordance with the requirements of the National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code) as amended by the National Code of Practice for Providers of Education and Training to Overseas Students Amendment (Overseas Student Transfers) Instrument 2026.

This policy does not apply to domestic students or international students on non-student visas such as tourist, work or family visas that allow the student unrestricted rights to study in Australia.

Where a student has a packaged enrolment comprising multiple courses, the provider of the final course of study is known as the principal education provider. Packaged students seeking to transfer to another provider must generally seek a release from their principal provider.

Definitions

Compelling or compassionate circumstances	means circumstances that may negatively impact a student's study, including but not limited to serious illness or injury, bereavement of close family members, major political upheaval or natural disaster in their home country, a traumatic experience such as a serious accident or crime.
Confirmation of Enrolment (CoE)	means a document issued by education providers to verify the applicant's enrolment in a specified course.
CRICOS	means the Commonwealth Register of Institutions and Courses for Overseas Students prescribed under Section 14A of the ESOS Act
International student	means a person who holds or intends to hold a student visa with rights to study in Australia.
Principal course of study	means the main course of study undertaken by an international student where the student visa covers multiple courses and is generally the final course in the package.
PRISMS	means Provider Registration and International Student Management System (PRISMS) - an Australian Government secure online system that enables providers to issue Confirmations of Enrolment (CoEs),which government agencies use to monitor student compliance with visa conditions and education provider compliance with the ESOS Act.

Policy Principles

- From 2 October 2026 to 30 June 2027 inclusive, international students seeking to transfer between registered providers must have completed at least 12 months of their principal course before transferring, unless an exception under Standard 7.1A of the National Code applies.
- The 12 month restriction applies to students who had completed 6 months or more, but less than 12 months, of their principal course on 2 October 2026.
- As the principal course is generally the final course in a packaged enrolment, the transfer restriction also applies to courses undertaken before the principal course. Where a student is issued a visa for one course, that course is the principal course of study.
- Kaplan will not prevent an international student from transferring to another provider once the applicable transfer restriction period has been completed.
- From 1 July 2027, the transfer restriction period returns to 6 months of the principal course.

Guiding Procedures

Transferring from Kaplan to another provider before the applicable transfer restriction period has been completed

Kaplan will consider a request to transfer to another registered provider before the student has completed the applicable transfer restriction period where the transfer may be in the student's best interests. Circumstances may include, but are not limited to:

- the student will be reported to the Department of Home Affairs (DHA) because they are unable to achieve satisfactory course progress, even after engaging with Kaplan's intervention strategies;
- there is evidence of compassionate or compelling circumstances;
- Kaplan is unable to deliver the course as outlined in the written agreement;
- there is evidence that the course does not meet the student's reasonable expectations;
- there is evidence that the student was misled by Kaplan or an education or migration agent, regarding Kaplan or its course and the course is therefore unsuitable for the student's needs or study objectives;
- an internal or external appeal on another matter results in a decision or recommendation to release the student; or
- when the government sponsor considers the transfer to be in the student's best interests and has provided written support.

For students under 18 years of age, the following must also be provided:

- a written letter of support for the transfer from the student's parent or legal guardian; and
- where the student is not being cared for in Australia by a parent or suitable nominated relative, confirmation that the receiving provider will accept responsibility for the student's accommodation and welfare arrangements.

Kaplan may refuse a request for release where there are reasonable grounds for doing so. Grounds for refusal may include, but are not limited to, the following:

- the request for transfer is made by a student who has not commenced their studies;
- the student has not attached a copy of a valid letter of offer of unconditional enrolment with a CRICOS registered provider;
- the student has any outstanding debt owing to Kaplan. Debts may include all fees, loans or library fines;
- the student's actions have caused Kaplan to form the view that the student is not a genuine student (e.g. student was absent from Orientation sessions, low attendance rate, failure to access support services, non-submission of assessments);
- the student has been excluded or suspended from their program;

- Kaplan has formed the view that the student is trying to avoid being reported to the Department of Home Affairs for failure to meet attendance and/or academic progression requirements;
- a change of mind request based on financial reasons such as transferring to another provider with lower tuition fees;
- the transfer is considered detrimental to the student's welfare or future studies;
- the student applies to transfer from a Kaplan course to a course at a lower Australian Qualifications Framework (AQF) level or to a non-AQF course;
- the student is not genuinely engaging with an intervention program with the intention of failing and being released;
- the transfer would result in a breach of the student's mandatory visa conditions (e.g. student is trying to manipulate the Simplified Student Visa Framework (SSVF) system);
- the student's visa was processed under the SSVF arrangement, and the student applies to transfer to a course at a registered provider that is not eligible for SSVF;
- the student has not, or only recently, started to study their principal course of study and the full range of Kaplan's student support services are yet to be provided to the student; or
- the transfer may jeopardise the student's progression through a package of courses.

Kaplan reserves the right to take into consideration other factors, including the individual circumstances of a student, which may not have been specified above.

Applying for a Release

1. Students must request a release through the student management system (SMS). A release request must include a valid unconditional offer of enrolment from another CRICOS-registered provider.
2. Kaplan does not charge a fee for assessing a release request or recording a release in PRISMS.
3. Kaplan staff may meet with the student to discuss their request. Where the student is close to completing a course or near the end of a study period, Kaplan may advise the student to complete the study period, including relevant examinations or assessments.
4. Kaplan will provide a student with a written response within 10 working days from the receipt of the release request.
5. If the request is approved, Kaplan will record the release in PRISMS. A separate release letter will not be issued. The student will be advised to contact the Department of Home Affairs for information about any implications for their student visa.
6. If Kaplan refuses the release request, the student will be notified in writing of the reasons for the decision and their right to access Kaplan's Grievances, Complaints and Appeals process. Kaplan will not finalise the refusal in PRISMS until:
    - the student has had 20 working days from receiving the outcome to access the internal appeals process;
    - the student withdraws from the appeals process; or
    - the appeals process finds in favour of Kaplan.
7. Records of the request, assessment, decision, interviews and correspondence will be maintained in the student management system, and relevant information will be entered into PRISMS. Kaplan will retain records of transfer requests and decisions for two years after the student ceases to be a Kaplan student.

Transferring to Kaplan from another provider before the applicable transfer restriction period has been completed

Kaplan will not knowingly enrol an international student seeking to transfer from another registered provider before the applicable transfer restriction period has been completed, unless one of the exceptions below applies:

- the releasing provider has agreed to the student's release, recorded the date of effect and reason for release in PRISMS, and complied with its transfer policy and process;
- the releasing provider, or the course in which the student is enrolled, has ceased to be registered;
- the releasing provider has had a sanction imposed on its registration by the relevant ESOS agency that prevents the student from continuing their course; or
- a government sponsor considers the transfer to be in the student's best interests and has provided written support.

Process for Applications to Transfer to Kaplan

Any international student seeking to transfer to Kaplan from another registered provider must follow Kaplan's standard application process.

Kaplan may:

- seek the student's permission to contact the current provider;
- confirm the student's course commencement date; or
- require evidence that any necessary release has been recorded in PRISMS.

Kaplan will not enrol the student where a required release has not been recorded in PRISMS and no exception under Standard 7 of the National Code applies.

Complaints and Appeals

Students who are dissatisfied with a decision made under this policy may access Kaplan's *Grievances, Complaints and Appeals Policy*.

Relevant Legislation

As a registered education provider, Kaplan operates under a range of legislative and regulatory requirements. Policies and procedures are in place to support compliance with the instruments referenced below:

- Education Services for Overseas Students Act 2000 (ESOS Act)
- Education Services for Overseas Students (Foundation Program Standards) Instrument 2021
- Education Services for Overseas Students Regulations 2019
- ELICOS Standards 2018
- Higher Education Standards Framework (Threshold Standards) 2021
- National Code of Practice for Providers of Education and Training to Overseas Students 2018
- National Code of Practice for Providers of Education and Training to Overseas Students Amendment (Overseas Student Transfers) Instrument 2026

Related Policies

This Policy should be read in conjunction with the following College policies:

- Academic Success Policy
- Changes to Enrolment Policy
- Grievances, Complaints and Appeals Policy
- Refund Policy
- Student Record Management Policy

Version Control and Accountable Officers

It is the joint responsibility of the Implementation Officer and the Responsible Officer to ensure compliance with this policy.

Policy Category	Academic
Responsible Officer	Vice President, Academic
Implementation Officer(s)	Academic Dean, College Director
Review Date	March 2027
Approved by	
Vice President, Academic under a standing delegation from the KBS & KHE Academic Boards	

Version	Authored by	Brief Description of the changes	Date Approved	Effective Date
2.0	Quality, Regulations and Standards Team	Update to Murdoch College and removal of Kaplan International Language	05.05.2023	08.05.2023
2.1	Quality, Regulations and Standards Team	Update to Applying for a Release section and general review of policy.	20.06.2024	21.06.2024
2.2	Quality, Regulations and Standards Team	Policy re-branded for new KHE college. Minor editing and formatting changes.	10.03.2025	11.03.2025
3.0	Quality, Regulations and Standards Team	• Consolidated KBS and KHE policies into one Kaplan policy. • Updated transfer requirements to reflect the 2026 amendments to Standard 7 of the National Code. • Updated transfer-in and transfer-out requirements, including the temporary 12-month restriction period. • Clarified release, appeals and PRISMS requirements. • Updated terminology, references and formatting.	02.10.2026	02.10.2026