

Transferring to and from Another Provider Policy

Scope

This policy is applicable to Kaplan Business School Pty Ltd, (Kaplan) and applies to international students only.

Purpose

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

- conditions under which Kaplan will consider an international student's request for a transfer to or from another registered provider, and
- procedures for students to follow in relation to changing their provider.

Student Transfers

According to the ESOS National Code 2018, registered providers are restricted from enrolling transferring students prior to the student completing six months of their principal course of study, unless the student has met an exception under standard 7.

Transferring from Kaplan to another Provider

Transfer before the first six months of the principal course have been completed

Kaplan will consider permitting a student to transfer to another registered provider prior to completing six calendar months of their principal course in certain circumstances, which may include (and is not limited to) the following:

- the international student will be reported because they are unable to achieve satisfactory course progress;
- there are compassionate or compelling circumstances, such as the student provides evidence that he/she is under a real threat to his/her mental or physical health by remaining in the course, or provides evidence of other significant personal reasons;
- Kaplan is unable to deliver the course;
- there is evidence that current courses do not meet international student's expectations;
- there is evidence that the international student was misled by the registered provider or an education agent; or
- an appeal (internal or external) on another matter results in a decision or recommendation to release the international student.

Where Kaplan approves the request, Kaplan will record the release in PRISMS. NB - From 1 January 2018, transfers will be recorded in PRISMS and formal release letters will no longer be provided.

Where Kaplan does not grant a release, the student will be advised of the reasons for refusing the request and his or her right to access the complaints and appeal process. Kaplan will not finalise the refusal in PRISMS until the student has been given an opportunity to access the complaints and appeals process, the student withdraws from the process, or if the process finds in favour of Kaplan.

Kaplan may, in its absolute discretion, **not** grant a release or transfer request (ie. record a release in PRISMS). Reasonable grounds for refusal may include the following, but are not limited to:

- failure to provide a complete “*Application for Release*”;
- the student has completed more than six calendar months of their principal course;
- the request for transfer is made where a student 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 to Kaplan. Debts include all fees, loans, 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);
- the student has been excluded or suspended from their course;
- Kaplan has formed the view that the student is trying to avoid being reported to the Department of Home Affairs for failure to meet Kaplan’s attendance and/or academic progress requirements;
- the student applies to transfer from a Kaplan course to a course that is at a lower AQF level for which the original visa was issued;
- change of mind, request is based on financial reasons, transferring to another provider with lower tuition fees;
- 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 SSVF system);
- the transfer is considered detrimental to the student’s welfare or future studies.

Factors that may be detrimental to the student could include:

- the student has not, or only recently, started to study their principal course and the full range of Kaplan’s student support services are yet to be provided to the student;
- the transfer may jeopardise the student’s progression through a package of courses;
- the student is changing their principal course of study to a lower Australian Qualification Framework (AQF) level or a non-AQF level;
- the student’s visa was processed under the Streamlined Visa Processing (SVP) arrangement and the student applies to transfer to a course at a registered provider that is not eligible for SVP.

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

Transfer after six months of principal course is complete

Kaplan will not prevent a student from transferring to another provider after he/she has completed six months of the principal course.

Transfer process

1. Students must request a transfer using the “*Application for Release*”.
2. Kaplan will acknowledge the request within 5 working days assuming that the request is not within the restricted period.
3. Kaplan staff will meet with the student to discuss and assess their request.
4. Kaplan will provide a student with a written response within 10 working days from the receipt of the Application for Release.
5. If approved, Kaplan will record the release in PRISMS.
Please note: - From 1 January 2018, releases will be recorded in PRISMS and formal release letters will no longer be provided. The student will also be advised to contact the Department of Home Affairs to seek advice on whether a new student visa is required.
6. Records of interviews and correspondence will be documented in the student’s file and relevant information entered into PRISMS.
7. All fees must be paid up to date.

8. Where the student is close to completion of a subject or near the end of trimester Kaplan will advise the student to complete the trimester, including relevant examinations.
9. Where the student is struggling with the academic work Kaplan will provide additional support as part of an intervention strategy.
10. Kaplan will provide information on the refund of fees.
11. Kaplan will not release a student unless a letter from another CRICOS registered provider confirming that a valid unconditional enrolment offer has been made, is provided.
12. Records of interviews and correspondence must be placed in the student's file and relevant information entered into PRISMS.
13. Kaplan will maintain records of all requests from students for a release, the assessment of, and decision regarding the request, for a minimum of two years after the student ceases to be an accepted student.

Transferring to Kaplan from another Provider

Kaplan will not willingly enrol students from another registered provider prior to the six months requirement except under the following circumstances:

- the other registered provider has released the student;
- the registered provider has ceased to be registered, or the course in which the student is enrolled has ceased to be registered or is no longer being offered;
- a government sponsor of the student considers the change to be in the student's best interest and has provided written support for the change.

Any request to transfer into Kaplan must be in writing and may include Kaplan conducting an interview with the student.

Kaplan may then proceed to:

- ask permission to contact the institution concerned;
- check the student's commencement date;
- request that the student get the principal provider to report the release, where the student is on a packaged offer.

Where a release from the provider cannot be provided, Kaplan will check the status of the student at the institution and enquire if exceptional circumstances exist such as:

- the original registered provider has ceased to be registered;
- the course in which the student is enrolled has ceased to be registered;
- 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;
- any government sponsor of the student considers the change to be in the student's best interest and has provided written support for that change;

in determining whether a transfer to Kaplan will be approved.

Complaints and Appeals

Students who are dissatisfied with the application of this Policy by the School may refer to the School's "Complaints and Appeals Policy" (currently available at following link: <https://www.kbs.edu.au/current-students/school-policies/>) for information regarding their options.

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	General Manager, National Operations			
Review Date	December 2020			
Approved by				
Vice President Academic under a delegation from KBS Academic Board				
Version	Authored by	Brief Description of the changes	Date Approved:	Effective Date:
1.1	Academic Quality and Governance Team	Policy reviewed for currency. Clarification made that policy only applies to international students. Further, clarifications made as to when an outcome will be provided, i.e. within 14 days of receipt of the request. A policy Implementation Officer was introduced and hyperlinks introduced to enhance user experience.	06.09.2017	30.09.2017
1.2	Academic Quality and Governance Team	Policy amended to reflect that KBS no longer accepts students under 18 and to align with National Code changes (with an implementation date of 1 January 2018).	05.12.2017	20.12.2017
1.3	Academic Quality and Governance Team	Department of Immigration and Border Protection changed to Department of Home Affairs.	08.03.2018	09.03.2018
1.4	Quality, Regulations and Standards Team	Included information on circumstances which Kaplan considers as reasonable grounds to refuse a student's request for release/transfer to meet National Code 2018, Standard 7.2.3 requirements.	04.09.2019	09.09.2019