



Greystone Institute Intention to Report Policy and Procedures

1. Purpose

This Policy establishes the framework for managing Intention to Report notifications and reporting obligations for international students enrolled at Greystone Institute.

The Policy is designed to ensure that students are provided with procedural fairness before Greystone Institute reports a breach of their enrolment through PRISMS and that all actions are undertaken consistently with the student's Written Agreement, the ESOS legislative framework, the *Greystone Institute's Students at Risk Policy and Procedures, Unsatisfactory Progress Policy and Procedures, Fees Policy, Cancellation and Refund Policy and Procedures* and the *Student Complaints and Appeals Policy and Procedures*.

2. Scope

This Policy applies to all international students enrolled in CRICOS-registered courses at Greystone Institute.

The Policy covers:

- breaches of the Written Agreement;
- unsatisfactory course progress;
- non-payment of tuition fees;
- failure to maintain an approved payment plan;
- cancellation of enrolment arising from student default;
- student visa compliance obligations;
- compassionate or compelling circumstances; and
- reporting requirements under the ESOS framework.

3. Definitions

- **Written Agreement:** The agreement entered into between Greystone Institute and the student, including the Letter of Offer, Acceptance Agreement, payment arrangements, and all applicable policies and procedures.
- **Intention to Report Notice:** A written notice advising a student that Greystone Institute intends to report them through PRISMS due to a breach of their Written Agreement or applicable student visa requirements.
- **PRISMS:** Provider Registration and International Student Management System used to manage student visa compliance.



- **Student Default:** Has the meaning given under the *Greystone Institute Cancellation and Refund Policy* and includes circumstances where a student:
 - fails to commence;
 - withdraws from their course;
 - fails to comply with their Written Agreement;
 - fails to maintain payment obligations; or
 - otherwise defaults under applicable legislation.
- **Compassionate or Compelling Circumstances:** Urgent and unforeseen events beyond a student's control that significantly affect their ability to meet their academic, enrolment, or financial obligations.

4. Policy Statement

Greystone Institute is committed to managing student compliance matters fairly, transparently and consistently.

Students will be informed of any breach of their Written Agreement and, where appropriate, provided with opportunities to resolve the matter before further action is taken.

An Intention to Report Notice may be issued where a student:

- breaches the conditions of their Written Agreement;
- fails to maintain satisfactory course progress;
- fails to comply with an approved intervention strategy;
- fails to meet tuition fee payment obligations;
- fails to maintain an approved payment arrangement;
- has their enrolment cancelled due to student default; or
- otherwise becomes reportable under the ESOS framework.

Students will be provided access to the complaints and appeals process before any report is made through PRISMS unless legislation requires otherwise.

5. Breaches of the Written Agreement

5.1. Academic Breach

Students may be considered in breach of their Written Agreement where they fail to maintain satisfactory course progress in accordance with the *Students at Risk Policy and Procedures*.

Prior to issuing an Intention to Report Notice, Greystone Institute will normally provide academic intervention and support measures.



5.2. Financial Breaches

Students may be considered in breach of their Written Agreement where they:

- fail to pay tuition fees by the due date;
- fail to comply with an approved payment plan;
- fail to respond to payment reminders or notices; or
- have their enrolment cancelled for non-payment under the Fees Policy and Cancellation and Refund Policy.

5.3. Other Enrolment Breaches

Students may also be considered in breach of their Written Agreement where they fail to comply with enrolment conditions, institutional requirements, or other obligations outlined in their accepted Letter of Offer and associated agreements.

5.4. Compassionate or Compelling Circumstances

Greystone Institute recognises that compassionate or compelling circumstances beyond a student's control may affect their ability to meet their academic, enrolment, or financial obligations.

Students requesting exemption from reporting due to compassionate or compelling circumstances must submit supporting documentation. Each case will be assessed on its individual merits, and Greystone Institute retains the discretion to determine whether the circumstances justify exemption.

Where compassionate or compelling circumstances exist, Greystone Institute may delay or discontinue the reporting process where supported by appropriate evidence.

6. Procedures

6.1. Identification of a Breach

Where a student is identified as being in breach of their Written Agreement, Greystone Institute will review the circumstances and determine whether support, intervention, payment arrangements, or other corrective action may resolve the matter.

The student may be contacted and provided with an opportunity to address the issue before further action is taken.

6.2. Issuing an Intention to Report Notice

Where the breach remains unresolved, Compliance will issue an Intention to Report Notice.



The notice will include:

- details of the breach;
- potential enrolment and visa implications;
- information regarding the complaints and appeals process; and
- advice that the student has 20 working days to access the internal appeals process.

6.3. Appeals

Students may lodge an appeal within 20 working days of receiving the Intention to Report Notice.

Appeals will be managed in accordance with the *Student Complaints and Appeals Policy and Procedures*.

Students will not be reported through PRISMS until:

- the appeal period has expired without an appeal being lodged;
- the student withdraws from the appeals process; or
- all available internal and external appeals have concluded in favour of the reporting decision.

6.4. Reporting through PRISMS

Greystone Institute may report a student through PRISMS where:

- no appeal is lodged within the required timeframe;
- the student withdraws from the appeals process;
- an appeal is unsuccessful; or
- legislation otherwise requires the Institute to report the student.

The student will be notified once reporting has occurred.

6.5. Recordkeeping

Greystone Institute will maintain records relating to:

- identified breaches;
- intervention activities;
- correspondence;
- notices issued;
- complaints and appeals;
- supporting evidence; and
- PRISMS reporting outcomes.

Records will be retained in accordance with institutional record management requirements.



7. Related Legislation and Standards

- Higher Education Standards Framework (Threshold Standards) 2021: 2.2; 3.3; 5.2; 6.2; 7.2
- National Code: Standards 6, 8, 9 & 10
- Education Services for Overseas Students Act 2000 (ESOS Act)
- Education Services for Overseas Students Regulations 2019 (ESOS Regulations)
- Other when applicable

8. Policy Review

This policy will be reviewed every 5 years, or earlier if required, to ensure alignment with changes in legislation, regulatory standards, compliance requirements, or organisational operations. Earlier reviews may be undertaken in response to audits, incidents, or identified opportunities for improvement.

8.1. Details

Policy Title		Greystone Institute Intention to Report Policy and Procedures		
Approved by		Grant Packer, National Director Higher Education & Pathways		
Next Review Date		18 Sept 2031		
Version	Date	Effective Date	Comment/Note	Author/Reviewed by
V2	18 Sept 2026	21 Sept 2026	Updated to broaden the scope of the policy to cover all reportable breaches	Daniela Inoue/ Grant Packer