

Student Lifecycle Policy

Document Control

Policy Title	Student Lifecycle Policy
Policy Number	Policy 2 of the Demi Education Group Consolidated Policy Suite
Applies to	Demi Education Group and all subsidiary Registered Training Organisations, including Demi International Beauty Academy, Australasian Academy of Cosmetic Dermal Science (AACDS), International College of Queensland (ICQ), and Demi Apprentices and Trainees; applies to all enrolled students regardless of cohort, funding stream, mode of study or location
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Policy Author / Custodian	General Manager, Operations
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1. Purpose

This policy sets out how Demi Education Group (DEG) and each of its subsidiary Registered Training Organisations (RTOs) manage the student lifecycle from the point a prospective student first considers enrolling, through the duration of their studies, and on to completion, certification and post-completion access to records. It establishes the rights, protections, obligations and support available to students, and the duties, decision-making authorities, timeframes and escalation pathways that apply to the staff who work with them.

The policy is written for both students and staff. Where it describes a right, protection or commitment, students can rely on it. Where it describes an obligation, decision point or expected practice, staff must follow it. Students and staff are encouraged to read the policy in full so that the operation of the underlying procedures, the boundaries of each cohort obligation, and the standards we hold ourselves to are clearly understood.

This policy operates in conjunction with Policy 1: Governance and Compliance Framework, which establishes the legal and regulatory framework within which the student lifecycle is administered, and with the three standalone policies referenced in Section 28 of this policy.

2. Scope and Application

This policy applies group wide. It binds all entities, staff, contractors, agents, consultants, third parties and education agents that operate under, or on behalf of, DEG, and it applies to all students enrolled in any program delivered by any DEG entity, regardless of mode (face-to-face, online or blended), funding stream, location, or cohort.

In this policy, references to "DEG", "the Group" or "we" mean Demi Education Group and each of the following RTOs:

- Demi International Beauty Academy;
- Australasian Academy of Cosmetic Dermal Science (AACDS);
- International College of Queensland (ICQ);
- Demi Apprentices and Trainees

Where an obligation in this policy applies only to a particular cohort, funding stream or registration, the applicable scope is identified explicitly inline. The principal cohort distinctions used in this policy are:

- Domestic students, being students who are Australian citizens, Australian permanent residents (including humanitarian entrants), or New Zealand citizens, enrolled in domestic-fee, VSL-approved, or government-subsidised places;
- Overseas students, being students enrolled in a CRICOS-registered course at the relevant DEG RTO under a student visa, to whom the ESOS Act 2000 and the National Code 2018 apply;
- VSL students, being students enrolled in a VSL-approved course who have applied for or been approved for a VET Student Loan under the VSL Act 2016 and the VSL Rules 2016;
- Smart and Skilled students, being students enrolled at a DEG entity approved as a Skills Assure Supplier (SAS) under the Career Start (Program Schedule 3) or Career Boost (Program Schedule 4) programs administered by the Queensland Department of Trade, Employment and Training (DTET);
- Apprentices and trainees, being students engaged under a registered training contract under the Further Education and Training Act 2014 (Qld), supervised by DEMI Apprentices and Trainees (Change Safety and Training) as the Supervising RTO (SRTO);
- Students under 18 years of age, being any enrolled student who has not attained 18 years of age, whether domestic or overseas.

3. Definitions

For the purposes of this policy, the following terms have the meanings set out below. Where a term is defined in legislation or in a regulatory instrument, the legislative definition prevails. Defined terms used in Policy 1 (such as ASQA, AVETMISS, CRICOS, VET Quality Framework and VSL) carry the same meaning in this policy.

AASN	Australian Apprenticeship Support Network provider, the entity that administers an apprentice or trainee's training contract on behalf of the Commonwealth.
CAN	Commonwealth Assistance Notice, issued to each VSL student after each census date confirming the amount of VET Student Loan applied to their enrolment for the relevant unit(s) of study.
Census Date	The date specified for a unit of study under the VSL Rules 2016 by which a VSL student must withdraw to avoid incurring fees and a VSL debt for that unit.
CoE	Confirmation of Enrolment, issued to an overseas student via PRISMS by the DEG RTO that holds the relevant CRICOS registration, evidencing acceptance into a registered course and used in support of a student visa application.
Critical Incident	A traumatic event, or the threat of one, within or outside Australia, that causes extreme stress, fear or injury, including but not limited to serious accident or injury, mental or physical illness, death, missing student, abuse, threatened or actual assault, or natural disaster.
DTET	The Queensland Department of Trade, Employment and Training, which administers the SAS Framework and the Career Start and Career Boost programs.
eCAF	The electronic Commonwealth Assistance Form by which a student applies for a VET Student Loan under the VSL Act 2016.
LLND	Language, Literacy, Numeracy and Digital skills. Where this policy refers to "LLN", that term is used interchangeably with LLND.
Minor / Student under 18	A student who has not attained 18 years of age at the relevant point in time.
National Code 2018	The National Code of Practice for Providers of Education and Training to Overseas Students 2018, made under the ESOS Act 2000.
National Principles	The National Principles for Child Safe Organisations endorsed by the Australian Government and state and territory governments.
PRISMS	The Provider Registration and International Student Management System, the system used by registered providers to issue CoEs and report changes to enrolment in relation to overseas students.

Reasonable Adjustment	A modification to the learning environment, training delivery, assessment or other aspect of a student's participation, made to enable a student with disability or other identified support need to access training on the same basis as other students, where the adjustment does not cause unjustifiable hardship and does not compromise the integrity of the training product or assessment requirements.
Student Support Plan	A documented record of identified support needs, reasonable adjustments, referrals and review points, prepared in consultation with the student and retained on the student file.
TPS	The Tuition Protection Service, which provides placement and refund services to overseas students and VSL students whose course cannot be completed with the registered provider.
Written Agreement	The written agreement entered into between the student and the relevant DEG RTO prior to course commencement, including the Enrolment Contract and accompanying schedules, which constitutes the written agreement required under the ESOS Act 2000 for overseas students and under the 2025 Standards for RTOs for all students.

4. Roles and Responsibilities

The roles set out below describe the formal accountabilities specific to the student lifecycle. Where a role is vacant, restructured or held by another title within a DEG entity, the equivalent function applies. General governance accountabilities are set out in Policy 1.

Chief Executive Officer (CEO)	Holds ultimate accountability for the proper administration of the student lifecycle, including compliance with the 2025 Standards for RTOs, the ESOS Act 2000 and National Code 2018 (for CRICOS-registered RTOs), the VSL Act 2016 and VSL Rules 2016 (for VSL-approved courses), and the SAS Policy 2025-2028 (for SAS-approved entities). Approves this policy. Has final decision-making authority on cancellation of enrolment, refusal of refund where escalated, and Critical Incident response.
Leadership Team	Reviews student outcome data, completion and attrition trends, complaints and appeals outcomes, support service utilisation, and student safety reports; endorses material policy and procedural changes; receives and considers child safety reports and Critical Incident reports.
General Manager, Operations	Maintains this policy and its supporting procedures; monitors changes to the Standards, ESOS framework, VSL Manual, SAS Policy and Program Schedules; coordinates the annual review; trains staff on cohort-specific obligations; and acts as the primary point of contact for ASQA, the VSL Tuition Protection Director, the TPS Director, and DTET in relation to student lifecycle matters. Designated as the Child Safety Officer for the Group. Receives and oversees the response to any child safety concern, including suspected abuse, neglect, grooming behaviour or boundary violations, in accordance with Section 14. Holds operational responsibility for

	orientation, support services, attendance monitoring, complaints intake, and certification.
Training Manager	Oversees academic delivery, course progress and attendance monitoring, intervention strategies, academic integrity decisions, and the Behaviour Management Procedure. Approves Student Support Plans on referral from trainers and student support staff.
RTO Manager	Conducts pre-enrolment meetings; verifies entry requirements, USI, citizenship/residency/visa status and funding eligibility; issues the written agreement; books students into orientation; and refers identified support needs to the student support team prior to commencement.
Student Administration Team	Designated as the official student point of contact under National Code 2018 Standard 6.5 for overseas students, and the equivalent contact for domestic, VSL, apprentice and Smart and Skilled cohorts. Develops Student Support Plans, coordinates referrals, monitors wellbeing flags, and maintains the Referral Pathways Guide.
Trainers and Assessors	Identify students at risk of unsatisfactory progress, attendance or wellbeing concerns; implement reasonable adjustments; uphold academic integrity; report child safety concerns; and maintain accurate attendance and assessment records.
Finance Team	Issues fee invoices, Statements of Covered Fees, Fee Notices and CANs (for VSL students); processes approved refunds; administers census dates; and reconciles SAS subsidy claims.
Privacy Officer	Administers the Privacy Statement, responds to Records Access Requests, manages corrections, and acts as the contact for privacy enquiries and complaints (see Section 7 and the standalone Privacy and Personal Information Policy).
Third parties and education agents	Must comply with this policy and its supporting procedures, with their conduct in pre-enrolment, recruitment and enrolment additionally governed by Policy 1 and the relevant written agreement. Education agents engaged in relation to overseas students must additionally comply with National Code 2018 Standard 4.

5. Policy Statement

DEG is committed to providing each student with a clearly explained, well supported and fair journey from enrolment through to certification. We make sure that the information a student needs to make an informed decision is provided before they commit, that the agreement they enter into is honest and transparent, and that the support, protections and pathways available to them are real, accessible and applied without discrimination.

We commit to:

- a) compliant and accurate pre-enrolment information and written agreements;
- b) age-appropriate, culturally appropriate orientation;

- c) reasonable adjustment and support for students with disability, additional needs or other identified barriers to participation;
- d) a safe, inclusive and respectful learning environment for all students, with particular safeguards and support for students under 18, Aboriginal and Torres Strait Islander students, culturally and linguistically diverse students, and students from diverse religious and cultural backgrounds, including a clear commitment to preventing and responding to anti-Semitism, discrimination, harassment and vilification;
- e) the timely and accurate management of fees, refunds, withdrawals, re-credits and tuition protection;
- f) ongoing monitoring of attendance and course progress with documented intervention;
- g) the proper issue of qualifications and statements of attainment;
- h) lawful and respectful management of personal information; and
- i) accessible internal and external complaints and appeals processes.

Failure to comply with this policy may result in performance management, disciplinary action, termination of employment or contract, or regulatory reporting, as set out in Policy 1.

6. Enrolment and Orientation

6.1 Pre-enrolment information and informed decision-making

Before a prospective student enrolls, DEG provides clear, accurate and current information so they can make an informed choice. We provide this information through our websites, course brochures, the Student Handbook, the Pricing Policy and the Enrolment Contract, and we confirm understanding during the pre-enrolment meeting. The information provided includes:

- entry and pre-requisite requirements, including academic suitability, educational qualifications, work experience and any licensing or placement requirements;
- course content, duration, mode of study (face-to-face, online or blended) and assessment methods;
- tuition fees, incidental and material fees, payment terms, deposits, any non-refundable amounts, any cooling-off period that applies, and the cost of replacement certification;
- eligibility for VET Student Loans, Queensland Career Start or Career Boost subsidies, or other funding, and the consequences of accessing those forms of assistance including loan caps, loan fees and ongoing eligibility rules;
- the location and general description of facilities, equipment, learning and support resources, including online learning platforms;
- requirements for satisfactory academic progress and attendance, including the cohort-specific requirements set out in Section 18;
- the option to apply for Recognition of Prior Learning (RPL) or Credit Transfer (CT), under the Training and Assessment Policy;
- the rights and obligations of students under the written agreement, including refund, withdrawal, complaints and appeals rights;

- any third-party or education agent arrangements that apply to the prospective student's enrolment;
- the issuance of AQF certification documentation and any pre-conditions to issuance (see Section 21).

6.2 Enrolment Procedure

What it is: The Enrolment Procedure documents the end-to-end steps from initial enquiry through application, pre-enrolment meeting, suitability determination, written agreement, USI verification and confirmation of enrolment. It applies to all DEG RTOs and to all enrolment pathways, including direct enrolments, education agent referrals, employer-arranged apprenticeship and traineeship sign-ups, and SAS-funded enrolments.

Why it exists: It enables DEG to discharge its legal obligation to provide accurate pre-enrolment information, to form a valid written agreement with each student, and to verify cohort-specific eligibility (residency, age, prior qualifications, English proficiency, USI, Tax File Number for VSL).

Who maintains it: The RTO Manager, in consultation with the General Manager, Operations.

How students access and use it: Students experience the procedure in practice through the enquiry, application form, pre-enrolment meeting, LLND assessment and signing of the Enrolment Contract. The Student Handbook explains the procedure in plain language. The current procedure is available from the Enrolment Officer on request.

How staff use it: Enrolment Officers must follow the procedure step-by-step for every enrolment. Documents are recorded against the student file in the Student Management System (SMS). Re-enrolment after a withdrawal requires a fresh suitability check and may require a new written agreement.

Review cycle: Annually, or earlier if triggered by regulatory change, audit finding, or feedback recorded in the Continuous Improvement Register (see Policy 1).

Pre-enrolment meetings are held in person, via web-meeting or recorded phone conversation. They may be conducted in a group only where none of the participants is in any of the following categories: English as a second language; international student; student under 18; student with a disclosed barrier to learning; or student enrolling in an on-campus course. Where any participant is in those categories, an individual pre-enrolment meeting is held. Students may request an individual meeting at any time, and an Course Advisor must convene an individual meeting if eligibility, suitability, support needs or risk indicators have not been adequately addressed in a group meeting. For students under 18, a parent or guardian must accompany the student.

Where a student is deemed not suitable for their chosen course, they are advised in writing and offered, where possible, alternative courses or an enrolment at a lower AQF level.

6.3 Written agreement and cohort-specific enrolment documents

DEG forms a written agreement with every student before course commencement. For all students, the written agreement is the Enrolment Contract and accompanying schedules, which sets out: campus location, course, course fees and any additional or incidental costs, payment terms, the cancellation and refund policy, a plain-English explanation of what happens if the course is not delivered, and links to the relevant DEG policies. For students under 18, a parent or guardian must counter-sign the Enrolment Contract.

For overseas students, the written agreement additionally includes the items required by ESOS Act s 7 and National Code 2018 Standard 3, namely the courses to be provided, tuition and non-tuition fees payable, refund policies (including in cases of student default and provider default), information about the student's right to access the provider's complaints and appeals process, and information about the right to other legal remedies under Australian consumer protection law. The agreement is provided in conjunction with the Overseas Student Important Information document, the Tuition Protection Statement, the Fact Sheet on Overseas Student Health Cover (OSHC), and the ESOS Framework.

For VSL students, the written agreement is accompanied by the Statement of Covered Fees (issued before the first census date) and a Fee Notice (issued before each census date). Detailed VSL administration is governed by the Finance and VET Student Loans Policy and is not duplicated here.

For Smart and Skilled (Career Start / Career Boost) students enrolled with a SAS-approved DEG entity, the written agreement incorporates by reference the applicable DTET fact sheets and the Student Contribution Fee schedule for the relevant Qualification.

For apprentices and trainees engaged with Demi Apprentices and Trainees, the Training Plan executed jointly by the apprentice or trainee, the employer and the SRTTO forms part of the written agreement, together with the registered training contract under the Further Education and Training Act 2014 (Qld).

6.4 Orientation

Every student attends an orientation, held prior to or on the first day of class, before any unit is delivered. Orientation introduces the student to their course, their trainers and assessors, the key support contacts and systems they will use, and the standards expected of them. Orientation is age-appropriate and culturally appropriate and is offered to online students via a digital orientation pack and live induction session.

Orientation covers the matters specified in the Orientation Checklist, including:

- class schedule, attendance days and times, course duration and key dates;
- Code of Conduct, personal presentation and uniform requirements, hygiene standards and professional conduct expectations in clinic and practical settings;
- access to learning resources, online platforms, the Student Portal and IT support;
- rights and obligations under the written agreement, including privacy, complaints and appeals, attendance, academic integrity and reasonable adjustment;
- support services available, both internal (pastoral support, trainer access, reasonable adjustment) and external (the Referral Pathways Guide), and how to access them at no additional cost;
- WHS, emergency procedures, evacuation routes and incident reporting;
- for overseas students, all matters required by National Code 2018 Standard 6.1 including English language and study assistance, legal services, emergency and health services, the provider's facilities and resources, requirements for course attendance and progress, services to assist with personal circumstances adversely affecting their education in Australia, and information on employment rights and conditions including how to contact the

Fair Work Ombudsman; together with information on visa conditions, OSHC, working rights and safety relevant to life in Australia;

- for apprentices and trainees, the relationship between off-the-job training and on-the-job learning, the role of the employer and the AASN, training contract progress documents, and the workplace WHS context;
- for students under 18, the matters required by National Code 2018 Standard 5.2 (where applicable to overseas students), including a clear nominated staff member to contact in an emergency, contact numbers for the nominated staff member, and how to seek assistance and report any incident or allegation involving actual or alleged sexual, physical or other abuse; equivalent information is provided to domestic students under 18 as part of DEG's child safety commitments.

7. Privacy and Personal Information

Personal information collected from students is managed in accordance with the standalone Demi Education Group Privacy Policy. That policy sets out how personal information is collected, used, stored, disclosed, accessed and corrected, the operation of the Privacy Statement issued to each student at enrolment, the rights of students to access and correct their information, and DEG's obligations under the Privacy Act 1988 and the Australian Privacy Principles.

Students should refer to the Privacy Policy for full detail. References elsewhere in this policy to privacy obligations (for example, in relation to records, photography, support plans and complaints) operate alongside that standalone policy and do not replace it.

8. Fees and Refunds

DEG provides transparent fee information before enrolment and applies consistent, fair refund and re-credit decisions throughout the lifecycle. This section sets out the core student-facing position. The operational mechanics of fee administration, including issuing invoices, Statements of Covered Fees, Fee Notices, CANs, census date administration, withdrawal processing, re-credit applications and tuition protection levy administration, are set out in the Finance and VET Student Loans Policy and its supporting procedures. The two policies should be read together.

8.1 Information about fees

Information about all fees and charges relating to a course is made available prior to enrolment through the relevant DEG RTO website, current marketing materials, the Pricing Policy and the Enrolment Contract. The information includes tuition fees, payment options, payment terms and conditions (including any deposits), administration fees, links to the Withdrawal and Cancellation Procedure, and consumer rights including any statutory cooling-off period. Fees are reviewed annually. Where a change to fees affects current enrolments, students are advised in writing at least one month prior to the date of effect.

DEG does not accept prepayment of tuition fees above \$1,500 from a domestic non-VSL student. Prepayments above \$1,500 may only be received through a VET Student Loan or from an international student and are protected by an approved tuition assurance arrangement (see Section 8.5).

8.2 Refunds: domestic students in non-VSL courses

The following schedule applies to domestic students enrolled in courses that are not VSL-approved (including fully privately funded enrolments and, subject to the Smart and Skilled rules in Section 9, government-subsidised enrolments where DTET arrangements are silent on student refund entitlements):

Circumstance	Refund Entitlement
Withdrawal up to 4 weeks prior to commencement of a unit (or prior to being provided with online access to unit materials)	100% refund of tuition fees paid for that unit.
Withdrawal between 4 weeks prior to commencement and commencement of a unit (or between 4 weeks prior and the provision of online access)	90% refund of tuition fees paid for that unit. 10% withheld covers administration costs.
Withdrawal after commencement of a unit (or after being provided with online access)	No refund. Full tuition fees for the unit remain payable.
Cancellation of enrolment due to a serious breach of policies and procedures after commencement	No refund. Full tuition fees for the unit remain payable.

No refund is provided for units a student has completed and been assessed as competent.

8.3 Refunds and re-credit: domestic students in VSL-approved courses

The following schedule applies to all students who enrol in a VSL-approved course, even if they choose not to access a VET Student Loan. It does not apply where VSL tuition assurance arrangements have been activated and the student has elected the VET course assurance option for that unit.

Circumstance	Refund / Re-credit Entitlement
Withdrawal from a VSL unit of study on or before the relevant census date	No VSL debt incurred. 100% refund of tuition fees paid for that unit.
Withdrawal from a VSL unit of study after the relevant census date	VSL debt is incurred. No refund. Discretion may be applied by the RTO where evidence of special circumstances is provided.
Cancellation of enrolment due to a serious breach of policies and procedures after commencement	No refund or re-credit.

A student who withdraws after the published census date, or who is unable to successfully complete a unit, and who believes this was due to special circumstances, may apply to have their HELP balance re-credited for the affected unit(s). Applications must be made within 12 months of the relevant census date. Special circumstances apply where the circumstances were beyond the student's control, did not make their full impact until on or after the census date, and made it impracticable for the student to complete the course or part of the course. Lack of knowledge or

understanding of VSL requirements, and incapacity to repay a VSL debt, are not special circumstances.

Students may also apply to the Secretary under section 71 of the VSL Act 2016 for re-credit where the provider, or a person acting on the provider's behalf, has engaged in unacceptable conduct in relation to the student's application for a VET Student Loan, or where the provider has failed to comply with the VSL Act or an instrument under it and the failure has adversely affected the student. Applications to the Secretary must be made within 5 years after the relevant census date, or such longer period as the Secretary allows.

8.4 Refunds: overseas students (CRICOS)

The following schedule applies to students enrolled at a DEG RTO under a student visa. It is set out in the written agreement entered into under National Code 2018 Standard 3 and complies with the refund requirements of the ESOS Act 2000:

Circumstance	Refund entitlement
Application for student visa is unsuccessful, before study period or education service commences	100% refund of tuition fees paid, less an application fee of \$250.
Student visa holder withdraws more than 10 weeks before study period or education service commences	100% refund of tuition fees paid, less administration fee.
Student visa holder withdraws more than 4 weeks and up to 10 weeks before study period or education service commences	70% refund of tuition fees paid, less administration fee.
Student visa holder withdraws 4 weeks or less before study period or education service commences	40% refund of tuition fees paid, less administration fee.
Withdrawal during the first four weeks of semester classes at the college	30% refund of tuition fees paid for the semester, less administration fee (\$250).
Withdrawal after the end of the fourth week of semester classes at the college	No refund of tuition fees paid for the semester.
Any fees paid for subsequent semesters	100% refund less an administration fee of \$250.
Cancellation of enrolment due to student default, including a serious breach of student visa conditions or DEG policies and procedures	No refund of current semester fees. Any fees paid for subsequent semesters will be refunded.
Provider default: provider withdraws offer, fails to provide the course as offered, or terminates the course before or after the study period commences	The provider default provisions of the ESOS Act 2000 apply (see Section 8.5).

The refund schedule for overseas students does not remove the right to take further action under Australian consumer protection law. Where a dispute is not resolved internally or through the internal complaints and appeals process, an overseas student may contact the Commonwealth

Ombudsman (Overseas Students Ombudsman) in accordance with the standalone Complaints and Appeals Policy.

8.5 Provider default and tuition protection

If DEG is unable to deliver a course in full, the affected student will be offered, at the student's choice, either a full refund of unspent tuition fees, or placement in an alternative course at no extra cost. If the student chooses placement, they are asked to sign an acceptance document. If DEG is unable to deliver either option, the relevant tuition protection arrangements apply, and the student will be placed in a suitable alternative course or refunded the tuition fees paid for the part of the course not yet received:

- For overseas students, the Tuition Protection Service (TPS) under the ESOS Act 2000 applies. Refunds in the case of provider default are made within 2 weeks of the day on which the course ceased being provided.
- For VSL students, the VSL Tuition Protection arrangements under the VSL Act 2016 apply, including placement assistance and re-credit of the student's HELP balance where placement is not achieved.
- For domestic non-VSL students, prepaid fees above \$1,500 are protected through DEG's approved tuition assurance arrangement, in accordance with the 2025 Standards for RTOs financial assurance requirements.

8.6 Decision, payment and appeal

Initial assessment of refund and re-credit applications is made by the RTO Manager in consultation with the Finance Manager. Decisions are provided in writing as soon as practicable. Where approved, refunds are processed within 4 weeks of receipt of the written application. Refunds can only be approved by the CEO, CFO or General Manager, Operations. Refunds are paid to the person who entered into the contract with DEG. Written claims must be received within 6 months of withdrawal or cancellation, except where a longer period applies by operation of the VSL Act 2016 or ESOS Act 2000.

No student will be victimised or discriminated against for making a refund or re-credit application, for seeking review of a decision, or for using this process or the Complaints and Appeals Policy.

Where a decision is made not to refund or re-credit, the decision may be appealed at no cost to the student under the standalone Complaints and Appeals Policy.

8.7 Refund Request Form

What it is: The Refund Request Form is the written application form a student uses to request a refund of tuition fees, re-credit of a HELP balance, or refund of administration or material fees. It captures the student's identifying details, the relevant unit(s) of study, the date and reason for withdrawal, any supporting evidence (including evidence of special circumstances for VSL re-credits), and the student's preferred refund destination.

Why it exists: It standardises the evidence trail required to demonstrate that refund and re-credit decisions are made on a fair, consistent basis and in accordance with the VSL Act, ESOS Act and consumer law.

Who maintains it: The Finance Manager in consultation with the RTO Manager.

Access and use: Available on each RTO website and on request from the Finance Manager or RTO Manager. Staff must accept and process forms in accordance with this section and the Finance and VET Student Loans Policy. Review cycle: annually.

9. Government Funding

9.1 VET Student Loans (VSL)

VSL is an income-contingent loan administered under the VSL Act 2016 for eligible students enrolling in approved courses with approved providers. DEG entities that are VSL-approved providers deliver VSL-approved courses in accordance with this section, the Finance and VET Student Loans Policy and the VSL Manual for Providers.

To be eligible for a VET Student Loan, a student must:

- be an Australian citizen, or a qualifying permanent humanitarian visa holder, or a New Zealand Special Category visa holder meeting residency requirements;
- be enrolled in an approved VSL course delivered by an approved VSL provider;
- meet academic suitability requirements (such as Year 12 completion at the required level, or completion of an approved LLN test demonstrating capacity);
- submit a valid Request for a VET Student Loan eCAF by the relevant due date for each unit of study;
- provide a valid Tax File Number (TFN) and Unique Student Identifier (USI).

VSL students have specific obligations and protections that DEG explains during pre-enrolment and orientation, including the operation of census dates, the issuance of the Statement of Covered Fees and Fee Notices, the receipt of Commonwealth Assistance Notices after each census date, loan caps, the 20% loan fee, and the rights to withdraw before census date or apply for re-credit under section 71 of the VSL Act in defined circumstances. Pre-enrolment, DEG provides each prospective VSL student with a link to the VET Student Loan Eligibility Check and the VSL Student Manual published by the Department of Employment and Workplace Relations.

DEG's obligations to VSL students include: providing accurate information to students about courses, fees, census dates and obligations under VSL Act s 50; not engaging in unacceptable conduct in relation to a student's application for a VSL; honouring withdrawal rights before census date; issuing CANs after each census date; complying with progression and engagement requirements; and reporting accurately to the Department.

9.2 Queensland Smart and Skilled: Career Start and Career Boost

DEG entities approved as Skills Assure Suppliers under the SAS Framework deliver Queensland Government subsidised training under the Career Start and Career Boost programs in accordance with the SAS Policy 2025-2028, the SAS Agreement, the applicable Program Schedules and Program Policies, and the Queensland Subsidised Training List (QSTL).

Eligibility for funding under each pathway is set by the Queensland Department of Trade, Employment and Training and is verified before enrolment using the Funding Eligibility Checklist (see Section 9.3). The principal eligibility criteria, summarised for student information and without limiting the operation of the relevant Program Schedule, are:

Career Start - General Training Pathway. Students must:

- be a permanent Queensland resident;
- be an Australian citizen, an Australian permanent resident (including humanitarian entrant), a temporary resident with the right visa and work permits on the pathway to permanent residency, or a New Zealand citizen;
- not currently be enrolled in a Qualification;
- not have previously completed a Certificate III or higher-level Qualification within the last 10 years for a general training pathway;
- not exceed a maximum of two government-funded apprenticeships or traineeships within a 10-year period.

Career Start - Traineeship/Apprenticeship Pathway. Students must be currently employed as a Queensland apprentice or trainee under a registered training contract in an eligible Qualification through the Program; not currently enrolled in another Qualification; not have completed a Certificate III or higher within the last 10 years for a general training pathway; and not exceed the cap of two government-funded apprenticeships or traineeships in a 10-year period.

Career Boost - General Training Pathway. Students must:

- be aged 15 years or older;
- not be a school student;
- be a permanent Queensland resident;
- be an Australian citizen, an Australian permanent resident (including humanitarian entrant), a temporary resident with the right visa and work permits on the pathway to permanent residency, or a New Zealand citizen;
- not already hold a Certificate IV or higher Qualification (including tertiary qualification) completed within the last 10 years (qualifications started as a school student and foundation skills qualifications do not count);
- not be enrolled in any other qualification, whether funded or unfunded, except for foundation skills qualifications.

Career Boost - Traineeship/Apprenticeship Pathway carries the equivalent employed-trainee/apprentice eligibility and the same two-funded-apprenticeship cap, with eligible students additionally able to access up to two funded Skill Sets under Career Boost.

Subsidised students may be required to pay a co-contribution (Student Contribution Fee) that represents a portion of the total course cost. The amount payable depends on the Qualification, the program, and the student's eligibility status (including concession or non-concession). DEG sets and publishes the Student Contribution Fee in accordance with SAS Policy Appendix 1 (Fee Conditions) and the relevant Program Schedule (Career Start cl 10; Career Boost cl 10). The DTET fact sheets for Career Start and Career Boost are provided to prospective students at the pre-enrolment stage.

Obligations of the funded student include providing accurate eligibility evidence, attending and progressing through the training, paying the co-contribution fee as agreed, and notifying DEG promptly of any change in employment circumstances (for apprentices and trainees) or other matter affecting eligibility. DEG's obligations as a SAS include verifying eligibility, reporting accurate AVETMISS and VET Activity data within DTET timeframes, refraining from third-party

delivery under the Career Start and Career Boost programs (Career Start Program Schedule 3 item 6; Career Boost Program Schedule 4 item 6), and ensuring that staff complete the mandatory Inclusive Practice Micro-Credential and embed inclusive practice in delivery.

Where a funded student has a complaint or concern relating to their funded place, the internal Complaints and Appeals Policy applies, and the student additionally retains access to the Queensland Training Ombudsman as an external avenue. The standalone Complaints and Appeals Policy sets out the relevant external pathways in full.

9.3 Funding Eligibility Checklist

What it is: A structured checklist used by Course Advisors to confirm and evidence that a student satisfies the eligibility criteria for VSL, Career Start or Career Boost prior to enrolment. The checklist captures the citizenship/residency evidence, age, prior qualifications, employment status (for apprenticeship/traineeship pathways), concession entitlements, USI, TFN (for VSL), and any other criteria specified for the funding stream.

Why it exists: To ensure DEG only enrolls and reports students who meet the funding eligibility criteria, and to maintain the audit trail required by the SAS Policy 2025-2028, the SAS Evidence Requirements and the VSL Manual for Providers.

Who maintains it: The RTO Manager in consultation with the Operations Coordinator.

Access and use: Students do not complete the checklist directly but provide the underlying evidence (identification, qualification transcripts, residency documents, training contract for apprentices and trainees, etc.). Staff complete the checklist for each funded enrolment and retain it on the student file. Review cycle: at each update of the SAS Policy, Program Schedules or VSL Manual.

10. Student Support and Reasonable Adjustment

DEG provides support that responds to each student's identified needs, with the goal of enabling all students to participate in and complete their training on the same basis as others. Support is identified at enrolment, confirmed at orientation, and re-evaluated as needs change throughout the course.

10.1 Identifying needs

Every applicant participates in a pre-enrolment meeting and, where applicable, an LLND assessment. This is used to determine each student's competency levels at the time of enrolment and to identify any individual support or reasonable adjustment that may be required throughout the duration of their training. Where the foundation skills training is to be delivered under the SAS framework, the requirements of SAS Policy Performance Standard 4 (including the use of the Australian Core Skills Framework (ACSF) and the Core Skills for Work Developmental Framework (CSfW)) apply, and a Training and Support Plan is developed in accordance with that Performance Standard. For apprentices and trainees, where the AASN has conducted an LLND assessment as part of the sign-up process, that assessment may be used, and the SAS is not required to conduct a separate assessment.

Throughout the course, trainers, assessors, student support staff and administrative staff watch for signs that a student may need additional support, including changes in attendance, assessment outcomes, participation, engagement, or wellbeing. Staff are trained to identify when a student might need additional help and to respond in a timely, respectful and supportive way. Students are also strongly encouraged to raise needs themselves, as early as possible, with their trainer or with student support.

10.2 Reasonable adjustment

DEG meets its obligations under the Disability Discrimination Act 1992 (Cth) and the Disability Standards for Education 2005 by making reasonable adjustments to the learning environment, training delivery, assessment and other aspects of participation where this is needed to enable a student with disability to access training on the same basis as others. Reasonable adjustments are unique and assessed case-by-case and may include:

- changing classrooms to be closer to amenities;
- installing assistive software, including for vision impairment;
- course materials in alternate formats, including electronic or large print;
- use of a laptop or assistive technology for assessments;
- extra time or extensions for assessments;
- alternate assessment tasks that maintain the integrity of the unit of competency;
- flexible delivery options or support staff assistance.

An adjustment is reasonable if it meets the needs of the student without compromising the integrity of the training product or assessment requirements, and without causing unjustifiable hardship to DEG. In determining whether an adjustment is reasonable, DEG considers the student's disability or barrier, the views of the student (or their advocate), the academic standards and training package requirements, the advantages and disadvantages for those affected, and the costs and benefits of making the adjustment. Where access to adaptive technologies or specialised learner support is required for a Smart and Skilled student with disability, DEG accesses DTET's Skills Disability Support (SDS) service where appropriate.

All reasonable adjustments made in relation to assessment are documented on a Reasonable Adjustment Form and retained in the student's file. Information about adjustments is shared only with staff directly involved in the student's support.

10.3 Student Support Plan Template

What it is: A documented plan prepared in consultation with a student when support needs are identified at or after enrolment. It captures the identified needs, the reasonable adjustments and supports to be provided, the responsible staff member(s), the agreed review points and timeframes, and the student's acknowledgement.

Why it exists: It standardises the documentation of support arrangements so that consistent, appropriate support is delivered, and so that adjustments can be transparently reviewed.

Who maintains it: The Student Support Officer, with Training Manager approval.

Access and use: Where a potential need for a Student Support Plan is identified at pre-enrolment, by a trainer, or by the student, the relevant staff member discusses the matter with the student,

drafts the plan, escalates to the College Manager or Unit Coordinator for approval, obtains signatures, uploads to the student record, and notifies the relevant trainers and support staff. The plan is reviewed at the agreed milestones and updated as the student's needs change. Review cycle: at each milestone and at least every semester, and annually as a template.

10.4 Referral Pathways Guide

What it is: A current directory of internal and external services to which students may be referred for support beyond the scope of DEG's direct services, including LLND tutoring, drug and alcohol services, family support, counselling, mental health, financial counselling, legal aid, settlement services, ELICOS providers, and cultural and identity-specific support services.

Why it exists: To ensure students requesting assistance with personal or general circumstances adversely affecting their participation receive relevant information or appropriate referrals at no additional cost. This is required by the 2025 Standards for RTOs and, for overseas students, National Code 2018 Standard 6.1 and 6.2.

Who maintains it: The Student Support Officer, in consultation with the RTO Manager.

Access and use: Provided to all students at orientation and maintained in the Student Handbook and Student Portal. Staff use the Guide to make warm referrals where students raise concerns. Review cycle: at least every 6 months, to ensure contacts and resources remain current.

11. Wellbeing and Mental Health

Student wellbeing is integral to student success. DEG creates a safe, inclusive and supportive environment, recognises that study, work and life responsibilities can sometimes feel overwhelming, and offers practical guidance and access to support. Where appropriate, DEG can work with a student to adjust training arrangements, including moving between full-time and part-time study, accessing additional learning support, or deferring a course for a short period.

Internal support includes the Student Support Officer, trainer access, and the Student Support Plan. External referral options include, without limitation: Beyond Blue (1300 22 4636), Lifeline (13 11 14), Headspace, 1800RESPECT (1800 737 732), QLife (1800 184 527), 13YARN (13 92 76) for Aboriginal and Torres Strait Islander peoples, Transcend Australia and Minus18 for LGBTIQ+ young people, the Reading Writing Hotline (1300 655 506), Telephone Interpreter Services (13 14 50), Financial Counselling Australia (1800 007 007), JCCV Anti-Semitism Support Service (1300 000 274) the Fair Work Ombudsman (13 13 94), and Australian Government services such as StudyAssist. The full directory is maintained in the Referral Pathways Guide (Section 10.4) and reproduced in the Student Handbook.

Where a student appears to be in distress, staff respond by listening with care, offering immediate options for support, providing referral information, and (where the student consents or where there is a serious risk to wellbeing) escalating to the Student Support Officer or General Manager, Operations. DEG does not require staff to provide clinical advice or counselling. Where a student is in immediate danger, staff contact emergency services.

For overseas students, DEG has and implements a documented Critical Incident process under National Code 2018 Standard 6.8, retains records of any critical incident and remedial action for at

least 2 years after the student ceases to be an accepted student, and provides safety and personal security information consistent with Standard 6.9.

12. Access and Equity

DEG provides equitable access to training for all eligible students, regardless of background, age, gender, identity, ability, cultural heritage or belief. Our access and equity principles mean that we:

- treat all students with dignity and respect;
- provide equal opportunity to participate in training and assessment;
- make reasonable adjustments to support students with disability or additional needs;
- create safe, inclusive learning environments that value diversity;
- identify and remove barriers to participation wherever possible.

Access and equity principles apply throughout the student lifecycle, including in marketing and recruitment (governed by Policy 1), enrolment, orientation, training and assessment, support, complaints and appeals, and post-completion records access. DEG complies with the Racial Discrimination Act 1975, the Sex Discrimination Act 1984, the Disability Discrimination Act 1992, the Age Discrimination Act 2004, the Australian Human Rights Commission Act 1986, the Anti-Discrimination Act 1991 (Qld), and equivalent legislation in any other jurisdiction in which DEG operates.

Access and Equity Statement: DEG maintains a published Access and Equity Statement that summarises these principles in plain language for prospective and current students. The Statement exists to provide a clear, accessible expression of DEG's equity commitments, to support staff in upholding those commitments, and to evidence compliance with the 2025 Standards for RTOs and Commonwealth and State anti-discrimination law. It is maintained by the Compliance Manager, published on each RTO website and in the Student Handbook, used by Enrolment Officers and Student Support staff at the point of student contact, and reviewed annually.

13. Cultural Safety and Inclusion

DEG recognises and values the diverse cultural backgrounds, identities, beliefs and experiences that each student brings to their learning. Creating a culturally safe and inclusive environment means making sure all students feel respected, welcomed and able to fully participate without fear of discrimination, judgement or exclusion.

DEG acknowledges Aboriginal and Torres Strait Islander peoples as the First Peoples of Australia and is committed to ensuring that the training environment supports cultural understanding and respect. Cultural safety obligations include: providing culturally appropriate orientation and support information; making the Referral Pathways Guide include culturally specific services such as 13YARN; respecting cultural protocols in classrooms, clinics and ceremonies; and responding promptly to any concerns raised by Aboriginal and Torres Strait Islander students or their family members.

DEG embraces the inclusion of students from culturally and linguistically diverse (CALD) communities, international students, students with disability, and students of all gender identities, sexual orientations and faiths. Inclusive learning environments are built on fairness, open

communication, and the ability to adapt, and may include offering alternative formats of materials, flexible learning pathways, or respectful adjustments that support different ways of participating. Where language is a barrier, DEG provides or facilitates access to Telephone Interpreter Services (13 14 50).

All DEG staff complete inclusive practice training. Where the relevant DEG entity is approved as a SAS, staff (trainers, assessors and support staff) complete the Department's mandatory Inclusive Practice Micro-Credential by the date specified, and DEG ensures new staff and any approved third parties also complete the credential. Inclusive practices (including cultural awareness) are embedded into DEG processes, systems and activities.

14. Child Safety and Youth Protections

DEG is committed to providing a safe and supportive environment for children and young people. We apply the National Principles for Child Safe Organisations across all entities, locations and modes of delivery, and we comply with Commonwealth, State and Territory child welfare and protection legislation, including the relevant working with children check or screening regime in each jurisdiction in which we operate.

This section applies to any enrolled student under 18 years of age (whether domestic, overseas, an apprentice or trainee, or a SAS-funded student), to staff, contractors and volunteers, and to third parties whose role involves contact with students under 18.

14.1 Application of the National Principles

DEG operationalises the National Principles for Child Safe Organisations as follows:

- Principle 1 (Child safety and wellbeing is embedded in organisational leadership, governance and culture) - the CEO holds ultimate accountability for child safety, and the General Manager, Operations, is the designated Child Safety Officer. Child safety is a standing item in Leadership Team reporting.
- Principle 2 (Children and young people are informed about their rights, participate in decisions affecting them and are taken seriously) - students under 18 are given age-appropriate information at enrolment and orientation about who to contact in emergency situations, how to raise concerns, and how to make a complaint. Their views are sought in any matter affecting them, and concerns they raise are taken seriously.
- Principle 3 (Families and communities are informed and involved in promoting child safety and wellbeing) - parents and guardians countersign the Enrolment Contract for students under 18 and are provided with contact details for the Child Safety Officer, the nominated emergency contact, and the Complaints and Appeals process.
- Principle 4 (Equity is upheld and diverse needs are respected in policy and practice) - safeguards are applied without discrimination and are tailored to the needs of culturally and linguistically diverse students, Aboriginal and Torres Strait Islander students, LGBTIQ+ students, and students with disability.
- Principle 5 (People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice) - recruitment, induction and ongoing supervision include child safety screening and training. Working with children checks (or jurisdictional equivalents) are obtained and verified before staff or third parties commence in roles involving contact with students under 18 (see also Section 14.3).

- Principle 6 (Processes to respond to complaints and concerns are child focused) - any child safety concern, including suspected abuse, neglect, grooming behaviour or boundary violations, must be reported immediately to the General Manager, Operations, verbally or in writing. Reports are handled promptly, sensitively and confidentially, subject to mandatory reporting and legal obligations. Students and staff will not be disadvantaged for raising a genuine concern. Complaint and reporting pathways are tailored to be accessible to children and young people.
- Principle 7 (Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training) - all staff complete child safety training at induction and refresher training annually.
- Principle 8 (Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed) - classrooms, clinics and online learning environments are configured to minimise opportunities for harm, including supervision standards in practical settings and safe-by-design online communication channels.
- Principle 9 (Implementation of the National Child Safe Principles is regularly reviewed and improved) - the Child Safety Officer reports annually to the Executive Leadership Team on implementation and improvement actions.
- Principle 10 (Policies and procedures document how the organisation is safe for children and young people) - this policy, the Child Safety Code of Conduct, the Behaviour Management Procedure, and the Complaints Handling Procedure together document DEG's approach.

14.2 Reporting child safety concerns

Any child safety concern, including suspected abuse, neglect, grooming behaviour, or boundary violations, must be reported immediately and directly to the General Manager, Operations (the Child Safety Officer). Reports can be made verbally or in writing and will be treated with the highest level of confidentiality, subject to mandatory reporting and legal obligations. Students and staff will not be disadvantaged for raising a genuine concern. All matters are handled promptly and sensitively, in line with child safety legislation and DEG's child safety frameworks, with appropriate support provided throughout the process.

Where mandatory reporting obligations apply under the relevant State or Territory legislation, DEG makes the required report to the relevant child protection authority and/or police. Where the matter relates to an overseas student under 18, DEG also notifies the Department of Home Affairs (Immigration) as required by National Code 2018 Standard 5, including (as applicable) within 24 hours where DEG is no longer able to approve the student's welfare arrangements.

14.3 Recruitment safeguards

Recruitment safeguards include role-specific child safety screening for all staff and contractors whose role involves contact with students under 18, verification of working with children checks (or jurisdictional equivalents) appropriate to the jurisdiction(s) in which DEG operates, behavioural-based interviewing addressing child safety, and reference checks. Where DEG accepts responsibility for approving accommodation, support and general welfare arrangements for an overseas student under 18 under the Migration Regulations, DEG ensures that any adults involved in or providing those arrangements have all relevant working with children clearances, and has and

implements documented processes for selecting, screening and monitoring any third parties engaged in connection with welfare or accommodation arrangements (National Code 2018 Standards 5.3.2 and 5.3.7).

14.4 Child Safety Code of Conduct

What it is: The Child Safety Code of Conduct sets out the behaviours expected of all staff, contractors, third parties and volunteers when interacting with students under 18 (and, where relevant to safeguarding, with all students). It defines acceptable and unacceptable behaviour, prohibits any form of grooming or boundary violation, and explains the consequences of breach.

Why it exists: It gives effect to National Principle 5 and supports DEG's compliance with State and Territory child safety legislation. It exists so that everyone working with children and young people at DEG understands the standard expected, and so that breaches can be addressed clearly and consistently.

Who maintains it: The General Manager, Operations, as Child Safety Officer, in consultation with the RTO Manager.

Access and use: Signed at induction by all staff and contractors and on engagement by third parties. Provided to students under 18 and their parents/guardians at enrolment and orientation. Used by trainers, support staff and managers as the behavioural baseline against which conduct is assessed. Review cycle: annually, and immediately on any material change to child safety legislation or the National Principles.

15. Student Code of Conduct

Students are expected to uphold the highest standards of conduct throughout their learning experience. By enrolling with a DEG RTO, each student agrees to abide by this Code, which is also recorded in the Student Handbook and the Enrolment Contract.

15.1 Respect, behaviour and integrity

- Treat all students, staff, and visitors with respect and dignity, valuing diversity and promoting inclusivity.
- Refrain from any form of bullying, harassment or discrimination.
- Maintain honesty and academic integrity by completing all assessments without plagiarism or cheating, and by properly referencing any external sources.
- Behave in a way that does not disrupt the learning environment and align conduct with professional standards relevant to the field of study.
- Take care of all training materials, equipment and facilities provided and report any damage or malfunction promptly.
- Respect the privacy and confidentiality of students, staff, and organisational matters; do not disclose personal or sensitive information unless required by law or DEG policy.
- Respect intellectual property rights and do not infringe on the copyrights or trademarks of others, including not posting course materials publicly or selling them.
- Abide by all DEG policies, procedures, and relevant industry regulations, including those concerning assessment, complaints and grievances.

- Pay agreed fees in line with the Pricing Policy and the Enrolment Contract.
- Refrain from any inappropriate or criminal behaviour, including disorderly conduct, breach of intellectual property, breach of confidential information, abuse of DEG property, stealing, conduct dangerous to others, and the improper use of drugs and alcohol. Rude or aggressive behaviour, whether face-to-face or via electronic communication, is not tolerated.

15.2 Appearance, hygiene and clinic conduct

When attending salons, clinics or any setting that reflects a real or simulated workplace environment, presentation plays a vital role in building trust, professionalism and client confidence. Personal presentation and conduct at practical workshops and clinical work experience requires students to:

- wear the designated uniform during all classes, clinics, salons and practical sessions, including while travelling to and from campus, during off-campus training, and when visiting public places during break times;
- wear only black tailored pants or slacks; tights, leggings, jeggings, jeans, cargo pants, tight or snugly fitted pants, miniskirts and shorts are not permitted;
- wear closed, clean black shoes; high heels, sandals, thongs and casual footwear such as sand shoes are not permitted;
- keep hair clean, neat and secured off the face; hair touching the collar must be tied back in a low ponytail or bun with a plain black accessory;
- wear minimal jewellery only (sleepers or studs, a wedding ring, and a watch);
- always maintain professional conduct and adhere to the Privacy Act 1988 in relation to client information.

15.3 Online conduct

The same expectations of respect, integrity and professionalism apply to online classes, online discussion forums, the Student Portal and DEG-administered social media channels. Students must not record classes or capture images of staff, fellow students or clients without consent. Students must not share login credentials, must not post DEG learning materials publicly, and must not engage in conduct online that would breach this Code if engaged in on campus.

15.4 Behaviour Management Procedure

What it is: The Behaviour Management Procedure sets out the staged, proportionate steps taken when a student's behaviour breaches the Code of Conduct: from initial conversation with the trainer or student support, through documented warning, support meeting and behaviour agreement, to formal disciplinary outcomes which may include suspension, cancellation of enrolment or expulsion for serious or repeated breaches.

Why it exists: It ensures students receive fair, transparent and consistent treatment when behavioural concerns arise, and ensures staff have a clear authority and process for addressing conduct issues without prejudice to natural justice rights protected by the standalone Complaints and Appeals Policy.

Who maintains it: The General Manager, Operations, in consultation with the Training Manager and the RTO Manager.

Access and use: Available on each RTO website and from student support. Staff must follow the procedure step-by-step. All decisions are documented and uploaded to the student file. For overseas students, suspension or cancellation triggers National Code 2018 Standard 9 obligations, including PRISMS reporting, written notice and the 20-working day appeal window before reporting to the Department. Review cycle: annually.

16. Academic Integrity

DEG expects all students to complete their training and assessment with honesty and integrity. Academic integrity means doing one's own work, giving credit where due, and following the rules set out for learning and assessment. It ensures that a student's qualification is earned fairly and is respected by employers, industry and the community.

Whether studying in a classroom or online, students are responsible for ensuring their work is their own. This includes:

- not copying from others or submitting someone else's work;
- not using artificial intelligence, contract cheating or unauthorised assistance, including not commissioning or purchasing work from third parties;
- completing assessments under the conditions provided by the trainer or assessor;
- participating honestly in group work and assessments, including in clinic and practical settings;
- accurately referencing sources where required.

Trainers and assessors are trained to identify signs of academic misconduct and may verify a student's work through interviews, follow-up questions, observation, viva voce or other validation methods consistent with the Training and Assessment Policy.

Cheating and plagiarism are regarded seriously. Cheating includes presenting another person's work as one's own, copying without acknowledgement, providing or receiving unauthorised assistance, falsifying evidence, and impersonation. Plagiarism is an act of academic dishonesty that occurs when the work of another person, or persons, is used and presented as one's own without proper acknowledgement of the work quoted or reference made. Where a student is found to have engaged in academic misconduct, the matter is investigated fairly and sensitively, and outcomes may include:

- a requirement to resubmit or complete an alternative task;
- formal warnings or academic counselling;
- loss of marks or being deemed not yet competent in a unit;
- cancellation of results for a specific assessment or unit;
- suspension or cancellation of enrolment in serious or repeated cases.

Students retain the right to appeal any academic integrity decision through the standalone Complaints and Appeals Policy. Overseas students retain the right to the 20-working day internal appeals window before any reporting via PRISMS where the consequence is unsatisfactory course progress under National Code 2018 Standard 8.

16.1 Academic Misconduct Procedure

What it is: The Academic Misconduct Procedure sets out how suspected academic misconduct is identified, investigated and decided. It includes initial verification by the trainer or assessor, escalation to the Education and Training Manager, the student's right to respond, evidence collection, decision criteria, written outcome notification, and the right of appeal.

Why it exists: To protect the integrity of nationally recognised AQF qualifications issued by DEG entities and to give students a fair, transparent process when misconduct is alleged.

Who maintains it: The Education and Training Manager, in consultation with the Compliance Manager.

Access and use: Available on each RTO website and from student support. Trainers, assessors and managers follow the procedure when misconduct is suspected. All decisions are documented and the student file updated. Review cycle: annually and on any change to the relevant training package or the 2025 Standards for RTOs.

17. Respect, Harassment and Discrimination

Matters of respect, harassment and discrimination are addressed in the standalone Demi Education Group Respect, Harassment and Discrimination Policy. That policy sets out DEG's position on harassment (including sexual harassment), bullying, discrimination on prohibited grounds, vilification and victimisation; the responsibilities of students, staff and third parties; the support available to anyone affected; and the investigation, reporting and disciplinary processes that apply when allegations are made.

Students and staff should refer to the Respect, Harassment and Discrimination Policy for full detail. Compliance with that policy is a condition of enrolment under the Student Code of Conduct (Section 15) and a condition of employment or engagement for all staff and third parties.

18. Attendance

Regular attendance is essential to successful completion. Attendance requirements vary by cohort, mode of delivery and visa or funding conditions. The attendance requirements set out in this section operate alongside the course progress requirements set out in the Training and Assessment Policy.

18.1 General attendance expectations (all students)

DEG requires each student to progress through their course at a rate that will enable them to complete it in the nominated duration. Attendance is monitored by trainers and recorded in DEG's Student Management System. Where attendance falls below the threshold relevant to the student's cohort (see below), DEG implements an intervention strategy in accordance with Section 18.5.

In the case of illness or bereavement, students must provide evidence by way of a Medical Certificate from a Registered Medical Practitioner or other suitable evidence. The trainer takes a copy for the student file; the student retains the original. Wherever possible, planned absences should be requested in advance with supporting evidence, so that DEG can adjust the delivery schedule in a way that is reasonable to the student, the class and (where applicable) the employer.

If a student is consistently absent without sufficient reason, a formal warning of course cancellation is issued and, where possible, a Student Support Plan is implemented with the purpose of getting the student back on track towards successful graduation. If attendance does not improve, a final warning letter is issued, and the enrolment may be cancelled.

18.2 On-campus and clinic/practical attendance

For face-to-face students, DEG requires 80% attendance for all theoretical lectures and 100% attendance for all practical workshops and clinic sessions. Where a student does not attend a practical workshop, a Medical Certificate must be presented, or an additional training fee may be issued to cover the cost of catch-up delivery. Punctual attendance is expected for all theoretical lectures and required for all practical workshops.

18.3 Course progress and attendance: overseas students (CRICOS)

DEG monitors each overseas student's course progress and, where applicable, attendance for each course in which they are enrolled. The expected duration of study specified in the student's CoE must not exceed the CRICOS registered duration. Before the student commences the course, DEG informs them of the requirements to achieve satisfactory course progress and, where applicable, attendance in each study period.

DEG has and implements documented policies and processes to identify, notify and assist any overseas student at risk of not meeting course progress or attendance requirements, where there is evidence from assessment tasks, participation in tuition activities or other indicators that the student is at risk. For VET courses, the documented process includes:

- requirements for achieving satisfactory course progress, including policies that promote and uphold the academic integrity of the registered course and meet the training package requirements, and processes to address misconduct;
- processes for recording and assessing course progress;
- processes to identify overseas students at risk of unsatisfactory course progress;
- the intervention strategy used to assist overseas students at risk in sufficient time to achieve satisfactory progress;
- processes for determining the point at which the overseas student has failed to meet satisfactory course progress.

Where DEG is required by an ESOS agency to monitor overseas student attendance, the documented attendance process includes the method for working out minimum attendance (80%), processes for recording attendance, an intervention strategy to identify, notify and assist students who have been absent for more than five consecutive days without approval, or who are at risk of attendance dropping below 80%, and processes for determining the point at which the student has failed to meet satisfactory attendance.

Where an overseas student is assessed as not meeting course progress or attendance requirements, DEG provides the student with written notice as soon as practicable, informing them of the intention to report, the reasons for the intention, and their right to access the internal complaints and appeals process within 20 working days. DEG only reports unsatisfactory course progress or attendance in PRISMS under section 19(2) of the ESOS Act if: the internal and external complaints processes have been completed and the decision supports DEG; or the

student has chosen not to access the internal or external process within the relevant period; or the student has withdrawn from the appeals process in writing. DEG may decide not to report a student for breaching attendance requirements where the student is still attending at least 70% of scheduled contact hours and, for VET courses, the student is maintaining satisfactory course progress.

18.4 Attendance: apprentices and trainees

Apprentices and trainees engaged with Demi Apprentices and attend off-the-job training as scheduled in their Training Plan and engage with on-the-job training under the supervision of their employer. The SRTTO works with the employer and the AASN to monitor progress against the Training Plan, address any workplace issues, and reschedule or adjust training where reasonable to do so. Persistent unexcused absence from off-the-job training is addressed in accordance with Section 18.5 and may, depending on circumstances, be a matter for resolution between the employer, AASN and the SRTTO.

18.5 Intervention strategy and Student Support Plan trigger

Each trainer reports a student at risk to the Training Manager through their classroom monitoring of academic progress and attendance. If no improvement is being made during the study period, the student is notified by the trainer that a support meeting will need to take place between the student and the trainer and/or the Training Manager, to put in place early support and intervention strategies. These strategies may include, without limitation:

- attending special tutorials or coaching;
- assistance with personal issues that are influencing progress;
- repeating a unit of competency;
- a review of groups and teams the student is working with;
- advice on seeking external study skills or academic support, including English language support or peer tutors;
- agreeing a revised study plan, including the ability to re-submit or re-sit assessment tasks;
- referral to personal guidance counselling, internal or external;
- counselling about the potential of transferring to another program in which the student would more easily cope;
- attendance at individual case management sessions.

Intervention measures and strategies are recorded by the staff involved, with a designated time frame for review determined case-by-case. A copy is retained in the student's file. It is the student's responsibility to follow through with the supports implemented and to maintain contact with the staff involved. The student is monitored throughout the duration of the intervention, and where improvement is observed and the Training Manager approves, the intervention strategy is withdrawn or adapted accordingly.

19. Photography and Media Consent

By enrolling with DEG, students acknowledge that photos and videos may be taken during class and while attending campus, clinic, practical training or events for the purpose of promoting

educational activities. These images may be used by DEG and its entities in marketing materials, on social media platforms and in other public communications.

DEG ensures that all images are used respectfully and in accordance with the Privacy Act 1988. Students who do not wish to be photographed or have their image used must advise us in writing at the time of enrolment, or by notifying their trainer or DEG marketing staff at any time during the course or when photos and videos are being taken at the campus or clinic.

DEG will always verbally advise students attending on the day of any photos or videos being taken and will identify any students who do not wish to participate so they are excluded from any media capture. DEG respects cultural and individual preferences regarding photography and media use. Students who have cultural or personal reasons for not being photographed are encouraged to notify DEG, and their wishes will be fully respected and accommodated. Students may withdraw their consent at any time by notifying DEG in writing.

For students under 18, photography and media consent must be obtained from a parent or guardian and is treated with additional care under Section 14 and the Child Safety Code of Conduct. Photographs of students under 18 are not published with identifying information unless explicitly authorised by the parent or guardian.

20. Complaints and Appeals

All matters relating to complaints and appeals, both internal and external, are addressed in the standalone Demi Education Group Complaints and Appeals Policy. That policy sets out:

- how students lodge an academic or non-academic complaint or appeal, the timeframes that apply, and the right to be accompanied or assisted;
- the internal investigation, decision-making and review processes, including written reasons and the right of independent review;
- the external pathways available, including the Commonwealth Ombudsman (Overseas Students Ombudsman), the VSL Ombudsman, ASQA, the Queensland Training Ombudsman, and the relevant State and Territory anti-discrimination and privacy bodies;
- the 20-working day window applicable to overseas students before any reporting via PRISMS under National Code 2018 Standards 8 and 9;
- the protections against victimisation and the confidentiality of complaints handling.

Where another section of this policy mentions a right to complain or appeal (for example, in relation to refund decisions, academic misconduct outcomes, behaviour management decisions, reporting under PRISMS, or refusal of a Student Support Plan adjustment), that right is given effect through the standalone Complaints and Appeals Policy. The full external pathway detail is not reproduced in this policy.

The supporting Complaints Handling Procedure and Appeals Form referenced in the framework (see Section 24) are administered through that standalone policy.

21. Completion and Certification

On successful completion of course requirements, a student is issued with a formal qualification or statement of attainment that is nationally recognised under the Australian Qualifications Framework (AQF):

- a qualification (for example, Certificate III, Certificate IV, Diploma) is issued when the student has completed all required units of competency in a full course;
- a statement of attainment is issued when the student has successfully completed one or more individual units, but not a full qualification;
- students who successfully complete non-accredited training are issued with a certificate of completion.

All results must be finalised, and any outstanding fees paid (or VSL census obligations cleared), before certification documents are issued. Documents are provided within 30 calendar days of the student being assessed as meeting the requirements for the qualification or statement of attainment, in accordance with the 2025 Standards for RTOs.

Replacement certification documents may be requested at any time. A fee may apply for reissuance. Records of certification and the underlying assessment outcomes are retained in accordance with the Data Provision Requirements and (for overseas students and VSL students) the relevant record-retention rules under the ESOS Act 2000 and the VSL Rules 2016.

DEG does not issue a VET qualification or VET statement of attainment except in accordance with the NVR Act 2011 and the 2025 Standards for RTOs. Issuing, purporting to issue, or holding out a non-VET qualification as a VET qualification is a contravention of the NVR Act 2011 (ss 126-131) and a serious breach of DEG policy.

21.1 Issuing Certification Procedure

What it is: The Issuing Certification Procedure sets out the verification, sign-off and production steps required before a qualification, statement of attainment or replacement certificate is issued. It captures verification of unit completion, finalisation of results, USI verification, payment status check, format and branding compliance, secure printing and distribution, and the recording of issuance in the Student Management System.

Why it exists: To ensure that AQF certification documentation issued by a DEG RTO is accurate, validly earned, free of administrative defect, and compliant with the NVR Act, the 2025 Standards for RTOs, the AQF and the Student Identifiers Act 2014.

Who maintains it: The Compliance Manager in consultation with the Education and Training Manager.

Access and use: Followed by the administration team and signed off by the Education and Training Manager (or delegate). Students experience the procedure through the issuance of their certificate. Replacement certificate requests are submitted via the relevant RTO website or to the administration team. Review cycle: annually and on any change to AQF, USI or training package requirements.

22. Transition of Training Products

Training packages, accredited courses and qualifications are sometimes updated to reflect new industry standards. When this happens, the older version becomes superseded, and DEG must transition students into the updated training product within the timeframes set by the National VET Regulator (ASQA) and the training package rules. DEG only continues to deliver a superseded course within those timeframes.

If a student is enrolled in a course that is later superseded, DEG will:

- notify the student of the change and explain what it means for their training plan, certification and timeframes;
- ensure the transition to the new qualification happens smoothly and without disadvantage to the student;
- provide a new training plan if required;
- honour all previously completed units where equivalent in the new course, and conduct gap training and assessment for any non-equivalent units;
- notify the relevant funding body where required, including, for SAS-funded students, transferring from the original Qualification to the new Qualification in accordance with ASQA's General Direction on Learner Transition and clauses 1.26 and 1.27 of the 2025 Standards for RTOs, and reporting Payment Outcome Code 65 (Transitional Gap Training) where applicable.

DEG cannot enrol new students into a superseded Qualification after the no new enrolments date published by ASQA, by the Queensland Subsidised Training List (QSTL), or otherwise applicable under the relevant Program Schedule.

22.1 Transition Management Procedure

What it is: The Transition Management Procedure sets out the steps DEG follows when a Qualification, Skill Set, Unit of Competency or accredited course is superseded, removed or replaced. It includes monitoring training.gov.au and the QSTL, impact assessment, scope-of-registration variation where needed, student notification, training plan revision, gap training and assessment design, certification arrangements, and funding/reporting consequences (including SAS Payment Outcome Code 65).

Why it exists: To ensure DEG and each affected student complete training in a current, recognised training product within regulatory timeframes, and to ensure SAS-funded transitions are reported correctly for payment.

Who maintains it: The RTO Manager in consultation with the Training Manager.

Access and use: Triggered by any change notified on training.gov.au, the QSTL, the Department of Trade, Employment and Training, or ASQA. Coordinated by the RTO Manager, with student-facing notifications issued by student administration. Review cycle: annually and on each material change in regulatory transition rules.

23. Student Records Access

Students have the right to access the personal records DEG holds about them. This includes enrolment information, academic progress, assessment outcomes, certification issued, and any approved Student Support Plan.

Students may request access to their records at any time by contacting student support or administration. To protect privacy, DEG may ask the student to verify their identity before releasing any information. Records are provided within a reasonable timeframe, usually within 10 working days of the request.

DEG does not release a student's information to any other person, including parents, employers, education agents or third parties, without the student's written consent, except where required by law or where express disclosure obligations apply (for example, to ASQA, the Department of Employment and Workplace Relations, DTET, the USI Registrar, the Department of Home Affairs in relation to overseas students, or the Tuition Protection Service).

Students who believe any information DEG holds about them is incorrect may request an update or correction at any time. Privacy obligations are detailed in the standalone Privacy and Personal Information Policy.

Learner records of attainment and qualifications are retained for 30 years in accordance with the Standards for RTOs. Replacement records and qualifications attract a fee to cover administration and handling costs.

23.1 Records Access Request

What it is: The Records Access Request is the standard form by which a student requests access to or correction of their personal records held by DEG. It captures identity verification, the records sought, the form of access requested (electronic, hard copy, in person), and any consent for disclosure to a third party.

Why it exists: To give effect to APP 12 and APP 13 (access and correction) and the corresponding obligations in the 2025 Standards for RTOs, while protecting the privacy of the student and other individuals whose information may be in the relevant records.

Who maintains it: The Privacy Officer.

Access and use: Available on each RTO website and from student support and administration. Requests are processed by the Privacy Officer with input from the Training Manager and Finance Officer as required. Review cycle: annually and on any change to the Privacy Act 1988 or the 2025 Standards for RTOs.

24. Supporting Procedures

The supporting procedures and templates required by the framework are referenced and explained within the sections of this policy to which they relate. The table below provides a consolidated reference for ease of governance, audit and continuous improvement, identifying the policy section where each procedure is described in detail.

Procedure / form	Where described in this policy
Enrolment Procedure	Section 6.2
Orientation Checklist	Section 6.4
Privacy Statement	Section 7 (refer to standalone Privacy and Personal Information Policy)
Refund Request Form	Section 8.7
Funding Eligibility Checklist	Section 9.3
Student Support Plan Template	Section 10.3
Referral Pathways Guide	Section 10.4
Access and Equity Statement	Section 12
Child Safety Code of Conduct	Section 14.4
Behaviour Management Procedure	Section 15.4
Academic Misconduct Procedure	Section 16.1
Complaints Handling Procedure	Section 20 (refer to standalone Complaints and Appeals Policy)
Appeals Form	Section 20 (refer to standalone Complaints and Appeals Policy)
Issuing Certification Procedure	Section 21.1
Transition Management Procedure	Section 22.1
Records Access Request	Section 23.1

All procedures and forms are subject to version control, are recorded in the DEG Policy Register, and feed into the Continuous Improvement Register described in Policy 1.

25. Records and Retention

The records generated under this policy include, without limitation: pre-enrolment meeting forms, LLND assessments, written agreements (Enrolment Contracts and accompanying schedules), USI evidence, citizenship/residency and visa evidence, Funding Eligibility Checklists, Orientation Checklists (signed), Student Support Plans, Reasonable Adjustment Forms, attendance and progress records, intervention strategy records, written notices of intention to report under National Code Standard 8, behaviour management decisions, academic misconduct decisions, refund and re-credit decisions, certification records, Records Access Requests, and child safety reports.

Student records are retained for the minimum periods required by law and applicable standards, including:

- learner records of attainment of units of competency and qualifications: 30 years (Standards for RTOs);
- VSL records, including eCAF forms, CANs, Fee Notices and Statements of Covered Fees: as specified in the VSL Rules 2016 and VSL Manual for Providers;
- overseas student records, including written agreements and PRISMS records: in accordance with ESOS Act 2000 and National Code 2018 requirements;
- Critical Incident records: at least 2 years after the overseas student ceases to be an accepted student (National Code 2018 Standard 6.8);
- SAS-funded student records: in accordance with SAS Policy 2025-2028 clause 5 (Records Maintenance) and the SAS Evidence Requirements.

26. Breach Reporting

Suspected breaches of this policy must be reported to the RTO Manager. Where the suspected breach involves a child safety concern, the report must be made immediately to the General Manager, Operations, as Child Safety Officer (Section 14).

Where a breach affects a student's lawful rights or DEG's regulatory standing, the matter is escalated in accordance with Policy 1, which sets out the framework for notification to ASQA, the Department of Employment and Workplace Relations, DTET, and any other relevant regulator. Material non-compliance with a condition of registration is notified to the relevant regulator within the timeframe required by law.

27. Review

This policy is reviewed annually by the General Manager, Operations. It is reviewed earlier where triggered by: a change to the 2025 Standards for RTOs, the NVR Act 2011, the ESOS Act 2000 or National Code 2018, the VSL Act 2016 or VSL Rules 2016 or VSL Manual, the SAS Policy or any applicable Program Schedule, the National Principles for Child Safe Organisations, the Privacy Act 1988, or any other instrument referenced in this policy; an audit or compliance finding; or a continuous improvement entry relating to the student lifecycle. Changes are approved by the CEO and are recorded in the Policy Register described in Policy 1.

28. Related Policies

This policy operates in conjunction with the following DEG policies:

- Policy 1: Governance and Compliance Framework (foundational governance, legal and regulatory compliance, continuous improvement, quality assurance, third-party arrangements, marketing and recruitment);
- Demi Education Group Privacy Policy (standalone) (cross-referenced from Section 7 and elsewhere);
- Demi Education Group Respect, Harassment and Discrimination Policy (standalone) (cross-referenced from Section 17);
- Demi Education Group Complaints and Appeals Policy (standalone) (cross-referenced from Section 20 and from each section that gives rise to a complaint or appeal right);

- Policy 3: Training and Assessment Policy (training delivery and TAS, assessment principles, validation, RPL and credit transfer, trainer and assessor competency, practical placement and clinic);
- Policy 4: Finance and VET Student Loans Policy (detailed VSL administration: Statements of Covered Fees, Fee Notices, CANs, census dates, withdrawals, re-credits, eCAFs, tuition protection, records and reporting; co-contribution and government funding administration);
- Policy 5: WHS and Facilities Policy (WHS, emergency procedures, insurance and risk management, facilities and equipment, online and physical learning environments, copyright and IP, social media).

29. Legislative and Regulatory References

This policy is to be read with reference to the following Commonwealth and State legislative and regulatory instruments. Where any instrument is replaced, amended or re-issued, the reference is taken to be a reference to the current version as in force from time to time.

Domain	Key instruments
VET Quality Framework and RTOs	Standards for Registered Training Organisations 2025 (Cth) National Vocational Education and Training Regulator Act 2011 (Cth) Australian Qualifications Framework (AQF) Student Identifiers Act 2014 (Cth) and the Unique Student Identifier Scheme Data Provision Requirements 2020 (Cth) Financial Viability Risk Assessment Requirements 2021 (Cth) Fit and Proper Person Requirements 2011 (Cth)
VET Student Loans	VET Student Loans Act 2016 (Cth) VET Student Loans Rules 2016 (Cth) Higher Education Support Act 2003 (Cth) VSL Manual for Providers (Department of Employment and Workplace Relations)
Overseas students (CRICOS)	Education Services for Overseas Students Act 2000 (Cth) Education Services for Overseas Students Regulations 2019 (Cth) National Code of Practice for Providers of Education and Training to Overseas Students 2018 (Cth) Migration Act 1958 (Cth) and Migration Regulations 1994 (Cth) (relevant provisions) ESOS Tuition Protection Service framework
Queensland Smart and Skilled and apprenticeships	Skills Assure Supplier Policy 2025-2028 (DTET) Skills Assure Supplier Agreement and applicable Program Schedules and Delivery Schedules Career Start Program Schedule 3 (effective 1 July 2025) Career Boost Program Schedule 4 (effective 1 July 2025) Queensland Subsidised Training List (QSTL)

	Further Education and Training Act 2014 (Qld)
Child safety, equity and discrimination	National Principles for Child Safe Organisations Child Protection (Working with Children) Act 2012 (and equivalent State / Territory schemes) Working with Children (Risk Management and Screening) Act 2000 (Qld) Working with Children Act 2006 (WA) Children and Young Persons (Care and Protection) Act 1998 (NSW) Disability Discrimination Act 1992 (Cth) and Disability Standards for Education 2005 (Cth) Racial Discrimination Act 1975 (Cth) Sex Discrimination Act 1984 (Cth) Age Discrimination Act 2004 (Cth) Australian Human Rights Commission Act 1986 (Cth) Anti-Discrimination Act 1991 (Qld) and equivalent State / Territory legislation
Privacy, consumer protection and workplace	Privacy Act 1988 (Cth) and the Australian Privacy Principles Competition and Consumer Act 2010 (Cth) and the Australian Consumer Law Fair Work Act 2009 (Cth) and Fair Work Regulations 2009 Work Health and Safety Act 2011 (Cth) and Work Health and Safety Act 2011 (Qld), and equivalent State / Territory legislation Copyright Act 1968 (Cth)
External oversight bodies (cross-reference to standalone Complaints and Appeals Policy)	Australian Skills Quality Authority (ASQA) Commonwealth Ombudsman (including Overseas Students Ombudsman) VSL Ombudsman Queensland Training Ombudsman Office of the Australian Information Commissioner (OAIC) Australian Human Rights Commission and State / Territory equivalents