

Finance and VET Student Loans Policy

Document Control

Policy Title	Finance and VET Student Loans Policy
Policy Number	Policy 4 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, and to every enrolled or prospective student of those RTOs, regardless of cohort, funding source, mode of study or location.
Policy Owner	Chief Executive Officer, Demi Education Group
Policy Author / Custodian	General Manager, Operations (in consultation with the Chief Financial Officer and RTO Manager)
Approval Authority	Chief Executive Officer, with Board endorsement for any change to pricing principles, refund treatment, or the Statement of Fees
Effective Date	04.06.2026
Date of Last Review	04.06.2026
Next Scheduled Review	Annually from effective date, or earlier if triggered by changes to the VSL Act, VSL Rules, ESOS Act, National Code 2018, 2025 Standards for RTOs, Skills Assure Supplier Policy, Program Schedules 3 or 4, the DEG Pricing Policy, or the DEG Statement of Fees
Version	1.0
Status	Final
Publication	Published on the Demi Education Group website, included or referenced in the Student Handbook and Enrolment Contract, and provided to all staff and third parties through induction and the policy register

1. Purpose

This policy establishes a single, consolidated framework for the management of all financial dealings between Demi Education Group (DEG) and its students. It governs how fees are set, disclosed, collected and refunded; how VET Student Loans (VSL) are administered across the full student lifecycle; how Queensland Government subsidised training delivered under the Skills Assure Supplier (SAS) framework is priced, administered and reported; how tuition protection operates; and how financial records are kept, retained and reported.

The policy applies uniformly across all three RTOs in DEG. Where an obligation only applies to a specific cohort, scope or funding source (for example, VSL-approved courses, CRICOS-registered courses, Career Start or Career Boost funded students, or apprentices and trainees), the applicable scope is identified inline.

The policy is written for both students and staff in unified language. Students will find here a clear explanation of what they will pay, when payment is due, what is refundable and what is not, how VSL works, what tuition protection provides, and the rights they hold under each funding pathway. Staff will find the procedural detail required to administer fees consistently, issue statutory notices on time, manage census dates, process withdrawals and re-credit applications, support tuition protection events, and meet financial and VSL recordkeeping and reporting obligations.

2. Scope

This policy applies to:

- all enrolled and prospective students of DEG, whether domestic fee-paying, VSL-assisted, Queensland Smart and Skilled Career Start or Career Boost funded, apprentice or trainee, or overseas (CRICOS) students;
- all DEG staff with any responsibility for fees, refunds, payment plans, VSL administration, census date setting and communication, withdrawals, re-credit decisions, eCAF, tuition protection, government funding eligibility, AVETMISS or VET activity reporting, and financial recordkeeping;
- any third-party arrangement under which a third party undertakes financial or VSL-related activities on behalf of DEG, including third-party payment plan providers, education agents (for CRICOS), Apprentice Connect Australia Providers (ACAPs) and any approved subcontracted delivery arrangement. DEG remains responsible for compliance with this policy regardless of the involvement of any third party (refer to Policy 1: Governance and Compliance Framework, Section on Third-Party Arrangements).

The current fee amounts, payment terms, refund triggers and refund treatment that operationalise this policy are set out in the DEG Pricing Policy and the DEG Statement of Fees. Those documents are the authoritative source for fee items, amounts, inclusions, exclusions and refund treatment, and are read together with this policy. Where any operational detail in this policy is intended to be governed by the Pricing Policy or the Statement of Fees, this policy refers to those documents rather than restating amounts.

3. Defined Terms

For the purposes of this policy, the following defined terms apply. Terms not defined here take their ordinary or statutory meaning.

AVETMISS	the Australian Vocational Education and Training Management Information Statistical Standard, the national data standard for VET activity reporting.
Census Date (or Census Day)	the published date set by DEG for a part of an approved VSL course (or a corresponding date used administratively for non-VSL courses), no earlier than 20% of the way through that part of the course, on or before which a student must withdraw if they do not wish to incur a VSL debt or fee liability for that part of the course. Aligns to: VSL Act 2016 s.58; VSL Rules 2016 r.130 to r.134.
CAN (Commonwealth Assistance Notice)	the notice required by the VSL Rules 2016 r.100 that DEG must issue to each VSL-assisted student enrolled on the census day for a part of a course, within the period starting on the census day and ending 28 days after the census day, confirming the loan amount deferred and other prescribed information.
Career Boost	the Queensland Government VET subsidy program for higher-level training for career advancement, including general training and apprenticeship and traineeship pathways, administered under the SAS framework and Program Schedule 4.
Career Start	the Queensland Government VET subsidy program for entry-level training for job seekers, including general training and apprenticeship and traineeship pathways, administered under the SAS framework and Program Schedule 3.
Co-contribution Fee	the student contribution amount payable for a Queensland Government subsidised training place under the SAS framework, charged at the unit of competency level and reported via AVETMISS.
eCAF (electronic Commonwealth Assistance Form)	the online Request for a VET Student Loan form that an eligible student must complete and submit by the published due date to access a VSL.
ESOS Act	the Education Services for Overseas Students Act 2000.
Fee Period	a period determined by DEG in accordance with the VSL Rules over which tuition fees are reasonably apportioned and which contains at least one census day.
Gap Fee	any tuition fee charged in addition to the portion of tuition fees covered by a VSL up to the loan cap for the course, as set out in the Pricing Policy and the Statement of Fees.
HELP Loan Limit	the combined Higher Education Loan Program limit applying across HECS-HELP, FEE-HELP, VET FEE-HELP and VSL.

LLND	Language, Literacy, Numeracy and Digital skills, assessed at or above the relevant exit level of the Australian Core Skills Framework (ACSF) and the Core Skills for Work Developmental Framework (CSfW) as required for the targeted qualification.
National Code	the National Code of Practice for Providers of Education and Training to Overseas Students 2018.
Provider Default	circumstances in which DEG, as an approved course provider, fails to start providing, or stops providing, the course to a student before the course is completed, as defined in the VSL Act s.66B (for VSL-assisted students) and the ESOS Act (for overseas students).
Re-credit	the process under the VSL Act and VSL Rules by which a student's HELP balance and VETSL debt are reduced for a part of a course where Special Circumstances apply or where the Secretary determines re-credit is warranted.
SAS (Skills Assure Supplier)	an RTO approved by the Queensland Department of Trade, Employment and Training to deliver Queensland Government subsidised training under the SAS framework.
Secretary	the Secretary of the responsible Commonwealth department administering the VSL Act, or their delegate.
SoCF (Statement of Covered Fees)	the statement required by VSL Act s.56 and VSL Rules r.128 and r.129 that DEG must give to a VSL-assisted student after enrolment and before the first census day for the course.
Special Circumstances	circumstances that are beyond the student's control, did not make their full impact on the student until on or after the census date, and were such that it was impracticable for the student to complete the requirements for the course or part of the course, as set out in VSL Rules r.145.
Student Default	circumstances in which a student withdraws from a course or part of a course, fails to commence on the agreed start date, or otherwise fails to meet the obligations under their enrolment, in the manner relevant to the cohort (VSL, CRICOS or fee-for-service).
TFN	Tax File Number, issued by the Australian Taxation Office and required for VSL eligibility.
TPS	the Tuition Protection Service for overseas students under the ESOS Act; VSL Tuition Protection means the corresponding arrangements for VSL-assisted students administered by the VSL Tuition Protection Director under Part 5A of the VSL Act.
Tuition Fees	fees paid for a course or part of a course (a unit of study under VSL terminology), distinct from non-tuition fees such as application, late enrolment, kit, materials, change-of-enrolment, re-issue and re-assessment fees.

Unit of Study	a part of an approved VSL course for which a student may access VSL assistance to pay all or part of their tuition fees.
USI	Unique Student Identifier under the Student Identifiers Act 2014.
VSL	VET Student Loan, the Commonwealth income-contingent loan scheme established under the VET Student Loans Act 2016.
VSL-Eligible Student	a student who meets the citizenship, residency, academic suitability and other eligibility criteria set out in the VSL Act and VSL Rules and is enrolled in an approved VSL course.
VETSL Debt	the debt incurred by a VSL-assisted student under the VSL Act, which may be up to 120% of the loan amount where a 20% loan fee applies.

4. Policy Principles

DEG manages fees and VSL administration in accordance with the following principles, which apply to all RTOs in the group and to every cohort.

4.1 Fee transparency

Every student will receive clear, accurate and accessible information about the full cost of their course, including tuition fees, kit and material fees, administration fees and any other charges, before they make a financial commitment. Pre-enrolment, enrolment and statutory disclosure documents will be consistent with one another and with the published Pricing Policy and Statement of Fees.

4.2 Single source of truth for pricing and refunds

The DEG Pricing Policy and the DEG Statement of Fees are the authoritative documents for fee items, amounts, inclusions, exclusions and refund treatment. This policy operationalises and supplements those documents but does not override them. Any conflict between this policy and the Pricing Policy or Statement of Fees on a matter of pricing or refund treatment is resolved in favour of the Pricing Policy or Statement of Fees.

4.3 Compliance with legislation, rules and funding instruments

DEG operates as an approved course provider for VSL and as a Skills Assure Supplier for Queensland Government funded training, and (through ICQ and AACDS) as a CRICOS-registered provider. Every action taken under this policy must comply with the VSL Act 2016, the VSL Rules 2016, the ESOS Act 2000, the National Code 2018, the 2025 Standards for RTOs, the SAS Policy 2025-2028 and the relevant Program Schedule, and the Privacy Act 1988.

4.4 Cohort-appropriate treatment

Students enrolled under different cohorts (domestic fee-paying, VSL-assisted, Career Start or Career Boost subsidised, apprentice or trainee, CRICOS overseas) are entitled to the treatment

provided by the legislative, rules and funding instruments applicable to their cohort. Differences in entitlement, particularly around fees, refunds, census, withdrawal and tuition protection, are explicitly identified throughout this policy and operationalised consistently.

4.5 No discriminatory or improper treatment

DEG does not discriminate between students on the basis of whether they access VSL, government subsidy or fee-for-service, except as required by legislation, rules or the funding instrument. DEG does not victimise or otherwise treat adversely any student who applies for re-credit, lodges a complaint, requests internal or external review, or accesses the VSL or ESOS grievance pathways.

4.6 Tuition protection

DEG maintains tuition protection arrangements consistent with the VSL Tuition Protection framework (for VSL-assisted students) and the Tuition Protection Service framework (for overseas students), and operational arrangements for fee-for-service students consistent with the 2025 Standards for RTOs.

4.7 Privacy and information handling

Personal information collected for financial and VSL purposes (including TFN, USI, residency evidence, LLND results and bank or payment information) is handled in accordance with the Australian Privacy Principles, the Privacy Act 1988, the Taxation Administration Act 1953 (in relation to TFNs), the Student Identifiers Act 2014 and the VSL Rules 2016 r.94 (handling information). Refer to the standalone DEG Privacy Policy.

4.8 Continuous improvement

All fees, charges, refund and re-credit decisions, statutory notice processes and tuition protection events are recorded, monitored and reviewed at least annually as part of DEG's continuous improvement system (refer to Policy 1: Governance and Compliance Framework). Material changes to legislation, the SAS Policy, the Program Schedules or the Pricing Policy and Statement of Fees trigger an out-of-cycle review.

5. Roles, Responsibilities and Decision Authority

5.1 Board of Directors

Approves the DEG Pricing Policy and the DEG Statement of Fees and any material amendment to either. Reviews tuition protection arrangements and any provider default event.

5.2 Chief Executive Officer (CEO)

Holds ultimate accountability for compliance with this policy. Approves operational procedures supporting this policy. Acts as Review Officer for re-credit decisions where a student requests internal review under Section 13.6 below. Approves provider default communications under VSL Act s.66D and equivalent ESOS provisions where applicable.

5.3 Chief Financial Officer (CFO)

Owns this policy and its supporting financial procedures. Maintains the financial recordkeeping framework. Approves payment plan terms, write-offs and referrals to debt collection within delegated authority. Acts as the initial designated decision-maker for re-credit applications based on Special Circumstances, in accordance with Section 13 below.

5.4 General Manager, Operations

Maintains regulatory alignment of this policy, the Pricing Policy and the Statement of Fees; coordinates internal audit of VSL administration, census setting, CAN issue, SoCF issue, fee notices, re-credit and tuition protection; and reports compliance matters to the CEO and Board. Acts as the initial designated decision-maker for re-credit applications based on Special Circumstances, in accordance with Section 13 below.

5.5 RTO Manager

Operationally responsible for setting and publishing census days; issuing SoCFs, VSL Fee Notices and CANs within statutory timeframes; managing eCAF; maintaining VSL records under VSL Rules r.105; and operating the VSL Recordkeeping Procedure. Confirms enrolment eligibility, including academic suitability and (for VSL or SAS-funded students) the funding-specific eligibility criteria; signs off enrolments before fees are charged or VSL is committed.

5.6 Finance Manager

Issues invoices and receipts, administers payment plans, processes refunds for approved applications, reconciles fee accounts and produces the financial records for audit.

5.7 Admissions and Student Administration

Disseminates pre-enrolment fee information; confirms USI, TFN and residency evidence; supports eCAF completion; processes withdrawal applications; and communicates census date reminders and fee notices to students.

5.8 Staff in third-party arrangements

Where any of the responsibilities above are performed by a third party on behalf of DEG (including ACAPs and third-party payment plan providers), DEG remains accountable and the third-party arrangement is governed by Policy 1: Governance and Compliance Framework.

6. Fees and Refunds

6.1 Fee setting principles

DEG sets tuition fees and non-tuition fees in accordance with the DEG Pricing Policy, the DEG Statement of Fees, the VSL Rules 2016 (where applicable to VSL courses), the SAS Policy 2025-2028 and Program Schedules 3 and 4 (where applicable to Queensland Government subsidised places), and the National Code 2018 Standard 3 (where applicable to overseas students).

For VSL-assisted students, DEG must not have regard to a student's eligibility for a VSL when determining tuition fees and must not vary tuition fees for a part of a course on or after the published census day for that part except in the limited circumstances permitted by the VSL Rules.

For SAS-funded students, the Co-contribution Fee must represent the total cost to the student of training, assessment and the awarding of the qualification, must be charged at the unit-of-competency level, and must not be set at an artificially low rate to attract enrolment. Upfront charging of more than 30% of the total Co-contribution Fee is prohibited. The Co-contribution Fee must not be paid or waived by DEG (directly or indirectly), unless approved in writing by the Department of Trade, Employment and Training.

For apprentices and trainees under SAS Career Start or Career Boost pathways, Co-contribution Fees are set by the Department at \$1.60 per nominal hour for each unit of competency or module and must be calculated at the commencement of each unit or module. Additional Co-contribution Fees may be charged to the employer if negotiated, agreed and documented in writing before training commencement.

For overseas (CRICOS) students, tuition fees are set in accordance with the published Pricing Policy and Statement of Fees and disclosed in the written agreement before any payment is accepted.

6.2 Fee items

The complete list of fee items applicable across DEG is set out in the DEG Statement of Fees. These include, without limitation: Application for Enrolment Fee; Late Enrolment Fee; Recognition of Prior Learning Application Fee; Course Change Fees; Course Fees (including the term liability schedule worked example); Gap Fees; account transaction fees; certification re-issue fees; student documentation request fees; re-assessment and late submission fees; dishonour direct debit payment fees; third-party credit provider fees; student kit / material fees; replacement uniform fees; and short course extension fees. Students are referred to the Statement of Fees as the authoritative source for amounts, conditions and refund treatment.

For SAS-funded students, the Co-contribution Fee is treated as the total cost to the student including enrolment charges, tuition, services and materials, and mandatory costs (for example criminal history checks where required for placement). Fees cannot be charged for Outcome 60 (credit transfer) or Outcome 65 (transitional gap training) or for cohorts exempt from paying Co-contribution Fees.

For VSL-assisted students, DEG must not charge a fee for assessments to determine academic suitability for a VSL course, or for applying for enrolment in an approved VSL course.

6.3 Fee disclosure (pre-enrolment and at enrolment)

Before a student incurs any fee, DEG must ensure the student has received:

- for all students, the published Statement of Fees, the Pricing Policy and the relevant course information (including duration, mode, delivery sites, assessment methods, payment options and refund terms);
- for VSL-assisted students, the pre-enrolment information required by VSL Rules r.98, including the maximum loan amount available, the VETSL debt that would be accrued (up

to 120% of the loan amount), an explanation of fee periods, census days and withdrawal consequences, and an explanation of how to access tuition fees, census days and withdrawal procedures on the DEG website;

- for overseas (CRICOS) students, the written agreement complying with National Code 2018 Standard 3.3 and 3.4, including all tuition and non-tuition fees, payment options, refund treatment, the role of TPS, and the rights of the student under Australian Consumer Law;
- for SAS-funded students, the relevant program fact sheet and a clear, written statement of the Co-contribution Fee at the unit-of-competency level, including any exemption or concession applied;
- for apprentices and trainees, integration of the relevant fee information into the Training Plan agreed with the student and employer.

This pre-enrolment information is operationalised by the Pricing and Refund Procedure, the Statement of Covered Fees Template (for VSL students), and the Funding Eligibility Checklist (for SAS students). The Enrolment Procedure (Policy 2: Student Lifecycle Policy) integrates these steps into the broader pre-enrolment process.

6.4 Incurring liability for fees

Upon enrolment in a course, the student becomes liable for the first fee period as determined by DEG once the enrolment period (and where applicable the cooling-off period or census date) has passed. From that point the student is liable to pay for the first period of study. In the event of withdrawal by the student during the study period, the student remains liable for all fees related to that study period in accordance with the term liability schedule set out in the Statement of Fees.

6.5 Payment methods and payment plans

DEG offers payment methods consistent with the Pricing Policy, including government funding, fee-for-service payment (credit or debit card, direct bank transfer or, where DEG permits, a third-party credit provider), prepaid fees in line with the 2025 Standards, and payment plans operated through a third-party provider on weekly direct debit terms. Payment plan instalments are collected at least two weeks in advance of study. Tuition fees collected via a payment plan are non-refundable. Failure to make payment in accordance with the plan results in suspension of course access and assessment marking until fees owing are paid in full, in accordance with the Pricing Policy. DEG does not offer payment plans to any student it considers unable to meet the terms of the plan and may withdraw access to a payment plan if it considers the student is unable to meet the terms or has defaulted on the plan.

For SAS-funded students, payment plan or third-party credit arrangements must be consistent with SAS Policy 2025-2028 Appendix 1 (B) (no more than 30% of the total Co-contribution Fee upfront) and (C) (no payment or waiver by the SAS, directly or indirectly).

6.6 Cooling-off period (fee-for-service)

For all DEG courses, students have a five-day cooling-off period following enrolment. If a student withdraws within this period, they are entitled to a full refund of any course fees paid, less the Application for Enrolment Fee, Late Enrolment Fee, RPL Application Fee or kit fee, each of which

is non-refundable. Student kit and student material fees are not refundable once the kit or materials have been received.

6.7 Refund treatment (by cohort)

Refund treatment is set out below and is fully aligned with the DEG Pricing Policy clause 7 and the DEG Statement of Fees. Where a student is eligible to a refund, the responsible Finance Officer processes the refund in accordance with finance administration procedures.

6.7.1 Domestic fee-for-service students (non-VSL, non-SAS):

- Withdrawal within the five-day cooling-off period: full refund of course fees paid, less the Application for Enrolment Fee, Late Enrolment Fee, kit fee and RPL Application Fee.
- Withdrawal after the cooling-off period: no refund of course fees. The student is liable for the full fee owing for the relevant unit or term of study, and remains liable in accordance with the Course Fee Liability schedule in the Statement of Fees.
- Short courses and non-accredited courses: non-refundable.

6.7.2 Domestic students enrolled in VSL-approved courses (whether or not they access VSL):

- Withdrawal on or before the census date: no VSL debt incurred; 100% refund of any Gap Fees and tuition fees paid relevant to the unit of study, including fees paid upfront or by payment plan.
- Withdrawal after the census date: VSL debt incurred (where the student has accessed VSL); no refund of tuition fees. Refund is at the discretion of DEG dependent on evidence of Special Circumstances (see Section 13).
- Cancellation of enrolment due to a serious breach of policy after commencement: no refund or re-credit.
- This refund treatment does not apply where VSL Tuition Protection arrangements have been activated and the student has elected the course assurance option for the unit (see Section 15 on Tuition Protection).

6.7.3 SAS-funded students (Career Start or Career Boost):

Refund treatment is governed by the SAS Agreement, the relevant Program Schedule and the SAS Policy 2025-2028. Where DEG has charged a Co-contribution Fee or instalment of a Co-contribution Fee, refunds are processed where the student is determined ineligible after charging or where DEG cannot complete delivery. Co-contribution Fees collected must be reported in whole dollar values at the unit-of-competency level via AVETMISS and supported by retained evidence.

6.7.4 Apprentices and trainees (under SAS Career Start or Career Boost pathways):

Refund treatment is governed by the relevant Program Schedule and the SAS Agreement. Co-contribution Fees are calculated at the commencement of each unit at the prescribed rate (currently \$1.60 per nominal hour, set by the Department), and additional employer-paid Co-contribution Fees agreed up-front must be administered in writing.

6.7.5 Overseas (CRICOS) students:

The international student refund schedule is set out in the Statement of Fees and is retained in the form previously published in the Niche Fees, Charges, Refund and Re-Credit Policy v4.2 clause 5.4.3, as adapted for DEG operations across International College of Queensland and AACDS. Provider default refund arrangements operate under ESOS Act 2000 sections 27-29 and the National Code 2018 (see Section 15 on Tuition Protection).

6.8 Extenuating circumstances

A fee-free extension of up to six months may be considered in cases of extenuating circumstances, such as medical conditions, supported by verifiable evidence. Extenuating circumstances are addressed in the Student Handbook. Refunds will not be given for the reasons listed in DEG Pricing Policy clause 7(iv), including change of mind, inability to navigate online learning, preference for another training provider, change in employment or financial status, change in personal circumstances, pregnancy, family commitments, changes to schedule, changes to living situation, lack of progression or non-achievement of competence within the allocated timeframe.

For VSL-assisted students, where a withdrawal occurs after the census date, the student may apply for re-credit on the basis of Special Circumstances under Section 13. The reasons listed in DEG Pricing Policy clause 7(iv) are not, of themselves, Special Circumstances within the meaning of the VSL Rules.

6.9 Refund and cancellation procedure

The Pricing and Refund Procedure sets out the operational steps for processing refund requests across all cohorts, including the Refund Request Form, evidence requirements, decision authority, communication timelines, and recordkeeping. The Procedure is owned by the CFO and reviewed at least annually. Where DEG determines not to refund or re-credit, the student is informed in writing of the reasons and of the right to appeal under the Complaints and Appeals Policy.

7. VSL Eligibility and Entry

This Section applies only to students enrolling in a course approved for VSL assistance.

7.1 Academic suitability

Before a prospective VSL student is enrolled and a VSL is committed, DEG assesses the student's academic suitability for the course. Evidence required is at least one of the following:

- evidence of a Senior Secondary Certificate of Education for completion of Year 12 (or equivalent);
- proof of assessment demonstrating competence at or above exit ACSF Level 3 in both reading and numeracy, undertaken through DEG's approved online LLN assessment tool; or
- evidence of successful completion of a qualification at AQF Level 4 or above delivered in English.

The provision of one of these items does not preclude the requirement for another where the course or the student's circumstances warrant it. Interactions with the student during application, pre-enrolment and orientation are also taken into account in relation to academic suitability, including engagement with staff and use of LLN skills in completing forms and processes.

DEG must not charge a fee for an academic suitability assessment for a VSL course.

The results of the academic suitability assessment are reported to the student as soon as practicable after completion of the assessment.

7.2 Citizenship and residency

To be eligible for VSL assistance the student must be:

- an Australian citizen, evidenced by an Australian Passport, Australian Citizenship Certificate, or Australian Birth Certificate (subject to the parental citizenship requirements for births after 20 August 1986); or
- a holder of a Permanent Humanitarian Visa who will usually reside in Australia for the duration of the VET units of study, verified through the Department of Home Affairs (VEVO check); or
- a New Zealand Special Category Visa holder who satisfies the additional residency criteria, verified through VEVO.

Residency is reviewed where the student's circumstances change during the course.

7.3 LLND assessment

DEG may conduct an LLND assessment as part of the pre-enrolment process, using its approved online LLN assessment tool, to support academic suitability and to identify any support needs. Results inform any Student Support Plan that is developed prior to enrolment confirmation. For SAS-funded students (including apprentices and trainees), DEG uses the LLND assessment process described in SAS Policy 2025-2028 Performance Standard 3 (D), and for apprentices and trainees may rely on an ACAP-administered LLND assessment where one has been conducted as part of sign-up.

7.4 Tax File Number (TFN)

A valid TFN is a Commonwealth eligibility requirement for VSL. The student provides their TFN directly to the Commonwealth through the eCAF, which is administered by the Department of Employment and Workplace Relations (DEWR). DEG does not collect, hold or store the student's TFN, and is not permitted under the VSL Rules to do so. DEG's role in relation to TFN is limited to providing the student with the information and support they need to understand the TFN requirement and to complete the eCAF correctly through the Commonwealth system; the TFN itself is supplied by the student to the Commonwealth, not to DEG.

A student who does not provide a valid TFN (or an accepted alternative, such as a TFN application receipt) through the eCAF by the prescribed time will not be able to access VSL for the relevant fee period and will be liable for the unit fees on a fee-for-service basis. Where this risk arises, DEG will communicate the consequences to the student in writing in good time before the relevant census date.

7.5 Unique Student Identifier (USI)

DEG verifies a USI for every enrolled student prior to enrolment confirmation. Without a verified USI, DEG must not issue a VET Statement of Attainment or VET qualification, and AVETMISS reporting (where applicable) will not accept the enrolment record. The USI is verified at the time of enrolment and reported through AVETMISS for SAS-funded students.

7.6 HELP Loan Limit

DEG checks the student's combined HELP Loan Limit during the enrolment process to ensure the loan is serviceable for the course fees being applied for. It is the student's responsibility to maintain a serviceable HELP loan limit. If the student enrolls with another provider that puts them over their limit, or makes the available HELP balance unserviceable to DEG, the student becomes liable to pay for the affected unit of study on a fee-for-service basis.

7.7 eCAF (electronic Commonwealth Assistance Form)

To access VSL the student must complete and submit a valid eCAF by the published due date. DEG provides the student with information and support to complete the eCAF, including ensuring the student's current email and mobile number are on record so the eCAF can be issued and received accurately. Responsibility for successful eCAF completion rests with the student. Failure to complete the eCAF by the due date means the student will not be able to fund the course (or relevant unit) via VSL, and the student must immediately pay the due course fees on a fee-for-service basis if they wish to continue.

The Funding Eligibility Checklist integrates academic suitability, residency, LLND, TFN, USI and HELP Loan Limit verification steps into a single staff-facing tool, used by the RTO Manager and the VSL Administrator to confirm eligibility before enrolment is finalised. The Checklist is reviewed at least annually and updated whenever eligibility rules change.

8. Statements of Covered Fees (SoCFs)

DEG issues a VET Student Loan Statement of Covered Fees (SoCF) to each VSL-assisted student.

8.1 Content

The SoCF must include the title "VET Student Loan Statement of Covered Fees" and the information required by VSL Act s.56 together with the additional content specified in VSL Rules r.99(4)(a) to (i), which includes the student's identifying information, the course and part of the course names, the tuition fees, the maximum loan amount available, the VETSL debt that would accrue at the maximum loan (up to 120%), an explanation of fee period apportionment, and information about census days (including the meaning of a census day, the student's right to withdraw before census without incurring a VSL debt, and the right to a refund of tuition fees already paid).

8.2 Issue timing

The SoCF must be given to the student after enrolment and before the first census day for the course. The SoCF may be issued together with the first VET Student Loan Fee Notice for the first fee period.

8.3 Delivery

The SoCF is delivered electronically to the student's personal email address (or postal address, or other method agreed by the student) and a copy is retained in the student's VSL record.

8.4 Version control and acknowledgement

The Statement of Covered Fees Template is owned by the RTO Manager, version-controlled in the Policy Register (Policy 1) and reviewed at least annually or upon any change to the VSL Rules or to course tuition fees. Each student SoCF is uniquely versioned by reference to course, part of the course and fee period, and the student's electronic acknowledgement (or read receipt) is recorded in the student file. Where tuition fees are varied before the published census day in accordance with VSL Rules r.126, a revised SoCF is issued promptly.

8.5 Student-facing explanation

As a student, your SoCF is the document that tells you, before your first census date, how much your course will cost, how much of that can be paid through a VET Student Loan, and when each census date is. It is important that you read it and contact us if anything is unclear before the first census date.

9. Fee Notices

9.1 VET Student Loan Fee Notice

DEG issues a VET Student Loan Fee Notice to each VSL-assisted student in relation to each fee period. The notice must include the title "VET Student Loan Fee Notice" and the information required by VSL Rules r.99(4), which includes the student's identifying information, the provider's name and registration code, the date of the notice, the student's tuition fees for the part of the course, the amount of those fees covered by VSL, the VETSL debt that will be accrued (up to 120% of the loan amount), the census day, the student's right to request correction of information in the notice, the meaning of a census day, the consequences of withdrawal before and after the census day, and a reminder that the student must notify DEG of any change of contact details.

9.2 Standard fee notices (non-VSL)

For non-VSL students, fee notices and invoices are issued in accordance with the DEG Pricing Policy and the Statement of Fees, and include the description of the fee, the amount, the payment terms, payment method, due date and dishonour treatment.

9.3 Procedure

The VSL Fee Notice Procedure sets out the staff steps for preparing, version-controlling, issuing and retaining VSL Fee Notices, including how the VSL Administrator coordinates with the Finance Officer for any required variation under VSL Rules r.126 and r.127. The Procedure is owned by the VSL Administrator and reviewed at least annually.

9.4 Student-facing explanation

As a student, you receive a VET Student Loan Fee Notice before each census date. The Fee Notice tells you what you will be charged that fee period, how much will go on your loan, and what happens if you withdraw. If anything looks wrong, contact student administration before the census date so it can be corrected.

10. Commonwealth Assistance Notices (CANs)

10.1 Obligation to issue

For each VSL-assisted student enrolled in a part of the course on the census day, DEG must issue a Commonwealth Assistance Notice (CAN) that complies with VSL Rules r.100.

10.2 Content

The CAN must include the title “Commonwealth Assistance Notice” and the information required by VSL Rules r.100(4), including the student's identifying information; the provider's name and any other business name used; the date of the notice; the student's CHESSN; the student's identifier; the name of the course; the name and identifying code of the part of the course; the census day for the part of the course; the tuition fees for the part of the course; the amount of those fees covered by VSL; the amount of VETSL debt that will accrue (up to 120% of the loan amount); any payments of tuition fees made by the student; and information about the student's right to request correction of the information in the notice in accordance with DEG's information handling procedure.

10.3 Issue timing

The CAN must be issued within the period starting on the census day for the part of the course and ending 28 days after the census day.

10.4 Combined CANs

A single CAN may relate to more than one part of the course so long as the issue timing requirement is met for each part included.

10.5 Delivery

The CAN is delivered to the student's personal email address (or postal address, or other method agreed by the student) and retained in the student file.

10.6 Correction and reissue

Where a student requests correction of information in a CAN, DEG investigates the request promptly and, where the request is substantiated, reissues a corrected CAN as soon as practicable. Where the original CAN contained an administrative error identified by DEG, DEG reissues a corrected CAN as soon as practicable and retains both versions in the student VSL record.

10.7 Procedure

The CAN Issue Procedure sets out the operational steps for generating, quality-checking, issuing, retaining and correcting CANs, including the responsibilities of the VSL Administrator, the Finance Officer and the Compliance Manager. The Procedure is owned by the VSL Administrator and reviewed at least annually.

10.8 Student-facing explanation

As a student, your CAN is the document that confirms what was deferred to your VET Student Loan after each census date. If anything on it is wrong, ask us to correct it as soon as you receive it. The CAN is not an invoice; it is your record of what has been added to your loan for that part of the course.

11. Census Date Administration

11.1 Determining census days

DEG must determine census days for each approved VSL course offered for a particular period such that:

- there are at least three census days for the course; and
- each census day for a part of the course is at least 20% of the way through the period starting when that part of the course starts to be provided and ending on the day a student would reasonably be expected to complete that part of the course.

11.2 Publishing census days

Census days are published prominently on the DEG website (specifically, on the website of the relevant RTO or the DEG group site) before the earliest day for enrolment in the course or part of the course. Census days must be accessible without provision of login information.

11.3 Communicating census days

DEG communicates census days to students through:

- the pre-enrolment information and course outline;
- the SoCF (Section 8) issued before the first census date;
- the VSL Fee Notice (Section 9) issued in relation to each fee period;

- census date reminders sent to the student's recorded contact details prior to each census date; and
- the student portal (aXcelerate).

11.4 Varying census days

A census day may be varied only where the Secretary has given written approval, or where the variation:

- occurs before the census day;
- does not disadvantage a student enrolled in (or seeking to enrol in) the course or part of the course (a student is taken to be disadvantaged if the variation makes the census day earlier); and
- is necessary to correct an administrative error or to deal with a change in circumstances.

Where a census day is varied, the variation must be published as soon as practicable on the DEG website, accessible without login.

11.5 Procedure

The Census Date Admin Procedure sets out the steps for determining, publishing, communicating and (if necessary) varying census days; for ensuring three or more census days exist per course; for the 20% rule check; for coordinating SoCF, Fee Notice and CAN issue around each census date; and for recording all census-related decisions in the VSL record. The Procedure is owned by the VSL Administrator and reviewed at least annually.

11.6 Student-facing explanation

As a student, the census date is the deadline by which you must withdraw if you do not want to incur a VET Student Loan debt (or, for non-VSL VSL-eligible students who have paid Gap Fees, if you want a refund of those Gap Fees). You can find your census dates on the relevant RTO website, on your SoCF and on your Fee Notice. We send you a reminder before each census date. If you are considering withdrawing, contact student support as soon as possible so we can help you understand your options.

12. Withdrawals

12.1 How to withdraw

Students wishing to withdraw from a course or part of a course must submit a written withdrawal request to student administration, in accordance with the process described in the Student Handbook. Verbal requests are not sufficient. The Withdrawal Procedure sets out the form to be used, the evidence required (if any), the decision authority, the financial consequences for the student's cohort (see Section 6.7) and the communication timeline.

12.2 Pre-census withdrawals (VSL-assisted students)

Where a VSL-assisted student withdraws on or before the relevant census date:

- no VSL debt will be incurred for the affected part of the course;
- any Gap Fees and tuition fees paid by the student for that part of the course will be refunded (subject to non-refundable items as set out in Section 6); and
- the withdrawal is recorded in the VSL record and reflected in DEG's reporting.

Aligns to: VSL Act 2016 s.58; VSL Rules 2016 r.98(4)(l)(iii); DEG Pricing Policy clauses 6(iv), 7(ii).

12.3 Post-census withdrawals (VSL-assisted students)

Where a VSL-assisted student withdraws after the relevant census date:

- the VETSL debt incurred for the affected part of the course remains;
- no refund of tuition fees applies, except where DEG's discretion is exercised on the basis of Special Circumstances; and
- the student may apply for re-credit under Section 13 below.

12.4 Withdrawals (non-VSL domestic students)

Where a domestic fee-for-service student withdraws after the five-day cooling-off period, no refund applies and the student remains liable for the fees owing for the affected unit or term of study, in accordance with the Course Fee Liability schedule in the Statement of Fees.

12.5 Withdrawals (SAS-funded students)

Where a SAS-funded student withdraws, DEG records the partial completion and reports the actual hours of training and assessment delivered prior to withdrawal via AVETMISS in accordance with SAS Policy 2025-2028 Appendix 2 (Reporting Requirements). Where a Co-contribution Fee has been collected for units not yet delivered, refund treatment is in accordance with the SAS Agreement and the relevant Program Schedule.

12.6 Withdrawals (apprentices and trainees)

Where an apprentice or trainee withdraws, the withdrawal must also be processed through the Training Plan, the relevant Apprentice Connect Australia Provider (ACAP), and the Department's apprenticeship arrangements under the Further Education and Training Act 2014 (Qld). Co-contribution Fees are reported and charged in accordance with SAS Policy 2025-2028 Appendix 1 (Apprenticeships and Traineeships) and Appendix 2.

12.7 Withdrawals (overseas / CRICOS students)

Withdrawal of an overseas student is subject to the refund schedule in the Statement of Fees (and the international refund schedule referenced in Section 6.7.5), the ESOS Act 2000, the National Code 2018 and any student visa implications, which are reported in PRISMS as required. Refer also to Policy 2: Student Lifecycle Policy.

12.8 Provider-initiated cancellation

Where DEG initiates a cancellation of a student's enrolment:

- DEG will inform the student in writing of the proposed cancellation;

- the student will have at least 28 days from receipt of the notification to initiate the Complaints and Appeals Policy and Procedure (see the standalone DEG Complaints and Appeals Policy referenced in Policy 2) before the cancellation has effect;
- if an appeal is made, the cancellation will not take effect until the appeal has been completed;
- if DEG initially informs a VSL-eligible student of a proposed cancellation prior to the census date, the student will not incur fees for the relevant unit of study and any amounts paid will be refunded; and
- if DEG initially informs a VSL-eligible student of a proposed cancellation after the census date and the student has been an active and genuine student past the census date, any refund of VET tuition fees is not guaranteed and is at the discretion of DEG.

12.9 Re-enrolment

A student may apply to re-enrol into a course or part of a course they previously withdrew from by submitting an Application for Re-Enrolment Form to student administration. Where required, the Admissions Officer will arrange a re-enrolment interview to ensure the student is suited to continue study, provide updates on policies, and determine any required support needs. All re-enrolments are charged as outlined in the Enrolment Contract and Statement of Fees.

12.10 Procedure and student-facing explanation

The Withdrawal Procedure, owned by the RTO Manager and operated by student administration, sets out the operational steps, including verification of the cohort, evidence (for Special Circumstances applications), system updates (aXcelerate, AVETMISS and VSL records), communication to the student, and coordination with the relevant ACAP for apprentices and trainees. For students: withdrawing is your right, but the financial consequences depend on your cohort and on when you withdraw. Talk to us early; we will explain what applies to your situation.

13. Re-credit and Review of Debt

13.1 When re-credit applies

A VSL-assisted student who withdraws from a unit of study after the published census date, or who has been unable to successfully complete a unit of study, and who believes this was due to Special Circumstances, may apply to have their HELP balance re-credited for the affected unit(s).

13.2 Special Circumstances test

DEG will re-credit the student's HELP balance where it is satisfied that Special Circumstances apply, meaning that:

- the circumstances were beyond the student's control;
- the circumstances did not make their full impact on the student until on or after the census date; and
- the circumstances were such that it was impracticable for the student to complete the requirements for the course or part of the course during their enrolment.

For circumstances to be beyond the student's control, the situation should be one that a reasonable person would consider is not due to the student's action or inaction, either direct or indirect, and for which the student is not responsible. The situation must be unusual, uncommon or abnormal to be considered Special Circumstances.

Special Circumstances do not include:

- lack of knowledge or understanding of the requirements for VSL assistance; or
- a student's incapacity to repay a VSL debt (repayments are income-contingent and the student may apply to the Australian Taxation Office for a deferral of compulsory repayment in certain circumstances).

13.3 How to apply

The student must apply in writing using the Re-credit Application Form within 12 months of the relevant census date of the course or part of the course concerned. DEG has discretion to waive the 12-month limit if satisfied that it was not possible for the application to be made within that period. The application must include the unit(s) for which re-credit is sought, the Special Circumstances claimed, and supporting documentation substantiating the claim.

13.4 Initial decision

The General Manager, Operations is the designated officer responsible for the initial assessment of the application and the initial decision. Each application is considered on its merits together with all supporting documentation. The student will be notified in writing of the decision as soon as practicable after receipt of the application, and in any event within a reasonable period consistent with VSL administrative practice.

13.5 Decisions in relation to replacement components after tuition protection

Where a re-credit application relates to a replacement component of a replacement course offered under VSL Tuition Protection arrangements, DEG applies the additional considerations set out in VSL Rules r.147 alongside the standard Special Circumstances test.

13.6 Internal review

Where DEG makes a decision not to re-credit a student's HELP balance, the student may request internal review at no cost to the student. The application for review must:

- be made within 28 days of receipt of the original decision;
- include the date of the original decision;
- state fully the reasons for applying for review; and
- include any additional relevant evidence.

The CEO (or equivalent senior officer not involved in the original decision) acts as the Review Officer. The Review Officer must be senior to the officer responsible for the original decision and must not have been involved in making that original decision. The Review Officer will affirm, vary or

set aside the original decision and will provide the student with a written statement of the review decision and the reasons for it.

13.7 External review (Administrative Review Tribunal)

A student dissatisfied with the internal review decision may seek external review by the Administrative Review Tribunal (ART), which has replaced the Administrative Appeals Tribunal in the Commonwealth review architecture *[Adapted from AACDS/Niche legacy policy to reflect the current Commonwealth external review architecture]*. DEG provides the student with information about the external review pathway in the internal review decision letter, including timeframes and how to apply.

13.8 Application directly to the Secretary

A student may also apply to the Secretary for re-credit under section 71 of the VSL Act in circumstances where:

- DEG (or a person acting on DEG's behalf) has engaged in unacceptable conduct in relation to the student's application for VSL; or
- DEG has failed to comply with the VSL Act or an instrument under the VSL Act and the failure has adversely affected the student.

The Secretary may also re-credit a student's HELP balance in relation to Special Circumstances if the provider is unable to act or is being wound up or dissolved or has failed to act and the Secretary is satisfied that the failure is unreasonable. Applications to the Secretary must be made within five years after the relevant census date of the course or part of the course concerned, or within that period as extended by the Secretary.

13.9 No victimisation

DEG ensures that a student is not victimised or discriminated against for seeking review or reconsideration of a decision, using DEG's grievance procedures, or making an application for re-crediting of their HELP balance.

13.10 Form, procedure and review cycle

The Re-credit Application Form is owned by the RTO Manager, available through the student portal and student support, and reviewed at least annually for alignment with current VSL Rules. Decisions, reviews and outcomes are recorded in the student VSL record and aggregated in the Continuous Improvement Register for trend analysis (refer to Policy 1).

13.11 Student-facing explanation

As a student, if Special Circumstances beyond your control prevented you from completing a part of your course after the census date, you can ask us to re-credit your HELP balance for that part. There is a form for this, and you need to apply within 12 months. If we say no, you can ask for the decision to be reviewed by a more senior officer not involved in the first decision. If you are still not satisfied, you have a right to external review with the Administrative Review Tribunal, and in some

circumstances, you can apply directly to the Secretary. You will not be disadvantaged for using any of these review rights.

14. Student Progression (eCAF Forms)

14.1 Progression principles

Students must remain financial throughout their course, including paying any course fees owing, completing eCAF requirements for VSL progression, and meeting any funding contract requirements (for SAS-funded students). Failure to remain financial or to complete VSL progression requirements may result in suspension of access and, where DEG is unable to claim VSL for the relevant study load, the student becoming liable for that study load on a fee-for-service basis.

14.2 eCAF for subsequent fee periods

Where the course has more than one fee period and the student's continued VSL assistance for the next fee period requires re-confirmation, DEG provides the student with timely written reminders to complete the relevant eCAF (or to communicate and agree, as required by VSL Rules r.98(4)(h), that the Secretary continue to use the VSL to pay tuition fees for the course).

14.3 Progression Reminder Process

The Progression Reminder Process sets out the cadence, channels, content and escalation steps for reminding students of upcoming eCAF, fee period and census deadlines. It includes:

- an initial reminder no less than 28 days before the relevant census date;
- a second reminder no less than 14 days before the census date; and
- a final reminder no less than five business days before the census date,

with escalation to student support where a student has not responded. The Process is owned by the VSL Administrator and reviewed at least annually.

14.4 Student-facing explanation

As a student, your course is divided into fee periods, each with its own census date. To keep using your VET Student Loan in each fee period you must complete the required forms and confirmations by the due dates we communicate. We will remind you in good time, but it is your responsibility to act on those reminders. If you do not, you may have to pay the relevant fees yourself.

15. Tuition Protection

15.1 Tuition protection across cohorts

DEG maintains tuition protection arrangements that protect students in the event of provider default or, where applicable, student default. The arrangements are:

- for VSL-assisted students: VSL Tuition Protection administered by the VSL Tuition Protection Director under Part 5A of the VSL Act and Part 6 of the VSL Rules;
- for overseas (CRICOS) students: the Tuition Protection Service (TPS) administered under the ESOS Act;
- for domestic fee-for-service students: tuition assurance arrangements consistent with the 2025 Standards for RTOs, operationalised through prepaid fee management, refund obligations and the Tuition Protection Statement.

15.2 Provider default obligations (VSL-assisted students)

Where DEG defaults in relation to a VSL-assisted student (as defined in VSL Act s.66B), DEG must:

- within 24 hours of the default occurring, give written notice to the affected students that the course is no longer being provided, and give written notice to the VSL Tuition Protection Director of the circumstances of the default;
- as soon as practicable, update the DEG website to reflect that the course is no longer being provided and to provide tuition protection information; and
- within three business days of the default occurring, give the VSL Tuition Protection Director the information required under VSL Act s.66C(3), including, for each student, the part-time or full-time status, the mode of delivery, the location of delivery, the withdrawal or deferral status, the completion status for each part of the course, and the name and code of each unit of competency.

The written notice to each student must specify the name of the course or part of the course the student was enrolled in at the time of the default, the date of the default, and a website specified by the VSL Tuition Protection Director where the student can get further information about tuition protection. The notice is delivered to the student's personal email address (or postal address, or other method agreed by the student).

15.3 Acting as a replacement provider (VSL-assisted students)

Where DEG accepts a student into a replacement course following another provider's default:

- DEG grants course credits for parts of the original course successfully completed by the student, as evidenced by a Statement of Attainment or other AQF certification documentation, or an authenticated VET transcript prepared by the Registrar under the Student Identifiers Act 2014;
- the student is not charged tuition fees for a replacement component of the replacement course where tuition fees have already been paid for the affected part of the original course;
- the student is enrolled in the replacement course as soon as practicable; and
- the VSL Tuition Protection Director is given written notice of the acceptance within 14 days of the acceptance.

15.4 Tuition protection for overseas (CRICOS) students

For overseas students, where DEG is unable to deliver the course in full:

- DEG will offer the student a refund of all course money paid to date, within 2 weeks of the day on which the course ceased being provided, or alternatively offer enrolment in an alternative course at no extra cost;
- the student has the right to choose between a refund and an alternative course;
- if DEG is unable to provide a refund or place the student in an alternative course, the TPS Director will place the student in a suitable alternative course at no extra cost; and
- if the TPS Director cannot place the student in a suitable alternative course, TPS will refund the tuition fees paid for the part of the course not yet received.

15.5 Tuition protection for domestic fee-for-service students

For domestic fee-for-service students, DEG maintains tuition assurance arrangements consistent with the 2025 Standards for RTOs, supported by prepaid fee management and the Tuition Protection Statement. Where DEG is unable to continue delivery, students will be offered the choice of (a) continuing studies in a comparable course with an alternative provider, or (b) discontinuing studies and obtaining a refund for prepaid but unutilised tuition fees. The mechanism is documented in the Tuition Protection Statement, which is published on the DEG website and provided to students at enrolment

15.6 Tuition Protection Statement

The Tuition Protection Statement is owned by the Finance Manager and reviewed at least annually. It explains, in plain language, the protections available to each cohort, the steps DEG will take in the event of default, and the role of the VSL Tuition Protection Director and TPS Director. The Statement is published on the DEG website and is referenced in the Student Handbook, the Enrolment Contract, the SoCF and the international student written agreement.

15.7 Student-facing explanation

As a student, tuition protection is the safety net that operates if we cannot continue to deliver your course. Depending on whether you are a VET Student Loan student, an overseas student or a domestic fee-paying student, the framework that protects you differs, but the outcome is the same: you will either be offered a place in a comparable course at no extra cost, or your unspent fees will be refunded. Our Tuition Protection Statement explains exactly how this works.

16. Records and Reporting

16.1 Recordkeeping principles

DEG maintains complete, accurate and accessible financial and VSL records to demonstrate compliance with the VSL Act and Rules, the 2025 Standards for RTOs, the SAS Policy, the ESOS Act and National Code (for overseas students), and the Privacy Act 1988. Records are retained securely and disposed of in accordance with the retention periods set out below.

16.2 VSL records

DEG retains information and documents required to be retained under VSL Rules r.105 for at least five years, including:

- evidence of academic suitability, citizenship/residency, LLND, TFN and USI verification;
- the eCAF and any associated communications;
- the SoCF, VSL Fee Notices and CANs issued to the student, including any corrected versions;
- census date determinations, publications, variations and reminders sent to the student;
- withdrawal applications and outcomes;
- re-credit applications, supporting documentation, internal review decisions and supporting reasons;
- tuition protection notices issued or received; and
- any other information required by the VSL Rules or the Secretary.

16.3 Financial records

DEG maintains general financial records (including invoices, receipts, payment plan agreements, refund records and debt collection records) in accordance with statutory tax and corporate recordkeeping requirements (Corporations Act 2001, Taxation Administration Act 1953, A New Tax System (Goods and Services Tax) Act 1999), and in any event for at least seven years.

16.4 SAS records

For SAS-funded students, DEG retains evidence of eligibility (including concession and PPG status), Co-contribution Fee charges and collections at the unit-of-competency level, Training Plans and Employer Resource Assessments (for apprentices and trainees), and AVETMISS submissions, in accordance with SAS Policy 2025-2028 Section 5 (Records Maintenance) and the Skills Assure Supplier Evidence Requirements.

16.5 CRICOS records

For overseas students, DEG retains written agreements and receipts of payments made under those agreements for at least 2 years after the person ceases to be an accepted student, in accordance with National Code 2018 Standard 3.6.

16.6 Reporting

DEG meets the following reporting obligations:

- VSL reporting: annual reporting under VSL Rules r.116 and ongoing event notifications under VSL Rules r.107 to r.114, including notifications of events affecting capacity to comply, changes to the provider, and student elections not to use the loan;
- AVETMISS / VET Activity reporting: under SAS Policy 2025-2028 Appendix 2, including monthly electronic data submissions (or 15th of each month for TAFE Queensland coordination), unit enrolment and outcome reporting within 30 days (general training) or 90

days (apprenticeship/traineeship), and reporting of Co-contribution Fees at the unit-of-competency level in whole dollar values;

- Total VET Activity (TVA) reporting: to NCVER, including FFS delivery (domestic and international) except where an exemption has been granted by ASQA;
- CRICOS reporting: PRISMS notifications under the ESOS Act and National Code, including student visa breaches and changes to course duration where RPL is granted post-visa.

16.7 VSL Recordkeeping Procedure

The VSL Recordkeeping Procedure sets out, for each VSL student, the inventory of records to be created and retained, the location, the retention period, the access controls, and the audit checks. The Procedure is owned by the VSL Administrator and is reviewed at least annually, and after any external audit or material continuous improvement finding.

16.8 Audit readiness

DEG conducts internal audits of VSL administration (including SoCFs, Fee Notices, CANs, census setting, withdrawals, re-credits and tuition protection events) and SAS administration (including eligibility evidence, Co-contribution Fees and AVETMISS reporting) on a schedule maintained in the Internal Audit Schedule (refer to Policy 1). Audit findings are recorded in the Continuous Improvement Register, with remediation actions tracked to closure.

16.9 Privacy and information handling

All records collected, used and disclosed under this policy are handled in accordance with the standalone DEG Privacy Policy and the Australian Privacy Principles. Personal information may be disclosed to the Commonwealth, the VSL Tuition Protection Director and TPS Director in the circumstances permitted by law.

17. Government Funding

This Section applies to all DEG delivery under Queensland Government subsidised programs, including Career Start and Career Boost under the SAS framework.

17.1 Eligibility verification

Before enrolling a student in a SAS-funded place, DEG verifies the student's eligibility in accordance with the relevant Program Schedule, including:

- citizenship / residency status and Queensland residency;
- age;
- prior qualifications and prior training history;
- employment circumstances (including apprenticeship or traineeship registration where applicable);
- concessional status (Health Care, Veteran or Pensioner Concession Card; Aboriginal or Torres Strait Islander identification; disability; adult prisoner) and supporting evidence;

- any qualification-specific eligibility exemption or restriction in the Queensland Subsidised Training List (QSTL); and
- for apprentices and trainees, the Training Contract registration and the Employer Resource Assessment.

DEG also checks the Apprenticeship Information Subsidy System (AISS) where relevant and confirms with the prospective student whether they have completed or are currently undertaking other training, recognising that AISS does not capture all records.

The Funding Eligibility Checklist integrates SAS eligibility verification with VSL eligibility (where applicable) and general DEG enrolment requirements. It is owned by the Compliance Manager and reviewed at least annually.

17.2 Co-contribution Fee and concession treatment

Co-contribution Fees are set, charged, collected and reported in accordance with Section 6 of this policy, SAS Policy 2025-2028 Appendix 1 and the relevant Program Schedule. Concessional students receive a reduced Co-contribution Fee (or full exemption in the cases prescribed). Evidence of concessional status is retained for the duration of the SAS retention period.

17.3 Prohibited fee practices

DEG must not engage in any of the prohibited fee practices set out in SAS Policy 2025-2028 Appendix 1, including:

- setting the Co-contribution Fee at an artificially low rate to attract enrolment;
- requesting or collecting more than 30% of the Co-contribution Fee upfront;
- paying or waiving the Co-contribution Fee, directly or indirectly, without written Departmental approval;
- refunding, returning or providing cash payments (including referral fees or other bonuses) to any fee payer, including third parties; or
- charging fees for Outcome 60 (credit transfer), Outcome 65 (transitional gap training), or cohorts exempt from paying Co-contribution Fees (including SQW participants, foundation skills training, and other Departmental fee-free announcements).

17.4 Reporting and subsidy claims

DEG submits compliant AVETMISS data on or before the last working day of each month, with unit enrolments and outcomes reported within the SAS-prescribed timeframes (30 days for general training; 90 days for apprenticeship/traineeship). All required data fields, including verified USI, concession status, fund source code, Co-contribution Fee amount collected per unit of competency, and (for apprentices and trainees) the Training Contract registration number, are populated correctly.

17.5 Student and provider obligations

Students enrolled in SAS-funded places must comply with the eligibility, attendance, participation and progression requirements in the Program Schedule and any LLND support arrangements set out in their Training Plan or Training and Support Plan. DEG must comply with the broader

Performance Standards in SAS Policy 2025-2028 (including responsible marketing, Inclusive Practice Micro-Credential completion, ongoing student support and outcome achievement) and is subject to Departmental compliance monitoring and performance reviews.

17.6 Apprenticeships and traineeships

For apprentices and trainees, the Co-contribution Fee is set by the Department at the prescribed rate (currently \$1.60 per nominal hour). Where the apprentice or trainee converts from a school-based apprenticeship or traineeship (SAT) to a full-time or part-time apprenticeship or traineeship, Co-contribution Fees must be charged for training and assessment for any units of competency not yet commenced (this does not apply to Free Apprenticeships for under 25s). The fee, the Training Plan and the Employer Resource Assessment are administered in coordination with the relevant ACAP and the employer.

17.7 Student-facing explanation

As a SAS-funded student, you may be eligible for reduced tuition fees, with the Queensland Government paying the subsidy directly to us and you paying a Co-contribution Fee. The exact amount depends on the qualification, the program (Career Start or Career Boost) and your eligibility status (concessional or non-concessional, apprentice or trainee). The fee will be explained to you at enrolment and is also published. If you have any questions about your funding arrangement, our team will walk you through it before you enrol.

18. Procedures Registered Under This Policy

The following procedures, templates and forms sit under this policy and operationalise its requirements. For each, the table below identifies its purpose, regulatory driver, owner, how it is accessed and used, how it is communicated to students, and its review cycle.

Procedure / Template / Form	Purpose	Regulatory driver	Owner	Access and review cycle
Pricing and Refund Procedure	Sets out the steps for setting, disclosing and varying fees, and for processing refunds across all cohorts.	DEG Pricing Policy; DEG Statement of Fees; VSL Rules 2016 r.93, r.117-127; SAS Policy 2025-2028 Appendix 1; National Code 2018 Standard 3.	CFO	Staff: Policy Register and finance system. Students: indirectly via Pricing Policy and Statement of Fees. Reviewed annually.
Statement of Covered Fees Template	Generates each VSL student's SoCF in accordance with VSL Rules r.99 and r.129.	VSL Act 2016 s.56; VSL Rules 2016 r.128, r.129.	RTO Manager	Staff: VSL administration toolkit. Students: receive individualised SoCF before first census date. Reviewed annually and on any VSL Rules change.
VSL Fee Notice Procedure	Prepares and issues VET Student Loan	VSL Rules 2016 r.99.	RTO Manager	Staff: VSL administration toolkit. Students: receive Fee

	Fee Notice for each fee period.			Notice each fee period. Reviewed annually.
CAN Issue Procedure	Generates and issues CANs within 28 days of each census day, and manages corrections and reissues.	VSL Rules 2016 r.100.	RTO Manager	Staff: VSL administration toolkit. Students: receive CAN within 28 days of census. Reviewed annually.
Census Date Admin Procedure	Determines, publishes, communicates and (if needed) varies census days.	VSL Act 2016 s.58; VSL Rules 2016 r.131-134.	RTO Manager	Staff: VSL administration toolkit. Students: website, SoCF, Fee Notice and reminder communications. Reviewed annually and per intake.
Withdrawal Procedure	Operationalises student withdrawal and provider-initiated cancellation across all cohorts.	VSL Act 2016 s.58; VSL Rules 2016 r.98(4)(l); Pricing Policy clauses 7, 10; National Code 2018 Standard 7; SAS Policy 2025-2028 Appendix 2 (D).	RTO Manager	Staff: Policy Register. Students: described in Student Handbook and on the relevant RTO website. Reviewed annually.
Re-credit Application Form	Captures Special Circumstances applications under VSL Rules Part 8.	VSL Act 2016 ss.68-71; VSL Rules 2016 Part 8.	RTO Manager	Staff: Policy Register. Students: student portal and student support; explained in Student Handbook and SoCF. Reviewed annually.
Progression Reminder Process	Reminds students of upcoming eCAF, fee period and census deadlines.	VSL Rules 2016 r.97-99.	RTO Manager	Staff: CRM and VSL administration toolkit. Students: receive reminders at 28, 14 and 5 business days before census. Reviewed annually.
Tuition Protection Statement	Plain-language explanation of tuition protection arrangements across cohorts.	VSL Act 2016 Part 5A; VSL Rules 2016 Part 6; ESOS Act 2000 ss.27-29; National Code 2018 Standard 3; 2025 Standards for RTOs.	Finance Manager	Staff: Policy Register. Students: published on website, Student Handbook, enrolment pack; referenced in SoCF and international student agreements. Reviewed annually.
VSL Recordkeeping Procedure	Lists all VSL records to be created and retained, retention	VSL Rules 2016 r.104, r.105.	RTO Manager	Staff: Policy Register. Not applicable directly to students. Reviewed

	period and access controls.			annually and after any audit.
Funding Eligibility Checklist	Single staff-facing tool to verify SAS, VSL and general DEG enrolment eligibility.	SAS Policy 2025-2028 Performance Standard 2; Program Schedules 3 and 4; VSL Act 2016 ss.11-13; Student Identifiers Act 2014.	RTO Manager	Staff: admissions and enrolment toolkit. Not provided to students directly; outcomes communicated through enrolment confirmation. Reviewed annually and on any funding rule change.

Each procedure feeds into the Continuous Improvement Register and the Internal Audit Schedule under Policy 1: Governance and Compliance Framework. Outputs of each procedure (notices issued, decisions made, records created) are reviewed for trends, errors and continuous improvement opportunities at least annually.

19. Monitoring, Review and Continuous Improvement

DEG monitors compliance with this policy through:

- monthly checks by the VSL Administrator that SoCFs, Fee Notices and CANs have been issued within statutory timeframes for the preceding month;
- quarterly checks by the RTO Manager that census days are correctly published on the relevant RTO websites and accessible without login;
- annual internal audit of a sample of student VSL records against the VSL Recordkeeping Procedure;
- monthly AVETMISS submission validation and reconciliation;
- ongoing review of refund, re-credit, tuition protection and provider default events as they occur, with each event recorded in the Continuous Improvement Register and remediated as required;
- annual review of the Pricing Policy, the Statement of Fees and this policy by the CEO, CFO and General Manager, Operations, with Board endorsement of any material change; and
- out-of-cycle review wherever a change occurs in the VSL Act or Rules, the ESOS Act or National Code, the 2025 Standards for RTOs, the SAS Policy or Program Schedules, or material continuous improvement findings warrant it.

Continuous improvement actions, including changes to procedures, templates, forms or system controls, are tracked to closure and verified through subsequent audit cycles.

20. Related Policies and Documents

This policy is read together with the following DEG policies and authoritative documents:

- Policy 1: Governance and Compliance Framework (legislative compliance register, policy register, third-party arrangements, internal audit, continuous improvement);

- Policy 2: Student Lifecycle Policy (enrolment, orientation, fees disclosure at enrolment, certification and transition);
- Policy 3: Training and Assessment Policy (assessment principles, RPL and credit transfer, practical placement and clinic);
- DEG Pricing Policy - authoritative for pricing principles, fee setting and refund treatment;
- DEG Statement of Fees - authoritative for fee items, amounts, inclusions, exclusions, payment timing and refund treatment;
- DEG Privacy Policy - personal information handling, including TFN, USI and financial information;
- DEG Complaints and Appeals Policy - internal and external review pathways, including for re-credit, fees and refund disputes;
- DEG Harassment and Discrimination Policy;
- Student Handbook - student-facing summary of fees, VSL, withdrawals, refunds, tuition protection and government funding;
- Enrolment Contract and (for overseas students) the Written Agreement under National Code 2018 Standard 3;
- DEG Conditions of Enrolment;
- DEG Tuition Protection Statement.

21. Legislative, Regulatory and Funding Program References

This policy operationalises and aligns with the following:

Commonwealth legislation and instruments

- VET Student Loans Act 2016
- VET Student Loans Rules 2016 (in particular Parts 6, 7 and 8)
- VET Student Loans (Charges) Act 2016
- Higher Education Support Act 2003 (insofar as legacy VET FEE-HELP records and continuing HELP loan limit interactions apply)
- National Vocational Education and Training Regulator Act 2011
- 2025 Standards for Registered Training Organisations
- Education Services for Overseas Students Act 2000 (ESOS Act), in particular sections 19, 27-29
- National Code of Practice for Providers of Education and Training to Overseas Students 2018, in particular Standards 2, 3, 7 and 9
- Student Identifiers Act 2014
- Privacy Act 1988 and the Australian Privacy Principles
- Taxation Administration Act 1953
- A New Tax System (Goods and Services Tax) Act 1999
- Corporations Act 2001

- Australian Consumer Law (Schedule 2 to the Competition and Consumer Act 2010)
- Administrative Review Tribunal Act 2024 (and predecessor Administrative Appeals Tribunal Act 1975, as referenced in legacy provider documentation)

Queensland legislation and instruments

- Further Education and Training Act 2014 (Qld)
- Skills Assure Supplier Policy 2025-2028 (Department of Trade, Employment and Training)
- Skills Assure Supplier Agreement
- Program Schedule 3 - Career Start (effective 1 July 2025)
- Program Schedule 4 - Career Boost (effective 1 July 2025)
- Queensland Subsidised Training List (QSTL)
- Skills Assure Supplier Evidence Requirements

Departmental and authoritative guidance

- Department of Employment and Workplace Relations (DEWR) VET Student Loans Provider Manual and VSL Student Manual
- DEWR / Study Assist published VSL information (www.dewr.gov.au/vet-student-loans; www.studyassist.gov.au)
- Tuition Protection Service (TPS) framework and TPS Director publications
- VSL Tuition Protection Director publications