

1. POLICY STATEMENT

genU Karingal St Laurence (genU) is committed to ensuring fair and transparent application of fees, charges and refunds in accordance with VET regulator, funding contract requirements and all related legislative requirements.

2. PURPOSE OF POLICY & PROCEDURE

The purposes of this policy and procedure is to outline:

- (i) how and when Activ Pathways charges fees for courses
- (ii) how fees paid in advance are protected
- (iii) when and how students are required to make payments
- (iv) how refunds are processed

3. SCOPE

This policy and procedure applies to genU meaning: Karingal St Laurence Ltd and related bodies corporate, associations and trusts.

This policy and procedure applies to all Activ Pathways workers issuing and/or administering fees, charges and refunds and providing students with information regarding the protection of pre-paid fees, refunds and charges.

4. POLICY

4.1. Informing Students

In accordance with Outcome Standards and Compliance Requirements for RTOS 2025 and relevant state funding body fees policies, Activ Pathways provides students with (or directs them to) information on the following prior to enrolment and commencement:

- All fees that must be paid.
- Payment terms and conditions including deposits and refunds.
- Refund terms and conditions – e.g., how to request a refund and conditions under which a refund is provided.

4.2. Fee categories

Activ Pathways has three tuition fee levels for all training delivered (see [Appendix 1](#)).

In determining eligibility for funded training, Activ Pathways is bound by the requirements of:

- Department of Training and Workforce Development (DTWD) – Business Rules
- current DTWD Fees and Charges Policy

All prospective students will undergo an assessment of eligibility for any government funded training during the pre-enrolment process. For further information regarding Activ Pathways' process for assessing eligibility see Activ Pathways':

- Pre-Enrolment and Enrolment Procedure

Offer of funded places is at RTO's discretion with consideration to individual student circumstances which will be discussed at the time of Pre-Training Review.

Information on Government funded training can be found via the:

- Jobs and Skills WA website (<https://www.jobsandskills.wa.gov.au/>)
- [Jobs & Skills WA: Contractual requirements for registered training organisations](#)
- [DTWD Payment Tables](#)

4.3. Additional fees or charges

Students may incur additional fees above standard course fees that include but are not limited to those outlined in [Appendix 2](#).

There are no additional costs to students associated and under no circumstances is a fee to be applied to the following processes:

- Credit Transfer Fees – see Activ Pathways' Credit Transfer Procedure
- Reassessment – see Assessment and Reassessment Procedure

4.4. Fee waivers / exemptions – for government funded training

Activ Pathways may not charge course fees to students enrolling in funded training as per the fee waiver information/guidance of the:

- DTWD VET Fees and Charges Policy - [Fee Waiver Guidelines](#)

Where a student is experiencing extreme hardship/exceptional circumstances a fee waiver may be granted upon application. Students seeking fee waiver from any funded training must meet the requirements under the Fee Waiver Guidelines (Attachment C) of the DTWD VET Fees and Charges Policy .

Partial fee waivers are not permitted for funded training under the DTWD VET Fees and Charges Policy.

4.5. Protection of fees paid in advance

Activ Pathways requires that a prospective or current student does not prepay fees in excess of a total of \$1500. Therefore, students shall not be charged more than \$1500 at enrolment and no more than \$1500 per payment plan increment after the course has commenced.

It is Activ Pathways' policy to protect all prepaid fees by ensuring that if a student's enrolment is cancelled and not all agreed services are provided, he/she will:

- be placed into an equivalent course, if the new location is suitable to the student, and receive agreed services at no additional cost, or
- be paid a refund of all prepaid fees for services yet to be delivered

4.6. Fee payment

The student or third party is required to make payment for training and assessment services delivered as part of their enrolment contract. Students and/or the approved third party will receive an invoice for payment required.

Payments may be made via:

- Credit Card
- Direct Deposit
- BPAY
- Stripe

4.6.1. Charges and payment for funded training in Western Australia

Any charges and payments for students undertaking funded training in Western Australia must only be for units commencing in that calendar year. Charges and payments for units commencing in the next calendar must be held until confirmation by the department on the fees payable per the DTWD VET Fees and Charges Policy.

4.6.1. Payments required for Activ Pathways courses under this policy

Where fees are payable by a student or third party the parameters in Appendix 3 must be considered and applied to all enrolments.

4.7. Refunds

For full fee for service students, all requests for refunds must be made by the student in writing using the Application for refund of training fees form and sent to activpathwaysenquiries@gnu.org.au

Where a full fee paying student decides to withdraw from a course after they have enrolled, refunds are NOT made automatically. Applications for refunds must be made in writing to Activ Pathways, within the periods outlined below, for a refund to be considered.

4.7.1 Refunds – qualifications and skill sets

Students are eligible to apply for a refund per the table detailed in [Appendix 4](#).

4.7.3. Exceptional circumstances refund applications

If proof of extenuating circumstances is received, at the discretion of the General Manager Education & Training, Head of Qualifications and Funded Programs the student may:

- Be scheduled into a future booking of the same course at no further fee, or
- Receive a partial refund.

Any refunds for funded training delivered under the DTWD Business rules must comply with the current DTWD VET Fees and Charges Policy.

5. PROCEDURE

5.1. Informing students

Information regarding fees, charges and refunds is contained within the following documents, accessible through the Activ Pathways website (<https://www.activ.asn.au/pathways/>):

- Activ Pathways' Course Fee Information
- Activ Pathways' Student Handbook
- Activ Pathways' Fees, Charges and Refunds Policy and Procedure (this document)

- Activ Pathways website and course specific pages.

All prospective students must be directed to this information and provided with a copy of the Activ Pathways Handbook, along with an individualised Statement of Fees during the pre-enrolment process (even where a third party is paying the invoice). See Activ Pathways' Pre-Enrolment and Enrolment Procedure.

5.2. Referring students to Activ Pathways

5.2.1. Job seeker referrals

If an Employment Services Provider refers a job seeker on their caseload to a funded training place they may contribute to the cost of the course. This is determined through negotiation with the prospective student and provider. Activ Pathways will then invoice the course fees to student.

5.3. Determination of course fees / fee structure

Activ Pathways charges students in accordance with pre-determined and set fees (*to comply with DTWD funding requirements*) or through evaluation of comparable market fees (*for full fee for service*) for all courses delivered. Fees are also determined based on a range of variables including program duration, delivery methods and resource requirements.

The Senior Management Team is responsible for determining all fees and charges, which are reviewed on an annual basis, and for updating the Activ Pathways Fee Structure when changes to fees occur.

5.4. Fee waiver for extreme hardship / exceptional circumstances

An Application for Fee Waiver form must be completed by the relevant Training Manager, detailing reasons for the requested fee waiver. The completed form must be submitted to the Head of Qualifications and Funded Programs who will decide whether the waiver will be granted and inform parties accordingly.

If approved, the completed Application for Fee Waiver form must be added to the student's enrolment documentation and submitted to the Activ Pathways Administration Team for processing. A copy of the form must be retained on the student's file following enrolment, together with supporting documentation.

5.5. Fee structure and issuing statement of fees for all qualification students

An individualised Statement of Fees must be produced and provided to every prospective student prior to enrolment in a qualification with Activ Pathways. This includes students who are taking part in courses that are part of the Fee Free initiative, for which there are no fees. The statement of fees is to be generated via VETtrak.

Factors taken into consideration to determine an individual's fees include:

- Fee type / level – Standard, Full Fee, Concession. (See [Activ Pathways Pre-Enrolment and Enrolment Procedure](#) for further information regarding the process for assessing eligibility)
- Qualification and subsidy category (existing worker trainee, new worker trainee, PIT funding, VET Delivered in Secondary Schools etc)

- Whether a fee waiver/exemption applies
- Whether the prospective student has been granted Credit Transfers or will be assessed for any units via RPL.
- Offer of funded places is at RTO's discretion with consideration to individual student circumstances which will be discussed at the time of Pre-Training Review.

The Statement of Fees provided to student must include:

- Full student name and student number
- Future Skill WA Category (subsidy category)
- Code and title of program.
- Fee type (Funded - No Concession, Funded - Concession or Fee for Service)
- Enrolment date
- A list of all enrolled Units of Competence, specifying the withdrawal/census date, nominal hours, and associated fee
- Total cost to the individual for the course – considering any fee concessions, waivers, and reductions for Credit Transfers
- Any other applicable fees such as amenities or administration fees

Activ Pathways' statement of fees also include:

- Proposed start and end date

Please note: If an RPL Application is approved or a Credit Transfer is granted after the Pre-Enrolment and Enrolment process, a new adjusted Statement of Fees will be provided to the student.

5.6.1. Collecting payment for training services

Activ Pathways collects payment for training services via:

- Credit Card /Debit Card
- Direct Deposit
- BPAY
- Stripe

The method used for collecting payment will vary depending on the type of course, total amount payable and way in which prospective students have been referred to training.

5.6.2. Payment – qualification courses

The Activ Pathways representative completing a prospective student's PTR must ensure:

- Statement of fees is generated and provided to the student.

Students may also be informed that:

- For students receiving a funded training place, payment of applicable tuition fee prior to commencement of training is preferred and ensures the funded place in the preferred course is secured.
- Fees paid by a third party must be paid within a calendar month of the invoice being issued.

- In discussion with the relevant Training Coordinator the Training Manager may issue discretion up to 30 days from issuing of invoice which will occur after signing of enrolment offer.
- A 10% discount may be applied for full fees paid upfront directly to Activ Pathways, for Fee for Service Training.
- An invoice for fees already paid and remaining must be sent to the student or third party paying on behalf of student.

Payment plans made directly to Activ Pathways (at the Training Manager's discretion) can be negotiated between Activ Pathways and the student at the time of enrolment. The following requirements apply:

- All payment plans must be made via direct debit. Cash payment plans are not available. Remaining fees must be made via regular instalments over a maximum of three months from the date the enrolment offer is signed. The payment schedule must be recorded on a Direct Debit Request form.
- Details of the student's enrolment and details of why deferred payment was granted must be retained. Any payment plans in place for DTWD funded training must ensure fee increments are paid to align with commencement of units
- The Course Fees and Direct Debit Information (2G) form must be completed at enrolment, indicating the student's agreed/approved method of payment. For further detail see Activ Pathways' Pre-enrolment and Enrolment Procedure.
- If a student's account details change, the student is responsible for notifying Activ Pathways and providing the new details prior to the date of the next payment/instalment.
- For other terms and conditions please see the Karingal St Laurence Customer Direct Debit Service Agreement. Please note: A copy of this document must be provided to all students who chose to pay their fees via payment plan/direct debit.

All payments must be made in line with terms and timeframes provided to the student on the invoice or direct debit payment plan.

5.7. Late or non-payments

Students who are having trouble making payments on time are asked to call Activ Pathways and speak to an Activ Pathways representative to discuss alternative arrangements for payment during their period of difficulty. Payment plans may be re-negotiated at the discretion of Activ Pathways.

In the event of late/non-payment where Activ Pathways has not already been notified by the student, the relevant Coordinator will attempt to contact the student to negotiate a solution. If attempts to receive payment are unsuccessful, the student must not be enrolled in additional units unless appropriate arrangements are in place, and may be suspended or withdrawn from training. The General Manager Education & Training must approve any decision to suspend or withdraw a student due to non-payment.

In accordance with Division 2 Section 9 of Compliance Requirements for RTOs 2025, if the student still owes fees to Activ Pathways at the completion of the course, he/she will not be issued with a Certificate or Statement of Attainment until outstanding fees have been paid.

5.8. Refunds

5.8.1. Applying for a refund

A student who wishes to apply for a refund must complete an Application for Refund of Training Fees form obtained from Activ Pathways administration staff or relevant Coordinator. Where a funded student withdraws from study and does not complete an application for refund form, the refund must still be applied.

The student must complete the form and return to Activ Pathways via email to activpathwaysenquiries@genu.org.au within 30 days of being withdrawn* or cancelling participation in the course in which they are enrolled.

If required, the student is encouraged to seek assistance from the relevant Activ Pathways representative to complete their application for refund.

*Students withdrawing from qualification courses or skill sets must go through a formal withdrawal process. See Withdrawal Procedure.

5.8.2. Assessment and processing of refund applications

All Application for Refund of Training Fees forms must be forwarded to the relevant Training Manager for approval.

Applications for refunds in line with Activ Pathways' refund policy (3.7 Refunds) will be approved by the relevant Training Manager.

Any refunds outside of Activ Pathways' refunds policy must be approved by the General Manager Education & Training. The relevant Manager must inform the student of the outcome within 10 business days of receiving the application.

If approved, the relevant Manager is to document their decision on the Application for Refund of Training Fees form and submit the completed form to an Activ Pathways Administrator for processing. Once approved any refund will be payable by direct deposit within 30 days.

If not approved, the relevant Manager is to record their decision (and reason for non-approval) on the Application for Refund of Training Fees form.

A completed/processed Application for Refund of Training Fees form is to be retained on the student's file.

5.8.3. Appeals

A student who is dissatisfied with Activ Pathways' decision in relation to their application for a refund may choose to lodge an appeal following the process outlined under Activ Pathways' Complaints, Appeals and Compliments Policy and Procedure.

6. RESPONSIBILITY

Position	Responsibility
Chief Executive Officer (CEO) or their delegate	Is responsible for ensuring the RTO meets the obligations as per the Outcome Standards for RTOs, requirements under state-

Position	Responsibility
	based funding contracts and the general management of the RTO.
General Manager Education and Training	Is the delegate of the CEO responsible for ensuring the RTO meets the obligations as per the Outcome Standards for RTOs, requirements under state-based funding contracts and the general management of the RTO. Ensure adequate resources in place to support effective management and operations of the RTO.
Heads of Department	Ensure that all staff employed in the RTO are informed of this procedure upon induction and in an ongoing capacity. Ensure effective governance and management of fee collection, refunds and fee waivers per this policy and procedure. Work with Finance Department to ensure effective governance and management of fees.
Administrators	Ensure accurate Fees Statements and invoices are provided to students in a timely manner. Complete required actions to process applications for refund through to finance department
Finance	Process all financial transaction per genU policies and procedures.

7. RELATED DOCUMENTS

6.1. Related Policies and Procedures

- [Revenue Recognition Policy and Procedure](#)
- Activ Pathways Fee Structure
- [Activ Pathways Pre-enrolment and Enrolment Procedure](#)
- [Complaints, Appeals & Compliments Policy and Procedure](#)
- [Activ Pathways Complaints, Appeals and Compliments Work Instruction](#)
- [Activ Pathways RPL Procedure](#)
- [Activ Pathways Withdrawal, Deferral and Cancellation Work Instruction](#)
- [Activ Pathways Credit Transfer Work Instruction](#)
- [genU Karingal St Laurence Ltd Direct Debit Request Form](#)
- [Karingal St Laurence Ltd Customer Direct Debit Service Agreement](#)
- Activ Pathways Certification Issuance Work Instruction

- genU Study Now Pay Later (ZeeFi) Process

8. LEGISLATION & RELATED REFERENCES

Commonwealth legislation:

- National Vocational Education and Training Regulator Act 2011
- National Vocational Education and Training Regulator (Outcome Standards for Registered Training Organisations) Instrument 2025
- National Vocational Education and Training Regulator (Compliance Standards for NVR Registered Training Organisations and Fit and Proper Person Requirements) Instrument 2025
- Acts and Instruments (Framework Reform) Act 2015
- Vocational Education and Training Act 1996 (WA)
- Work Health and Safety Act 2011
- Australian Human Rights Commission Act 1986
- Age Discrimination Act 2004
- Disability Discrimination Act 1992
- Disability Standards for Education 2005
- Racial Discrimination Act 1975
- Racial Hatred Act 1995
- Sex Discrimination Act 1984
- Privacy Act 1988 and National Privacy Principles (2001)
- Fair Work Act 2009
- Skilling Australia's Workforce Act 2005
- Copyright Act 1968
- Competition and Consumer Act 2010

9. DEFINITIONS

Term	Definition
BPAY	Electronic Bill Payment System
Credit Transfer	Formal process of recognising previously completed units of competency
DTWD	Department of Training and Workforce Development
ESP	Employment Services Provider
Fee Structure	A document outlining Activ Pathways' course fees.
Pre-paid fees	Fees paid by the student which are attributed to services that have not yet been provided/delivered by Activ Pathways.
RPL	Recognition of Prior Learning

Statement of Fees	An individualised statement or quote produced by applying Activ Pathways' Fee Structure. A Statement of Fees contains accurate, relevant and up-to-date fees and charges information, and any other details required by the Standards for Registered Training Organisations 2025 and related funding contract requirements
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10. APPENDICES

Appendix	Summary
1	Student Fee Categories
2	Additional Fees and Charges table
3	Payment policy table
4	Qualification and Skill Set refunds table
5	Short courses (TUFW, Commercial, accredited and non-accredited) refunds table

11. RELATED RECORDS

Records must be maintained as per legal and contractual requirements. For guidance please refer to the [Records and Information Management Policy](#) and the [Records Retention and Disposal Schedule](#).

12. Appendix 1 – Fee categories

Fee Category	Description
Standard (Government Funded Training – Non Concession)	Students eligible for funded training in states in which Activ Pathways hold a funding contract or agreement may pay reduced fees. The standard fee payable by eligible individuals is determined by in force/current guidelines within the current DTWD VET Fees and Charges Policy
Concession	<p>A concession fee may be available to students who are eligible for a funded training place and hold a current:</p> <ul style="list-style-type: none"> a) Health Care Card issued by the Commonwealth; or b) Pensioner Concession Card; or c) Veterans Affairs Gold Card; or d) An alternative card or concession eligibility criterion approved by the Minister <p>The concessions provided for a) Health Care Card issued by the Commonwealth or b) Pensioner Concession Card also apply to a dependent spouse or dependent child of a card holder. Students must provide a copy of the relevant card at enrolment and a copy must be retained on the student's file.</p> <p>Additional concession categories may apply under the DTWD VET Fees and Charges Policy</p>
Full Fee	<p>Full fees are applicable to students</p> <ul style="list-style-type: none"> • who are not eligible for a government funded place in a qualification and/or skill set in any state that Activ Pathways holds a funded training contract or agreement. The offer of funded places is at RTO's discretion with consideration to individual student circumstances which will be discussed at the time of Pre-Training Review. • who are participating in a course that is not offered as part of a funded training program, including: JobSeeker Training though Training U For Work, Professional Development, Short Courses and eLearning through the Commercial Programs Team.

13. Appendix 2 – Additional fees and charges

Fee type	Description
Amenities fee	A “reasonable” amenities fee may be charged for services such as comfortable amenities and facilities for Fee for Service Training, but are not able to charge an amenities fee for funded training places
Materials / resource fee	Activ Pathways will not charge students a materials fee. Where applicable, students are to be directed to purchase any required materials / books from a third party. Under circumstances of financial hardship students may apply for a loan book to be provided by Activ Pathways which must be returned in good condition at the end of the class. If it is not returned in satisfactory condition the student must pay Activ Pathways the full retail price of the book.
Administration Fee	Activ Pathways are not able to charge an administration fee in relation to any funded training places and will not charge any administration fees for Fee for Service Training.
RPL fees	<p>Where a student wishes to apply for RPL for a unit(s) they are required to pay an Application Fee of \$250 (including GST). This fee allows Activ Pathways to decide regarding the student’s RPL application.</p> <p>During the application process Activ Pathways will determine the applicable fee for each RPL unit. This per unit fee is determined on a case-by-case basis, however, will be a minimum of \$250.00 and maximum of \$500.00. For students in receipt of Government funding, RPL costs still apply.</p> <p>All RPL costs must be paid up front, prior to the RPL assessment process commencing. Please see Activ Pathways’ Recognition of Prior Learning Procedure for further detail.</p>
Replacement Certificate and/or Statement of attainment	If a student loses or misplaces their original Statement of Attainment or Certificate, a replacement document can be provided for a charge of \$20.
Complaints and appeals	There is no cost for a student to make a complaint or appeal, or to have the outcome of a complaint or appeal reviewed internally, however if the student requests an external review by an independent body, costs may be incurred. The cost of the initial session with an independent body will be paid by Activ Pathways, however further costs incurred will be payable by the student/appellant/complainant (See Activ Pathways’ Complaints, Appeals and

Compliments Policy and Procedure for further detail).

14. Appendix 3

Course Type	Payment upon enrolment /prior to training required	Ongoing payment plans accepted	Payment Upon Completion of Training (via invoice) accepted	Minimum Payment	Maximum Payment
Qualification courses and Skill Sets	Yes	Yes	No	<p>Full payment is required within 30 business days of signing the enrolment offer.</p> <p>If paying via payment plan at the Training Manger's discretion, a minimum deposit of \$100 or 10% of the total course fee (whichever is greater) must be paid prior to commencement of the training post acceptance of the enrolment offer.</p>	<p>Full payment is required within 30 business days of signing the enrolment offer unless on a payment plan.</p>

15. Appendix 4 – Refunds: Qualifications and Skill Sets

Withdrawal / Course	Notification period of withdrawal / cancellation	Refund eligibility and fees still payable	Refund application	Refunds payable within
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Cancellation			period	
Student initiated withdrawal / cancellation	Between 1 – 5 days after signing the enrollment offer.	Refund of all fees paid	30 days of notification of withdrawal / cancellation	30 days of receipt of application
Student initiated withdrawal / cancellation	More than 5 days after signing the enrollment offer but prior to the course commencement.	<u>FFS</u> : If paying Activ Pathways directly refund of all fees paid; less a \$100 administration fee <u>Funded</u> : Refund of all fees paid	30 days of notification of withdrawal / cancellation	30 days of receipt of application
Student initiated withdrawal	On or after course commencement date (if beyond 5 days after signing enrollment offer)	<u>FFS</u> : Refund of all fees paid minus what has already been delivered <u>Funded</u> : Refund available if withdrawal occurs prior to census date set by Activ Pathways, per Withdrawal Work Instructions	30 days of notification of withdrawal	30 days of receipt of application
Activ Pathways initiated withdrawal (student breach of policy and procedure)	At any time after commencement of the course where a student has been found to be in breach of Activ Pathways' policies and procedures (e.g., in relation to attendance/engagement, academic or general misconduct)	No refund and full course fees payable	30 days of notification of withdrawal	30 days of receipt of application
Activ Pathways initiated course	Prior to course commencement where Activ Pathways cancel a course or is postponed for more than 4	Refund of all fees paid.	30 days of notification	30 days of receipt of

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Policy and Procedure

cancellation	weeks.		cancellation	application
Activ Pathways initiated course cancellation	After course commencement**	Refund of all fees paid minus what has already been delivered.	30 days of notification cancellation	30 days of receipt of application
Outside circumstances requiring course cancellation	Where, by reason or reasons beyond Activ Pathways' control, including Acts of Government authorities, civil strike and riots, the student is prevented from commencing a course	Refund all fees paid (at discretion of Activ Pathways)	30 days of notification cancellation	30 days of receipt of application