

POLICY

PPMF | TAFESA | 66

Title

TAFE SA Full Time Study Policy for recipients of Centrelink Student Benefits

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TAFE SA Policies are issued under the TAFE SA Policy Management Framework. They are binding on all TAFE SA employees.

Responsible Division Executive: Director, Student Experience

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1 Policy

The Full Time Study for Recipients of Centrelink Student Benefits established the principles, responsibilities and staff procedures for the provision of full time study load information as defined by the Social Security Act 1991 for students on receipt of a Centrelink Benefit.

2 Scope

This policy applies to all TAFE SA students who are in receipt of Centrelink benefits where the payment of that benefit is dependent upon the student maintaining a full time study load in the specified qualification.

Note: This policy relates to fulltime student benefits only (Austudy, ABSTUDY and Youth Allowance). Recipients of other Centrelink benefits must comply with conditions relevant to their payment (such recipients may be eligible for allowances- e.g. pensioner education supplement, in addition to their Centrelink payment when they undertake study).

3 Definitions

Word/phrase	Description
ABSTUDY	ABSTUDY provides help with costs for Aboriginal and Torres Strait Islander Australians who are studying an approved course or undertaking an Australian Apprenticeship
Act	The Social Security Act 1991
Austudy	Austudy provides financial help to full-time students and Australian Apprentices aged 25 or more.
Contact hours	TAFE SA uses the nominal hours of a curriculum/qualification as a guide to the number of contact hours in which a student is expected to participate.
CRN	Class Reference Number. This is unique identifier which applies to the delivery of a specific unit of competency, at a particular time, set of dates and location
Duration	TAFE SA describes the duration of a course in terms of calendar periods such as weeks, months or years. The duration for full time study for all qualifications is published as part of the course information on the TAFE SA website.
Exceptional Circumstances	Where a training provider schedules classes in such a way that a student is prevented from undertaking a full time load, Centrelink may determine that the student is still entitled to receive study benefits provided they are undertaking at least 75% of the Full time load.
Full time	The load that a student must undertake in order to complete a qualification within the published duration for the course
ID card	The card issued to all TAFE SA students. The card provides access to TAFE SA systems and services and also acts as a photographic identification card.
Nominal Hours	The anticipated hours of supervised learning or training deemed necessary to conduct training and assessment activities associated with the program of study. TAFE SA uses the nominal hours published in the Victorian Purchasing Guide
On line/External Study	Study where a student is not required to attend a campus and

	participates through self-directed study using on line or packaged materials. For Centrelink Student benefit purposes, students are to be advised of the duration and expected assignment submission and participation requirements to complete the unit(s) within the specified time for that unit
SIS	The online Student Information System used by TAFE SA
Student Benefits	Centrelink provides benefits to students undertaking full time study in an approved qualification with an approved provider as defined in the Social Security and Austudy legislation.
Youth Allowance	Youth Allowance provides financial help for young people (between 16-24 years of age) who are studying and training full-time, undertaking a full-time Australian Apprenticeship, or looking for work or sick.
VET	Vocational Education Training

4 Related policies –

PPMF TAFESA 140	Information Management - Records Management
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5 References

Australian Government Legislation Social Security Act 1991	Social Security Act 1991 (Cth)
Australian Government Legislation Privacy Act 1988	Privacy Act 1988 (Cth)
Standards for NVR Registered Training Organisations 2012	NVR
Government website Students and trainees	Department of Human Services Web page – Students and Trainee. Information on Student Benefits, including eligibility requirements and application guide

6 Procedure

<p>TAFE SA has dual responsibilities in the establishment and reporting of student study loads. Centrelink Student Benefits are contingent on full time study loads and TAFE SA has an obligation to report the study loads of Centrelink Student Benefits to that organisation, accordingly these procedures outline:</p> <ul style="list-style-type: none"> • What TAFE SA defines as a full time study load with respect to its delivered qualifications, • The process for ensuring TAFE SA students are provided with accurate information on study loads which may impact on their benefit entitlements across the student life cycle • TAFE SA obligations for reporting student information to Centrelink <p>This procedure is underpinned by Social Security legislation and the National VET regulator standards for Vocational Education and Training Providers</p>

6.1 Limitations

- Student Benefits are provided under the Social Security Act 1991 and administered through the Department of Human Services (Centrelink)
- All applications for student benefits should be made through Centrelink
- The information regarding Student Benefits shown in this Policy are for information purposes only to provide context to the processes
- Detailed information on Student Benefits can be found here-[Payments for students and trainees](#)

6.2 Study Load as Per the Act

- VET students have entitlement to request Student Benefits (e.g. Austudy, Youth Allowance etc.) under the Social Security Act 1991 if they are full time students.
- The Act defines full time study in terms of the number of contact hours per week undertaken by a student. This figure is established in the relevant section of the Act in terms Contact Hours per week (Sections, 541B (3), 593E, 1016PF)
- TAFE SA describes the content of qualifications and the duration (in calendar periods of weeks, months and years) so that students can understand the study commitments required to undertake and complete the qualification.

6.2.1 Determination of Full Time Status for a Student

- Fulltime Study load is derived from the total nominal hours to complete a qualification and the work group defined (advertised) duration for the completion of a qualification at a full time capacity. (e.g. Duration 12 months fulltime means that a student is considered to be full time if they are undertaking the required units to complete the qualification in 12 months).
- SIS compares a student hours based on the CRNs the student has registered in with the underlying fulltime study load for the qualification they are undertaking, on an hour per week basis, to ensure they meet the parameter of a fulltime study load for that qualification.
- Once that parameter is met a student can be issued with a Full time ID card.
- Enrolments into single units do not contribute to the calculation of a full time load unless the unit meets the packaging rules for the qualification as listed in the TAFE SA Training Plan.
- Enrolments into single units do not contribute to the calculation of a full time load unless the unit meets the packaging rules for the qualification as listed in the TAFE SA Training Plan.

6.2.1.1 Effect of On-line and External Delivery on Study Load

- For the calculation of FT status for Centrelink purposes, all open learning (on line or external) classes are to use the nominal hours of that unit in the calculation of the entitlement to a FT status based on the student's enrolment study load.

6.2.1.2 Effect of RPL on Study Load

- Centrelink does not count RPL as part of a full time study load

6.3 Identification of Full Time Student

- All students will be issued with a ID Card which is photographic card that contains the name of the student and their TAFE SA ID number, their date of birth, their signature and whether they are a full time student
- As SIS system uses nominal hours attached to the units a student is enrolled in to calculate the Study Load changes in enrolments may effect a student's full time status

6.3.1 Notification on change of enrolments

- To assist students in managing their obligations when they are in receipt of student benefits the SIS system will provide a warning message when a student changes their enrolment that it may affect their entitlement to full time study benefits

6.4 Other Centrelink Benefits

- Whilst this policy is specific to Student Benefits it is acknowledge that recipients of other Centrelink benefits (e.g. Disability Support Pension) may be eligible for allowances when engaged in study.

- The thresholds for full time study in these cases should be sought from Centrelink
- Recipients of these benefits will be only be eligible for a fulltime ID card if they meet the requirements of full time study as described in this policy

6.5 Centrelink Reporting

- TAFE SA is obliged to report the study loads of all recipients of Student Benefit payments to the required authority (Centrelink) on a regular basis
- This reporting involves the transmission of an extract file from SIS and includes student name, student ID number, qualification being undertaken and their enrolled study load, participation, attendance and results.
- Centrelink does verify a student's entitlement to receive study benefits and issues an overpayment claim wherever a student has not undertaken the required level of contact to complete the qualification in the specified duration for full time study. In some cases, prosecution action for fraud may be instigated by the Director of Public Prosecutions.

7 Responsibilities

7.1 TAFE SA staff responsibilities

Program Support Officers, Information Services Officers and Academic Staff

- Ensuring that students and prospective students are provided accurate information on course requirements in its publications
- Ensuring a Full Time status indicator on the TAFE SA ID card is only printed for those students who are enrolled in at least 15 hours of contact per week. The published duration of a qualification will be used to determine the expiry date of that status indicator.
- FT sticker is only issued to students meeting exceptional circumstances and this information is recorded in SIS along with the authorisation for issuance
- Ensuring that SIS accurately records the status of the student's study load so that in the event of an investigation by Centrelink, the audit trail of a student's enrolment hours, attendance and participation can be provided.
- TAFE SA staff are NOT to provide information on the legislative requirements for Student Benefits apart from:
 - providing information on whether or not the course is recognised for the payment of Student benefits and
 - what the participation requirements are for undertaking the course or unit in a full time capacity

Support Systems Staff

- Accurately reporting student enrolment details to relevant departments and administrative authorities such as Centrelink as defined by relevant legislation

7.2 TAFE SA student responsibilities

- Managing their applications and claims for student benefits
- Ensuring that they understand the requirements and time commitment required of a full time study load.

7.3 Review of TAFE SA Policy

TAFE SA Policy will be reviewed at least every two years, but may be actioned earlier according to strategic priorities, reforms or feedback received.

Appendix 1 – Fact Sheet – Centrelink Full Time Study Load

Where does Centrelink obtain information on the duration of a course?

Centrelink uses the TAFE SA Website to measure the duration of a course. This means that if course duration is defined on the website as 6 months full time, a student would be expected to enrol in all the units required to complete the course within that 6 months (one semester). Centrelink uses this duration to measure the period for which beneficiaries may continue to receive payments (“allowable time”). Allowable time varies between courses and payment types.

If a student enrolls as an external student or flexible delivery student for the above course, they would be expected to undertake all the units and be assessed in all the units within 6 months of enrolling, if they wish to meet the requirements for a Centrelink benefit as a full time student. External/ flexible delivery students often enrol in one unit at the beginning of a semester and then fail to enrol in further units, incurring large debts as a result.

What if a student enrolls in all the units to complete the course within the specified period but is granted RPL for some of the units?

Under current legislation a student is required to be enrolled in and **undertaking** a full time workload. RPL cannot be regarded as part of the workload for Centrelink purposes as the student would not be fulfilling the requirement to be **undertaking** this component within the course.

The reasoning behind the current Centrelink policy is that students seeking RPL for a particular competency are claiming that they have, through previous experience, already achieved the required skills and hence do not need to undertake any further study/practical experience in that area. They must provide evidence for their claims to achieve the competency, but this does not constitute study/ work/ etc. as this has already been done. Although they are enrolled in the unit, they are not **undertaking** it, and it is therefore not part of their current study load.

Although TAFE SA staff recognise that RPL is more involved than a credit transfer agreement/mutual recognition arrangement - and sometimes requires a student to invest as much time in preparing their evidence for RPL as it would to undertake the unit, **Centrelink does not consider RPL as part of a full time load.**

It is similar to granting credit from previous study. Centrelink would not count the workload of the study that has been granted credit.

Why does Centrelink ask for Student Enrolment Details when Auditing a Student’s Entitlement to Benefits?

Historically, nominal/ curriculum hours were used by Centrelink as a means to calculate study load, independent of the mode of course delivery (face-to-face, distance learning, etc.).

The nominal hours for the units of competency are provided by the Regulation unit. To determine study load for enrolments since 2007, Centrelink takes the modules/ units in which a student is enrolled in a given number of weeks, and divides the sum of the module hours by the number of weeks.

Why do students receive overpayment notices from Centrelink?

Where a student intends to complete a qualification as a full time student and enrolls in sufficient units to meet that requirement but then decides to only participate in a couple of units at a time for example, they will not be able to demonstrate that they are full time. Entitlement to a student support benefit will therefore be false and an overpayment will be raised.

What action will Centrelink take if a student claimed benefits as a full time student but enrolment details show that they were not full time?

Students who falsely claim that they are studying full time and fail to notify Centrelink of any changes to their enrolment as a full time student, will be issued with an overpayment (if indeed they are not full time students) and may well be prosecuted. It is absolutely critical that staff in TAFE SA provide students with accurate information about what constitutes a full time study load in a course and assist them to enrol in the appropriate units to complete the qualification within the duration specified on the web for that course. Under no circumstances should TAFE SA staff provide students with information on whether or not they are entitled to claim a Centrelink benefit as a full time student.

*(*concessional study loads – students should check with Centrelink)*

¹ *This fact sheet is not relevant for other Centrelink Benefits and what constitutes full time study*

² *The sections are: YA - subsections 541B(2) & (3); Austudy - s.569E; PES - s.1061PF.*

569E. Normal amount of full-time study

569E.(1) For the purposes of this Subdivision, the normal amount of full-time study in respect of a course is: (a) if: (i) the course is a course of study within the meaning of the Higher Education Support Act 2003; and (ii) there are Commonwealth supported students (within the meaning of that Act) enrolled in the course;

the full-time student load for the course; or

***[for TAFE SA]**(b) if the course is not such a course and the institution defines an amount of full-time study that a full-time student should typically undertake in respect of the course—the amount so defined; or*

*(c) otherwise—an amount of full-time study equivalent to the average amount of full-time study that **a person would have to undertake for the duration of the course in order to complete the course in the minimum amount of time needed to complete it.***

569E.(2) Without limiting subsection (1), the normal amount of full-time study in respect of a course is an average, taken over the duration of the period for which the person in question is enrolled in the course, of 20 contact hours per week.