ALL LEARNER REFUND POLICY 2025-2026

Advanced Learner Loans – Refunds Policy

1. Purpose and Scope

This policy sets out Green Labyrinth's position on refunds for learners funded through an Advanced Learner Loan (ALL). It applies to all learners who have taken out an ALL for a qualification delivered by Green Labyrinth, and to all staff involved in enrolment, IAG, administration, compliance, and finance.

The purpose of this policy is to:

- Ensure clarity, fairness, and consistency in how refund decisions are made.
- Protect the integrity of public funds administered through the Student Loans Company (SLC).
- Safeguard Green Labyrinth against financial, regulatory, and fraud risks.
- Comply fully with Department for Education (DfE) funding rules, SLC loan regulations, and the Provider Agreement.

2. Core Principles

1. **The Student Loans Company (SLC) is the body responsible for loan approvals, payments, and due-diligence checks.**

   SLC applies its own validation, identity, and eligibility checks before any loan is approved or paid. Green Labyrinth aligns to these processes and relies upon them for financial assurance.

2. **Green Labyrinth does not issue refunds of Advanced Learner Loans except in extremely limited circumstances.**

   An ALL is a contract between the learner and the SLC. The provider is not the lender, and therefore **refunds are not normally made by the provider**.

3. **Refunds will not normally be considered and will only be escalated where there is irrefutable and independently verifiable evidence of fraud**

   This threshold is deliberately high to ensure that public money and provider funds are protected.

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4. **Quality of teaching, learner satisfaction, or withdrawal from study do not automatically constitute grounds for a refund.**

Such matters are managed in accordance with the SLC rules through the established withdrawal, break-in-learning, and Change of Circumstance (CoC) processes.

Any concerns relating to delivery or continued participation must be raised promptly at the time they arise so that they can be appropriately addressed and, where applicable, notified to the SLC. Concerns raised retrospectively, after delivery has taken place or learning has progressed, will not normally result in any adjustment or refund of loan funding.

Green Labyrinth will not make any refund or repayment directly to a learner in respect of Advanced Learner Loan funding. Such payments are prohibited under the SLC regulations and the Provider Agreement and can only be managed through the SLC.

3. SLC Role and Due Diligence

Before authorising a loan, SLC undertakes:

- Identity verification
- Residency checks
- Eligibility confirmation
- Financial and application integrity checks
- Validation of the Learning and Funding Information Letter (LAFIL)
- Ongoing monitoring of provider CoC submissions

Because SLC carries out these checks, **Green Labyrinth relies on SLC determinations as authoritative** unless evidence demonstrates that the application itself was based on fraud.

4. Green Labyrinth Position on Refunds

4.1 No Refunds Except in Proven Fraud

Green Labyrinth will only refund loan payments to the SLC (never to the learner) where **all** of the following are met:

1. There is clear, documented, and verifiable evidence that the loan was obtained fraudulently.
2. The evidence is independent (e.g., police report, confirmed identity theft).
3. The circumstances meet the SLC's criteria for fraudulent loan applications.
4. The SLC confirms in writing that a "fraud refund" or "fraud reversal" is appropriate.
5. The DFE/SLC require the provider to return the funds.

4.2 Situations That Do Not Qualify for a Refund

Refunds will **not** be issued in the following circumstances:

- The learner withdraws voluntarily.
- The learner fails to attend or stops engaging.
- The learner is removed due to behaviour, safeguarding, or disciplinary breaches.
- Learner dissatisfaction with course content, delivery, pace, or tutor feedback.
- The learner changes personal circumstances (employment, health, childcare, relocation).
- Failure to complete assignments or assessments.
- Any case where SLC due-diligence was completed and no fraud is established.

In these cases, a standard CoC withdrawal or suspension must be processed, and SLC repayment terms remain between the learner and SLC.

5. Evidence Threshold for Fraud

To be considered “irrefutable”, evidence must be:

- Official (e.g., police crime reference number, Home Office or court documentation).
- Specific to loan misuse (e.g., evidence of identity theft, unauthorised signatures, forged documentation).
- Capable of independent verification.

Statements of dissatisfaction, perception, or dispute **do not** meet this threshold. **Green Labyrinth is under no obligation to investigate allegations that do not meet this evidential threshold and may decline to escalate such matters to the SLC.**

6. Provider Responsibilities

Green Labyrinth will:

- Provide full, compliant IAG prior to enrolment.
- Ensure the learner receives an accurate Learning and Funding Information Letter (LAFIL).
- Submit timely and accurate ILR data and CoC notifications to the SLC and DfE as appropriate.
- Retain robust records to support audit, funding assurance, and SLC checks.
- Cooperate with any SLC, DFE, or regulatory investigation.

Green Labyrinth will not:

- Circumvent SLC processes.
- Make direct payments or refunds to learners.
- Agree refunds for reasons outside fraud-based criteria.

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7. Learner Responsibilities

Learners are responsible for:

- Ensuring all information provided during the loan application is **true and accurate**.
- Understanding their repayment obligations to SLC.
- Attending scheduled sessions and engaging with the programme.
- Informing Green Labyrinth of any change that may affect their loan or learning.
- Using the SLC appeals or complaints process where appropriate.

8. Complaints and Appeals

Learners who wish to dispute a decision made under this policy may follow Green Labyrinth's formal Complaints Procedure.

Where the matter relates to SLC decisions (loan eligibility, repayments, interest, evidence requirements), learners must use the **SLC Complaints Procedure** as Green Labyrinth has no authority to overturn or amend SLC determinations.

The existence of a complaint or dispute does not suspend the learner's repayment obligations to the SLC unless and until the SLC determines otherwise.

9. Policy Review

This policy is reviewed annually or sooner if:

- DFE funding rules change
- SLC regulations change
- Funding assurance audits identify required amendments
- Legal or regulatory frameworks evolve

The Finance Director and ALL Contract Manager are jointly responsible for the review.

10. Summary Statement

Green Labyrinth recognises and respects the SLC's due-diligence processes. Refunds of Advanced Learner Loans are **not provided** except where **independently verified fraud** has occurred and the SLC directs a refund. This policy protects learners, public funds, and Green Labyrinth's regulatory position.

Nothing in this policy is intended to exclude or restrict any statutory rights a learner may have under the Consumer Rights Act 2015 or other applicable consumer protection legislation.

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