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# VPRBV POLICY: FEE REDUCTIONS, WAIVERS AND REFUNDS

VETERINARY PRACTITIONERS REGISTRATION BOARD OF VICTORIA

# **VERSION INFORMATION**

Document: VPRBV Policy: Fee reductions, waivers and refunds

Responsible persons: Maintained by the registration team; Responsible person: Chief Executive Officer; Approved by Board

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1.0	New policy	14 February 2023
1.1	<ul> <li>Policy revised to:</li> <li>Clarify approach to veterinary practitioners who convert from specific to general registration (both waivers and refunds may apply).</li> <li>Reword some parts of the policy for clarity.</li> </ul>	20 February 2024

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#### VETERINARY PRACTITIONERS REGISTRATION BOARD OF VICTORIA

# 1 PURPOSE OF THIS POLICY

Section 86(1)(b) of the *Veterinary Practice Act 1997* ("the VPA") provides that the Veterinary Practitioners Registration Board of Victoria ("the Board", "VPRBV") 'may fix a different fee for a different case and may allow for the reduction, waiver or refund, in whole or in part, of any fee'.

This policy contains the Board's general positions on fee reduction, waivers or refunds and describes the circumstances in which the Board will consider granting requests for different types of fee assistance.

Appendix 1 of this policy includes a summary of this policy in table format.

# 2 VPRBV SELF-FUNDING STATUTORY AUTHORITY

The VPRBV is a non-profit self-funding statutory authority whose mission is to protect the public and the health and welfare of animals through the regulation of the veterinary profession. The Board fixes its registration and service fees each year on a cost recovery basis. The revenue raised from fees enables the Board to maintain a small staff and undertake its functions, which include:

- registering persons so that they may hold themselves out as veterinary practitioners and veterinary specialists in Victoria
- investigating the professional conduct or fitness to practise of registered veterinary practitioners and imposing sanctions where necessary, and
- issuing guidelines about appropriate standards of veterinary practice and veterinary facilities.

Registration and service fees paid by individual veterinary practitioners support the regulation of the Victorian veterinary profession as a whole. The work of the Board provides assurance that persons practising in the veterinary profession in Victoria have the competencies to provide veterinary services in Victoria. This helps to protect the health and welfare of animals in Victoria and, by extension, the Victorian community.

# 3 GENERAL APPROACHES IN THIS POLICY

Some general approaches underlying this document are:

- 1. All registered practitioners in Victoria ("registrants") benefit from the Board's regulatory work, which plays a crucial part in maintaining veterinary professional standards and ensuring public trust in the veterinary profession.
- 2. Service fees are applied on a cost-recovery basis.
- 3. Due to resourcing and system constraints, fees are reduced or refunded in half-year increments (with some rare exceptions discussed in the section on waivers).
- 4. A registrant should not have to pay registration fees if they have already paid the same amount in registration fees for the relevant period.

# 4 FEE REDUCTIONS

#### 4.1 FFF REDUCTION POLICY

On request, the Board may agree to reduce registration fees in limited circumstances outlined in this section. An applicant for a fee reduction may be:

- a person applying to be granted registration in Victoria, i.e. not yet registered
- an existing registrant, e.g. applying for a fee reduction during the registration renewal period.

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Except as discussed in section 5.1.5, the Board does not reduce *service* fees (as opposed to registration fees) because the Board must recover the costs of work undertaken to process new applications, renew and maintain the registration of veterinary practitioners, and complete other registration-related tasks.

# 4.1.1 Applicable fees to be paid in full where no special circumstances

All applicants for general registration (including renewal of general registration) who will be practising in the period 1 July up to 31 December are expected to pay full registration fees unless they are a graduate registrant or can show to the Board that there are special circumstances that warrant payment of a reduced fee. More information: see section 4.1.2 below.

Graduates who register for the first time during the practising year pay half the full yearly fee.

Applicants who begin practice on or after 1 January up to 30 June pay half the full yearly fee. As the Board's registration fee is already discounted from 1 January, the Board does not further reduce fees for the second half of the practising year unless a person can show to the Board that there are special circumstances that warrant payment of a reduced fee.

#### Circumstances that are not considered special circumstances

Veterinary practitioners in the following circumstances are charged the same registration fees as full-time practising practitioners. The cost of administering the general registration of veterinary practitioners in the following circumstances is the same as for other registered veterinary practitioners, and the Board's regulatory work to uphold professional standards has the same value for all practitioners. Generally, the Board does not consider the following circumstances to constitute special circumstances:

- working part-time
- an ordinary or foreseeable absence from practice for part of a financial year, including parental leave
- retirement (maintaining general registration so can practise occasionally, including treating own animals)
- leaving Victoria for another jurisdiction, and the costs associated with relocation (see section 6 Refunds).

#### Alternatives if temporarily leaving practice for more than a year

Veterinary practitioners in the following circumstances may wish to consider converting their general registration to non-practising registration either permanently or for a temporary period:

- parental leave spanning longer than one practising year
- · working in a non-veterinary role for longer than one practising year
- retirement.

Fees for non-practising registration are substantially less than general registration fees, and non-practising registrants who later choose to convert back to general registration pay a conversion (from non-practising) fee which is lower than the service fees payable for a general registration application.

# 4.1.2 Special circumstances: financial or personal hardship

#### Definition of special circumstances

Special circumstances in relation to reduction of registration fees are those where an applicant for a reduced fee can demonstrate financial or personal hardship.

*Financial hardship* is considered to mean more than increased financial pressure. Financial hardship means difficulty paying for basic needs and meeting other financial obligations. A person could be considered to be in financial hardship if they were unemployed and looking for work (maintaining their registration so they can work as soon as they find a job) and on a low income such as a Government benefit.

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**Personal hardship** may reduce a veterinary practitioner's capacity to practise and trigger temporary or permanent financial hardship. Examples of personal hardship include:

- the applicant is affected by domestic or family violence
- the applicant or a close family member has serious ill-health or a disability, and while this has affected their income, they still want to keep working
- the applicant has had to leave their home and/or has lost income due to an extreme weather event.

#### Demonstrating evidence of special circumstances

An applicant for a reduced registration fee must provide sufficient information to satisfy the Board of their special circumstances. Examples of the information required from an applicant to demonstrate financial hardship include details of what has happened and when this happened (what has changed since their last registration if they are already registered), evidence of their employment and/or income, and an explanation of the impact of the registration fee on their ability to pay for basic needs and meet other financial obligations.

#### Board options when satisfied of special circumstances

Where the Board is satisfied that there are special circumstances, the Board will consider the information provided to decide whether the circumstances warrant reduction of the registration fee. Factors the Board may consider include the type of hardship and its expected duration, the applicant's employment situation, and their capacity to practise.

If the Board is satisfied that there are special circumstances that warrant reduction of the registration fee, the Board will charge a fee equivalent to half the full yearly registration fee.

If the Board is satisfied that there are special circumstances but *not* that they warrant reduction of the registration fee, the Board will offer the applicant a payment plan so they can pay in instalments over an agreed period.

#### Board decision when not satisfied of special circumstances

If on consideration of the information provided by the applicant, the Board is not satisfied that there are special circumstances that warrant either fee reduction or a payment plan, the Board will decline the fee reduction or payment plan.

# 5 FEE WAIVERS

# 5.1 WAIVER POLICY

While the Board may agree to reduce registration fees in special circumstance, the Board rarely fully waives registration fees for the reasons outlined in section 2 of this policy. Nor generally will the Board waive service fees because it must recover the costs of work undertaken to process registration applications, renew and maintain the registration of veterinary practitioners, and complete other registration-related tasks.

Some exceptions to this approach are outlined in this section.

# 5.1.1 New registrant starting practice within a month before end of year

Applicants granted registration within a month of the end of the practising year, i.e., between 1 and 30 June, are only required to pay a pro-rata amount of one month's registration fee because they will be renewing their general registration for a full year within a month of commencing practice.

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# 5.1.2 Specific registrant converting to general registration

If a veterinary practitioner who holds specific registration converts general registration during the practising year, the Board will waive general registration fees payable for the period up to 30 June of the current practising year if the registrant has already paid the equivalent amount in specific registration fees.

**Note**: The Board will also *refund* registration fees paid by the registrant for periods after 30 June of the current financial year. More information: see section 6.1.2.

A registrant whose period of specific registration ends *before* 30 June would be required to pay a pro-rata amount to make up the shortfall in fees payable for general registration. For example:

• For a 12-month period of registration: if a specific registrant who has paid registration fees up to 31 March 2023 converts to general registration in January 2023, they will pay 3 months' registration fees for the period 1 April to 30 June 2023. At renewal in June 2023, they will pay the full registration fee.

A specific registrant who converts to general registration must still pay fees to cover the costs of processing their application for general registration, e.g. application processing, fast track fees.

# 5.1.3 Non-practising registrants and former general registrants applying to convert, restore or re-register for general registration

#### Conversion to or from non-practising registration

The Board will charge a conversion processing fee to veterinary practitioners who apply to either:

- · convert their general registration to non-practising registration, or
- convert their non-practising registration to general registration.

A lower conversion fee (compared to application processing fees) is charged because they are already on the Register of Veterinary Practitioners with registration fees paid up to 30 June, and minimal administration is required to process the change in registration type.

Other fees payable at the time of conversion from non-practising to general registration include:

- the general registration fees which apply from the date the conversion takes effect to 30 June of the current practising year
- if the practitioner has not practised as a veterinary practitioner for a period of 3 or more years, a complex assessment fee so the Board can consider their competencies in general veterinary practice.

**Note**: See section 6.1.3 for refunds the Board may pay to veterinary practitioners who convert from general to non-practising registration before the second half of the practising year.

#### Re-registration or restoration of general registration

All former general registrants (whose names have been removed from the Register) who apply either to re-register for general registration or restore it under section 13 of the VPA (after failing to renew their registration) are expected to pay the general registration fee which will apply on the date their registration will take effect, unless the Board is satisfied that there are special circumstances that warrant payment of a reduced fee.

Applicants are expected to pay full application service processing fees to re-register or restore their registration.

# 5.1.4 Honorary registrants

The Board waives the fees of non-practising veterinary practitioners who have practised for 50 years or more. Only non-practising veterinary practitioners can be granted "honorary registration".

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While the Board recognises the essential contributions to the veterinary profession and community of veterinary practitioners who have practised in Victoria for 50 years or more, all veterinary practitioners with general registration are expected to pay full registration fees (unless the Board is satisfied that there are special circumstances that warrant payment of a reduced fee).

# 5.1.5 Waiver of registration fee in exceptional circumstances

The Board may decide to waive the registration fees of certain categories of veterinary practitioners in exceptional circumstances. An example of such a category is new applicants for registration who have applied to practise as veterinary practitioners for a limited period as unpaid volunteers in a veterinary emergency, e.g., a catastrophic weather event or biosecurity emergency.

Applications from individuals to fully waive registration fees, application processing fees or other fees in exceptional circumstances may be more appropriately considered under section 4.1.2 of the Board's fee reduction policy. If the fee reduction policy does not apply, the Board will consider such applications on a case-by-case basis.

# 5.1.6 Waiver of non-registration service fees

On a case-by-case basis on request or at its own initiative, the Board may waive other service fees in full or in part. Examples of service fees that may be waived include the fee to issue:

- a full or partial copy of the Register of Veterinary Practitioners, e.g., when shared with a Government department or the Australasian Veterinary Boards Council.
- a letter of professional standing (LOPS), where a veterinary practitioner lodges a repeat LOPs request within 3 months of the Board issuing a similar LOPs.

# 6 REFUNDS

# 6.1 REFUND POLICY

# 6.1.1 Refunds to registration applicants

An applicant for registration is eligible for a refund of the registration fee component of the fees they have paid if they withdraw their application before registration has commenced or if the Board refuses to grant them registration.

A graduate registrant is eligible for a refund of the registration fee component of fees already paid if they:

- withdraw their application before registration has commenced, or
- provide proof that they have registered in another State or Territory *and* surrender their registration in Victoria *within 30 days* of their registration commencing in the other jurisdiction.

In the circumstances described above, the Board will *not* refund any service fees paid for processing the application, including standard application processing fees, fast-track processing fees and complex assessment fees.

The Board does not give prospective refunds to persons who are only applying to be registered for the first half of the practising year (or part of it). Applicants are required to pay the full fee up front but may subsequently request a refund if they surrender their registration *before* 1 January. See section 6.1.3 below for more information.

# 6.1.2 Refunds to specific registrants

If a veterinary practitioner, holding specific registration converts to general registration, the Board will refund any registration fees paid for periods after 30 June of the current financial year minus a refund processing

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fee. For example:

 For a 36-month period of registration: if a specific registrant has paid registration fees up to 31 March 2026 and converts to general registration in January 2024, they will be refunded the fees paid for the period 1 July 2024 to 1 March 2026 (minus a refund processing fee).

**Note**: The Board will also *waive* payment of any general registration fees payable for the period up to 30 June of the current financial year if the registrant has already paid the equivalent amount in specific registration fees. More information: see section 5.1.2.

Application, complex processing and fast-track fees previously paid for a specific registration application are non-refundable. The registrant must also still pay fees to cover the costs of processing their application for general registration, e.g. application processing, fast track fees.

# 6.1.3 Refunds to practising registrants (general registration)

The practising year for veterinary practitioners who hold general registration is 1 July to 30 June. Registration fees are not refunded if a veterinary practitioner has practised (or been able to practise) for any portion of the first half of the practising year (i.e., from 1 July to 31 December), unless the Board is satisfied that there are also special circumstances that warrant a refund.

If a veterinary practitioner surrenders their registration on or before 31 December, i.e., before the second half of the practising year commences, on request the Board will refund half the yearly registration fee minus a refund processing fee.

The Board will not refund registration fees if a veterinary practitioner has practised (or been able to practise) for any portion of the second half of the practising year (i.e., from 31 December to 30 June), unless the Board is satisfied that there are also special circumstances that warrant a refund. Examples of special circumstances for refunds include those listed in section 4.1.2 of this policy, and where the veterinary practitioner has asked to be removed from the Register because:

- they cannot practise at all due to personal illness
- they had to return to their home State or country due to the illness or death of a family member or a global emergency such as the COVID-19 pandemic.

# 6.1.4 Refunds to non-practising veterinary practitioners

If a veterinary practitioner converts from general to non-practising registration before 31 December, the Board will refund the difference between the non-practising registration fees payable and the general registration fees already paid for the period 1 January to 30 June.

# 6.1.5 Refunds where registration cancelled

The Board may cancel the registration of a veterinary practitioner either as a result of disciplinary proceedings or under section 7AA of the VPA if a veterinary practitioner who holds specific registration is unable to comply with a condition on their registration.

If the Board has cancelled the registration of a veterinary practitioner in the first half of the practising year, and the practitioner requests a refund of registration fees for the second half of the practising year on the basis of special circumstances, the Board may refund those fees if it is satisfied that there are special circumstances that warrant a refund (see section 4.1.2).

# 6.1.6 Refund to estate of deceased veterinary practitioner

Where a request for a fee refund is received from the estate of a deceased veterinary practitioner, the Board will refund the second half year's fees if the practitioner died during the first half of the practising year.

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If the estate requests a full refund, the Board will decide on a case-by-case basis whether to offer a refund. It may be appropriate to provide a refund of full fees if the estate provides information indicating that the veterinary practitioner was in financial or personal hardship before they died or their family is currently in hardship.

#### 6.1.7 Refund of late fees at renewal

The Board will refund all or part of a late fee for renewal of registration, on the request of the affected veterinary practitioner, if it is satisfied that there are special circumstances that warrant refund of the late fee. Special circumstances include where the practitioner was unable to lodge an application on time due to factors beyond their control, such as ill health.

# 7 WHEN THE BOARD DECLINES FEE ASSISTANCE

If after considering the information provided to it, the Board declines to reduce, waive or refund fees, or offer a payment plan, its decision is final and there is no appeal process.

# 8 ADMINISTRATION OF FEE ASSISTANCE

An applicant for fee assistance may request:

- a refund of registration fees by submitting the Board's Fee refund request form, or
- a waiver or fee reduction of registration or other fees by submitting the Board's Fee assistance statutory declaration. After receiving a statutory declaration, Board staff may ask the applicant for more information.

The Board will assess the request and decide whether to grant the required fee reduction, payment plan, waiver or refund. The Board may offer a payment plan to the applicant instead of a fee reduction.

Board staff will advise the applicant of the Board's decision, and the process for implementing that decision, in writing; and will then implement any agreed fee reduction, payment plan, waiver or refund.

#### Fee reductions

The Board requires any reduced fee to be paid in full by the time it is due.

Where the Board offers a payment plan, the Board usually requires an applicant to pay the full amount within 3 months in 4 instalments, making a first instalment initially, then paying further instalments at the end of each successive month.

The Board will consider making reasonable adjustments to a payment plan, e.g., if the applicant is in extreme financial hardship. If a payment plan is adjusted, the veterinary practitioner must pay the full amount within 6 months of the agreement commencing.

Where a practitioner does not pay the full amount by the agreed end date, their name will be removed from the Register of Veterinary Practitioners. No refunds will be issued for payments already made.

#### Waivers

Some of the waivers discussed in this policy will be applied automatically (at the time a fee invoice is raised) without requiring registrants to apply for a waiver.

Individual applications to waive fees will be considered on a case-by-case basis.

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#### Refunds

All registered veterinary practitioners who request refund of registration fees will be charged a refund processing fee to cover the additional staff time involved in administering pro rata fees or refunds. The refund processing fee will be deducted before registration fees are refunded.

The refund processing fee will not be charged if the Board decides not to refund fees.

New applicants for registration who apply for a refund will not be charged the refund processing fee because they will forfeit the non-refundable application processing fees they have already paid.

# 9 PRIVACY AND COLLECTION OF INFORMATION

The personal information collected from veterinary practitioners or other stakeholders who request fee reductions, waivers or refunds is collected, used, disclosed (internally) and stored to fulfil the Board's functions under the *Veterinary Practice Act 1997* ("the VPA") as provided for under Section 86(1)(b) of the Act.

When implementing this policy, Board members and staff will adhere to secrecy provisions of the VPA, the Board's <u>Privacy and Data Collection Policy</u>, and the Victorian *Privacy and Data Protection Act 2014*.

Applicants for fee reductions, waivers or refunds will be advised of their personal information privacy rights and the Board's actions to maintain their personal information policy at the time their information is collected.

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# **APPENDIX 1: POLICY SUMMARY**

Circumstances of request	Consideration	Outcome
Fee reduction requests		
Working part-time	No special circumstances advised	No fee assistance
	Special circumstances demonstrated, e.g., financial hardship	Fee reduction or payment in instalments
Ordinary or foreseeable absence from	No special circumstances advised	No fee assistance
practice for part of financial year including parental leave	Special circumstances demonstrated, e.g., financial hardship	Fee reduction or payment in instalments
Retirement	No special circumstances advised	No fee assistance
	Special circumstances demonstrated, e.g., financial hardship	Fee reduction or payment in instalments
Financial or personal hardship, e.g., low income and cannot meet basic needs and financial commitments; reduction in capacity to practise either temporarily or permanently	Special circumstances demonstrated	Fee reduction or payment in instalments
Fee waivers (automatic or requested)		
Specific registrant converting to general registration	General registration fees where equivalent amount in specific registration fees already paid for to 30 June	Registration fees applied against their general registration till year their specific registration would have expired (do not have to renew till that year)
	Registration fees not fully paid up to 30 June of year converting registration	Registrant pays pro-rata registration fees (calculated per month).
New registrant starting practice within a month before the end of the practising year	Will be renewing their registration before 30 June, within a month	Registrant pays pro-rata registration fees, e.g., one month's fees. Pays application service fees
Non-practising registrant converting to general registration	Has been paying fees to remain on the Register of Veterinary Practitioners	Pays an administrative fee less than application fee, e.g., \$60 vs \$194
Former general registrant re-	No special circumstances advised	Pay full registration fees and application fees
registering or restoring registration	Special circumstances demonstrated, e.g., financial hardship	For registration fee component – reduction or payment in instalments Pays full application fees
Registrant has practised for 50 years	General registration	No fee waiver
or more	Non-practising registration	Fees waived
Fee refunds		
Applicant for registration withdraws their application before registration commences but after paying fees	N/A	Registration fees refunded Application and other services fees not refunded.

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Circumstances of request	Consideration	Outcome
Removed from Register in first half of practising year	Graduate registrant surrenders registration within 30 days of being granted registration	All registration fees refunded Application and other services fees not refunded.
	Not graduate and no special circumstances advised	Refund of second half year's fees only minus refund processing fee
	Special circumstances demonstrated, e.g., financial hardship	Case-by-case consideration of fee refund for first half year's fees. If granted, minus refund processing fee.
Leaving Victoria and removed from	No special circumstances advised	No refund
Register in second half of practising year	Special circumstances demonstrated, e.g., financial hardship	Case-by-case consideration of fee refund for first half year's fees. If granted, minus refund processing fee.
Specific registrant converting to general registration	Specific registration fees paid for periods after 30 June of current practising year	All registration fees refunded for periods after 30 June of current practising year
Registrant whose registration is cancelled (if they request refund)	Registration cancelled in first half of practising year	Refund of second half year's fees if special circumstances, minus refund processing fee.
	Practised in first and second half of practising year	No refund unless special circumstances. If granted, minus refund processing fee.
Deceased practitioner (request from estate providing evidence)	Deceased in first half of practising year	Second half year's fees refunded.  First half year's fees may be granted if special circumstances on case-by-case basis. If granted, minus refund processing fee.
	Practised in first and second half of practising year. Consider any special circumstances advised by estate.	No refund unless special circumstances, in which case part or full refund on case-by-case basis. If granted, minus refund processing fee.
Service fees:     Renewal late fees     Register of veterinary practitioners     Letter of professional standing	Consider reasons provided including any special circumstances demonstrated	Case-by-case decision re waiver or reduction