

## Wyndham Community and Education Centre Inc Policy and Procedure

Policy name	<b>Concessions, Fees, Charges and Refunds</b>
Responsible person	Chief Operating Officer, Chief Financial Officer
Staff involved	CEO, Education Manager, RTO Manager, VCAL & Youth Manager, Pre-Training Assessors (VET, VCAL, LLN), VET Coordinator, LLN Coordinator, Short Course Coordinator, Finance Coordinator, Administration Staff, VCAL Admin Staff, Compliance & Reporting Staff
Review dates	2020
Related documents	<p><b>Legislation:</b> National Vocational Education and Training Regulator Act 2011 (Cth), Education Training and Reform Act 2006 (Vic), Children, Youth and Families Act 2005 (Vic), Corrections Amendment Act 1996 (Vic), A New Tax System (Goods &amp; Services Tax) Act 1999, Schedule 2 – The Australian Consumer Law, The Competition &amp; Consumer Act 2010 (Vol 3.)</p> <p><b>Policies:</b> Recognition of Qualifications Issued by Other RTOs Policy &amp; Procedure, Records Management &amp; Record Keeping Policy &amp; Procedure, Victorian Training Guarantee Program Reporting Policy &amp; Procedure, Debt Collection Policy &amp; Procedure, Issuing Certificates Policy &amp; Procedure, VCAL Student Selection, Enrolment, Induction &amp; Delivery Policy &amp; Procedure, Student Selection, Enrolment &amp; Induction (VET) Policy &amp; Procedure, Student Selection, Enrolment &amp; Induction (FS) Policy &amp; Procedure, Recognition of Prior Learning Policy &amp; Procedure</p> <p><b>Other:</b> Determining Eligibility Procedure, Skills First 2019 Guidelines about Fees, VRQA Guidelines for VET Providers, Essential Conditions &amp; Standards for Continuing Registration, Standards for Registered Training Organisations (RTOs) 2015, Setting Fees Procedure, 2019 Pre-Accredited Purchasing Package &amp; Guide, Fee Schedule (Skills First Subsidised Training), Fee Schedule (Fee-for-Service Training), Statement of Fees (VCAL, LLN, VET), Fees by Enrolment Start Date Schedule, Fees by Unit of Competency Schedule, Request for Payment Plan, Request for Fee Reduction or Fee Waiver, Victorian VET Student Statistical Collection Guidelines, Student Statistical Report, Enrolment Form, Charging &amp; Collecting Fees Procedure, Cash Handling Procedure, Digital Wallet – Concession Provider Fact Sheet, General Information for Participants</p>

### **POLICY**

Wyndham Community and Education Centre Inc. (Wyndham CEC) delivers Skills First subsidised courses, Adult Community and Further Education (ACFE) subsidised courses and courses that are not government subsidised, known as fee-for-service courses.

Eligibility for Skills First and ACFE subsidised courses are determined prior to enrolment (see Determining Eligibility procedure).

To set, charge and collect tuition fees, service & amenities fees, and to issue refunds for Skills First subsidised courses, Wyndham CEC complies with the ‘Skills First Guidelines about Fees’, the ‘VRQA Guidelines for VET Providers’ and the ‘Essential Conditions and Standards for Continuing Registration.’

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This document was reviewed and accepted by the Board of Governance of the Wyndham Community and Education Centre Inc on 01/02/2019 and supersedes all previous versions.

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To set, charge and collect tuition fees, service & amenities fees, and to issue refunds for ACFE subsidised courses, Wyndham CEC complies with the '2019 Pre-Accredited Purchasing Package & Guide'.

To set, charge and collect tuition fees, service & amenities fees, and to issue refunds for fee-for-service courses Wyndham CEC complies with the 'VRQA Guidelines for VET Providers' and the 'Essential Conditions and Standards for Continuing Registration.'

To charge and collect tuition fees, service & amenities fees, and to issue refunds for all courses, Wyndham CEC complies with 'A New Tax System (Goods & Services Tax) Act 1999'.

### **PROCEDURES**

#### **1. Skills First subsidised courses**

##### **1.1 Setting fees**

- Wyndham CEC's Chief Operating Officer and Chief Financial Officer set tuition fees, service and amenities fees and text book costs in October each year for the following year, and on a case by case basis, subject to Department guidelines and market conditions. Wyndham CEC has a written procedure for setting fees – see Setting Fees Procedure.
- Based on the fees set above, the Education Manager develops and distributes a 'Fee Schedule (Skills First Subsidised Training)' to the COO, the CFO, Training Service Managers and Coordinators, the Business Services Manager and the Compliance & Reporting Team.
- The Marketing & Technology Coordinator publishes the 'Fee Schedule (Skills First Subsidised Training)' on Wyndham CEC's website.
- Should there be any changes to Wyndham CEC's fees at any time, the Education Manager is responsible for organizing changes to the 'Fee Schedule (Skills First Subsidised Training)' and for ensuring the schedule is updated on Wyndham CEC's website.

##### **1.2 Applying fees**

- Based on the 'Fee Schedule (Skills First Subsidised Training)', 'Statement of Fees' are created by the VCAL & Youth Manager for VCAL courses, the Education Manager for LLN courses and the RTO Manager for VET courses.
  - 'Statement of Fees' includes standard and concession tuition fee rates, services and amenities fee rates, textbook costs and the approximate value of the funding provided by government towards the course in which the individual is considering enrolment.
- A 'Statement of Fees' is provided to the Pre-training Assessor by the VCAL & Youth Manager for VCAL courses, the Education Manager for LLN courses and the RTO Manager for VET courses.
- Prior to enrolment, the Pre-Training Assessor supplies each individual with a 'Statement of Fees', being an itemised list of all fees required for the course. Prior to issuing, on a case by case basis, the 'Statement of Fees' is individualized based on the following principles.

##### **i. Enrolment in a course (pro-rata)**

- An individual enrolling in VCAL is charged the following
  - Term 1 – 100% of student fee
  - Term 2 – 75% of student fee
  - Term 3 – 50% of student fee
  - Term 4 – 25% of student fee

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- An individual enrolling in LLN is be charged pro-rata using the ‘Fees by Enrolment Start Date Schedule’
- An individual enrolling in VET is charged by the number of units of competency to be undertaken, using the ‘Fees by Unit of Competency Schedule’

### **ii. Credit transfer**

- A tuition fee is not charged for any Unit of Competency that is a credit transfer (see ‘Recognition of Qualifications Issued by other RTOs Policy & Procedure’).

### **iii. Financial hardship**

- In circumstances of financial hardship, individuals can request to be considered for a Wyndham CEC payment plan and/or a Wyndham CEC fee reduction or waiver.
- Pre-Training Assessors ensure a ‘Request for Payment Plan’ or ‘Request for Fee Reduction or Fee Waiver’ form is completed by the individual and lodged with a Training Services Manager or the COO / CFO by one working day following the PTA Interview.
- Requests are considered by a Training Services Manager and/or the COO / CFO on a case by case basis and a response will be given within two working days of receiving it.

### **iv. Skills First Tuition fee waivers/exemptions**

- The Pre-Training Assessor sights and retains copies of all documentation demonstrating an individual’s eligibility for the Skills First Tuition fee waiver/exemption. Wyndham CEC does not charge a tuition fee for enrolment for an individual who is from the Judy Lazarus Transition Centre, a young person on a community based order or a young person referred by the Skills First Youth Access Initiative.
- All documentation demonstrating an individual’s eligibility for the Skills First Tuition fee waiver/exemption is retained for audit or review purposes, and in accordance with Wyndham CEC’s ‘Records Management & Record Keeping Policy & Procedure’.
- Wyndham CEC’s Compliance & Reporting team reports to the Department all tuition fee waivers/exemptions granted in accordance with the Victorian VET Student Statistical Collection Guidelines (see ‘Victorian Training Guarantee Program Reporting Policy & Procedure’).
- The Pre-Training Assessor notes that they have provided an individual with a Statement of Fees and determined any individualization of the fees to be charged on the ‘Enrolment Interview Checklist 2019’ (VET, VCAL, LLN).
- The Pre-Training Assessor ensures that the individual signs their Statement of Fees, as written acceptance including the cost of Certificate reprints.

## **1.3 Applying fee concessions**

### **Concession fees - general**

- At the PTA Interview, the Pre-Training Assessor sights and retains copies of all documentation demonstrating an individual’s eligibility for a fee concession for audit or review purposes, and to meet the requirements of Wyndham CEC’s ‘Record Management and Keeping Policy & Procedure’.

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- For enrolments in courses at the Certificate IV level and below, Wyndham CEC charges a concession fee, prior to the commencement of training (valid on the day of commencement), to an individual who holds a current and valid:
  - a. Health Care Card issued by the Commonwealth;
  - b. Pensioner Concession Card; or
  - c. Veteran's Gold Card; or
  - d. an alternative card or concession eligibility criterion approved by the Minister for the purposes of these Guidelines
- The concessions provided for in (a) and (b) also apply to a dependant spouse or dependent child of a card holder.
- For enrolments at Diploma level, Wyndham CEC sets and charges a concession fee based on market conditions.
- Before the completion of a course, if an individual who was previously eligible for a concession becomes ineligible for the concession, this does not affect the tuition fees payable for the enrolment.
- Where a concession card is presented to the Pre-Training Assessor via a Digital Wallet through a Centrelink Express Plus mobile application, the Pre-Training Assessor must sight and authenticate the card by viewing the card directly through the Centrelink Express Plus mobile application of the card holder's mobile device. Such cards may not be sighted via a screenshot of the card that is emailed or otherwise produced.
- Wyndham CEC's Compliance & Reporting team reports to the Department all fee concessions granted by Wyndham CEC in accordance with the 'Victorian VET Student Statistical Collection Guidelines' (see 'Skills First Program Reporting Policy & Procedure').

### **Indigenous Completions Initiative**

- Under the Indigenous Completions Initiative, for enrolments in a course at any level Wyndham CEC charges the concession fee to individuals who self-identify as being of Aboriginal or Torres Strait Islander descent (and reports as such through the 'Indigenous Student Identifier' field of the Student Statistical Report).
- The Pre-Training Assessor retains a copy of the enrolment form on which the individual self-identified as indigenous.

### **1.4 Charging & Collecting Fees**

- The total student fees payable by an individual is recorded on the Enrolment Form by the Pre-Training Assessor.
- After enrolment Wyndham CEC charges and collects fees that involves issuing all students with an Invoice. Wyndham CEC has a written procedure for charging and collecting fees – see Charging & Collecting Fees Procedure.
- When charging fees, Wyndham CEC adheres to the following principles
  - Tuition fees up to \$1,000 are due before the commencement of a course unless a Payment Plan has been approved. Wyndham CEC will not collect more than \$1,000 before the commencement of a course.
  - Course fees collected before the commencement of a course are held in a liability account until the commencement of the course.
  - For all courses over \$1,000, a scheduled payment plan is implemented following commencement of a course to ensure that any additional fees collected in advance for that course does not exceed \$1,500. This complies with Option 3 of AQTF Condition 5, Financial

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Management, which Wyndham CEC has adopted in relation to collection and protection of fees.

- When charging a services and amenities fee, students have the option of purchasing equivalent materials that can be sourced externally if they choose to. In this circumstance, the services and amenities fee would be reduced accordingly.
- A fee will be charged for the assessment of Recognition of Prior Learning, if the assessment is conducted at the request, or with the consent of the student. This fee will be the same as the fee-for-service tuition fee set for each course.
- Qualifications and Statements of Attainment are not issued until all fees have been paid (see Certification Procedure for further information).
- In the event of overdue payments, students are followed up by the Business Services Unit adhering to Wyndham CEC's Debt Collection Policy & Procedure.
- Wyndham CEC does not charge a fee if a student is required to re-sit an assessment
- In the event a student is deemed 'Not Yet Competent' (NYC) the following principles will apply
  - Staff will work with students who are assessed as NYC and provide opportunities to satisfactorily complete units of competency to achieve a 'Competent' (C) result where possible. Wyndham CEC does not charge a fee in this case.
  - Students will have one month from the last day of training/timetabled classes to meet all of the requirements of the program they are enrolled in. Wyndham CEC is not obliged to accept any work or assessment beyond this date.
  - Beyond this date, students will need to re-enrol in a program and pay the relevant fees and charges.

### **1.5 Refunds**

- If a student withdraws, by written notice (letter, email, fax), from Skills First subsidised training at any time up until 4 weeks after the scheduled commencement date of the course, Wyndham CEC will refund the tuition fees paid.
- Where materials have been supplied for a course, and a student withdraws, no refund of the Services and Amenities fee will be given.
- No refund is available where a student withdraws from Skills First subsidised training at any time after 4 weeks of the scheduled commencement date.
- If a student withdraws from Skills First subsidised training at any time after 4 weeks of the scheduled commencement date and the student is on a payment plan, fees must still be paid.
- If a course is cancelled by Wyndham CEC at any time during the period of a student's enrolment, then Wyndham CEC will refund the tuition fees and service and amenities fees in full.
- In the unlikely event that Wyndham CEC ceased operation at any time during the period of a student's enrolment, then Wyndham CEC will refund the tuition fees and service and amenities fees in full.
- The procedure for requesting and issuing a refund is outlined in the 'Charging & Collecting Fees Procedure'.

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### **2. ACFE subsidised courses**

#### **2.1 Setting fees**

- Wyndham CEC's COO & CFO set tuition fees, service and amenities fees and text book costs for ACFE subsidised courses in October each year for the following year, and on a case by case basis, subject to ACFE guidelines and market conditions. Wyndham CEC has a written procedure for setting fees – see Setting Fees Procedure.

#### **2.2 Applying fees**

- Prior to enrolment, a Pre-Training Assessor or administration staff will supply each individual with an Invoice, being an itemised list of all fees and materials required for the course. Prior to issuing, on a case by case basis, the 'Invoice' is individualized based on the following principles.

##### **i. Financial hardship**

- In circumstances of financial hardship, individuals can request to be considered for a Wyndham CEC payment plan and/or a Wyndham CEC fee reduction or waiver.
- Pre-Training Assessors or administration staff should ensure a 'Request for Payment Plan' or 'Request for Fee Reduction or Fee Waiver' form is completed by the individual and lodged with a Training Services Manager or the COO / CFO by one working day, for consideration.
- Requests will be considered by a Training Services Manager and/or the COO / CFO on a case by case basis and a response will be given within two working days of receiving it.

#### **2.3 Applying fee concessions**

##### **Concession fees - general**

- At enrolment, the Pre-Training Assessor or administration staff must sight and retain copies of all documentation demonstrating an individual's eligibility for a fee concession for audit or review purposes and to meet the requirements of Wyndham CEC's 'Record Management and Keeping Policy & Procedure'.
  - For enrolments in ACFE subsidised courses, Wyndham CEC will charge the concession fee to an individual who, prior to the commencement of training, holds a current and valid:
    - a. Health Care Card issued by the Commonwealth;
    - b. Pensioner Concession Card; or
    - c. Veteran's Gold Card; or
    - d. an alternative card or concession eligibility criterion approved by the Minister for the purposes of these Guidelines
  - The concessions provided for in (a) and (b) also apply to a dependant spouse or dependent child of a card holder.
  - Before the completion of a course, if an individual who was previously eligible for a concession becomes ineligible for the concession, this does not affect the tuition fees payable for the enrolment.
- Where a concession card is presented via a Digital Wallet through a Centrelink Express Plus mobile application, Wyndham CEC staff must sight and authenticate the card by viewing the card directly through the Centrelink Express Plus mobile application of the card holder's mobile device. Such cards may not be sighted via a screenshot of the card that is emailed or otherwise produced.
- Wyndham CEC's Compliance & Reporting team will report to the Department all fee concessions granted by Wyndham CEC in accordance with the 'Victorian VET Student Statistical Collection Guidelines' (see 'Victorian Training Guarantee Program Reporting Policy & Procedure').

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### **Indigenous Completions Initiative**

- Under the Indigenous Completions Initiative, for enrolments in a course at any level Wyndham CEC must charge the concession fee to individuals who self-identify as being of Aboriginal or Torres Strait Islander descent (and are reported as such through the 'Indigenous Student Identifier' field of the Student Statistical Report).
- Wyndham CEC must retain a copy of the enrolment form on which the individual self-identified as indigenous.

### **2.4 Charging & Collecting Fees**

- After enrolment Wyndham CEC charges and collects fees. Wyndham CEC has a written procedure for charging and collecting fees – see Charging & Collecting Fees Procedure.
- When charging a services and amenities fee, students have the option of purchasing equivalent materials that can be sourced externally if they choose to. In this circumstance, the services and amenities fee would be reduced accordingly.
- A Participation Certificate will not be issued until all fees have been paid (see Certification Procedure for further information).
- In the event of overdue payments, students are followed up by the Business Services Unit adhering to Wyndham CEC's Debt Collection Policy & Procedure.

### **2.5 Refunds**

- If a student withdraws, by written notice (letter, email, fax), from ACFE subsidised training at any time up until 4 weeks after the scheduled commencement date of the course, Wyndham CEC will refund the tuition fees paid.
- Where materials have been supplied for a course, and a student withdraws, no refund of the services and amenities fee will be given.
- If a student withdraws from ACFE subsidised training at any time after 4 weeks of the scheduled commencement date and the student is on a payment plan, fees must still be paid.
- If a course is cancelled by Wyndham CEC at any time during the period of a student's enrolment, then Wyndham CEC will refund the tuition fees and service and amenities fees in full.
- In the unlikely event that Wyndham CEC closed at any time during the period of a student's enrolment, then Wyndham CEC will refund the tuition fees and service and amenities fees in full.
- The procedure for requesting and issuing a refund is outlined in the 'Charging & Collecting Fees Procedure'.

## **3. Fee-for-service courses**

### **3.1 Setting fees**

- Wyndham CEC's CFO & COO set tuition fees, service and amenities fees and text book costs for fee-for-service courses in October each year for the following year, and on a case by case basis, subject to Department guidelines and market conditions. Wyndham CEC has a written procedure for setting fees – see 'Setting Fees Procedure'.
- Based on the fees set above, the Education Manager develops and distributes the 'Fee Schedule (Fee-for-Service)' to Training Service Managers and Coordinators, the Business Services Manager and the Compliance & Reporting Team.

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- The Marketing & Technology Coordinator publishes the 'Fee Schedule (Fee-for-Service)' on its website.
- Should there be any changes to Wyndham CEC's fees and charges at any time, the Education Manager is responsible for organizing changes to the 'Fees Schedule (Fee-for-Service)' and for ensuring the schedule is updated on its website.

### **3.2 Applying fees**

- Based on the 'Students Fees (Fee-for-Service)' statement, 'Statement of Fees' are created by the VCAL & Youth Manager for VCAL courses, the Education Manager for LLN courses and the VET Coordinator for VET courses.
  - A 'Statement of Fees' includes standard and concession tuition fee rates (if applicable), services and amenities fee rates and textbook costs.
- A 'Statement of Fees' is provided to the Pre-training Assessor by the VCAL & Youth Manager for VCAL courses, the Education Manager for LLN courses and the VET Coordinator for VET courses.
- Prior to enrolment, the Pre-Training Assessor supplies each individual with a 'Statement of Fees', being an itemised list of all fees required for the course. Prior to issuing, on a case by case basis, the 'Statement of Fees' is individualized based on the following principles.

#### **i. Enrolment in a course (pro-rata)**

- An individual enrolling in VCAL is charged the following
  - Term 1 – 100% of student fee
  - Term 2 – 75% of student fee
  - Term 3 – 50% of student fee
  - Term 4 – 25% of student fee
- An individual enrolling in LLN is charged pro-rata using the 'Fees by Enrolment Start Date Schedule'
- An individual enrolling in a VET course is charged by the number of units of competency to be undertaken, using the 'Fees by Unit of Competency Schedule'

#### **ii. Credit transfer**

- A tuition fee is not charged for any Unit of Competency that is a credit transfer (see 'Recognition of Qualifications Issued by other RTOs Policy & Procedure').

#### **iii. Financial hardship**

- In circumstances of financial hardship, individuals can request to be considered for a Wyndham CEC payment plan and/or a Wyndham CEC fee reduction or waiver.
- Pre-Training Assessors ensure that a 'Request for Payment Plan' or 'Request for Fee Reduction or Fee Waiver' form is completed by the individual and lodged with a Training Services Manager or the COO / CFO by one working day from the time of the PTA Interview.
- Requests will be considered by a Training Services Manager and/or the COO / CFO on a case by case basis and a response will be given within two working days of receiving it.

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### **3.3 Applying fee concessions**

- At the PTA Interview, the Pre-Training Assessor sights and retains copies of all documentation demonstrating an individual's eligibility for a fee concession for audit or review purposes and to meet Wyndham CEC's Record Management and Keeping Policy & Procedure requirements
  - For enrolments in courses at the Certificate IV level and below, Wyndham CEC charges a concession fee to an individual who, prior to the commencement of training, holds a current and valid:
    - a. Health Care Card issued by the Commonwealth;
    - b. Pensioner Concession Card; or
    - c. Veteran's Gold Card; or
    - d. an alternative card or concession eligibility criterion approved by the Minister for the purposes of these Guidelines
  - The concessions provided for in (a) and (b) also apply to a dependant spouse or dependent child of a card holder.
  - For enrolments at Diploma level, Wyndham CEC does not offer a concession rate.
  - Before the completion of a course, if an individual who was previously eligible for a concession becomes ineligible for the concession, this does not affect the tuition fees payable for the enrolment.

### **3.4 Charging & Collecting Fees**

- After enrolment Wyndham CEC charges and collects fees. Wyndham CEC has written procedures for charging and collecting fees.
- When charging fees, Wyndham CEC adheres to the following principles
  - Tuition fees up to \$1,000 are due before the commencement of a course unless a Payment Plan has been approved. Wyndham CEC will not collect more than \$1,000 before the commencement of a course.
  - Course fees collected before the commencement of a course are held in a liability account until the commencement of the course.
  - For all courses over \$1,000, a scheduled payment plan is implemented following commencement of a course to ensure that any additional fees collected in advance for that course does not exceed \$1,500. This complies with Option 3 of AQTF Condition 5, Financial Management which Wyndham CEC has adopted in relation to collection and protection of fees.
  - When charging a Services and Amenities fee, students have the option of purchasing equivalent materials that can be sourced externally if they choose to. In this circumstance, the services and amenities fee would be reduced accordingly.
  - A fee will be charged for the assessment of Recognition of Prior Learning, if the assessment is conducted at the request, or with the consent of the student. This fee will be the same as the fee-for-service tuition fee set for each course.
- Qualifications and Statements of Attainment are not issued until all fees have been paid (see Certification Procedure for further information).
- In the event of overdue payments, students are followed up by the Business Services Unit adhering to Wyndham CEC's 'Debt Collection Policy & Procedure'.
- Wyndham CEC does not charge a fee if a student is required to re-sit an assessment

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- In the event a student is deemed ‘Not Yet Competent’ (NYC) the following principles will apply
  - Staff will work with students who are assessed as NYC and provide opportunities to satisfactorily complete units of competency to achieve a ‘Competent’ (C) result where possible. Wyndham CEC does not charge a fee in this case.
  - Students will have one month from the last day of training/timetabled classes to meet all of the requirements of the program they are enrolled in. Wyndham CEC is not obliged to accept any work or assessment beyond this date.
  - Beyond this date, students will need to re-enrol in a program and pay the relevant fees and charges.

### **3.5 Refunds**

- If a student withdraws, by written notice (letter, email, fax), from a fee-for service course at any time up until 5 working days prior to the commencement date of the course, Wyndham CEC will refund the tuition fees paid, less a \$50 administration fee.
- Where materials have been supplied for a course, and a student withdraws, no refund of the Services and Amenities fee will be given.
- No refund is available where a student withdraws from fee-for-service training at any time after 5 working days prior to the commencement date of the course.
- If a student withdraws from fee-for-service training at any time at any time after 5 working days prior to the commencement date of the course and the student is on a payment plan, fees must still be paid.
- If a course is cancelled by Wyndham CEC at any time during the period of a student’s enrolment, then Wyndham CEC will refund the tuition fees and service and amenities fees in full.
- In the unlikely event that Wyndham CEC ceased operation at any time during the period of a student’s enrolment, then Wyndham CEC will refund the tuition fees and service and amenities fees in full.
- The procedure for requesting and issuing a refund is outlined in the ‘Charging & Collecting Fees Procedure’.

### **4. Accounts & records**

- The accounts and records kept by Wyndham CEC’s Business Services Unit clearly distinguish income and expenditure for fee-for-service training from government subsidised training.
- Wyndham CEC’s Business Services Unit maintains a separate general ledger account to record receipt of income from fees for tuition and the payment of refunds of tuition fees.
- Wyndham CEC’s Business Services Unit maintains a separate general ledger account to record tuition fees paid in advance.
- Wyndham CEC’s Training Services Unit keep records, including evidence, to support any claim for a contribution towards revenue foregone as a result of granting concessions or waivers/exemptions (see Records Management & Record Keeping Policy & Procedure).