Policy Framework Procedure

Section 1 - Purpose

(1) This Procedure supports the Policy Framework Policy by stating requirements for developing and reviewing Policies and Procedures, implementing their requirements and monitoring their Effectiveness. Some points also apply to Guidelines and Local Instructions, and specify this.

Section 2 - Scope

(2) This Procedure has the same scope as the Policy Framework Policy.

Section 3 - Policy

(3) Refer to Policy Framework Policy.

Section 4 - Procedure

Types of Policy Framework Texts and Their Relationship with One Another

(4) The Policy Framework Policy:

a. defines the types of text in the policy framework (Policy, Procedure, Guideline and Local Instruction) and the sort of content they will contain; and
b. states the hierarchy of texts that can state requirements, and what must be done if there is inconsistency between a text lower in the hierarchy and a higher text.

Interpretation of Texts

(5) Where a Policy, Procedure or Local Instruction uses the verbs ‘will’, ‘must’, ‘cannot’, ‘must not’ or the phrase ‘only [specified position or committee] can’, it states a requirement.

(6) Where a Policy, Procedure or Local Instruction uses the words ‘include’ or ‘including’, or the phrases ‘for example’ or ‘such as’, the inclusions or examples are not exhaustive.

(7) Where a Policy, Procedure or Local Instruction uses the singular, it also means the plural, and vice versa.

Effect of Policy Requirements

(8) The Charter of Conduct and Values includes compliance with Rules, Policies, Procedures and Local Instructions as a conduct expectation for staff. Failure to comply may be a performance issue or, in cases of serious non-compliance, may lead to disciplinary action under the University of Canberra’s (University) Enterprise Agreement.

(9) Students accept that they are subject to the University’s Rules, Policies, Procedures and Local Instructions as a

condition of enrolment. The University of Canberra (Student Conduct) Rules 2023 state that non-compliance with Rules, Policies, and Procedures is a type of non-academic misconduct, which may be subject to action under those rules.

Approval of Policy Framework Texts

(10) The Delegations Schedule in the Delegations of Authority Policy states which committees or officers of the University may approve, for each category of activity (governance, academic or management):

a. Rules, Policies and Procedures, and substantive changes to these;
b. administrative changes to Rules, Policies and Procedures; and
c. definitions of terms that apply to all texts in the University's Policy Suite.

(11) The Policy Sponsor of a Policy may approve a Guideline that supports the Policy, or changes to such a Guideline.

(12) The Executive Dean of a faculty or head of a division may approve a Local Instruction.

Roles in Relation to Policies

(13) For each Policy, staff (and in some cases students) will be nominated to perform the following roles:

a. Policy Sponsor, who will be a member of the Vice-Chancellor's executive or the Chief People Officer.
b. Policy Custodian, who will be nominated by the Policy Sponsor: typically this will be the Chief Officer, Director, Deputy Director, Associate Director or Pro Vice-Chancellor of the central division with the greatest responsibility for the area of activity covered by the Policy.
c. Procedure Custodian, who will normally be the same as the Policy Custodian; however, a Procedure for one of the activities covered by a Policy may need a different custodian from the central division with the greatest knowledge of that activity.
d. Core Stakeholders, one of whom will be nominated by the Executive Dean of each stakeholder faculty and the head of each stakeholder division.
e. The roles and responsibilities section below states the responsibilities of these roles.

(14) A Policy Custodian may delegate leadership of consultation activities, benchmarking research and drafting of the Policy, its supporting Procedures and (if any) Guidelines to a staff member or consultant (a Policy Developer).

(15) Policies on some areas of activity may have additional specialised Core Stakeholders, as follows:

a. The Pro Vice-Chancellor, Indigenous will nominate one or more Core Stakeholders for Policies for which they consider development and review need to be informed by knowledge of the needs of Australian First Nations staff and students.
b. The Chief People Officer will nominate a member of the People & Culture team as a Core Stakeholder for Policies for which they consider development and review need to be informed by expertise in inclusive practices. This Core Stakeholder may involve, as subject matter experts in consultation, groups who have expertise in aspects of inclusive practice.
c. For student-facing Policies, the Student Representative Council may be invited to nominate a Core Stakeholder.
d. For Policies with academic quality aspects, Academic Board may be invited to nominate a Core Stakeholder.
e. For staff-facing Policies, the staff union may be invited to nominate a Core Stakeholder.

Policy Development and Review Process

(16) Development or review of a Policy will include development or review of its supporting Procedures and Guidelines,

if any.

(17) Development or review of a Policy will include the following activities:

a. Where a new Policy is proposed, consultation between the proposed Policy Custodian and the Legal to consider whether a new Policy is essential, or (preferably) the requirements can be added to an existing Policy/Procedure and/or as a new Procedure.
b. Initial research, including benchmarking research to identify leading practice in similar Policies in the university sector (it may also include review of professional literature).
c. Consultation with Core Stakeholders and, as necessary, one or more subject matter experts who may or may not be nominated Core Stakeholders, to identify issues and consider how to resolve them, and plan implementation of proposed changes.
d. Development of an implementation and communication plan listing the tasks that will be needed to ensure users of the Policy will be aware of changes to requirements, will know how to follow the new requirements and will have the resources and systems to do so. (The implementation plan will allocate each task to a manager responsible for carrying it out, and state the expected time frame for the task. Where the implementation plan allocates tasks to a manager who is not in a stakeholder faculty or unit, the Policy Custodian will consult that manager about whether the task and the time frame for it are feasible).
e. Posting of drafts for comment by members of the University community where the policy has a material affect on the broader University community.
f. Review of drafts by the Legal before they are submitted for approval, to ensure the drafts are in plain English and use inclusive language.

(18) The Policy Custodian will:

a. retain a record of feedback raised during consultation and, as relevant, how feedback was handled;
b. retain comments by members of the University community when the drafts were posted for comment, and, as relevant, how the comments were handled;
c. provide these records to the Legal when the Policy is submitted for approval; and
d. make available any records to, as relevant, Core Stakeholders or those who commented on the drafts, so they can see how their feedback was handled.

Requirements Specific to Review

(19) A Policy will be reviewed within five years of the Policy's original approval or its approval following its previous review.

(20) The Chief Operating Officer and Vice-President Operations will maintain a schedule for reviews of the University's Policies, and will remind each Policy Custodian of any review they are due to complete, one year before the scheduled review completion date.

(21) In addition to the initial steps in clauses 17 (b) and (c) above, review of a Policy will consider:

a. the log of issues raised in relation to the Policy and its supporting Procedures since their original approval or previous review;
b. the record of monitoring of the Effectiveness of the Policy and its Procedures, and any changes to supporting Procedures and (if any) Guidelines since the last review; and
c. risks in relation to the activity governed by the Policy, the level of the risks and whether they are well enough mitigated by the Procedure requirements.

(22) Where the Policy Custodian and Core Stakeholders agree, following consultation, research, benchmarking and risk analysis, that no changes to the Policy and its supporting Procedures and Guidelines (if any) are needed at this time, the Policy Sponsor can submit a recommendation to the approving authority that the Policy be regarded as reviewed and re-approved without changes to requirements. In this case:

a. the remaining steps of the review process (implementation planning, redrafting, etc.) will not be needed; and
b. if the approving authority accepts the recommendation, the Policy can be regarded as reviewed.

(23) A Policy or a Procedure may be changed at any time to resolve issues identified by a post-implementation review or by ongoing Effectiveness monitoring, or changes to legislative requirements. Such changes:

a. may involve a workshop to consult Core Stakeholders of the Policy or subject matter experts on the proposed changes where the proposed changes are assessed as high risk or impact;
b. may involve written or verbal consultation with Core Stakeholders of the Policy or subject matter experts on the proposed changes where the proposed changes are assessed as medium to low risk or impact;
c. may involve posting of the changes for comment from the University community where the policy has a material affect on the broader University community; but
d. do not constitute review of the relevant Policy, and do not change the date by which the Policy must be reviewed except where the change is a major change to the document that results in its substantial amendment.

(24) Where, however, there is urgency to make changes to a Policy or Procedure, the Chief Operating Officer and Vice-President Operations may waive some or all of the requirements set out in this Procedure, provided that:

a. the exception and the reasons for it are communicated to the Core Stakeholders, and are reported to the next meeting of the Legislation Committee;
b. as far as possible, consultation with Core Stakeholders on the proposed changes and how to implement them takes place before they are submitted for approval; and
c. where the time-frame does not permit consultation with Core Stakeholders on the proposed changes and how to implement them before they are approved, the consultation takes place as soon as is practicable.

(25) A review of a Policy is complete when either:

a. the new versions of the Policy, their supporting Procedures and (if any) Guidelines have been approved by the relevant approval authorities; or
b. the relevant approval authority has accepted the report of the Policy Sponsor that the Policy has been reviewed by the process required in this Procedure and no changes are needed.

(26) Where the review of a Policy is not complete by the scheduled review date, the Policy Sponsor or the Chief Operating Officer and Vice-President Operations will ask the approval authority whether:

a. it is willing to extend the deadline for the review; or
b. the Policy should be removed from the website or Policy Library until it has been reviewed.

Drafting Texts

(27) Policy developers will draft Policies, Procedures and Guidelines in accordance with the Policy Writing Guideline.

(28) Policies will as far as possible state measurable objectives, to facilitate monitoring of their Effectiveness.

(29) The Legal will review draft Policies, Procedures and Guidelines before they are submitted for approval, and may

edit them in consultation with the relevant expert area for plain English in collaboration with the Policy Custodian.

Consequential Changes

(30) Development of a Policy or Procedure, or changes to such a text, may require a change to another related text (a consequential change).

(31) Where a consequential change is needed, the Policy Custodian will identify and draft the consequential change as part of the approval submission, then either:

a. if the approver of the Policy or Procedure has authority to approve the consequential change, ask them to approve it at the same time as they approve the Policy or Procedure, or
b. if the approver of the Policy or Procedure does not have authority to approve the consequential change, ask them to endorse it at the same time as they approve the Policy or Procedure, and forward the consequential change to the appropriate approver, for approval.

Publishing Texts

(32) Only the Legal may publish Statutes, Rules, Policies, Procedures, Guidelines or changes to these.

(33) New or reviewed Policies, Procedures and Guidelines will be published in the University's web policy repository, and the Legal will announce their publication to the University community.

(34) Local Instructions will be published on a web page of Local Instructions maintained by the faculty or division to which the instructions apply. The web page must be accessible to all staff, and to students if the Local Instructions apply to students.

(35) Rules, Policies, Procedures and Local Instructions take effect when they are published, unless the publication states a later take-effect date for some or all of the text's provisions.

Implementation

(36) The Policy Custodian will coordinate implementation of changes to requirements and processes arising from development or review of a Policy and its Procedures, in collaboration with Core Stakeholders and (where relevant) Procedure Custodians.

(37) Core Stakeholders will coordinate implementation in their faculty or division, and will inform the Policy Custodian of whether implementation is proceeding smoothly and of any implementation issues that arise.

(38) Where the implementation and communication plan for a new or reviewed Policy allocates tasks to other managers, these managers will carry them out.

Administrative Changes

(39) The Delegations Schedule under the Delegations of Authority Policy authorises the Chief Operating Officer and Vice-President Operations to approve an administrative change to a Policy, Procedure or Guideline.

(40) An administrative change is a change that does not change the substance of the text, such as:

a. correcting a stylistic error such as incorrect spelling or punctuation, an obviously omitted word, an obviously redundant word or an obviously mistaken order of words; or
b. updating a position's title, the title of an organisational unit or the name of a system, form or template.

Post-implementation review

(41) Where a new Policy or Procedure, or a review of a Policy and its Procedures, introduces changes to requirements for staff or students, the Policy Custodian will within one year from the date the new requirements took effect:

a. hold a post-implementation review meeting with the Core Stakeholders of the Policy; and
b. provide a report to the authority that approved the Policy, on whether the post-implementation review meeting considered the implementation successful or identified issues with the Policy and, if so, how these are to be resolved.

Effectiveness Monitoring

(42) The Policy Custodian of a Policy and its Core Stakeholders will collaborate to monitor the Effectiveness of the Policy and its Procedures on an ongoing basis. This monitoring will involve, at a minimum:

a. Core Stakeholders raising issues with Effectiveness of the Policy and its Procedures with the Policy Custodian as the issues arise;
b. the Policy Custodian maintaining a log of issues with the Policy and its Procedures that are raised by Core Stakeholders, users of the Policy or identified in other ways (such as through complaints, appeals or analysis of data); and
c. occasional meetings of the Policy Custodian and Core Stakeholders to consider whether the Policy is achieving its objectives, the issues log and whether changes to the Policy or its Procedures are needed.

Section 5 - Roles and Responsibilities

Who	Responsibilities
Chief Operating Officer and Vice-President Operations	• Procedure Custodian of this Procedure. • Contact with whom to raise issues and seek advice on this Procedure.
Core Stakeholders	• In development/review of Policies, lead consultation and implementation in their faculty or division. • Involve subject matter experts in their faculty or division in consultation and implementation planning as needed. • Keep their Executive Dean or head of division informed of progress with consultation and implementation. • Monitor Effectiveness of the Policy and its supporting Procedures, raising any issues with the Policy Custodian.
Legal	• Coordinate Policy development/review activities in the University. • Approve administrative changes to Policies, Procedures and Guidelines. • Approve exceptions to this Procedure.
Legal	• Advise Policy Sponsors and Policy Custodians on whether a suggested new Policy is needed or whether new requirements can be added to the Policy Suite as changes to existing texts and/or as a new Procedure. • Publish Rules, Policies, Procedures and Guidelines on the website or in the Policy Library. • Convene the University’s community of Policy practice. • Support Policy Custodians and Policy Developers to draft texts concisely in plain English and in inclusive language; where necessary, edit drafts in collaboration with Policy Custodians. • Collaborate with the Pro Vice-Chancellor, Indigenous to ensure that the policy framework meets the needs of Australian First Nations staff and students and supports their cultural safety.

Who	Responsibilities
Policy Custodians	• Lead development/review of the Policy and its supporting Procedures and (if any) Guidelines, in collaboration with Core Stakeholders. • Monitor Effectiveness of the Policy and its supporting Procedures and (if any) Guidelines, in collaboration with Core Stakeholders. • Maintain a log of issues noticed or raised with the Policy and its supporting Procedures and (if any) Guidelines. • Initiate changes to Procedures as needed to resolve issues. • Participate in the University's community of Policy practice. • As needed, nominate a Policy Developer(s) to carry out these responsibilities on their behalf, and support the Policy Developer(s) in this work.
Policy Developers	• Carry out responsibilities of the Policy Custodian (see above), on behalf of the Policy Custodian. • Participate in the University's community of Policy practice.
Policy Sponsors	• Have overall responsibility for the Effectiveness of the Policies they sponsor. • Submit new/reviewed Policies and Procedures to approval authorities for approval. • Nominate and support the Policy Custodian.
Procedure Custodians	• Lead development/review of the Procedure and its supporting Guidelines (if any), in collaboration with the Policy Custodian and Core Stakeholders. • Monitor Effectiveness of the Procedure and its supporting Guidelines (if any) in collaboration with Core Stakeholders. • Participate in the University's community of Policy practice.
Pro Vice-Chancellor, Indigenous	• Identify which Policies need one or more Australian First Nations Core Stakeholders, to advise how they can meet the needs of Australian First Nations staff and students and support their cultural safety. • Collaborate with the Legal to ensure that the Policy Suite as a whole meets the needs of Australian First Nations staff and students and supports their cultural safety.

Section 6 - Implementation and Reporting

(43) The Legal will report annually to:

a. the Legislation Committee on progress with the University's schedule of Policy review projects; and
b. Academic Board on progress with the schedule of academic Policy review projects.

Section 7 - Definitions

Terms	Definitions
Administrative Change	As defined in clauses 39 & 40
Core Stakeholder	As defined in clauses 13(d) & 15
Policy Custodian	As defined in clause 13(b)
Policy Developer	As defined in clause 14
Policy Library	The University's online repository of Policies, Procedures and Guidelines.
Procedure Custodian	As defined in clause 13(c)
Policy Sponsor	As defined in clause 13(a)
University	The University of Canberra (ABN 81 633 873 422).

Status and Details

Status	Historic
Effective Date	31st March 2023
Review Date	31st March 2024
Approval Authority	Council
Approval Date	31st March 2023
Expiry Date	19th February 2025
Custodian	Michelle Moore Chief Operating Officer and Vice-President Operations Michelle.Moore@canberra.edu.au
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