

# **Policy Framework Policy**

### **Purpose**

This policy describes the UNSW Policy Framework and the process for developing and reviewing University-wide policy documents (rules, codes, policies, standards and procedures).

## **Scope**

The *Policy Framework Policy* applies to staff and students. The *Policy Framework Procedure* applies to policy developers and other staff responsible for developing, approving and reviewing UNSW policy documents.

## Our commitment

- 1. Codes and policies state UNSW's core values and obligations.
- 2. The Policy Framework enables a culture of integrity, accountability and trust.
- 3. The University's policy documents support our compliance with legislative obligations; enable consistent, fair practice; and encourage consistency with community, discipline and professional expectations.
- 4. Policy documents are informed by effective consultation with stakeholder representatives, and all stakeholders have an opportunity to comment on drafts.
- 5. Policy documents are written in plain, inclusive language.
- 6. The UNSW Community must comply with policy documents.
- 7. There will be the smallest number of rules, codes and policies necessary to govern the University's activities.
- 8. The effectiveness of policy documents will be monitored on an ongoing basis.

## **Principles**

## 1. Policy hierarchy

1.1. The policy hierarchy below shows documents included in the UNSW Policy Framework in order of precedence. A document lower in the hierarchy must be consistent with a document higher in the hierarchy. Where it is not consistent, the higher document overrules the lower document to the extent of the inconsistency.

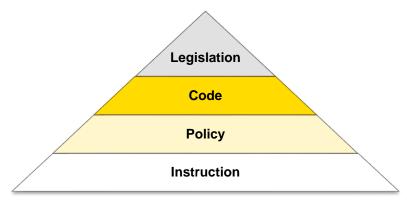


Figure 1: UNSW policy hierarchy

- 1.2. **Legislation** includes Commonwealth, NSW and ACT laws with which UNSW must comply, including regulations and by-laws made under the *University of New South Wales Act 1989* (NSW).
- 1.3. **Codes** state the behaviour necessary to meet the core values and obligations of the University. Codes are approved by Council and are university-wide documents. A code may:
  - state principles (objectives that govern and guide conduct and decision-making) and responsibilities for the UNSW Community
  - · state university-wide requirements, and
  - contain **standards** that state required behaviour to achieve the principles of the code.

#### 1.4. **Policies** are documents that:

- state principles (objectives that govern and guide conduct and decision-making)
- state university-wide requirements
- authorise positions to make decisions to implement the policy on behalf of the University
- may authorise a position to approve changes to a standard or procedure section of the policy
- are approved by the Vice-Chancellor, and
- may contain:
  - **standards** that state required behaviour, levels of quality or an operating standard for a product, service or system, to achieve the principles of the policy
  - procedures that state university-wide requirements to achieve the principles of the policy, and
  - **schedules** which, if they need to be changed, can be submitted to the policy approving authority for approval separately from the policy as a whole.
- Academic Board must endorse policies, standards or procedures concerning academic governance and the maintenance of academic standards.
- 1.5. A standard or procedure in support of a policy may be a separate policy document where a regulator requires the University to have a separate policy document on a topic.
- 1.6. Standards or procedures are approved by:
  - the policy lead when contained within a policy; or
  - the Chief Assurance and Legal Officer when they form a separate policy document.

#### 1.7. Instructions:

- state university-wide requirements (or requirements that apply more widely than to an individual
  division or faculty) when approved by a person with the authority to do so under the <u>Delegations</u>
  <u>Policy</u> or their parent code or policy. University-wide instructions must be linked to the parent code
  or policy.
- state requirements that apply specifically to, a division, faculty or school and its students, as authorised by a divisional head, dean, head of school, director or 'head of' positions.
- must be consistent with codes and policies; an instruction specific to a division, faculty or school
  must also be consistent with any university-wide instruction
- must identify any UNSW-wide policy document that they supplement, and
- must be published on a division, faculty or school web page that is linked to the UNSW policy website.
- All instructions that have a university-wide scope must be approved by the relevant policy lead.
- All instructions that are tailored towards a faculty must be approved by the relevant Dean.
- All instructions that are tailored towards a school must be approved by the the relevant Head of School.
- All instructions that are tailored towards a division may be approved by the relevant delegate listed in Schedule 9 of the <u>Delegations Policy</u>.
- 1.8. The term **policy documents** is used in this policy to mean all the types of document listed in sections 1.1–1.6 of this policy. Where the phrase 'university-wide policy documents' is used it does not include

instructions.

- 1.9. The term **parent policy** is used in this policy to mean the policy that authorises a position to develop, review and approve a standard, procedure or instruction.
- 1.10. The following terms are used in this policy for roles that oversee or manage policy documents:
  - **responsible officer** means a member of University leadership or a person authorised by a policy who is responsible for developing and reviewing a policy document and for monitoring its effectiveness
  - policy lead means a position nominated by the responsible officer for a code or policy, to lead
    development, review and monitor the effectiveness of the policy, or a position authorised by a policy
    to maintain and approve a supporting standard, procedure or university-wide instruction
  - policy developer means a staff member assigned to lead development or review of a policy document on behalf of the responsible officer and policy lead. The policy lead may be the policy developer.

## 2. Policy Framework

- 2.1. This policy is part of the UNSW Policy Framework which also includes:
  - The University's policy document management software platform and its policy project workflows for development, consideration by relevant committees, consultation, approval, publication and reporting.
  - An online policy library managed by Governance that is the source of truth for university-wide policy documents. This library will include policy documents on the University's activities. All areas of the University must link to the university-wide policy documents published by Governance.
  - Policy delegations which authorise specific committees or positions to establish, implement and
    maintain policy documents. Policies may also contain, or be linked to, standards, procedures or
    instructions that are developed by staff with authority to do this stated in the policy or in <a href="UNSW Delegations">UNSW Delegations</a>.
  - Policy document resources, including templates and forms, that support a standard approach to the development of policy documents and equip staff to develop and review these documents.
  - Training and policy implementation to support staff and students to find, understand and apply university-wide policy documents.

## 3. Policy documents support compliance with legal obligations

- 3.1. Policy documents must be written so they are consistent with the University's legislative obligations to enable a culture of integrity and compliance.
- 3.2. University-wide policy documents whose requirements ensure compliance with relevant legislation are included in the UNSW Legislation Register managed by the Head, Compliance and Controlled Entities Law.
- 3.3. The UNSW Community are expected to familiarise themselves with policy documents that apply to their work, studies and interactions and will comply with requirements of those policy documents.

## 4. Policy documents reflect our values and trust in our people

- 4.1. Policy documents should reflect our values and trust in our staff and students within a system of accountability and transparency.
- 4.2. Subject to the risks involved, staff should be able to fulfil their responsibilities and make decisions without policy documents being overly directive or prescriptive.

### 5. Policy review and development

5.1. The Policy Framework Procedure below states the steps required when reviewing or developing a

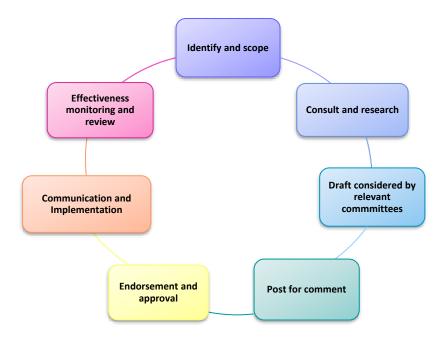
university-wide policy document.

- 5.2. The Chief Assurance and Legal Officer may approve changes to the procedure.
- 5.3. The Director of Governance and University Secretary maintains templates, guides and resources associated with this policy.

## Policy Framework Procedure

The policy review and development cycle identifies the steps you must take when reviewing or developing a university-wide policy document. The Chief Assurance and Legal Officer, or their nominee to make such decisions, may exempt codes and policies from steps in this procedure. The policy review and development cycle applies to instructions, however, the instruction developer may adapt each step as appropriate to the instruction.

Figure 1, policy review and development cycle



## 1. Identify and scope: what kind of document is needed?

- 1.1. This section applies to the proposed development of a new code or policy.
- 1.2. The Policy Framework Policy states that the University will have the minimum number of policy documents necessary to govern its activities. A new policy document should only be developed where there is no alternative.
- 1.3. Check the UNSW policy library and consider whether an existing policy document can be changed to meet the need you have identified. Refer to Section 10 for the process to change policy documents.
- 1.4. If you consider that a new policy document is essential, you will need to make a case for this and gather evidence which may include:
  - changes in legislative requirements
  - a new or revised higher education standard or government policy
  - an audit or risk assessment finding that has identified a policy gap at UNSW
  - · a new strategic direction for UNSW.
- 1.5. Contact the Governance team for their advice on completing a Phase One Policy Proposal for the Chief Assurance and Legal Officer (CALO) to consider. The CALO will decide whether a new policy document is needed and, if so, what type.
- 1.6. The pathway for consideration by relevant committees and boards, consultation, endorsement and approval will be negotiated with policy lead/s and responsible officer in consultation with the Director of Governance and University Secretary as part of Phase One approval for new policy documents or at the start of a policy review.

#### 2. Consult and research

- 2.1. The Governance team maintains a list of key stakeholders for each code and policy.
- 2.2. If you are reviewing or considering a change to a code or policy, meet with Governance to gain a current list of key stakeholders and work with the Governance team to update the list.
- 2.3. Invite key stakeholders to identify issues they would like to see resolved in the policy document and propose solutions. Stimulate their thinking by providing a list of issues that are known to the responsible officer, policy lead and their teams.
- 2.4. In preparation for consultation workshops and in response to issues raised by key stakeholders, the policy developer should carry out:
  - external benchmarking research to ascertain how other universities and organisations handle similar policies and address the issues in their policy documents
  - internal research to gain a thorough understanding of the issue.
- 2.5. Gather the key stakeholders in consultation workshops to work out solutions to the issues gathered, and to develop the implementation and communication plan.
- 2.6. The implementation and communication plan should list:
  - all actions and communications that are needed to implement new requirements and changes to requirements that the policy document will introduce, such as
    - changes to processes, forms and published information
    - changes to curriculum and curriculum information
    - information technology system development or configuration
    - communication to and training for groups who need to change work practices
    - information that will be communicated in online training modules
    - communication to groups who need to be aware of changes to requirements that will apply to them.
  - who is to carry out of each of these actions and communications
  - the date by which they are to complete the action or communication.
- 2.7. You may use other consultation methods such as focus groups of likely users of the policy document. Consultation resources are available on the Governance website.
- 2.8. Update Governance regarding your proposed consultation approach to ensure a cohesive approach to policy development across UNSW.
- 2.9. The pathway for consideration by relevant committees and boards, consultation, endorsement and approval will be negotiated with policy lead/s and responsible officer in consultation with the Director of Governance and University Secretary.

#### 3. Draft

3.1. Develop a draft using the relevant template. A policy draft will state the principles to govern an area of activity and elaborate on these by stating the procedures and/or standards required to meet the principles, and may authorise someone to maintain separate university-wide instructions (and cross-refer to these).

## When you draft a policy document:

- 3.2. Follow the Policy Writing Guide, which will also refer you to the UNSW Writing Style Guide for guidance on writing in plain, inclusive language.
- 3.3. Ensure consistency with related policies and meet with the policy lead for those policy documents to discuss areas of discrepancy.
- 3.4. Assign responsibilities and decision authorities to positions or committees consistent with UNSW

Delegations and other UNSW policies.

3.5. Ensure the principles are consistent with the goals expressed in the current UNSW Strategy.

## 4. Consideration by relevant committees and boards

- 4.1. Depending on the complexity of a policy document, consideration by relevant committees or boards may be required prior to posting a policy document for comment.
- 4.2. Seek advice from policy lead/s, Director of Governance and University Secretary or the responsible officer to determine the pathway required in step 1 for new policy documents or step 2 for review of existing policy documents.
- 4.3. If consideration by relevant committees and boards is required, this may occur prior to posting a policy document for comment.

#### 5. Post for comment

- 5.1. A new policy document, or a policy document with major changes, must be posted on the Governance website for comment from any member of the University for at least two weeks. The document will be posted long enough to allow commenters a reasonable length of time to enable effective review. The Director of Governance will decide the length of posting. A long document or one that introduces a large number of new/changed requirements may be posted for up to six weeks.
- 5.2. Governance will communicate the posting of drafts for comment via Inside UNSW, myUNSW and the policy distribution list. You will be responsible for informing key stakeholders of the posting.
- 5.3. Collate the comments on the drafts and respond to each, in consultation with the policy lead and, as necessary, the responsible officer.
- 5.4. At the time when the responsible officer submits the drafts for endorsement and approval, circulate the table of comments and responses to those who commented, so they can see how their comments were handled.

#### 6. Review and endorsement

- 6.1. Governance will retain the records of consultation and comments for reference by committee members, Council members or the Vice-Chancellor as part of consideration, endorsement and approval.
- 6.2. The responsible officer will submit the policy document to relevant committees or boards determined in steps 1 and 2 for review and endorsement prior to approval.

## 7. Approval

- 7.1. At this stage you will prepare a policy approval form to describe the background, consultation process followed, summarise changes and the reasons for the changes. A policy officer in Governance will check this form before it is forwarded with the final draft policy document to the relevant approver: You must also provide:
  - the implementation and communication plan
  - · the record of consultation issues and solutions
  - the record of comments on the drafts from their posting for comment and responses.
- 7.2. <u>UNSW Delegations</u>include Council's delegations of authority to approve the various types of policy documents and changes to these.
- 7.3. A policy may authorise a position to maintain a standard, procedure or university-wide instructions that support the policy, provided this authority is consistent with the delegations to approve policy documents in <a href="UNSW Delegations">UNSW Delegations</a>.

## 8. Implementation and communication

- 8.1. Once a policy document has been approved, Governance will publish it in the online policy library and communicate the published version:
  - to the policy developer and policy lead listed on the approved policy document
  - via Inside UNSW and myUNSW
  - to Faculty Executive Directors and Divisional Directors of Operations and the Compliance Manager.
- 8.2. The policy lead will review and carry out the implementation and communication plan established in section 2.6. Where the responsible officer considers that the actions and communication in the implementation and communication plan require coordination to ensure that they are carried out, they or the policy lead will convene a working party of the staff with actions in the plan to coordinate implementation.

## 9. Effectiveness monitoring and review

- 9.1. When a new code or policy is approved, or changes to requirements in a standard or procedure are approved, the policy lead will hold a post-implementation review meeting with the key stakeholders within one year after the new/changed policy document took effect. The purpose of this meeting is to review implementation of new/changed requirements and consider whether any changes to the policy document are needed.
- 9.2. The policy lead will keep a record of issues raised by their team, key stakeholders and/or other users of the policy document.
- 9.3. Every two years the policy lead for a code or policy must consult key stakeholders to determine whether the code or policy and any procedures and standards that support it are up to date and fit for purpose and if not propose changes (refer to section 10).
- 9.4. Codes and policies will be due for full review five years after their effective date. A review will occur earlier than five years if a policy specifies an earlier review date or if legal or other changes require the policy to be updated to remain fit for purpose. The five-yearly review will include a review of any standards, procedures and instructions that support the code or policy.
- 9.5. Governance will annually inform responsible officers and policy leads of which codes or policies for which are due for review in the following year.
- 9.6. Governance will provide the University Leadership Team with an annual report of all codes and policies due for review in the current year or following year, or overdue for review, or of which the review has been completed in the current year. Governance will provide a similar annual report to Academic Board comprising only academic policies.
- 9.7. In preparation for review, the policy lead will consult the key stakeholders on their views as to whether the code or policy is effective in its current form or whether it and/or its supporting standards or procedures need to be changed.
- 9.8. Informed by that consultation, the responsible officer for a policy document will determine which of the following five-year review outcomes applies:

#### a) No change

If a policy document does not need changes, the responsible officer or authorised staff member must advise Governance so that this is recorded. Governance will report these outcomes to the Vice-Chancellor periodically.

## b) Minor changes

Refer to section 10 for the process to change a policy document. Refer to section 10.8 for administrative updates.

#### c) Full revision of the policy document

If full revision of the content is required, the policy review cycle will restart from section 2.

#### d) Retire

A policy document may be retired if it is no longer needed, for example, because of legislative, strategic or compliance changes. To retire a document, the policy lead must follow the steps in the retirement checklist.

## 10. Changes to policy documents

- 10.1. A policy document may be changed as an outcome of a five-year review, or before.
- 10.2. **Minor changes** are changes, other than an administrative change (refer to section 10.9), that do not significantly change the meaning or effect of the policy document. These changes may be endorsed by the policy lead and approved by the responsible officer for a policy or code, without going through the policy development/review process stated in section 2. Where a position has delegated authority to develop, review and approve a standard, procedure or instruction, they may approve a minor change to it without going through the policy development/review process.
- 10.3. A **major change** to a policy document is one that:
  - is contentious or complex
  - significantly changes the meaning or application of the policy document
  - · will require a substantial change to current practice, or
  - will significantly change roles and responsibilities.
- 10.4. To make a major change, you must follow the policy development cycle from section 2 above onwards, unless a fast-track process is approved in accordance with section 10.5–10.7.
- 10.5. Major changes may follow a fast-track policy development process in the following circumstances:
  - Academic Board has passed a resolution on an aspect of academic governance and quality that must be immediately addressed in the policy document
  - UNSW is subject to new legal or other obligations that require an immediate response
  - a University Compliance Officer or other authorised person has made a decision that is a binding commitment on behalf of UNSW and this must be reflected in the policy document
  - the Vice-Chancellor must respond to an emergency or urgent circumstance by changing the policy document.
- 10.6. The Chief Assurance and Legal Officer or the Vice-Chancellor and President may approve an urgent change to a policy document, that meets the criteria in clause 10.5, on the recommendation of the responsible officer for the code or policy or, for an urgent change to an instruction, on the recommendation of the responsible officer for its parent code or policy.
- 10.7. Where an urgent change is approved without following the policy development process, the policy lead will as soon as practicable convene key stakeholders for the policy document to discuss the change and whether it will create any unforeseen issues.
- 10.8. Fast-tracked changes do not change the review date of a code or policy that is changed in this way unless specified by the Vice-Chancellor.
- 10.9. The Director of Governance and University Secretary may authorise administrative changes to a policy document including:
  - changing the name of a position, unit, document, publication, address (including URL), legislation or entity
  - changing the name of a system or form where this does not change requirements of the relevant process in a procedure
  - · correcting grammar, spelling or style.

Version: 3.1

Effective: 19 March 2025

Responsible officer: Chief Assurance and Legal Officer

Policy lead: Director of Governance and University Secretary

Contact: Senior Policy Officer, Governance

## **Version history**

- Version 1.0 approved by UNSW Council on 7 December 2015, effective 1 January 2016. New policy.
- **Version 2.0** approved by President and Vice-Chancellor on 21 August 2017, effective 21 August 2017. Full review, minor amendments and title change.
- Version 2.1 approved by Director of Governance on 9 January 2018, effective 9 January 2018.
   Administrative update, Responsible Officer title changed from Vice-President and Chief of Staff to Vice-President, Strategy and Quality.
- Version 2.2 approved by President and Vice-Chancellor on 7 June 2018, effective 7 June 2018.
   Minor amendment at Section 5 to align with the Register of Delegations.
- Version 2.3 approved by Director of Governance on 12 June 2019, effective 12 June 2019.
   Administrative update. Responsible Officer title changed to Deputy Vice-Chancellor Enterprise
- **Version 2.4** approved by Director of Governance on 3 September 2019, effective 3 September 2019. Administrative update to Section 5 to include the Provost.
- **Version 3.0** approved by Vice-Chancellor and President on 13 December 2023, effective 1 January 2024. Major update to align with the Policy Transformation Program. Supersedes Policy Framework Procedure.
- **Version 3.1** approved by Director of Governance on 19 March 2025, effective 19 March 2025. Administrative update to align with UNSW Delegations.