Policy Handbook

JAMES COOK UNIVERSITY AUSTRALIA

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1. Introduction

The Policy Handbook is a resource to support staff undertake policy development – that is, the reviewing, drafting, consulting, communicating and implementation involved in developing/required to develop effective policies (including Frameworks) and procedures. The tools and information contained in the handbook represent a central reference point to embed best practice in policy development. Further support is available from Secretariat by contacting policy@jcu.edu.au.

2. University governance instruments and their operational context

The governance of the University takes place within a framework which exists to regulate and guide the conduct of Council members, staff, students and members of the public accessing the University's services. Key instruments in the governance framework include:

- James Cook University Act 1997 (Queensland)
- JCU Enterprise Agreement 2016
- Delegations Schedule and Registers
- Council and committee approved policies
- Management approved procedures
- Management approved guidelines

Consideration must be given when developing and reviewing governance documents to the distinction between delegations of authority (delegations), policies, procedures and guidelines

2.1 Delegations

Delegations of authority are the mechanism that enable committees of Council and individuals to make decisions which incur a commitment, liability or risk on behalf of the University. Delegations are expressed in the JCU Enterprise Agreement, policies and procedures as the position or committee responsible for undertaking an action or making a decision at the end of a process.

To make it easier for staff, the various actions, decisions and decision-makers spread throughout JCU policies and procedures are organised and listed into the JCU Delegations Schedule and four Sub-delegations Registers. All delegations expressed in policies and procedures should be recorded in the relevant delegations document. In the event there is a conflict between the delegations document and the policy or procedure, the delegations document will apply.

The JCU Delegations Schedule contains delegations conferred by Council to its committees, the Chancellor and Vice Chancellor along with the powers it retains for itself, while the Sub-delegations Registers contain sub-delegations conferred by the Vice Chancellor to staff positions. The JCU Delegations Schedule is approved by Council and the Registers are approved by the Vice Chancellor.

2.2 Policy

Policies establish principles and directions regulating how all members of the University community must act in certain circumstances. It is mandatory to act in accordance with a Policy.

Policies at JCU are developed to fulfil the following goals:

- Articulate the University's position on key aspects of operation
- Support the achievement of JCU's priorities and objectives
- Articulate requirements or directions from Council, its Committees or the Vice Chancellor
- Manage matters that present significant risks

- Comply with/Implement the requirements set by legislation, regulations, government policies and standards and professional standards.
- Establish and embed innovation and best practice.

Frameworks are similar to policy, with the same processes and approval paths. Wherever the term “Policy” is used, it applies equally to frameworks.

2.3 Frameworks

A Framework is a clear, consistent, coordinated and enforceable conceptual structure or system. Framework documents provide a structure that brings together policies, procedures and supporting artifacts to outline the University’s approach. A Framework may also identify how these structures enable compliance with specific legislative and regulatory requirements, or other relevant requirements. Frameworks covering management and operational activities are located in the policy library, for example the Risk Management Framework and Plan, and the Compliance Framework.

Frameworks, in this context, are at the same level as policy, with the same processes and approval paths. Wherever the term “Policy” is used, it applies equally to frameworks. It is mandatory to act in accordance with frameworks.

2.4 Procedure

Procedures are instructive documents that provide details on how to implement and operationalise a Policy. It is mandatory to follow procedures.

2.5 Other supporting documents (including guidelines, processes, forms, templates, handbooks)

Other supporting documents are created to provide further details and guidance around undertaking aspects of University business. Guidelines, forms, templates etc. may apply to a specific audience or area of the University and help the University community to undertake processes and tasks in a consistent and efficient way. Often these types of documents (eg. process) are used for training or as a reference for more information, advice and support. These supporting documents are peripheral to policies and procedures, and are not formally accommodated in the Policy Library, although links from the Policy Library to supporting documents are provided for convenience. The main differences between guidelines and procedures are that guideline documents are usually more detailed than procedures, they may have limited application (eg. apply only to academic staff, only to a particular business unit or only to specific roles) and they are advisory, rather than mandatory documents.

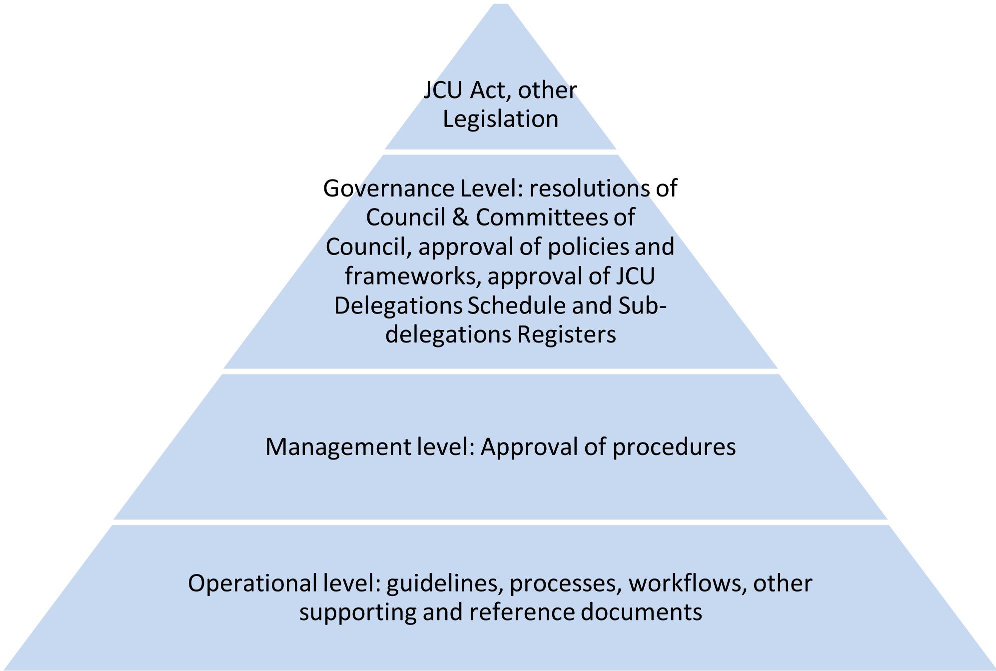
2.6 Plans and Strategies

Various plans and strategies are in effect across the University and these documents address strategic, management and operational activities. Documents covering management and operational activities are located in the policy library, for example the Emergency Management Plan.

The University Plan, the Academic Plan and other Plans (eg. International Engagement Strategy, and Digital Strategy) articulate the University’s strategic directions across core activities. Strategy documents are not located in the policy library and are not under the management of the Policy Officer.

2.7 Hierarchy of governance instruments

The following diagram represents the policy framework hierarchy as it applies to JCU. A document lower in the hierarchy must be consistent with a document higher in the hierarchy. Where two documents in the hierarchy conflict, the document higher in the hierarchy takes precedence.



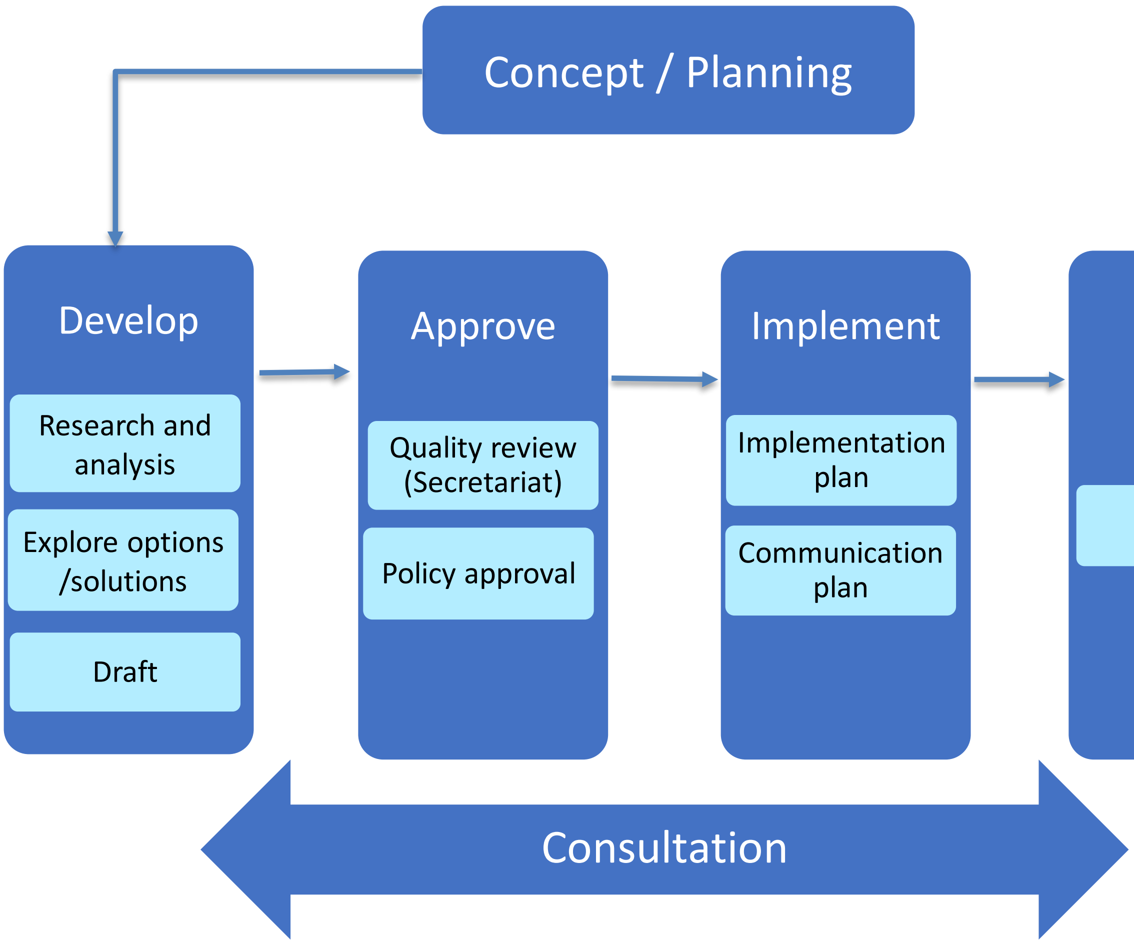
The University Council has approved the Policy and Delegations Responsibilities Map which outlines responsibility for sponsoring and approving policies, procedures and delegations. Policy authors/drafters must ensure the Policy complies with this map.

3. JCU Policy and Delegations Responsibilities Map

<table>
<tr><th>Policy Domain</th><th>Policy Domain Sponsor</th><th>Approval of Policy</th><th>Approval of Procedure</th><th>Approval of Delegations Schedule</th><th>Sub-delegation Register</th><th>Approval of Sub-delegations Registers</th></tr>
<tr><td>Learning & Teaching</td><td rowspan="2">DVC Education</td><td rowspan="6">Academic Board</td><td rowspan="2">DVC Education</td><td rowspan="14">Council</td><td rowspan="6">Academic and Student</td><td rowspan="14">Vice Chancellor</td></tr>
<tr><td>Student Matters</td></tr>
<tr><td>Academic Management</td><td>DVC Academy</td><td>DVC Academy</td></tr>
<tr><td>Research Management</td><td rowspan="2">DVC Research</td><td rowspan="2">DVC Research</td></tr>
<tr><td>Research Education</td></tr>
<tr><td>International and Admissions</td><td>DVC Services and Resources</td><td>DVC Services and Resources</td></tr>
<tr><td>Academic Governance</td><td>Chair, Academic Board</td><td rowspan="3">Council</td><td>Chair, Academic Board</td><td rowspan="3">Corporate and Administration</td></tr>
<tr><td>Engagement</td><td rowspan="3">Vice Chancellor</td><td rowspan="3">Vice Chancellor</td></tr>
<tr><td>Corporate Governance</td></tr>
<tr><td>Financial Management</td><td>Finance Committee</td><td>Finance</td></tr>
<tr><td>Human Resources</td><td rowspan="4">DVC Services and Resources</td><td>HR Committee</td><td rowspan="4">DVC Services and Resources</td><td rowspan="2">Human Resources</td></tr>
<tr><td>Work, Health & Safety</td><td>WHS Committee</td></tr>
<tr><td>Estate & Facility Management</td><td rowspan="2">Estate Committee</td><td rowspan="2">Corporate and Administration</td></tr>
<tr><td>Digital Infrastructure</td></tr>
</table>

4. Policy development and review

The Policy Sponsor is responsible for ensuring their respective domains are adequately covered by both policy and procedure, and that policy authors/reviewers undertake all the phases as shown in the diagram below. The phases do not necessarily occur sequentially, or as stand-alone activities. For example, collaborating and consulting with others in some form will be necessary throughout the process and implementation plans should be finalised or well advanced by the time the policy is ready for approval.



Adapted from 'The policy development process' page 18, Policy without (much) pain, ATEM Institutional Policy Network

Information about undertaking the different phases in the policy process is provided in the following pages.

- How to develop a policy – Phase 1: Develop
- How to consult with stakeholders – Phase 2: Consult
- How to have a policy approved – Phase 3: Approve
- How to implement a policy change – Phase 4: Implement
- How to review a policy – Phase 5: Review
- How to remove a policy that's no longer required – Disestablishment Process

4.1 Quality Check

A quality check of all materials provided for approval is conducted by the Policy Officer. This provides the Policy Sponsor with assurance that, policies:

- are fit for purpose;
- have been aligned with the Policy and Delegations Framework;
- are easy to understand;
- are developed using the processes in this Policy Handbook with particular application given to the Style Guide.

Final drafts of all materials must be forwarded to the Policy Officer before they are approved by the Policy Sponsor. The Policy Officer will also provide comments and recommendations on drafts throughout the development process, if requested.

5. How to develop a new policy

5.1 Phase 1: Develop

The policy development process is the starting point when a new policy is required or an existing policy is to undergo such major amendment that it effectively becomes a new policy.

New, or significantly amended policies are required when:

- There are changes to government policy, regulatory frameworks, legislation or JCU strategic direction;
- Changes occur in the risk environment;
- Gaps in existing policies are identified; or
- Changes to the JCU environment, such as implementation of service improvement activities, new systems or ways of working.

Before progressing too far into phase 1, identify the Policy Sponsor (refer to the Policy and Delegations Responsibilities Map), discuss the need for a new policy and clarify the objectives of the project. Policy Sponsors must endorse any proposal to develop new policy.

Research and analysis

It is critical to understand why the policy is needed, the context in which the policy must operate (both within and outside the University) and how the policy will interact with other policies and other functions within the University.

- Exploration of whether a new policy is the best solution. Could the issue be addressed through amending existing policies or procedures, developing guidelines, work instructions or system changes?
- Investigations to confirm the policy topic is not already covered elsewhere in another policy, or other University documentation
- Gathering and consolidating issues raised on the policy topic
- Reviewing existing policies and procedures, business unit webpages and JCU databases
- Researching similar policies at other universities
- Research in collaboration with the Policy Officer
- Consulting with Policy Sponsors and stakeholders

Explore options/solutions

Developing solutions to the policy issue must be done in consultation with key stakeholders. It may be appropriate to form a working group, at the very least it will be necessary to discuss the issues with subject matter experts. In designing a solution, consideration must be given to how it will be implemented, whether the solution will expose gaps in other areas that must be addressed (eg. delegations), the costs involved, what sort of change management process will be required and whether the solution addresses the needs of the groups who are impacted by the policy.

Drafting

Refer to the Style Guide – Writing Policies and Procedures (page 12) for guidance on writing policies. Access the Policy Template and draft the initial policy, which should reflect the outcomes of discussions with the subject matter experts and other key stakeholders.

New policies must be drafted using the Policy Template. Request the Word version of the current policy from the Policy Officer if you are amending an existing policy by emailing policy@jcu.edu.au .

Remember, policies contain statements that establish principles and direct how members of the University community execute aspects of the University's operations.

Policies should state no more than is necessary to direct decision-making.

Consideration must be given to:

- Aligning the policy with the domains in the Policy and Delegations Responsibilities Map and ensuring sponsorship is allocated to the correct area
- Aligning policy content and intent statement and supporting the University Plan, mission and values
- Operational compliance and risk
- Compliance with standards and legislation eg. TEQSA Threshold Standards, Higher Education Support Act, Higher Education Standards Framework and AQF
- Appropriate language, style, terminology and structure
- Comparison to and benchmarking against other Australian Universities
- Development of procedural support or guidelines to accompany the policy
  Refer to the Style Guide – Writing Policies and Procedures (page 12) for guidance on writing procedures. Access the Procedure Template and draft any procedures required to support the policy.

  (Guidelines can be developed to meet the needs of the audience and do not have a mandatory template).

- Amendments to existing policy and/or procedure(s) as a result of this new policy. Obtain a copy(s) of the documents to be amended from the Policy Officer and update as required, ensuring amendments are marked up by using track changes. Refer to Policy Review Process (page 15)
- Disestablishment of existing policy(s) and/or procedure(s) as a result of this new policy. Refer to the Policy Disestablishment Process (page 19).

5.2 Phase 2: Consult

The methods and strategies used to engage with stakeholders will depend on the complexity and sensitivity of the policy development project. However, all consultation should be undertaken in a way that ensures that those most impacted by the policy have been given the opportunity to provide input. It is not always possible to reach a consensus when consulting, and stakeholders may have to compromise and negotiate their positions to arrive at the most practical policy that also meets the University's objectives.

Engage with stakeholders

The Policy Sponsor is responsible for ensuring adequate consultation has occurred.

Consulting with stakeholders will occur throughout the policy development project, however different stakeholders will be more involved during different phases. Subject matter experts will help identify issues and explore solutions, managers and leaders will help you influence others and make decisions, the people responsible for implementing the policy will help you embed the principles and directions.

The Student Facing Policy Advisory Committee must be involved when developing student-facing policies, the Joint Consultative Committee must review staff related policies and the WHS Advisory Committee must review WHS related policies. Consider also whether to involve Technology Solutions Directorate, the JCU Student Association, the Complaints Unit, the Indigenous Education and Research Centre, students under partnership arrangements, international students, JCU Singapore and JCU Brisbane.

Refer to the Consultation Guidelines (Appendix A) for guidance on identifying and engaging with stakeholders.

Once the policy and procedure(s) have been drafted, circulate marked up versions to stakeholders for review along with any supporting documents, eg. plans, policies and procedures to be disestablished, changes to delegations etc., if applicable. **Learning and Teaching, Student and Academic Management policies must be circulated to the Director, Academic Quality and Strategy via the Student Facing Policy Advisory Committee for review**.

Collate feedback and update the documents as required to prepare the final drafts.

The Policy Author and Policy Sponsor must be clear about the rationale behind the policy statements and be able to demonstrate they have considered the views of stakeholders.

Legal advice

Consultation with Legal & Assurance is recommended when developing or amending policies covering high risk or sensitive topics, but may also be beneficial if the policy is lower risk. The Policy Sponsor is responsible for determining if legal advice or legal research is required.

5.3 Phase 3: Approve

All final drafts of documents must undergo quality review prior to approval by the relevant Approval Authority.

Quality review - Secretariat

The Policy Author or Sponsor must submit the following documents to the Policy Officer for quality review:

- draft of the new policy and any supporting procedures or guidelines;
- marked up copy of any amended existing policy(s) and/or procedure(s);
- any policy(s) for disestablishment;
- draft agenda item

Where necessary, the Policy Officer will work in consultation with Legal & Assurance and the Policy Sponsor to finalise all documents in preparation for approval. This includes managing further revisions to documents. Refer to the Policy Review and Approval checklist (page 17) prior to submitting documents to the Policy Officer.

Policy approval

The Policy Officer will manage the final documents through the approval process. New policies, or policies that have had major amendments will be guided through the Committee approval process, minor amendments will be forwarded to the Policy Sponsor for approval. The Policy Officer will implement administrative amendments.

Note: It takes approximately 8 weeks for a policy to move through the Committee approval process. This is unavoidable. It is possible to obtain urgent interim approval of policies if necessary, however the policy will still need to go through the full Committee approval process within 6 months.

5.4 Phase 4: Implement

Consideration of how the policy will be implemented should begin at the start of the policy project. The impacts of new or amended policies on the University community need to be known and planned for before the policy is approved.

Implementation Plan

Thinking and planning for implementation of the new policy should begin early in the project. A well designed and well executed implementation plan will help the University community comply with the new policy and reduce risks associated with introducing change.

Consideration must be given to:

- Identifying requirements and resources necessary for compliance (eg. supporting procedures/guidelines, knowledge articles, websites, apps etc.)
- Developing tools and training materials
- System changes
- How to monitor the effectiveness of the new policy

The Pre-implementation Checklist (page 24) will help you identify and plan the key steps involved in implementing the policy.

Communication Plan

Access the Communication Plan Template and draft the Communication Plan in consultation with the Policy Sponsor with consideration to:

- Who will be impacted by the new policy and/or any amended or disestablished policy documents?
- What information do they need to know?
- How will this information be shared?
- When will the policy take effect?

5.5 Phase 5: Review

The Policy Sponsor is responsible for ensuring their policies are accurate, relevant, effective and comply with legislation and regulations.

Monitoring

The Policy Development and Review Policy establishes that policies and procedures should be reviewed every five years, or sooner if circumstances warrant a shorter review timeframe. When determining the accuracy, relevance and effectiveness of a policy, consideration must be given to:

- Changes to University strategy impacting on policy
- New or amended legislation
- Impacts of new/changing technology
- Ease for the University community to comply with the policy.

6. Style guide – writing policies and procedures

Policy - a set of rules or a specific course of action, based on principles adopted by the University, to guide decision making, direct operations and achieve objectives.
Procedure – the steps in a process required to implement the provisions or directions described under a Policy or Enterprise Agreement.

Naming policies and procedures

- Give the document a concise title which immediately identifies its subject matter.
- Do not begin with 'The', 'University', 'James Cook University', 'Policy on', 'Procedure for' or 'Guidelines on /for'.
- Identify the type of document at the end of the title, eg, Academic Freedom and Freedom of Speech *Policy*, Student Fee Payments and Refunds *Policy*, Leave *Procedure*.
- Avoid using 'requirement' in a policy title as the policy will stipulate the requirements.
- Including 'Policy' or 'Procedure' in the title of a document does not render the document an official Policy or Procedure unless it meets the definition and requirements outlined in the Policy Development and Review Policy and has been formally approved by the relevant approval authority.
- Associated procedures should be titled identically to the policy, but end with 'Procedure'.
- If more than one associated procedure, choose concise titles that immediately identifies the subject matter.

Structure

- Policies are written as statements of principles, sets of rules and directions, and the key provisions which guide decision making.
- Policies must clearly articulate the requirements necessary for the intended audience to comply.
- Procedures state what will be done to implement the policy. The procedure identifies what will be done and how including:
    - the precise actions required
    - who is required to complete the action
    - when the actions are to occur
    - the sequence of events
- Procedures should be written as structured instructions:
    - Steps should be clear, short imperative statements
    - Each step should begin with an action verb to describe what should be done, examples include "click" "type" "identify" "collect" "confirm" "document" "provide".
    - Limit the number of steps. Longer procedures have a higher failure rate because users tend to lose their place or accidentally skip over steps

Layout and formatting

- A policy should be no longer than 4 pages (excluding the Administration section) and must align with the Policy Template.
- Inclusion of headings, styles or formatting that do not conform to JCU's standard template must be discussed prior to policy development with the Policy Officer.
- Additional information necessary for carrying out or complying with the policy must be detailed in a separate procedure or guideline.

Schedules, appendices and other supporting documents

- Schedules and appendices form part of the policy or procedure and are approved through the same process as the parent document.
- A schedule is a list, or a table of information attached to a policy or procedure that provides more information about a matter referred to in the policy/procedure. For example, 'Schedule A-Applicability of Working with Children Check' is a list of positions at JCU identified as requiring Blue Cards as per the Working with Children Check (Blue Card) Procedure. Including the list within the procedure would make it overly long and would disrupt the flow of information. Use a schedule to list detailed information that is not integral to the intent and purpose of the policy or procedure.
- Appendices contain information that is supplementary to the policy or procedure. Diagrams, flowcharts and other lengthy or complex reference information that would otherwise disrupt the flow of the policy or procedure are best placed in an appendix. Refer to 'Appendix 1-Research (Data and Information) Asset Lifecycle' and 'Appendix 2-Custodianship Model for Research Data and Information' as examples of the type of information best placed in appendices.
- Other supporting documents may also be attached to a policy or procedure. These documents provide further details, guidance and support around undertaking processes and include guidelines, processes, forms, templates, handbooks etc. and are generally only relevant to a specific business unit. Supporting documents with broad application (eg. beyond a single business unit) will be approved by the relevant Policy Sponsor, while documents with narrow application will be maintained by the relevant business unit on their website.

Numbering

- Use the numbering provided as an example in the approved templates.
- Keep numbering to a minimum. Use sub-headings and bullet points rather than resorting to over numbering e.g. 1.1.13. Remember the audience for whom you are writing. Keep it simple.
- Avoid duplication of numbering, eg. do not number paragraphs 1, 2, 3 etc. under a heading, and then use the same numbers under a new heading. Either continue numbering, or use multi-level numbering in moderation (eg. 1.1, 1.2, 2.1, 2.2 etc.)

Sections

- Use sub-headings for logical sections of the overall activity and apply appropriate formatting cues such as numbering, indents and sections to outline the steps logically
- Hyperlink to tools, templates or checklists which exist to support the procedure so users can easily navigate to these resources
- Use **Note:** to reference any important considerations, requirements or supplementary information that applies.

Using capitals

- Use capitals for the first letter of the heading or title, along with any proper nouns, acronyms and references to "the University". Only use capital letters for position titles, names of workgroups, organisational units, degree titles (e.g. Bachelor of Arts) and publications.

Definition

A definition should be included to explain the meaning of a term (including acronyms) which appears in the document when:

- the term (word or phrase) may not be commonly known;
- the term may be used by multiple business areas in different ways or with different implied meaning;

- the term may be open to interpretation; or
- a technical term is used.

The definition should be simple and easy to understand by the general reader and not repeated in the content of the policy/procedure.

Language

- Make sure the document 'speaks with a single voice'. When possible, have one author work on the draft, even if they are incorporating other people's ideas and feedback.
- Draft in the third person ('they') rather than the second person ('you').
- If an action is mandatory, use 'must'.
- Do not use 'should' in policies and procedures as it does not make a definite statement about what will/will not be done.
- If an action is permitted but not required, use 'may'.
- Avoid the terms 'normally', 'usually' and 'generally'.
- Use one main idea per paragraph, section or subsection. Keep paragraphs short and avoid slabs of unbroken text.
- Use clear, concise and grammatical plain English. Wherever possible, use everyday words over technical ones and clearly define any technical terms which are required.
- Be sparing in your use of adjectives and adverbs.
- To avoid ambiguity, use the same words for the same concepts throughout the document.
- Avoid passive or indirect language. Wherever possible say who must do what, rather than that something will be done.
- Use gender neutral language. For example, use 'they' or 'their' instead of 'he/she' or 'his/her'.
- When referring to 'who' use generic terms such as 'staff, students, Managers'.
- The following phrases should be used to reference roles:
  - Staff member
  - Line manager
  - Head of work unit
  - Senior staff
- Refer to people by title/role only if generic terms are not applicable. Do not refer to individuals by name.
- Do not list specific contact details where possible and refer to websites or other sources that provide this information and can be easily updated.

Hyperlinks and referencing

- Keep hyperlinking to a minimum, as it requires ongoing maintenance and often points to sources that are not under the control of JCU.
- Ensure all links contain the name of the document being referred to. This will enable the reader to conduct a web search if links break.
- Where the document, site or content is not owned or controlled by JCU, for example a legislative document located on a Queensland Government website, ensure the name of the organisation that owns the document is clear to the reader.

Please contact the Policy Officer for any further information or advice

Link to policy template

Link to procedure template

7. How to review a policy – Review process

Follow this process when a policy (or framework) reaches its expiration date from the previous review or if an out-of-cycle policy review is required, for example in the following circumstances:

- Changes to government policy, legislation or JCU strategic direction
- New or changing initiatives, systems or operational activities
- Minor or major amendments identified and required
- The establishment of new policies or amendments to other JCU policies which impact on associated policies
- Improvement opportunities have been identified for the policy or its associated procedures.

Access the Policy Review and Approval Checklist (p.17) to complete the policy review to identify any required amendments.

If amendments are not required, update the revision history to confirm that the policy was reviewed and found to be fit for purpose with no need for amendment. Provide the updated version to the Policy Officer, along with evidence of Policy Sponsor agreement.

If amendments are required, determine whether the amendment is classified as a minor, major or administrative amendment (if in doubt, the Policy Officer can advise) or a disestablishment:

If:	Do this:
Administrative amendment	• Mark the amendments up on the Word version of the policy, previously obtained from the Policy Officer. • Forward the marked-up document to the Policy Officer. • No other actions are required.
Minor amendment	• Mark the amendments up on the Word version of the policy, previously obtained from the Policy Officer. • Update the revision history. • Forward the marked-up document to the Policy Sponsor for approval of amendments. • Forward approved documents to the Policy Officer for quality review and publication. The Policy Officer may request further changes to comply with the Policy and Delegations Framework.
Major amendment	1. Determine whether the required amendments are so significant that a new policy will effectively be developed. If so, the same research, risk and impact assessment and consultation activities which are completed during the new policy development process will be required. Go to 'How to develop a new policy' (p. 8) 2. If the amendment won't result in a significantly changed policy, identify all impacts of the major changes to policy and/or procedure including any impacts to: • Other policy and/or procedures • Stakeholder groups and individuals • Roles and responsibilities (checking for any new or existing delegations within the policy being reviewed, and ensuring the relevant Sub-delegations Register is amended if required) . • Reporting, compliance and audit mechanisms 3. Consult with stakeholders (including Legal & Assurance, if required) to draft and finalise amendments. 4. Update revision history 5. Forward the following documents to the Policy Sponsor for endorsement:

	• amended policy • amendments to other impacted policies and procedures • a Committee agenda item • the Communication Plan • the completed Policy Review Checklist 6. Forward the Policy Sponsor endorsed documents to the Policy Officer for quality review and progressing through the approval pathway. The Policy Officer may require further amendments to ensure the documents comply with the Policy and Delegations Framework.
Disestablishment	Go to Policy Disestablishment Process (p. 19)

Communication Plan Access the Communication Plan Template and draft the Communication Plan with consideration to: • Who will be directly or indirectly impacted by the policy changes (think also of the people who manage and administer impacted systems)? • What information do they need to know about the changes to policy and/or procedures? • How will this information be shared? • What are the preferred communication channels for the different audiences? • The Policy Sponsor must approve the Communication Plan
Go to the 'How to have a policy approved – Approval process' (p. 18)

7.1 Policy Review and Approval checklist

Date:

Policy title:

- ☐ Policy is named in accordance with the Policy Handbook Style Guide – Writing Policy.
- ☐ Policy content provides clarity on principles and how the University makes decisions.
- ☐ Policy intent is aligned with the University Plan.
- ☐ Policy references (where applicable) relevant and current legislation including the *James Cook University Act 1997*.
- ☐ Policy content does not conflict with, or is duplicated in, the Enterprise Agreement.
- ☐ Policy contains policy content only (no embedded procedures). Associated procedures are to be documented in a procedural document and if required, supporting guidelines.
- ☐ Delegations contained in the Policy, either explicit or implied, are accurately reflected in the relevant Sub-delegations Register. See the relevant Sub-delegation Management Procedure for information on amending the Sub-delegations Registers.
- ☐ Definitions included are necessary and complete.
- ☐ Equity impacts of the policy have been considered to address any equity implications.
- ☐ Language and terminology used throughout the policy is appropriate to the audience and simple to understand.
- ☐ Policy is drafted using the policy template standard headings: Intent, Scope, Definitions, Policy, Related policy instruments, Schedule/Appendix, Related documents & legislation, Administration.
- ☐ Policy is consistent with other JCU policies and procedures (i.e policy does not contain information which opposes, is conflicting or duplicates content in other policies).
- ☐ Appropriate consultation, including advisory committees, eg. Student Facing Policy Advisory Group, WHS Advisory Committee, Joint Consultative Committee and Legal Review (where required) has occurred.
- ☐ Consultation with the Director, Academic Quality and Strategy has occurred? (Learning and Teaching, Student and Academic Management policies only).
- ☐ Check all hyperlinks are working correctly and are at the end of the document (hyperlinks to pages are preferred over individual documents as they break less often).
- ☐ Titles, names and organisational units are accurate and correct.
- ☐ Links to related procedures are clear in the 'Related Documents' section and linked correctly
- ☐ Administration section is up to date:
    - Correct Approval Authority
    - Correct Policy Sponsor
    - Appropriate Revision history
    - Correct Contact Person
- ☐ Communication plan completed and approved by the Policy Sponsor.
- ☐ Agenda item (cover sheet) completed.
- ☐ Policy Sponsor agrees to final draft.
- ☐ This checklist is complete and provided to the Policy Sponsor…..

8. How to have a policy approved – Approval process

This approval process is required for new policies, major amendments to existing policy or requests to disestablish policy.

A quality check of all materials provided for approval is conducted by the Policy Officer. This provides the Policy Sponsor with assurance that policies:

- Are fit for purpose;
- Are aligned with the Policy and Delegations Responsibilities Map;
- Are easy to understand;
- Are developed using the processes in this Policy Handbook with particular application given to the Style Guide.

Has the draft policy been quality reviewed by the Policy Officer?

YES	NO
1. The Policy Officer will progress the following Policy Sponsor agreed documentation within Secretariat to the Committees Officers for inclusion on the relevant agenda item (cc Policy Sponsor/Author): • marked up copy of the amended policy; • marked up copy of any amended procedures or guidelines; • or in the case of major re-write: current published version and revised clean copy to compare; • any policy(s) for disestablishment; • draft agenda item cover sheet. 2. Committees Officers to only receive policy items from the Policy Officer. 3. If it is not certain that a policy item received by Secretariat has been quality checked by the Policy Officer, the item is to be returned to the Policy Sponsor and the Policy Officer notified.	1. Send draft documents (as listed in the Review Procedure (p.15) to the Policy Officer (cc. Policy Sponsor) 2. Policy Officer to quality check draft documentation. Addition of text to agenda item: *'The amendments to the policy have been reviewed by the Policy Officer and comply with the Policy and Delegations Framework.'* 3. The Policy Officer is to: • organise endorsement of all documents from the Policy Sponsor • forward Policy Sponsor agreed documentation to the Committees Officers for inclusion on the relevant agenda with cc to relevant Policy Sponsor/Author. **Note:** if items are deemed not ready for committee review, they will be returned to the Policy Sponsor/Author for action. Return to How to review a policy – Review process. (p 15)

Has the Policy been approved?

YES	NO
YES (without conditions) 1. The Committees Officer to provide Policy Sponsor and Policy Officer with an Action Item from the committee's minutes. 2. Policy Officer will publish policy in the Policy Library and communicate to the Policy Sponsor/Author that this has occurred. Where policies are to be future-dated, the Policy Officer will liaise with the Policy Sponsor regarding the timing of publication. 3. Policy Sponsor to activate Communication Plan.	Return to 'How to develop a new policy' (p. 8)
YES (conditional)	

1. If a policy has been conditionally approved (requiring an agreed further amendment), all conditions will be documented in the minutes of the relevant committee and communicated by the Committees Officer as an Action Item from the committee's minutes to the Policy Sponsor and the Policy Officer (policy@jcu.edu.au). 2. Policy Officer to confirm with Policy Sponsor that conditions have been met before publishing/implementation can occur.	
When the policy has been published go to 'How to implement a policy change – Implementation process' (p. 20)	

9. Minor amendment approval

Minor amendments to policy are approved by the Policy Sponsor and sent to the Policy Officer for updating in the Policy Library as required.

Changes to supporting policy instruments, procedures or guidelines will be approved by the Policy Sponsor and updated as required.

10. Administrative amendments

Administrative amendments such as corrections to spelling and grammar, or changes to position titles, organisational units or contact details and other consequential changes arising from decisions made elsewhere, will be made by the Policy Officer and do not need to go through a formal approval process.

11. Policy publication

A policy will be published or disestablished in the Policy Library by the Policy Officer as soon as the action item arising from the committee minutes has been received.

Existing policies will remain in place and operational until such time as the new or reviewed amended policy is published, or disestablished and removed from the policy library.

12. How to remove a policy that is no longer required – Disestablishment process

Policy disestablishment may occur when: -

- New policy has been created which supersedes existing policy
- Policy is no longer required, possibly as a result of changes to government policy, legislation or JCU strategic direction
- Policy review has identified requirement for disestablishment

Note: Policies **must not** be disestablished without written approval from the approval authority.

Step 1 - Needs analysis • Identify the need to disestablish existing policy • Assess risks associated with the proposed disestablishment of existing policy and, conversely, the risks to the University of not disestablishing the policy. • Obtain the Policy Sponsor's endorsement to disestablish the policy
Step 2 - Consultation • If the disestablishment of the policy has potential to cause significant impact to stakeholders, consult with representatives from each of the impacted stakeholder groups to confirm that disestablishment is required • Policy Sponsor to decide if Legal & Assurance advice/review is required

Step 3 - Drafting • Arrange for other University policies which reference the disestablished policy, to be updated to remove links or references (contact the Policy Officer for assistance). • Check that any existing delegations within the policy remain appropriately recorded in the relevant Sub-delegations Register and are understood • Check other related documentation which may exist outside of the Policy Library that may also require amendment as a result of the proposed disestablishment, i.e. business unit webpages • Arrange for any content from the proposed disestablished policy which is to be retained, to be transferred to the appropriate location, i.e. amend another policy or other document
Step 4 – Communication Plan Policy Author will complete a Communication Plan with consideration to: • Who should be notified about the policy disestablishment? • Who will be impacted by any amendments to existing policy and/or procedure? • What information do they need to know about the policy changes? • How will this information be shared? • Policy Sponsor to approve the Communication Plan
Step 5 – Policy disestablishment endorsement The Policy Officer will work in consultation with the Policy Author to finalise all documents in preparation for approval to disestablish. The Policy Author will provide the following documents to the Policy Sponsor for endorsement: • a committee agenda item • Policy for disestablishment • amendments to other impacted policies and procedures • Communication Plan
Step 6 – Policy disestablishment approval Forward the Policy Sponsor endorsed documents to the Policy Officer for quality review and progressing through the approval pathway. The Policy Officer may require further amendments to ensure the documents comply with the Policy and Delegations Framework.
Go to 'How to have a policy approved – Approval process' (p. 18)

13. How to implement a policy change – Implementation process

The policy implementation date is the date the policy is published in the policy library. This is the date the policy takes effect.

The implementation process is required when:-

- A new policy has been developed and approved
- Major amendments to policy have been approved
- Policy disestablishment has been approved

Policy Communication Plans, as approved by the Policy Sponsor, must be activated immediately after policy approval has been confirmed.

Communication about changes in the policy environment is necessary to keep staff and students informed about policies and procedures which affect them. The type of information that the audience will need to know about new, amended or disestablished policy(s) will vary depending on the situation. The Communication Plan provides a matrix of information which identifies:

- Who will be impacted directly or indirectly by the policy changes
- How the impacts will be addressed and the approach that will be taken to communicating this information
- When the policy will take effect (implementation date)

Step 1 – Communication Plan Policy Sponsors will ensure a Communication Plan is developed that addresses the diverse needs of all relevant stakeholders as part of the policy development or amendment project. A Communication Plan Template is available to assist.
Step 2 – Systems, forms, processes, guides, templates etc. Systems and materials, including procedures, must be developed and finalised to coincide with the approval of the policy.
Step 3 – Policy training Policy Sponsors are responsible for ensuring that training is delivered to the relevant stakeholders, including any systems training, information about new requirements arising from legislative changes, other required information.
Step 3 – Policy library update The Policy Officer will update the Policy Library with the new, amended or disestablished policy(s) and/or procedure(s) as required by the Policy Sponsor on the implementation date(s).
Step 4 – Records management The Policy Officer will file all documents related to the policy development, approval and implementation in accordance with recordkeeping guidelines.

13.1 Pre-implementation checklist

- [ ] Has the new policy been approved by the relevant Approval Authority?
- [ ] Have any supporting procedures and/or guidelines been approved by the Policy Sponsor?
- [ ] Have equity impacts been considered to address any equity implications?
- [ ] Have the resources required for implementation been sourced?
- [ ] Have the appropriate communication channel(s) and key messages been identified?
- [ ] Has the current environment, including volume of change impacting stakeholders, been considered in the scheduling of any communications or training?
- [ ] Have communications been drafted and reviewed?
- [ ] Have all the changes to webpages, forms and other media been identified and plans for amendments made?
- [ ] Has a method or procedure for measuring compliance with the changes to policy and/or procedure been developed if required?
- [ ] Has the final, approved policy and all supporting policy instruments (or policy to be disestablished) been provided to the Policy Officer (policy@jcu.edu.au) along with the effective date of the change?

Appendices

Appendix A: Policy consultation guidelines

Related policy instruments

Policy Development and Review Policy
JCU Delegations Policy

Other related documents

Gender Equity – Guide for Policy Sponsors

Administration

Approval Details

Sponsor	University Secretary
Approval authority	University Secretary
Version no	23-1
Date for next review	10/11/2027

Revision History

Version	Approval date	Effective date	Description of changes	Author
23-1	NA	05/01/2023	Updated Policy and Delegations Responsibilities Map to version approved by Council 01/12/2022.	Policy Officer
22-2	NA	10/11/2022	Consequential amendments made to handbook to align with organisational structure post-PSC.	Policy Officer
V22-1		28/03/2022	Amended to improve functionality.	Policy Officer
V 3.0	09 March 2018	30 April 2018	Minor amendment to Responsibilities Map to reflect organisational structure and new University Plan	Quality, Standards and Policy Officer
V 2.0	21 April 2017	21 April 2017	Revised Approval Authority arrangements approved by Council 21 April 2017	Manager QSP
V1.0			Handbook established	Quality, Standards and Policy Officer

APPENDIX A - Policy consultation guidelines

Who is a Stakeholder?

Stakeholders include anyone who can be affected by the policy development work you are undertaking as well as the key decision makers and approval authorities. In most cases, the beneficiaries of the policy and the risk-bearers will be the people most interested in your project.

Stakeholders are valuable contributors in the decision-making and problem-solving processes. People most affected by the issues and most directly impacted by their effects can help you to:

- understand the context, issues and potential impacts more fully
- determine your focus, scope, and objectives for solutions
- establish whether further research is needed into the problem.

People who are attempting to solve the problem can help you:

- refine, refocus, prioritise solution ideas
- define necessary steps to achieving them
- implement solutions, provide key data, resources, etc.

Stakeholder Mapping

Identifying the various stakeholders, their level of interest in the project, the potential impact the project will have on them and their ability to influence the project outcomes is critical. The policy author may want to work with the policy sponsor, other executives, or a working group to brainstorm or mind-map all the potential stakeholders.

The CAIRO matrix is a useful tool for brainstorming and organising potential stakeholders into categories.

Consulted (who is knowledgeable, and who has an interest, past, current or future?)	
Accountable (who is/are the ultimate business owners?)	
Informed (who needs to know about it?)	
Responsible (who is involved on a day-to-day basis?)	
Outliers (who are the people who aren't really involved but who might have some inside knowledge or a different perspective?)	

Once you understand who your stakeholders are, you should consider their different needs from consultation, to ensure that scarce resources are directed most effectively and to ensure that staff are not over-burdened with excessive information or demands on their time.

Mapping your stakeholders onto a power / interest grid will help identify appropriate levels and methods of engagement.

Power	High ↑	Keep satisfied (inform, consult) • Engage and consult on interest area • Try to increase level of interest	Manage closely (involve, collaborate) • Focus efforts on this group • Involve in governance/decision making bodies • Engage and consult with regularly
	Low	Monitor (minimum effort) (inform) • Inform via general communications: newsletters, website etc.	Keep informed (inform, consult) • Make use of interest through involvement in low risk areas • Keep informed and consult on interest area • Potential Supporter
		Low →	High Interest

Levels of Stakeholder Engagement

There are various levels of engagement, ranging from simply informing people about what you plan to do, to asking them for help in developing policy content and associated documents, plans, tools, and systems.

Depending on the complexity and sensitivity of your project, the potential impacts and the types and needs of stakeholders, you may need to employ various tools and strategies to engage effectively.

The table below is a general guide to choosing the level of engagement with the different stakeholder groups mapped into the power/interest grid.

Stakeholder group	Strategy	Actions
Keep satisfied	**Inform**: Provide stakeholders with balanced and objective information to help them understand the project, the problem, and the solution alternatives. **Consult**: Gather feedback on the information given. Level of input can range from minimal interaction (online surveys, etc) to extensive. Can be a one-time or ongoing/iterative	These stakeholders have high power, but low interest. They are influential in the organisation, but your project is not a priority for them, and they don't need to know the details. Keep them informed and up-to-date by email, InfoBytes, updates at Committee meetings. Communications should be high-level, concise and to the point. Try to move them to

	opportunities to give feedback to be considered in the decision-making process.	the 'Manage closely' section of the grid by inviting input and feedback on areas of interest. Direct consultation should be organised if these stakeholders show a higher level of interest.
Monitor	**Inform**: Provide stakeholders with balanced and objective information to help them understand the project, the problem, and the solution alternatives.	These stakeholders have low power and low interest. Keep them informed so they understand the benefits of your project, but don't overdo the communication. Group emails, InfoBytes, newsletters and other multi-recipient type communications are appropriate. It is not necessary to establish a formal channel for these stakeholders to provide input or feedback, however you should always make it clear that feedback is welcome and provide contact details.
Manage closely	**Involve**: Work directly with stakeholders during the process to ensure that their concerns and desired outcomes are fully understood and taken into account at each stage. **Collaborate**: Partner with stakeholders at each stage of the decision-making, including developing alternative solution ideas and choosing the preferred solution together. Goal is to achieve consensus regarding decisions.	These stakeholders have high power and high interest and are likely the decision-makers and those with the most direct involvement in the project. You should be communicating frequently with these stakeholders using various channels including electronic and in-person communications such as face-to-face meetings, workshops, presentations etc.
Keep informed	**Inform**: Provide stakeholders with balanced and objective information to help them understand the project, the	These stakeholders have low power but high interest in your project and will include the people who are impacted by the project, but don't have

	problem, and the solution alternatives. **Consult**: Gather feedback on the information given. Level of input can range from minimal interaction (online surveys, etc) to extensive. Can be a one-time or ongoing/iterative opportunities to give feedback to be considered in the decision-making process)	any decision-making responsibilities. It is important to keep these stakeholders informed and to also increase engagement with them in critical phases of the project.

Adapted from: Technical Writing Essentials by Suzan Last, 5.5 Stakeholder Engagement and Consultation, https://pressbooks.bccampus.ca/technicalwriting/chapter/stakeholderengagement/

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