Policy Handbook

JAMES COOK UNIVERSITY
AUSTRALIA

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1. Introduction

The Policy Handbook is a resource to support staff undertaking policy development – that is, the reviewing, drafting, consulting, communicating and implementation required to develop effective policies (including Frameworks) and procedures. The tools and information contained in this handbook represent a central reference point to embed best practice in policy development.

Further support is available from the University's Policy Officer 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
- Delegations Schedule and Sub-delegations Registers
- Council, committee and Vice Chancellor approved policies and 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 across the University to make decisions which incur a commitment, liability or risk on behalf of the University. Delegations are expressed in instruments such as 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 three 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 Sub-delegations 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 are endorsed and approved in accordance with the Policy and Delegations Responsibilities Map.

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. Procedures are approved in accordance with the Policy and Delegations Responsibilities Map.

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, knowledge base articles, forms, templates and so on 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. processes) 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) or they may be advisory rather than mandatory documents.

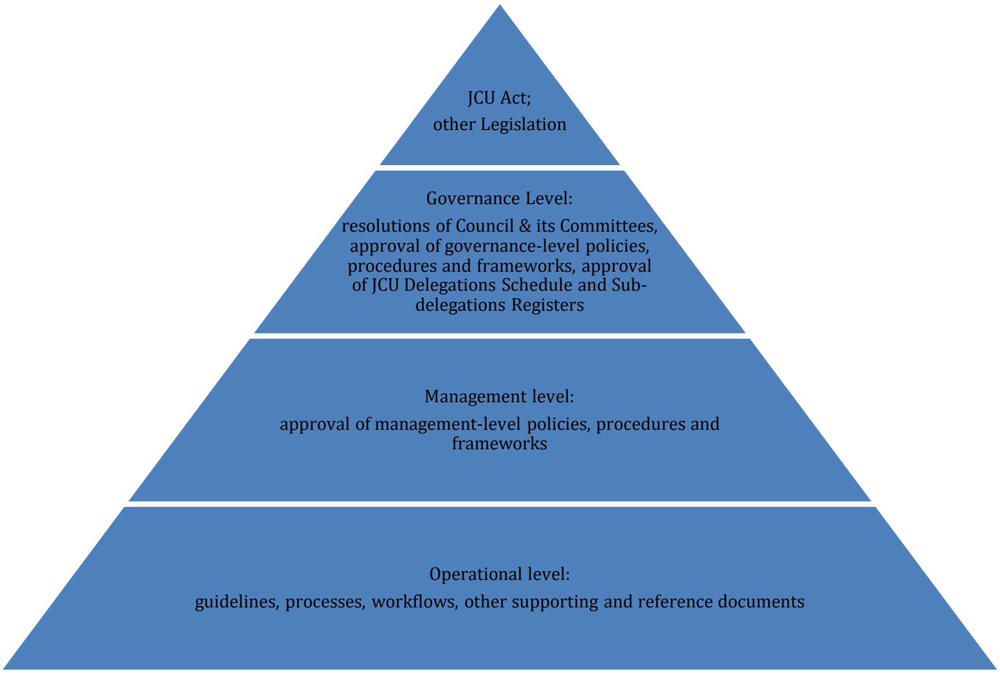
2.6 Plans and Strategies

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 JCU Corporate Strategy, Integrated Dynamic Plan and other plans and strategies 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.



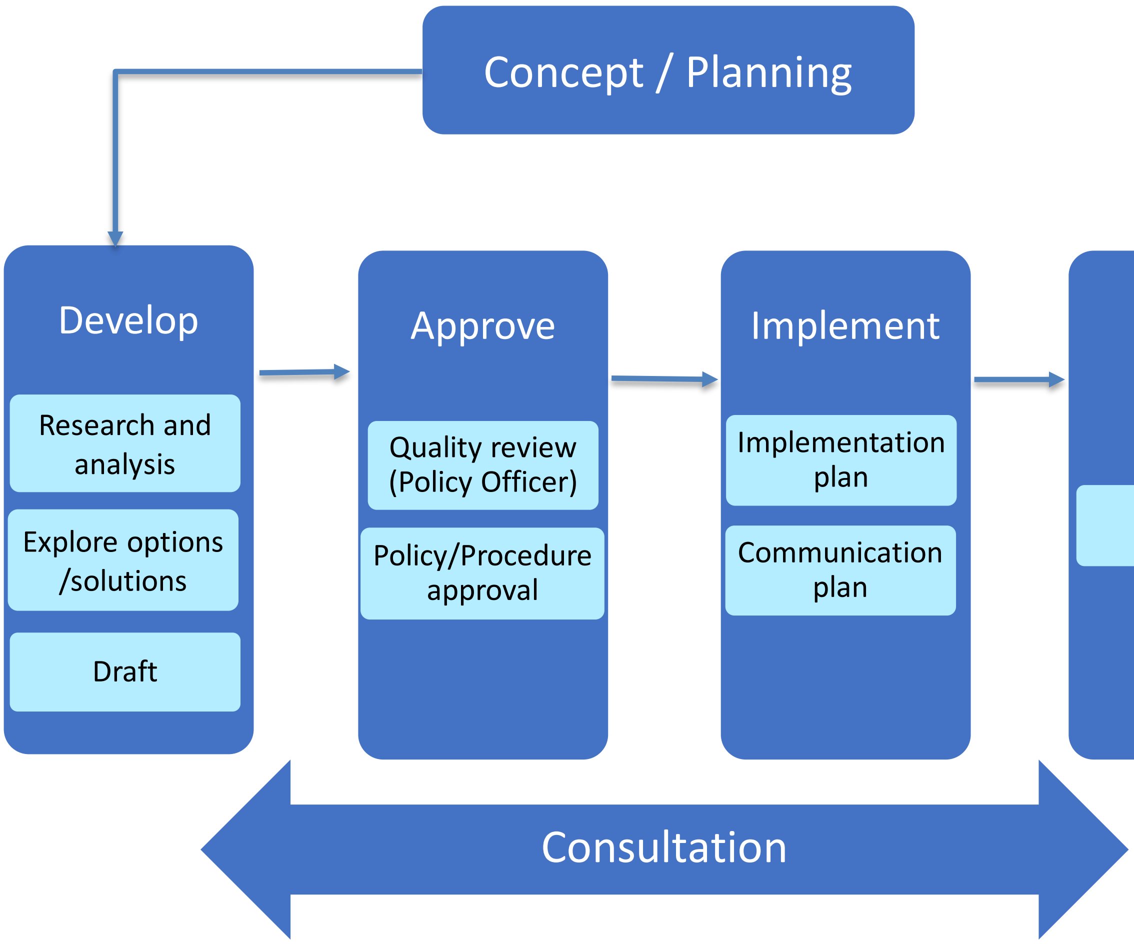
The University Council approves the Policy and Delegations Responsibilities Map which outlines responsibility for custodianship and approval of policies, procedures and delegations. Policy authors/reviewers must ensure their documents comply with this map.

3. JCU Policy and Delegations Responsibilities Map

<table>
<tr><th>Policy Domain</th><th>Policy Sub-Domain</th><th>Policy Sub-Domain Custodian</th><th>Approval of Policy and Procedure</th><th>Approval of Delegations Schedule</th><th>Sub-delegation Register</th><th>Approval of Sub-delegations Registers</th></tr>
<tr><td rowspan="4">Corporate Governance</td><td>Council Matters</td><td rowspan="4">Vice Chancellor</td><td rowspan="3">Council</td><td rowspan="15">Council</td><td rowspan="4">Corporate Governance</td><td rowspan="15">Vice Chancellor</td></tr>
<tr><td>Culture</td></tr>
<tr><td>Risk, Assurance, Regulatory and Compliance</td></tr>
<tr><td>WHS Governance</td><td>WHS Committee</td></tr>
<tr><td rowspan="5">Academic Governance</td><td>Academic Management</td><td>DVC Academy</td><td rowspan="5">Academic Board</td><td rowspan="5">Academic Governance</td></tr>
<tr><td>Learning and Teaching</td><td rowspan="2">DVC Education</td></tr>
<tr><td>Student Experience</td></tr>
<tr><td>Research Education</td><td rowspan="2">DVC Research</td></tr>
<tr><td>Research Management</td></tr>
<tr><td rowspan="6">University Management</td><td>WHS Management</td><td rowspan="2">Chief of Staff</td><td>WHS Committee</td><td rowspan="5">University Management</td></tr>
<tr><td>Corporate Administration</td><td rowspan="5">Vice Chancellor</td></tr>
<tr><td>Digital</td><td rowspan="3">DVC Services & Resources</td></tr>
<tr><td>Human Resources</td></tr>
<tr><td>Estate and Facility Management</td></tr>
<tr><td>Finance</td><td>Chief Financial Officer</td><td>Finance</td></tr>
</table>

4. Policy and Procedure development and review

The Policy Custodian is responsible for ensuring their respective sub-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 and/or procedure 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 new policy or procedure – Phase 1: Develop
- How to consult with stakeholders – Phase 2: Consult
- How to have a policy/procedure approved – Phase 3: Endorse and Approve
- How to implement a policy/procedure change – Phase 4: Implement
- How to review a policy/procedure – Phase 5: Review
- How to remove a policy/procedure 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 Custodian with assurance that policies and procedures:

- 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 appropriate Approval Authority. The Policy Officer can also provide comments and recommendations on drafts throughout the development process, if requested.

5. How to develop a new policy or procedure

5.1 Phase 1: Develop

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

New, or significantly amended policies and procedures may be 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 or procedures are identified, such as through internal audit recommendations; or
- There are 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 Custodian (refer to the Policy and Delegations Responsibilities Map), discuss the need for a new policy/procedure and clarify the objectives of the project. Policy Custodians must endorse any proposal to develop new a policy or procedure.

Research and analysis

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

- Explore whether a new policy or procedure is the best solution. Could the issue be addressed through amending existing policies or procedures, developing guidelines, a knowledge base article, work instructions or system changes?
- Check the topic is not already covered elsewhere in another policy or procedure, or other University documentation.
- Gather and consolidate issues raised on the topic, such as complaints, reviews and appeals.
- Review existing policies and procedures, business unit webpages and JCU databases.
- Research similar policies and procedures at other universities.
- Research in collaboration with the Policy Officer.
- Consult with Policy Custodians 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, or 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 or create conflicts 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 or procedure.

Drafting

Refer to the Style Guide – Writing Policies and Procedures for guidance on writing policies and procedures. Access the Policy Template or Procedure Template and draft the initial document, which should reflect the outcomes of discussions with the subject matter experts and other key stakeholders.

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

When drafting a policy or procedure, 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.
- **Procedures** are instructive documents that provide details on how to implement and operationalise a policy.

When writing policies and/or procedures, consideration must be given to:

- Aligning the document with the domains in the Policy and Delegations Responsibilities Map and ensuring custodianship is allocated to the correct area.
- Aligning content with the Intent statement and ensuring the document supports the University's strategic documents, mission and values.
- Operational compliance and risk.
- Compliance with standards and legislation e.g. TEQSA Threshold Standards, Higher Education Support Act, Higher Education Standards Framework and Australian Qualifications Framework.
- Appropriate language, style, terminology and structure.
- Comparison to and benchmarking against other Australian Universities.
- Development of support or guidelines to accompany the document.
- Amendments to existing policy and/or procedure(s) as a result of this new document. Obtain a copy of the documents to be amended from the Policy Officer and update as required, ensuring amendments are marked up by using tracked changes. Refer to Policy Review Process.
- Disestablishment of existing policy(s) and/or procedure(s) as a result of this new document. Refer to the Policy Disestablishment Process.

5.2 Phase 2: Consult

The methods and strategies used to engage with stakeholders will depend on the complexity and sensitivity of the policy/procedure development project. However, all consultation should be undertaken in a way that ensures that those most impacted by the document 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/procedure that also meets the University's objectives.

Engage with stakeholders

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

Consulting with stakeholders will occur throughout the policy/procedure 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 JCU Student Association must be involved when developing student-facing policies, and the Joint Consultative Committee must review staff related policies. Consider also whether to involve Technology Solutions Directorate, the Student Matters Team, 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 documents have been drafted, circulate marked up versions to stakeholders for review along with any supporting documents, e.g. plans, policies and procedures to be disestablished, changes to delegations etc., if applicable. **Learning and Teaching, Student Experience and Academic Management policies and procedures must be circulated to the Dean, Education Quality, Design and Standards and Associate Director, Policy and Standards for review**.

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

The Policy Author and Policy Custodian 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 and 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 Custodian is responsible for determining whether legal advice or legal research is required.

5.3 Phase 3: Endorse and Approve

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

Quality review – Policy Officer

The Policy Author 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 or procedure which is being proposed for disestablishment as a result of the proposed new/amended policy or procedure;
- draft agenda item coversheet (using the current template from Secretariat and completed using their guidance notes).

Where necessary, the Policy Officer will work in consultation with Legal and Assurance and the Policy Custodian to finalise all documents in preparation for endorsement and approval. This includes managing further revisions to documents. To ensure all necessary steps and actions have been taken, refer to the Policy Review and Approval checklist prior to submitting documents to the Policy Officer.

Policy endorsement and approval

The Policy Officer will manage the final documents through the approval process.

The approval process differs depending on the amendment type:

- New documents, documents which have undergone a Major review or which contain Major amendments must follow the formal endorsement and approval process. This process requires endorsement at the Management (advisory) level, before being approved by a governance committee.
    - Documents in the Academic Governance Policy Domain must additionally be endorsed by the relevant sub-committee of Academic Board.
- **Minor amendments** will be forwarded to the Policy Custodian for approval.
- **Administrative amendments** do not require approval, and will be implemented by the Policy Officer.

Note: It takes up to 10 weeks for a policy/procedure to move through the full Committee endorsement and approval process. This is unavoidable due to the cycle and scheduling of committee meetings. It is possible to obtain urgent interim approval of policies if necessary, however the policy/procedure will still need to go through the full Committee approval process within 6 months. Items for urgent approval will be assessed on a case-by-case basis at the discretion of the Policy Officer.

5.4 Phase 4: Implement

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

Implementation Plan

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

Consideration must be given to:

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

The Pre-implementation Checklist will help you identify and plan the key steps involved in implementing the policy/procedure.

Communication Plan

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

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

5.5 Phase 5: Review

The Policy Custodian is responsible for ensuring their policies and procedures 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 or procedure, 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

  - if there is a decision to be taken at the end of the sequence of events, clearly articulate who the decision-maker is, having due regard to the appropriate level of authority and the relevant delegation document/s (i.e., JCU Delegations Schedule, Sub-delegation Registers).
- 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 steps

Layout and formatting

- A policy should be no longer than 2 pages (excluding the Administration section) and Policies and Procedures must align with the relevant 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. The Policy Officer will determine whether any variations to the standard template are permitted.
- 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 Custodian, 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.

Definitions

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 grammatically-correct plain English. Wherever possible, use everyday words over technical ones and clearly define any technical terms which are required. The document should be easy to understand and apply.
- 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, including when nominating a contact person for the document.
- Do not list specific contact details where possible and refer to websites or other sources that provide this information – these sources can be more easily updated than a policy or procedure.

Hyperlinks and referencing

- Keep hyperlinking to external websites 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

7. How to review a policy/procedure – Review process

Follow this process when a policy, framework or procedure reaches its due date for next major review or if an out-of-cycle 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 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 Custodian 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:

Amendment type	Actions
Administrative amendment	1. Reviewer/author to mark the amendments up on the Word version of the policy, previously obtained from the Policy Officer. 2. Reviewer/author to forward the marked-up document to the Policy Officer. 3. Policy Officer to verify the proposed amendments and publish promptly.
Minor amendment	1. Reviewer/author to mark the amendments up on the Word version of the policy, previously obtained from the Policy Officer. 2. Reviewer/author to update the revision history. 3. Reviewer/author to forward the marked-up document to the Policy Officer for quality review. 4. The Policy Officer will forward the changes to the Policy Custodian for approval and publish promptly when approval is obtained.
Major amendment	1. Reviewer/author to 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'.

	2. If the amendment won't result in a significantly changed policy, the reviewer/author to 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 • New or existing delegations within the policy being reviewed, ensuring the relevant Sub-delegations Register is amended if required • Reporting, compliance and audit mechanisms 3. Reviewer/author to consult with stakeholders (including Legal and Assurance, if required) to draft and finalise amendments. 4. Reviewer/author to update revision history 5. Reviewer/author to forward the following documents to the Policy Officer for quality review and progressing through the approval pathway: • amended policy • amendments to other impacted policies and procedures • a Committee agenda item (see the University Council webpage 'Templates and Guidelines' tab for guidance on how to complete an agenda item cover sheet and for a cover sheet template) 6. Policy Officer to forward the finalised documents to the Policy Custodian for endorsement to progress through the approval pathway.
Disestablishment	Go to Policy Disestablishment Process.

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 Custodian 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/Procedure title:

- ☐ The document is named in accordance with the Policy Handbook Style Guide – Writing Policy.
- ☐ Policy content provides clarity on principles and how the University makes decisions. Procedure content provides sufficient detail on how the policy will be implemented and operationalised.
- ☐ The document intent is aligned with the Corporate Strategy.
- ☐ The document references (where applicable) relevant and current legislation including the *James Cook University Act 1997*.
- ☐ Policy content does not conflict with, or duplicate content in the JCU Enterprise Agreement.
- ☐ The document contains either policy or procedure content only (not a combination of both).
- ☐ Delegations contained in the document, either explicit or implied, are accurately reflected in the relevant Sub-delegations Register. See the Sub-delegation Management Procedure for information on amending the Sub-delegations Registers.
- ☐ Definitions included are necessary and complete, and are not duplicated in the Policy Glossary.
- ☐ Equity impacts of the document have been considered and adequately addressed.
- ☐ Language and terminology used throughout the document is appropriate to the audience and simple to understand.
- ☐ The document is drafted using the relevant template standard headings.
- ☐ The document 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 with all relevant stakeholders, including advisory committees, eg. Joint Consultative Committee and Legal Review (where required) has occurred.
- ☐ Consultation with the Director, Education Design, Quality and Standards has occurred (Learning and Teaching, Student Experience and Academic Management policies only).
- ☐ Hyperlinks are working correctly and are included at the end of the document (hyperlinks to pages are preferred over specific documents as they break less often).
- ☐ Position titles and organisational units are accurate and correct.
- ☐ Links to related policies and procedures are recorded in the 'Related Documents' section and linked correctly
- ☐ Administration section is up to date:
    - Correct Approval Authority
    - Correct Policy Custodian
    - Appropriate revision history summary
    - Correct Contact Person (the position title should be listed, not the person's name)
- ☐ Communication plan completed and approved by the Policy Custodian.
- ☐ Committee agenda item (cover sheet) completed using the current template.

8. How to have a policy or procedure approved – Approval process

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

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

- *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 attention given to the Style Guide.*

Has the draft document(s) been quality reviewed by the Policy Officer?

YES	NO
1. The Policy Officer will progress the following Policy Custodian-endorsed documentation to the Secretariat Committees Officers for inclusion on the relevant committee agenda: • marked-up and clean copies of the amended policy/procedure; • in the case of a major re-write: current published version and clean revised copy to compare; • any associated policies/procedures for disestablishment; • agenda item cover sheet. 2. Committees Officers will only accept policy/procedure related committee meeting items from the Policy Officer. 3. If it is not certain that a policy item received by the Secretariat has been quality checked by the Policy Officer, the item will be returned to the Author and the Policy Officer notified.	1. Send draft documents (as listed in the Review Procedure to the Policy Officer (cc. Policy Custodian) 2. Policy Officer to quality check draft documentation. 3. Refer to Yes process (to the left). ***Note:*** *if items are deemed not ready for committee review, they will be returned to the Policy Custodian/Author for action. Return to How to review a policy – Review process.*

Has the policy/procedure been approved?

YES	NO
YES (without conditions) 1. The Committees Officer will provide the Policy Custodian and Policy Officer with an Action Item from the committee's meeting minutes after they have been finalised. 2. Policy Officer will publish the document (or amendments) to the Policy Library as soon as practicable, and communicate to the Policy Custodian and Author that this has occurred. Where policies or procedures are to be future-dated for implementation, the Policy Officer will liaise with the Policy Custodian regarding the timing of publication. 3. Policy Custodian, Author or delegate to activate Communication Plan, as appropriate.	Return to How to develop a new policy

YES (conditional) 1. If a policy or procedure has been conditionally approved (requiring an agreed further amendment discussed at the committee meeting), all details and 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 Custodian, Author and the Policy Officer. 2. The Author will amend the document as agreed and provide the amended document to the Policy Officer. 3. Policy Officer to confirm with Policy Custodian (and the Committees Officer, if necessary) that conditions have been met before publishing/implementation can occur.	
When the policy or procedure has been published go to 'How to implement a policy/procedure change – Implementation process'.	

9. Minor amendment approval

Minor amendments to policies and procedures are to be sent to the Policy Officer who will obtain approval from the Policy Custodian before updating in the Policy Library.

Changes to supporting policy instruments or guidelines will be approved by the Policy Custodian 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, are to be sent to the Policy Officer. This type of amendment can be implemented by the Policy Officer without the need for further approval.

11. Publication

Policies and procedures will be published, amended or disestablished in the Policy Library by the Policy Officer as soon as practicable after 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.

Where a previous version of a policy or procedure must remain published concurrently with the new version (as is sometimes required for matters such as reviews or appeals etc.) this should be discussed with the Policy Custodian and Policy Officer.

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

Policy or procedure disestablishment may occur when:

- A new policy or procedure has been created which supersedes an existing policy
- The policy or procedure 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 and procedures **must not** be disestablished without written approval from the approval authority.

Step 1 - Needs analysis • Identify the need to disestablish existing policy/procedure. • Assess risks associated with the proposed disestablishment and, conversely, the risks to the University of not disestablishing the document. • Obtain the Policy Custodian's endorsement to disestablish the document.
Step 2 - Consultation • If the disestablishment of the policy/procedure 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 Custodian to decide if Legal & Assurance advice/review is required.
Step 3 - Drafting • Arrange for other University policies and procedures which reference the policy/procedure being proposed for disestablishment to be updated to remove links or references (contact the Policy Officer for assistance). • Check that any existing delegations within the document 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 document which is to be retained, to be transferred to the appropriate location, i.e. amend another policy or procedure.
Step 4 – Communication Plan Policy Author will complete a Communication Plan with consideration to: • Who should be notified about the disestablishment? • Who will be impacted by any amendments to other policies and/or procedures? • What information do they need to know about the changes? • How will this information be shared? • Policy Custodian 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 Officer: • a committee agenda item cover sheet • Policy/procedure for disestablishment • Draft amendments to other impacted policies and procedures The Policy Officer will complete a quality review and seek endorsement to proceed with the disestablishment from the Policy Custodian. Policy Officer may require further amendments to ensure the documents comply with the Policy and Delegations Framework.
Step 6 – Policy disestablishment approval The Policy Officer will forward the endorsed documents and committee agenda item to Secretariat, and ensure it is presented to the relevant committees for endorsement/approval.
Go to 'How to have a policy approved – Approval process'

13. How to implement a policy/procedure 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 occurs when:

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

Communication Plans, as approved by the Policy Custodian, must be activated immediately after 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 policies and procedures 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 changes
- How the impacts will be addressed and the approach that will be taken to communicating this information
- When the policy or procedure will take effect (implementation date)

Step 1 – Communication Plan Policy Custodians will ensure a Communication Plan is developed that addresses the diverse needs of all relevant stakeholders as part of the policy/procedure development or amendment project. A Communication Plan Template is available to assist.
Step 2 – Systems, forms, processes, guides, templates etc. Systems and materials such as forms, guidelines, work instructions etc. must be developed and finalised to coincide with the approval of the policy/procedure.
Step 3 – Training Policy Custodians 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 Custodian on the implementation date.
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/procedure been approved by the relevant Approval Authority?
- ☐ Have any supporting work instructions and/or guidelines been approved by the Policy Custodian?
- ☐ Have equity impacts been considered to address any equity implications?
- ☐ Have the resources required for implementation been sourced?
- ☐ Have the appropriate communication channels 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/procedure 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

Custodian	University Secretary
Approval authority	University Secretary
Version no	25-1
Date for next review	04/04/2030

Revision History

Version	Approval date	Effective date	Description of changes	Author
25-1	04/04/2025	04/04/2025	Major review of Policy Handbook to align with current practice and organisation structure.	Policy Officer
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 and procedure consultation guidelines

Who is a Stakeholder?

Stakeholders include anyone who can be affected by the policy/procedure 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, and 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 author may want to work with the policy custodian, 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, Info_Bytes, 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, Info_Bytes, 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

	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)	by the project, but don't have 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/