

## POLICY FRAMEWORK

### Purpose

This Policy Framework provides guidance for institutional policy development, including approval, implementation, publication, and review. The Framework aims to ensure the University has consistent, relevant and up-to-date governance documentation.

### Scope

The Framework applies to all staff involved in the drafting of institutional University policy documentation. Any additions or potential exemptions to the Framework will be considered exceptionally by the University Secretary.

## 1 Introduction

1.1 The Framework consists of the following:

- Definitions
- Roles and responsibilities
- Policy development guide and template
- Policy approval
- Implementation and communication
- Retention and storage
- Review process
- Compliance

## 2 Definitions

2.1 Please see the following definitions of official documents based on those currently used within the University and across the HE sector. Throughout this framework, the word 'policy' refers to both institutional policies and procedures.

Strategy	A plan of action to take the University in a particular direction or achieve the aims of the University Strategy Map.
Policy/Regulations	Sets out the University rules, conduct or standards governing an area. Generally approved by a University Committee or Council
Procedure	Steps and/or actions that must be taken to ensure consistency of practice, often in support of a policy or regulations.
Framework	A prescribed approach to be taken to an area/activity.
Code of Practice	A set of standards that indicate best and expected practice in an area.
Guidance	Detailed practical advice on a particular area/activity.

### 3 Roles and responsibilities

- 3.1 Service Directors and Deans are responsible for identifying the need for a particular policy to help the University meet its strategic objectives and/or to ensure legal and regulatory compliance. Should a Dean or Director identify the need for a new University policy, they should bring this to the attention of the University Secretary in the first instance. All staff with responsibility for policy development should be aware of, and ensure that their policies comply with, the Framework. The University Secretary's Office (USO) will communicate information on the Framework to all staff and publish the Framework on the University's website, together with links to all institutional policies.

### 4 Policy Development Guide and Template

- 4.1 Every policy must have an individual post-holder as owner. The owner will be responsible for the policy's development, dissemination, maintenance and review. The policy owner is usually the author of the policy, but this may not always be the case.
- 4.2 A template is available at Appendix A to assist staff with policy development. This is not intended to be prescriptive but to assist in drawing up new policies. The template also lends itself to drafting procedures, codes of practice and guidance.
- 4.3 A policy should include:
- University name and logo (where externally accessible) in the header of the first page
  - Page number, page x of y, and version number in the footer section of every page
  - Policy title and introduction to include the purpose of the policy, the aims and objectives and its scope.
  - Main body of the policy, with all sections and paragraphs numbered.
- 4.4 The last page of the policy **must** contain a policy sign-off and ownership details section and revision history as per the template. If a policy is not intended to be public-facing, it should be clearly labelled as such.
- 4.5 The University encourages all publications, including policies, to be written in a clear, concise and readable format and recommends the following:
- Use active rather than passive verb and avoid jargon as advised by the Plain English Campaign: <http://www.plainenglish.co.uk/>
  - An average sentence length of between 15-20 words.
  - Avoid using information that may become out of date (for example, use job titles rather than names).
  - If acronyms are used, the full name should be used in the first instance with the acronym in brackets.
  - Formatting should be consistent with the template, i.e. Arial font size 11, to conform to accessible document guidelines.

## 5 Policy Approval

5.1 Before a policy can be implemented it must go through an approval process. This generally includes the following four stages: **consultation, equality impact assessment, approval** and **implementation**.

### 5.2 Consultation

Consultation with key stakeholders should be carried out before a draft policy is submitted for approval with sufficient time allowed for meaningful consideration. Stakeholders should also be consulted as part of the review process. Consultation with relevant Deans and Service Directors is important for all policies to ensure awareness of any implications for their areas of responsibility.

5.3 Policy owners should also take cognisance of, and ensure compliance with, other University policies in consultation with relevant policy owners, as appropriate.

### 5.4 Equality Impact Assessment (EIA)

When developing or reviewing key policies, it is essential to ensure that they are fair, transparent, lawful and consistently applied. It is also essential to ensure that the proposed policy does not have an inadvertent negative impact on individuals by virtue of them being part of a protected group under the Equality Act (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation). An Equality Impact Assessment (EIA) must be carried out on all new policies, and where significant changes are made to existing policies to anticipate possible barriers the policy could pose to particular people with these protected characteristics. If the policy disadvantages certain groups of people, the University has a legal duty to mitigate, remove or reduce the negative impact. EIAs are an important component in supporting the University's compliance with equality legislation; and are a recognised tool for improving policy development, in identifying potential steps to advance equality and foster good relations, and to ensure that we do not discriminate unlawfully. Further guidance on EIAs is available from the [Human Resources department](#).

### 5.5 Privacy Impact Assessment (PIA)

Under the Data Protection Act 2018, you are required to carry out a Privacy Impact Assessment (PIA) when developing a new policy, where the new policy would have a significant impact on the use, collection, storage, retention and disposal of personal data. Further guidance on PIAs can be found on the University's Data Protection portal.

### 5.6 Approval

Many policies have to be approved by University Council or Senate, for example Finance Regulations and Student Regulations, and many policies by virtue of their wide impact across the University must also be approved by the University's Senior Leadership Team. Approval of other policies is delegated to the relevant Committee. Policy authors should refer to the terms of reference of the University's Committees to help with planning approval routes. If in any doubt, advice should

be sought from the University Secretary. For existing policies, approval routes are documented within the Policy Schedule within the Policy Uniwide site.

- 5.7 Procedures, guidance and codes of practice should usually be approved by the relevant Service Director/ /Dean.

## 6 Implementation and Communication

- 6.1 The policy owner has responsibility for the effective communication of the policy to the relevant target audience. Changes to staff policies will generally be promoted via the staff hub, supported by all-staff emails. Student-facing policies will follow a similar approach and will be available on the student portal.
- 6.2 Where appropriate, the policy owner should develop bespoke support and training sessions for the users to enhance understanding of, and adherence to, the policy. Training requirements should also be discussed with colleagues from the Human Resources Department.

## 7 Retention and Storage

- 7.1 The Policy Documents Media Library in Terminal 4 (T4) (the University's web content management system) is the primary location for all current institutional policy documents.
- 7.2 To improve accessibility of the University's policy documents for staff, students and other interested parties, links to all institutional policies are available from a central listing on the University's Policies and Procedures [home page](#). The University Secretary's Office (USO) is responsible for ensuring that the latest version of the policy is uploaded to T4 in pdf format.
- 7.3 The School/Service who owns the policy can include a link to the Policies and Procedures from their own webpages if relevant. It is essential that the same document is not hosted in multiple different locations so as not to cause confusion about which is the definitive version.
- 7.4 To facilitate links from a central page, policy names **must** not be changed in order for such links to remain valid. The policy name should not contain any reference to versioning; this should instead be specified in the document's revision history section.
- 7.5 A schedule of policies within the scope of the Policy Framework, together with information on review dates and compliance measures, is available in the Policies and Procedures Uniwide site which is accessible to all staff. The site contains a copy of the [policy template](#) and other useful guidance including the AUA Good Practice Guide on drafting policies, versioning guidance and Equality Impact Assessment guidelines.
- 7.6 The policy owner (or their designated representative) is responsible for providing a copy of the final, approved version to the USO for upload to the Policy Library. Please ensure that the Policy Sign-off and Revision History sections are completed in full; guidance is available from the USO. Once the policy review is

complete, please use the 'drop off' [facility](#) in the Uniwide site which will send an automatic notification to colleagues in the USO who will upload the policy to T4, having ensured the Framework is updated to reflect the new review date and any other relevant changes to the policy.

7.7 Policy owners (or their designated representative) are responsible for ensuring that previous versions of policies are stored in a centrally accessible location within their area (i.e. not a restricted area, such as personal K drives). In line with the [University's Retention and Disposal Schedule](#), it is recommended that all policies covered by the Policy Framework are retained for 10 years after they are superseded, with the exception of the following, which should be kept permanently:

- Award ceremonies administration policies
- Academic assessment policies
- Information governance policies
- Health and Safety Policy
- Research policies
- Intellectual Property Policy

Please contact the [Records Management Service](#) for advice on managing and retaining versions.

## 8 Review Process

8.1 It is important to review policies regularly to ensure that they remain fit for purpose and compliant with current legislation/regulations. Normally a three-year review period is sufficient. In some cases, review may be required earlier if there is a legislative or regulatory requirement or significant change and in other cases a review every five years may be more appropriate. In the preparation and review of a policy, the reviewer should consider sector practice as well as external requirements.

8.2 It is the responsibility of the policy owner to establish the review date/interval and complete the review at the appropriate time. The policy owner/author will receive automated emails (copied to the USO) to prompt review in advance of the specified date.

8.3 A reviewed policy, which is subject to the relevant approval process, will have a new version number. At each formal review the policy should have a new version number, starting with V1.0 with effect from 2017/18 upon the introduction of this Framework, V2.0 on subsequent review, etc. As mentioned in 7.4 above, versioning should be contained in the revision history table at the end of the policy, and not in the document title.

8.4 In addition to formal review, policy owners should ensure that an annual check of hyperlinks, roles and names is undertaken. There is no need to follow the formal approval process if no substantive changes are made at this point (unless the policy is subject to a formal review on an annual basis). Annual checks which involve no substantive changes will have a minor version number, for example,

V1.1 for a change made to update hyperlinks, minor grammatical changes or a change in job title and the version history table should be updated to reflect this.

8.5 For all formal review process, the policy owner must ensure that any change implemented is in consultation with relevant departments / areas of responsibility. This must be updated on the Policy Sign-off page.

8.6 All formal/ major changes to the existing policies must be approved by the relevant committee.

## **9 Compliance**

9.1 The policy owner is responsible for ensuring compliance with the policy, having identified appropriate measures at the outset, and ensuring that these remain fit for purpose at each policy review.

9.2 An annual compliance check against the Policy Framework is undertaken by the Records Management Team. Up to 10 policies will be assessed on whether they comply with the Framework, including timeliness of review, the correct approval route and correct use of the policy template. Policy owners will also be asked whether they have carried out and met their stated compliance measure(s). The relevant policy owners will receive prior notification of the check from the USO.

<b>POLICY SIGN-OFF AND OWNERSHIP DETAILS</b>	
<b>Document name:</b>	Policy Framework
<b>Version Number:</b>	V2.1
<b>Equality Impact Assessment:</b>	Not relevant for this policy
<b>Privacy Impact Assessment:</b>	Not relevant for this policy
<b>Approved by (date):</b>	University Senior Leadership Team
<b>Effective from:</b>	26 May 2022
<b>Date for Review:</b>	May 2024
<b>Consulted with (Departments / Area of Service/ Job Title)</b>	Not applicable
<b>Author:</b>	Information Governance Officer
<b>Owner (if different from above):</b>	University Secretary
<b>Document Location:</b>	<a href="https://www.hud.ac.uk/media/policydocuments/Policy-Framework.pdf">https://www.hud.ac.uk/media/policydocuments/Policy-Framework.pdf</a>
<b>Compliance Measures:</b>	Monitor timeliness of policy reviews and spot check random sample of policies for compliance with the framework on an annual basis.

<b>REVISION HISTORY</b>			
<b>Version</b>	<b>Date</b>	<b>Revision description/Summary of changes</b>	<b>Author</b>
V3.0	May 2022	Steps included in Policy Review process	Information Governance Officer
V2.1	March 2022	Minor amendments and links update. SLT approval not required	Information Governance Officer
V2.0	4 June 2020	Amendments around policy retention, Privacy Impact Assessments and Compliance.	Executive Officer – Governance, Compliance and Policy
V1.0	25 May 2017	New policy	University Secretary

## **APPENDIX A – POLICY TEMPLATE**

### **POLICY NAME**

#### **Purpose and Context**

Brief description outlining why the policy has been created.

#### **Scope**

What and who the policy applies to – staff, students, partner organisations etc

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### **1.0 Introduction**

1.1 Paragraph

### **2.0 Next Heading**

2.1 Paragraph



<b>POLICY SIGN-OFF AND OWNERSHIP DETAILS</b>	
<b>Document name:</b>	
<b>Version Number:</b>	
<b>Equality Impact Assessment:</b>	[Completion date or confirmation that equality considerations have been previously documented]
<b>Privacy Impact Assessment:</b>	[Completion date or confirmation that PIA not applicable]
<b>Approved by</b>	[Approving body, e.g. UTLC, SLT, URC]
<b>Date Approved:</b>	[dates of committee meeting]
<b>Date for Review:</b>	[as per the agreed review interval]
<b>Consulted with (Departments / Area of Service / Job Title):</b>	
<b>Author:</b>	
<b>Owner (if different from above):</b>	
<b>Document Location:</b>	This should be the link to the policy on the main policies and procedures home page
<b>Compliance Measures:</b>	Policy owner to ensure compliance checks identified at the outset are still fit for purpose.
<b>Related Policies/Procedures:</b>	[List any applicable University regulations/policies/ procedures that may impact upon the procedure]

<b>REVISION HISTORY</b>			
<b>Version</b>	<b>Date</b>	<b>Revision description/Summary of changes</b>	<b>Author</b>
V2.0	Sept 2019	Major redraft (approval required)	
V1.2	March 2018	Job titles updated (minor amends)	
V1.1	Sept 2017	Formatting updates (minor amends not requiring committee approval)	
V1.0	Sept 2016	First draft of new policy	