Revisiting the Policy Cycle
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ABSTRACT

This paper has been developed to guide a professional development exercise for the Association for Tertiary Education Management (ATEM) Developing Policy in Tertiary Institutions seminar. It focuses on the policy cycle employed by tertiary sector institutions to develop institutional policy. It is timely to revisit this issue in light of emerging requirements of the Tertiary Education Quality Standards Agency (TEQSA) regarding policy development, benchmarking, implementation, evaluation and review. The University of Melbourne Policy Development and Review Cycle is used as an organising construct to explore stages of an elongated, comprehensive policy cycle. This policy cycle includes: identification and confirmation; preliminary consultations; drafting; benchmarking; consultation; revision; compliance checking; endorsement; approval; communication and publication; implementation; implementation and compliance monitoring; implementation evaluation; triennial review. Following the lead of others in examining reasons for policy failure, this paper explores examples of poor policy practice in relation to various policy cycle stages. Revisiting the policy cycle will position policy practitioners and stakeholders to more ably implement institutional policy projects.

Introduction

A policy cycle is a guide, or heuristic, for policy development; it 'brings a system and a rhythm to a world that might otherwise appear chaotic and unordered' (Althaus et al., 2013, p. 32). The policy cycle, or sequenced policy process, was initially proposed in the seminal work of Lasswell (1951), and subsequently adopted by others (Brewer, 1974; Jenkins, 1978; Brewer and deLeon, 1983; and deLeon, 1999). In Australia, Bridgman and Davis (2004) developed the Australian Policy Cycle to conceptualise the public policy process:
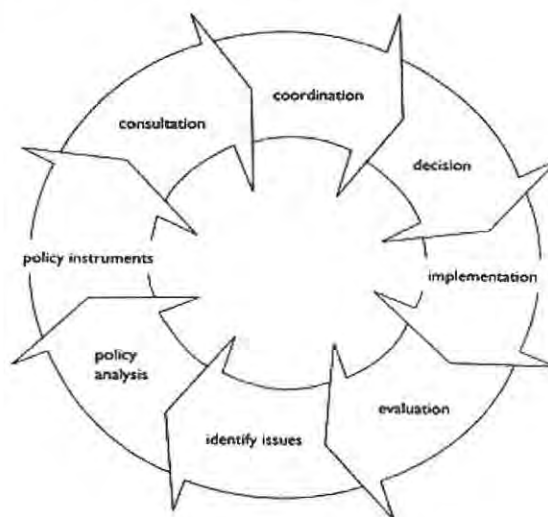

Figure 1: Australian Policy Cycle (Bridgman and Davis, 2004)

In terms of tertiary institution policy process the Association of College and University Policy Administrators (ACUPA) Policy Development Process with Best Practices (Ford, Petersen & Spellacy, 2001; Capell, Ford & Spellacy, 2004) and Institutional Policies and Procedures Approval Process (Clark et al., 2012) are two of the very few examples represented in the research literature. The ACUPA policy cycle includes the cycle stages of:

- predevelopment (be proactive in issue identification, identify an owner for each policy, determine the best 'policy path', assemble a team to develop policy)
- development (agree on common definitions and terms, use a common format, obtain approval at owner and senior levels, plan communication, publicity and education, put information online and accessible from one location; provide search capability) and
- maintenance (develop a plan for active maintenance and review, encourage users to provide feedback, archive changes and date new releases with an 'effective date', measure outcomes by monitoring or testing)
  (Ford, Petersen & Spellacy, 2001; Capell, Ford & Spellacy, 2004).
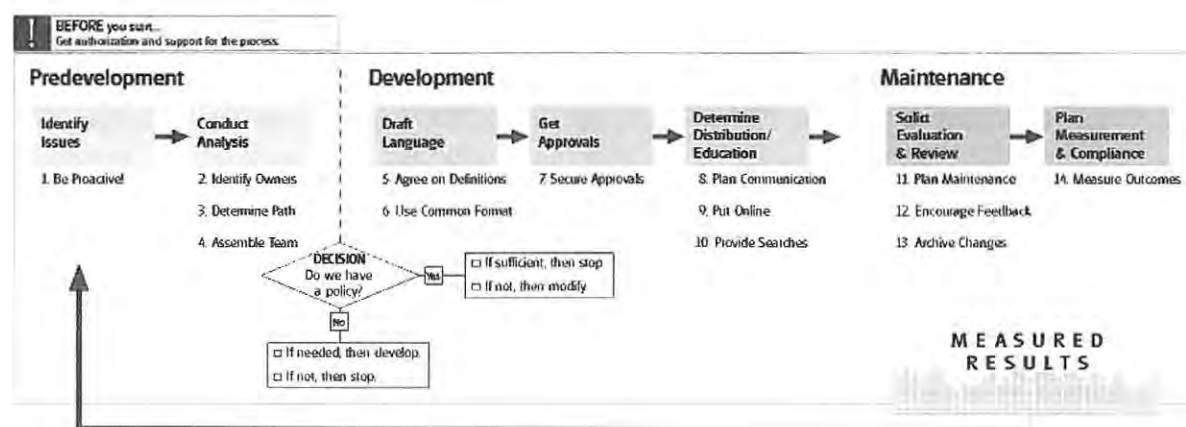

Figure 2: ACUPA Policy Development Process with Best Practices

The Institutional Policies and Procedures Approval Process (Clark et al., 2012) includes stages of: initiation and development, institutional entity review (where 'entity' refers to representative bodies), campus community review, Board of Trustees approval and posting of policy. Australian tertiary institutions have adopted the policy cycle concept and adapted it to scaffold the institutional policy process and this paper explores a policy cycle applicable for Australian tertiary institutions to guide policy development, implementation, amendment and review.

Defining and locating institutional policy

Australian tertiary sector institutions, including universities and Technical and Further Education (TAFE) institutes, have developed institutional policy to guide academic and administrative operations. Institutional policy may be defined as formally articulated statements of principle; it 'provide(s) a general, overall, rational canopy for specific actions, procedures, or operations' (Fincher, 1999, p. 10). Policy is complemented by subordinate institution-specific policy instruments – frequently including procedures and guidelines. For the purpose of this exercise the following University of Melbourne definitions from the *Policy on Policy* are employed:

Table 1: Definitions – Policy, Procedure and Guideline

Policy	A Policy is a statement of principle that articulates, and aligns with, legislative, regulatory or organisational requirements.
Procedure	A Procedure is a statement that provides information or step-by-step instructions to implement a Policy.
Guideline	A Guideline is a statement that provides guidance to support the implementation of, and ongoing compliance with, a Policy or Procedure.

Source: University of Melbourne, *Policy on Policy* (version approved by Council 29 April 2013), n.p.

Clark et al. (2012) assert the importance of institutional policy:

> Institutional policies are vital to the well-being of institutions of higher education. They promote legal and regulatory compliance; are the primary means of informing the faculty, staff, and students of rights, responsibilities, and procedures; are a standard by which institutions are judged in litigation; and can be an important facet of shared governance. (p. 12)

Policy is located in a hierarchy of institution-specific texts, below institutional legislative instruments (such as the foundation act and delegated legislation), and above texts frequently referred to as 'local documents', that is, documents such as forms and checklists developed to support the implementation of institutional policy instruments. The hierarchy is also populated by institution-specific texts such as codes of conduct, charters and formally articulated resolutions of peak decision-making committees. For example, the University of Melbourne hierarchy of texts may be depicted as follows:

Legislative instruments (Act, Statutes, Regulations)

Standing Resolutions of Council

Resolutions of the Board

Codes of conduct

Policy instruments (Policies, Procedures, Guidelines)

Local documents (including local provisions, instructions, forms, checklists or business process documents)

Figure 3: Hierarchy of institution-specific texts

Different policy cycle models

There are variations between Australian institutions with respect to the complexity and requirements of policy cycles. The majority of Australian universities articulate policy cycles inclusive of most of the stages of drafting, consultation, approval, promulgation and review. In addition to these policy cycle stages, some universities articulate policy cycle stages characteristic of 'model 2': identification of policy requirements, nomination of responsible officers, endorsement, implementation and records management. Few universities articulate comprehensive policy cycles inclusive of basic and 'value-adding' stages typified by 'model 3': most policy cycle stages identified for models 1 and 2, plus one or more of benchmarking, revision, quality control and monitoring and/or evaluation (Freeman, 2010).

Table 2: University Policy Development Cycle Stages: Models 1, 2 and 3

Model 1	Majority	Most of: drafting, consultation, approval, promulgation and review
Model 2	Some	Most stages from Model 1, and one or more of: identification of policy requirements, nomination of responsible officers, endorsement, implementation, records management
Model 3	Few	Most stages from Models 1 and 2, and one or more of: benchmarking, revision, quality control, monitoring, evaluation

Source: Freeman, B. (2010) *Benchmarking to Identify Good Practice University Policy Frameworks*, Tertiary Education Management Conference, 3-6th October 2010.

Althaus et al. (2013) support a comprehensive policy cycle: 'a policy process that does not include everything from problem identification to implementation to evaluation has less chance of success. ... (O)n balance ... a more thorough policy process is less likely to produce an obvious policy mistake' (p. 34).

Imperative for comprehensive policy cycles inclusive of value-adding stages

The Commonwealth government's *Provider Registration Standards* - one element of the *Higher Education Standards Framework (Threshold Standards)* 2011 - explicitly require that Australian tertiary provider's 'corporate and academic governance arrangements demonstrate: the effective *development, implementation and review of policies* for all aspects of the tertiary provider's academic activities ... and, effective quality assurance arrangements for all the higher education provider's operations, encompassing systematic monitoring, review and improvement' (2011, p. 4, emphasis added). The Tertiary Education Quality Standards Agency (TEQSA) has also revealed that they have explicit requirements with respect to policy benchmarking, and evidencing policy implementation. These new obligations – requiring evidence of policy development, benchmarking, implementation and review - will increasingly influence the composition of institutional policy cycles unless or until they are changed. For example, the recently announced Commonwealth government review of tertiary sector regulation (by Professor Kwong Lee Dow and Professor Valerie Braithwaite), following the release of the *Review of Reporting Requirements for Universities Final Report* (PhillipsKPA, 2012) may impact on requirements regarding institutional policy for some or all Australian tertiary providers.

Policy cycle

This paper uses the University of Melbourne Policy Development and Review Cycle articulated in the *Policy on Policy* and *Policy Development and Review Procedure* (version approved 29 April 2013) (refer Appendices 1 and 2), as depicted below, as an organising construct to briefly examine each policy cycle stage.

Identification and confirmation

Triennial review   Preliminary consultations

Implementation evaluation   Drafting

Implementation &   Benchmarking
compliance monitoring   POLICY CYCLE

Implementation   Consultation

Communication & Publication   Revision

Approval   Compliance check (PoP)
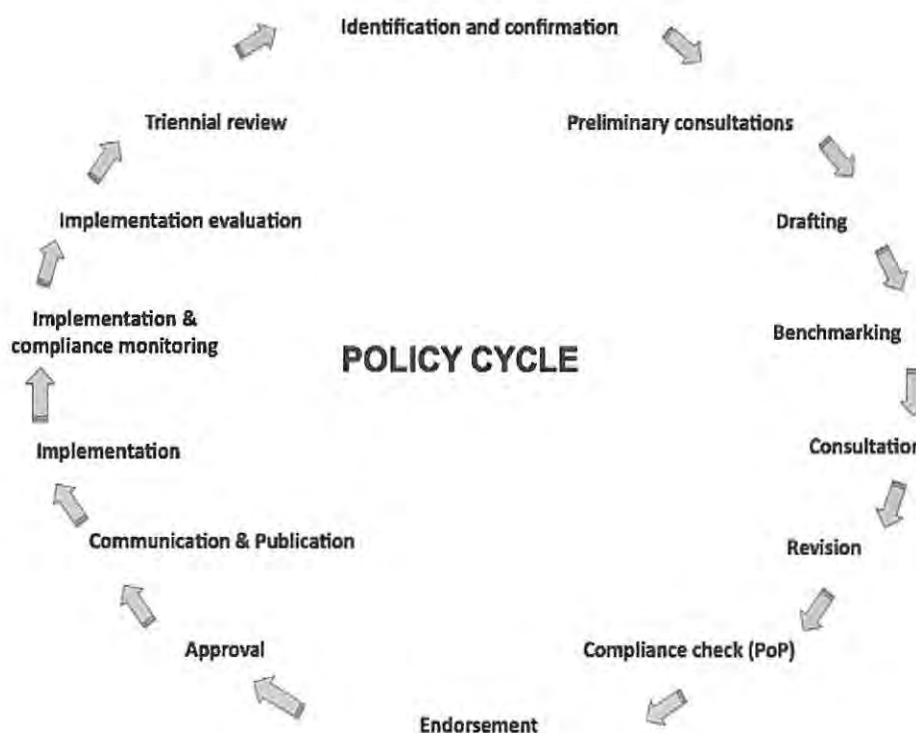
Endorsement

Figure 4 – Elongated Policy Cycle
(extracted from the University of Melbourne *Policy on Policy*)

The University of Melbourne Policy Development and Review Cycle is comprehensive; it includes value-adding policy cycle stages – including those required by TEQSA – and incorporates formal policy implementation review on a triennial basis. Progression through the policy cycle is intentionally iterative. Policy amendment and policy implementation review may be undertaken at any time using a truncated policy cycle comprising consultation, revision, compliance check, endorsement, approval, communication and publication. In a sense the principle policy cycle is supplemented by two spin-off cycles – policy amendment, and policy review.

Identification and confirmation of policy requirement

Using the policy cycle heuristic to guide the policy process, the first stage is the identification and confirmation of the need for a new policy, or new policy provision(s) within an existing policy. The first proponent of the staged policy process concept, Lasswell (1951), conceptualised a sequence commencing with 'intelligence'. Much subsequent public policy literature conceived similar gatekeeper stages; for example, 'problem identification' (Sabatier and Jenkins-Smith, 1993) at the commencement of the policy cycle. Essentially this stage is both an intelligence-gathering and co-ordination stage. For some institutions, this stage mitigates against uncoordinated policy proliferation (Aitken et al., 2010) or extemporaneous growth, described by Cropanzano and Bryne (2001) as similar to an "autocatalytic reaction" where policy feeds on itself (p. 42).

In some instances, external requirements will dictate a policy response. For example, whilst the relationship between public policy and institutional policy is not necessarily linear or direct (Fincher, 1999), there are some notable instances where institutions are explicitly required to develop an institutional policy response to comply with government legislation or regulation (for example, the *Australian Code for Responsible Conduct of Research*). In other instances, public policy imposes requirements other than institutional policy responses. In time, the

Commonwealth's *Higher Education Standards Framework (Threshold Standards) 2011* and related TEQSA requirements may necessitate explicit institutional policy responses.

Some institutions have established structural mechanisms to identify and confirm policy requirements (for example, new policy committees, or new policy-related terms of reference for existing senior management committees), whereas others rely on policy practitioners to identify issues and potential policy gaps. Issue identification skills include 'systematic monitoring, networking, intuitive issue monitoring ('political smarts'), ongoing consultation …, media monitoring, inter-agency information exchange (and) issue recording' (Althaus et al., 2013, p. 56).

Preliminary consultations

The second policy cycle stage involves preliminary consultations with key policy stakeholders to scope the policy requirement prior to the commencement of drafting. The extent to which preliminary consultations are required will be determined by the nature of the policy requirement and institutional practices.

Drafting

Most tertiary institutions have internal requirements regarding the presentation of policy instruments and make available policy, procedure and guideline templates to support policy drafting. Such requirements and templates encourage accessibility, transparency and consistency across the policy suite (see Figure 5 overleaf for a generic example of a policy template).

```
POLICY TEMPLATE                                                    INSTITUTIONAL LOGO

NAME/TITLE OF POLICY

GOVERNING LEGISLATION
PURPOSE/OBJECTIVE
SCOPE

POLICY
[insert policy provisions here]

DEFINITIONS
SUPPORTING DOCUMENTS
POLICY PERFORMANCE INDICATORS
POLICY OWNER & POSITION RESPONSIBLE FOR IMPLEMENTATION

VERSION CONTROL INFORMATION
Approval authority:
Approval date:           Commencement date:           Review date:
```

Figure 5: Generic policy template

Drafting policy involves writing both the peripheral information (in this example including the identification of the relevant governing legislation such as statutes and regulations; determination of the purpose and scope; identification of supporting documents and nomination of the responsible office holders), and the actual body of the policy (that is, the policy provisions). As the substance of the policy is drafted, defined terms can be identified and defined in the definitions section. Performance indicators - preferably including at least some quantifiable metrics - can be established to support policy implementation monitoring, evaluation and review.

Similarly, procedure templates are generally available to support the drafting of institutional procedures (see Figure 6 below for a generic example of a procedure template).

```
PROCEDURE TEMPLATE                                                    INSTITUTIONAL
LOGO

NAME/TITLE OF PROCEDURE

GOVERNING POLICY
PURPOSE/OBJECTIVE
SCOPE

PROCEDURE
[insert procedure provisions here]

DEFINITIONS
SUPPORTING DOCUMENTS
PROCEDURE PERFORMANCE INDICATORS
PROCEDURE OWNER & POSITION RESPONSIBLE FOR IMPLEMENTATION

VERSION CONTROL INFORMATION
Approval authority:
Approval date:           Commencement date:           Review date:
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Figure 6: Generic procedure template

Cropanzano and Byrne (2001) remind us that 'A policy has to be clear enough to be conveniently found, understood, and utilized. As procedures become more byzantine, they become more difficult to use and their instrumental value diminishes' (p. 39). Further, Cropanzano and Bryne

(2001) observe that policy should not be overly restrictive so as to 'grossly limit individuals' ability to use their intuition and creative problem-solving skills' (p. 48).

Some tertiary institutions provide detailed instructions for completing such templates and a centralised glossary of defined terms to support drafting. Institution-specific policy style guides may also be available, particularly where internet-based policy repositories dictate restrictions on policy content (for example, limitation on inclusion of graphics). In addition to institution-specific policy drafting resources, materials are available online to support policy development (for example, refer to the *Policy without (much) pain guide*). Some institutions provide policy drafting resources, either through capacity building to assist content experts apply their knowledge to the policy genre, or through the drafting of policy centrally prior to consultation with content and technical experts. Clark et al. (2012) identify a series of tertiary institution policy resources to support policy drafting and implementation of the policy cycle including: description of the policy approval process, policy approval process flowchart, policy cover sheet, policy office or personnel, policy on policies, policy template, policy tracking system and policy writing guide.

Policy drafters need to be cognisant of the hierarchical relationship between policy instruments and supporting documentation. Policies, procedures, guidelines and supporting documentation – frequently referred to as 'local documents' – are ideally linked as follows:
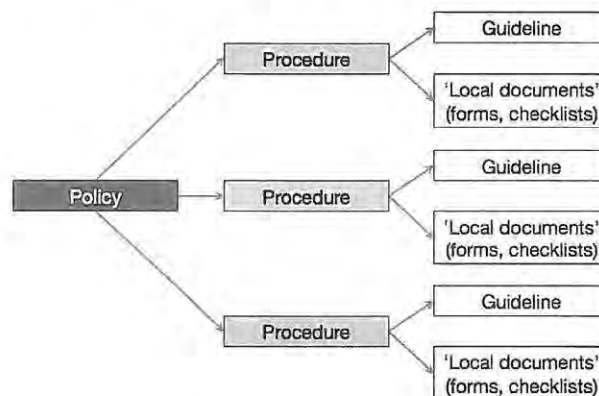

Figure 7: Relationship between policy instruments (policy, procedure, guideline) and 'local documents'

In a very small number of instances, subordinate documents will have no 'parent policy' (for example, a procedure may not relate to a specific policy), but may relate to institutional legislation, strategy or other operational imperative.

Policies do not operate in isolation. Some tertiary institutions explicitly establish requirements to ensure alignment between all institutional-specific texts (refer Figure 3). For example, the University of Melbourne *Policy on Policy* (version approved 29 April 2013), requires that:

> The policy developer will undertake, or secure support to undertake, sufficient checks to ensure:
> * compliance with all relevant laws, including Commonwealth and state legislation and regulations, the University of Melbourne Act 2009 (Vic), and University statutes and regulations
> * compliance with Standing Resolutions of Council and Resolutions of the Academic Board
> * consistency with the Policy on Policy
> * consistency with existing policies and procedures (unless consequential amendments will be concurrently proposed or identified)
> * consistency with existing delegations, authorities and responsibilities (unless proposed delegations, authorities and responsibilities amendments will be concurrently proposed or

identified)
- consistency with University plans and industrial agreements
- consistency with templates provided by the University Secretary to ensure presentation consistency
- the use of plain English and inclusive language. (n.p.)

Benchmarking

As with public policy, the practice of policy borrowing is both widely practiced by institutional policy practitioners and well supported by the tertiary sector. Lessons from the public policy literature can guide tertiary sector policy practitioners seeking to undertake policy borrowing – or policy benchmarking, to develop institutional policy. For example, the Policy Transfer Framework (Dolowitz & Marsh, 2000) distinguishes between what is transferred (policies – goals, content, instruments; programs; negative lessons); the degrees of transfer (copying; emulation; mixtures; inspiration); identifies constraints on transfer (policy complexity; past policies; structural institutional feasibility; language); and identifies how transfer can lead to policy failure (uninformed transfer; incomplete transfer; inappropriate transfer).

Why Transfer? Continuum (Want To.........Have To) — Voluntary	Mixtures	Coercive	Who Is Involved in Transfer?	What Is Transferred?	Past	From Where — Within-a Nation	Cross-National	Degrees of Transfer	Constraints on Transfer	How To Demonstrate Policy Transfer	How Transfer leads to Policy Failure
Lesson Drawing (Perfect Rationality)	Lesson Drawing (Bounded Rationality)	Direct Imposition	Elected Officials	Policies (Goals)(content)(instruments)	Internal	State Governments	International Organizations	Copying	Policy Complexity (Newspaper)(Magazine)(TV)(Radio)	Media	Uniformed Transfer
	International Pressures		Bureaucrats Civil Servants	Programs	Global	City Governments	Regional State Local Governments	Emulation	Past Policies	Reports	Incomplete Transfer
	(Image)(Consensus)(Perceptions)									(Commissioned)(uncommissioned)	
	Externalities	Pressure Groups	Institutions			Local Authorities		Mixtures	Structural Institutional Feasibility	Conferences	Inappropriate Transfer
	Conditionality	Political Parties	Ideologies					Inspiration		Meetings/ Visits	
	(Loans)(Conditions Attached to Business Activity)								(Ideology)(cultural proximity)(technology)(economic)(bureaucratic)		
	Obligations	Policy Entrepreneurs/ Experts	Attitudes/ Cultural Values						Language	Statements (written)(verbal)	
			Consultants Think Tanks Transnational Corporations Supranational Institutions	Negative Lessons			Past Relations				

Table 3: A Policy Transfer Framework (source: Dolowitz & Marsh, 2000)

Dolowitz and Marsh (2000) specifically support the examination of failure as a mechanism to identify policy transfer success factors.

In terms of the process of benchmarking, Clarke et al. (2012) note the limited value associated with benchmarking at the policy suite – or set - level:

> What we found was a remarkable degree of variation among the policy sets of the institutions reviewed. Some institutional policy sets consisted of just a few policies while others consisted of well over 1000 policies; some had no business policies while others had a large number of business policies; some had no student policies while others had numerous student policies; and some institutions were governed by system-wide policies while others developed their own institutional policies. (pp. 16-17)

Similar difficulties were associated with benchmarking at the policy title level, as title frequently

did not accurately reflect the full scope of content, leading Clarke et al. (2012) to recommend benchmarking at the policy content, or substance level.

In terms of external requirements and influences, TEQSA clearly indicate that they will require, with respect to institutional policy, 'evidence of active benchmarking (and) formalised benchmarking relationships' (Fitzgibbon & Treloar, 2013, n.p.). A further influence on institutional performance (and potentially policy) benchmarking may be found in the increasing pressure of international institutional rankings, including the Shanghai Jiao Tong University Academic Ranking of World Universities (ARWU), Times Higher Education, QS World University Rankings, Leiden Ranking, SCImago Institutions Rankings. With respect to individual institutional requirements, whilst few meta-policy statements currently incorporate a discrete policy cycle stage encompassing 'policy benchmarking', business intelligence systems are being established which could provide the basis for performance, strategy, policy and program benchmarking. Indeed the nexus between policy process and institutional research warrants closer scrutiny.

In terms of resources to support policy benchmarking, ATEM circulated a listing of URLs for Australian and New Zealand university policy repositories. This resource is currently being updated to incorporate URLs for Australian TAFE institutes, and New Zealand Institutes of Technology and Polytechnics (ITPs) and Māori wānanga, where these are publicly accessible, to encourage learning across the sectors, and across the Australian-New Zealand divide.

There are many approaches to benchmarking policy content, or substance. At the most basic level, policy benchmarking involves sourcing and examining policy texts from other organisations in the tertiary education sector and/or other relevant sectors. The objective of benchmarking or policy borrowing is essentially to inform policy and practice through comparative analysis. Benchmarking involves identifying points of similarity and points of difference, and making judgements based on these findings. Essentially these judgements relate to the identification of good practice policy provisions and practices that are potentially transferable, and by definition, non-transferable or inappropriate policy provisions and practices for your particular institutional policy requirements.

Consultation

Consultation is central to the policy cycle, and key to successful policy implementation (Aitken et al., 2010). According to Althaus et al. (2013), consultation may 'improve the quality of policy decisions through access to relevant information and perspectives, including exchange of problem and solution definitions, alternatives and criteria; ensure understanding, acceptance and legitimacy of proposed policies; promote consensus about policy choices; anticipate challenges to the policy process by providing transparency, accountability and opportunities for participation' (p. 127). The consultation process involves stakeholders as policy participants. Weible et al. (2012) characterise policy participants as:

- Goal oriented with goals derived from a variety of sources including interests, beliefs and values, or collective affiliations;
- Limited in their cognitive capacity to process the multiple stimuli supplied from the environment;
- Reliant upon heuristics to simplify, understand, interpret, and respond to incoming stimuli;
- Affected by their emotions, such as fear and trust, in reasoning, allocating attention, and making behavioural decisions' (p. 5).

Further, Weible et al. employ a metaphor to typify policy participants:

The first is "foxes," who are prone to seeing different points of view with flexibility and with the ability to adapt. The second is "hedgehogs", who are rigid in their world views

(i.e. belief systems). Consistent with Tetlock [2005], we argue that both personality types are needed for influencing the policy process. At times to be effective, policy participants must act like the hedgehogs to overcome threats to their ideas and the many obstacles confronted in any political system. At other times, policy participants should act more like foxes in adapting and seeing the world from different points of view' (ibid, p. 10).

Policy developers undertaking consultations need to be cognisant of the divergent goals, understandings, motivations and personalities involved when planning and undertaking consultation processes.

In terms of internal requirements for consultation, almost all university meta-policy incorporates a discrete policy cycle stage requiring consultation, although the extent to which specific consultation mechanisms are stipulated varies considerably. For example, some university meta-policy statements contain no details regarding specific consultation requirements; others specify and mandate very detailed mechanisms. For example, the University of Melbourne *Policy on Policy* requires that draft new policies, and draft policy amendments which are not minor are made publicly available for consultation purposes through the University of Melbourne policy website. Further, the *Policy on Policy* requires that information be distributed to an institution-wide policy network alerting staff and student union representatives to the availability of the draft texts for the duration of the consultation period (generally one month).

Revision

This is essentially a 'pause' placeholder in the policy cycle, and may not in fact need to be explicitly identified. For the purposes of this exercise, the revision policy cycle stage is just that – recognition that following a period of consultation, the policy developer needs to consider each recommended addition or amendment to the draft new policy (or draft amendment) circulated. To support this process, the policy developer advises policy stakeholders prior to the consultation process that the drafter(s) will consider each and every recommended addition, deletion or other amendment, and make a determination whether to reflect them in the final policy (that is, not all recommendations will be accepted, not the least because contradictory recommendations are not uncommon). The drafter(s) are responsible for making these strategic determinations. It is good practice - and indeed only polite - to provide feedback to all policy stakeholders who contributed to the consultation process, acknowledging where recommendations were – and were not – adopted.

Compliance with institutional meta-policy

The University of Melbourne *Policy on Policy* has an explicit compliance policy cycle stage during the policy development (or amendment) process. Policy developers submit drafts to the University Policy Officer to ensure compliance with the institutional meta-policy; and to the University Compliance Officer (who is also Special Counsel) for advice regarding 'compliance with all relevant laws, including Commonwealth and State legislation and regulations, the *University of Melbourne Act 2009*, University statutes and regulations, as well as the Melbourne Legislative Framework and the *Register of Authorities and Responsibilities*' (version approved 29 April 2013, n.p.). Inclusion of legal review in the University of Melbourne policy cycle was a deliberate attempt to incorporate an important value-adding stage; one which is reliant on a close working relationship with the institutional legal and/or compliance staff to support timely consideration, and a fundamental respect for their contribution to the policy process. Building a positive working relationship based on a shared understanding of the role of policy within the institution is imperative to guard against reported concerns regarding legalistic approaches to policy. For example, Peterson (2004) notes that while 'it is unwise to ignore the legal context in which college and university policies operate … a legalistic approach to policy development may stifle creativity and emphasize "doing things right" as opposed to "doing the right thing"' (p. 54). However, Peterson (2004) does caution institutions: 'Educational environments are increasingly

regulated and operate within a society that is litigious. Consequently, liability may result from the absence of appropriate policies and procedures or from failure to follow policies and adhere to necessary standards of care' (p. 54).

Endorsement and Approval

Institution-specific texts such as delegated legislation and peak decision-making committee terms of reference, or institutional practices, may determine endorsement processes required prior to formal policy approval. Institutional meta-policy frequently articulates approval authorities for institutional policy, although in many instances is silent with respect to approval authorities for lower order policy instruments such as procedures and guidelines (including those which apply institution-wide, and those which apply to a specific organisational unit). In terms of external requirements, TEQSA will require evidence of policy approval processes (Fitzgibbon & Treloar, 2013, n.p.), so clarification regarding approval authorities for all policy instruments is now essentially obligatory.

Communication and publication in the policy library

Australian universities and many other tertiary institutions publish institutional policy in internet-based policy repositories. Publication is the first of many communication strategies required to inform policy stakeholders of institutional policy to position them to successfully commence policy implementation.

Implementation

According to Althaus et al., 'good policies are meaningless unless implemented. Policy analysts must consider implementation needs early in the development of a proposal' (2013, p. 168), and be aware during the policy development process of 'implementation traps': incomplete specification, conflicting objectives, conflicting directives, limited competence, inadequate administrative resources, communication failures, instrument choice (pp. 180-185). In terms of external requirements, the Commonwealth's *Higher Education Standards Framework (Threshold Standards) 2011* include the *Provider Registration Standards* which explicitly require that Australian tertiary provider's demonstrate effective policy implementation. The March, 2013 TEQSA briefings (Fitzgibbon & Treloar, 2013, n.p.) confirm that TEQSA will require evidence of policy implementation, as opposed to the more traditional requirement of evidence of policy. This requirement could be anticipated to have significant ramifications for strategic policy management, implementation monitoring and evaluation, and reporting to government.

Implementation and compliance monitoring and evaluation

The policy cycle also includes the two stages of implementation and compliance monitoring, and implementation evaluation. The intention of these two stages is to embed the concept of *progressive* monitoring and evaluation *of policy implementation* – or practice. Weiss (1998) defines evaluation as the 'systematic assessment of the operation and/or outcomes of a program or policy, compared to a set of explicit or implicit standards, as a means of contributing to the improvement of the program or policy' (p. 4). According to Althaus et al., 'integrating evaluation into policy design and implementation adds rigour, consistent with the idea of carefully considered decisions made by a well-informed, accountable decision maker. ... Evaluation is essential if programs are to improve' (p. 205).

In terms of internal requirements, institutional audit schedules and quality assurance programs may intersect with policy implementation monitoring and evaluation efforts, as could the introduction and implementation of business intelligence systems to support enhanced institutional performance. The outcomes of progressive monitoring and evaluation efforts can contribute to formally scheduled policy implementation review processes.

Review

For the purposes of this exercise, review refers to the formal review of *policy implementation*; it is a discrete policy cycle stage that builds on the outcomes of *ongoing* policy implementation monitoring and evaluation. The review policy cycle stage is differentiated from the ongoing processes of monitoring and evaluation in that it is intentionally a formal review of practices associated with policy implementation at a particular point-in-time (frequently three years following initial approval) (Freeman, 2012a).

Universities with established meta-policy almost always explicitly refer to policy review either in their meta-policy, associated procedures or supporting documentation (Freeman, 2012a); however review may or may not be formally included in the institutional policy cycle as a discrete stage, and there is considerable evidence in institutional policy repositories and policy review schedules to suggest that much scheduled institutional policy review is overdue. In terms of external requirements, the *Provider Registration Standards* explicitly require that Australian tertiary provider's demonstrate policy review, and maintain a policy review schedule (Fitzgibbon & Treloar, 2013, n.p.).

Some institutions, such as the Northern Metropolitan Institute of TAFE (NMIT), have articulated a truncated policy cycle largely dedicated to policy review; in this instance, academic policy review.
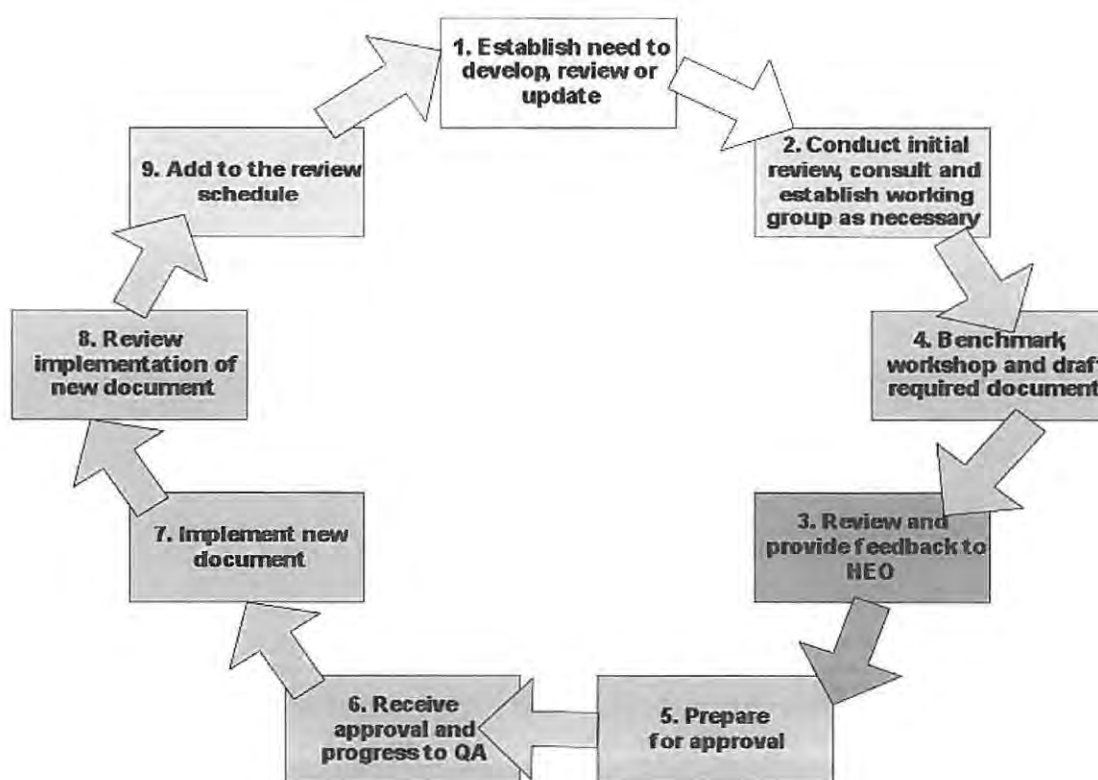

Figure 8: NMIT Higher Education Office (HEO) Policy Documentation Process (NMIT, 2013)

Generic review resources have been developed to support institutional policy review (refer: Freeman 2012b) including policy review-related inclusions for institutional meta-policy; policy review questions; policy review-related inclusions for a policy approval form; policy feedback form; policy issues log; policy review schedule; draft policy consultation notice board; and history of changes to institutional policy library.

Learn quickly: learn from the mistakes of others

With respect to the policy process – and various other things – most institutions will have pockets of excellence and numerous examples of good practice. Likely, many - if not most - institutions will also harbour examples of poor practice. With respect to public policy, Althaus et al. (2013) identify results arising from gaps in the policy cycle, including: confusion/wasted effort; false picture/solution in search of a problem; untested assumptions; stakeholder frustration/partial information; messy results/unintended consequences; false start; usurp authority; undermine authority; success? (p. 246).

Following the lead of others in examining reasons for policy failure (for example, Dolowitz & Marsh, 2000) the following table provides some examples of poor practice in relation to various policy cycle stages. Through professional development exercises such as these, sharing examples of poor policy practice is a mechanism to collectively improve institutional policy practices.

POLICY CYCLE STAGE	EXAMPLE OF BAD PRACTICE	NATURE OF PRACTICE
Drafting	• Enforcement of rigid formatting styles within templates to unnecessarily restrict styles (e.g. restriction to two level headings, prohibition against numbered lists)	Style over substance
	• Equating 'succinct' with 'short' (e.g. transferring policy provisions to lower order documents to shorten policy)	Style over substance
	• Amending policy text or structure and inadvertently altering meaning or introducing errors	Style over substance
	• Accepting some, but not all, tracked changes when highlighting amendments in documents for submission to approval authority	Misleading
Consultation	• Random enforcement of mandatory consultation requirements	Random
Compliance (with institutional meta-policy)	• Disregarding legal advice	Unwise, increases institutional risk
	• Disregarding compliance advice	Unwise, increases institutional risk
Approval (and post approval)	• Post approval, amending approved documents without authority, due process, or appropriate acknowledgement/versioning	Exceeding authority
	• Post approval, amending definitions without authority, due process, or appropriate acknowledgement/versioning	Exceeding authority
	• Post approval, amending policy structure or removing conjunctions from lists and inadvertently altering meaning or introducing errors	Style over substance
Communication and publication in policy repository	• Publication of amended policy without appropriate approval or acknowledgement/versioning	Exceeding authority
	• Determination not to publish approved policy	Exceeding authority
	• Inappropriately altering policy repository records	Misleading

These examples of poor practice fall into several categories: adherence to style over substance, misleading behaviour, making unwise decisions which increase institutional risk, exceeding authority and random application of policy provisions. In most instances, these examples demonstrate lack of policy and policy management expertise, failure to observe institutional delegations of authority, and failure to uphold procedural integrity. Fundamentally, these examples illustrate a failure to understand the core objective of policy work: implementation. Bagehot observes that:

> It is an inevitable defect, that bureaucrats will care more for routines than for results: or, as Burke put it, "that they will think the substance of the business not to be much more important than the forms of it." (1867, p. 195).

However, professional development exercises such as these can serve to focus attention on the importance of implementation, and the centrality of procedural integrity as a guiding principle for policy practitioners, regardless of level of expertise: 'respecting policy process rules, and living

within their spirit' (Althaus et al., 2013, p. 209).

Conclusion

The University of Melbourne Policy Development and Review Cycle represents an elongated policy cycle inclusive of many value-adding stages, and TEQSA requirements. This particular policy cycle is appropriate for a policy environment involving multiple policy owners, managers, developers, practitioners and stakeholders as it provides a detailed roadmap of institutional requirements. This may not be necessary in all instances; however at the very least Australian tertiary institutions are obliged to meet TEQSA requirements in terms of articulating approaches to policy development, benchmarking, implementation, evaluation and review. Variations will continue to occur in terms of both the employment (or not) of the policy cycle or sequenced policy process concept, and the representation of this (or not) in institutional meta-policy, practices or other mechanisms. Regardless of the location and shape of institutional requirements in this respect, revisiting the policy cycle is a worthwhile capacity building exercise to better position institutional policy practitioners and policy stakeholders to more ably implement and participate in policy projects.

REFERENCES

Althaus, C., Bridgman, P., & Davis, G. (2013). The Australian policy handbook. Allen & Unwin Australia.

Aitken, D., Hatwell, M., Jensen, K., Kosman, B. & Perdriau, J. (2010). Policy without (much) pain: A guide to better practice in policy development and policy management in Australasian tertiary education institutions, Association for Tertiary Education Management, Melbourne.

Bagehot, W. (1867). The English Constitution, reprinted 1963, Ithaca: Cornell University Press.

Brewer, G.D. (1974). The policy sciences emerge: To nurture and structure a discipline. Policy Sciences, 5(3), 239-244.

Brewer, G.D., & DeLeon, P. (1983). The foundations of policy analysis. Homewood, IL: Dorsey Press.

Bridgman, P., & Davis, G. (2004). The Australian policy handbook. Allen & Unwin Australia.

Capell, N., Ford, T. M., & Spellacy, P. (2004, July). Institutional policy development: Effective practices and solutions. Paper presented at the annual meeting of the National Association of College and University Business Officers (NACUBO), Milwaukee, WI.

Clark, S. C., Griffin, R. A., & Martin, C. K. (2012). Alleviating the Policy Paradox through Improved Institutional Policy Systems: A Case Study. Innovative Higher Education, 37(1), 11-26.

Commonwealth Government of Australia (2011). Higher Education Standards Framework (Threshold Standards) 2011. Canberra: Australian Government. Retrieved from http://www.comlaw.gov.au/Details/F2012L00003/Download.

Cropanzano, R., & Byrne, Z. S. (2001). When it's time to stop writing policies: An inquiry into procedural injustice. Human Resource Management Review, 11(1), 31-54.

DeLeon, P. (1999). The stages approach to the policy process: What has it done? Where is it going. Theories of the policy process, 1, 19-32.

Dolowitz, D. P., & Marsh, D. (2000). Learning from abroad: The role of policy transfer in contemporary policy-making. Governance, 13(1), 5-23.

Fincher C. (1999). The Purposes and Functions of Policy: Plans, Programs and Decisions, University of Georgia, Institute of Higher Education. Retrieved 3 June 2013 from http://www.eric.ed.gov/PDFS/ED442332.pdf.

Fitzgibbon, C. & Treloar, K. (2013, March). Registration and accreditation: Overview of issues. Paper presented at the TEQSA Provider Briefing. Retrieved 14 March 2013, from http://www.teqsa.gov.au/sites/default/files/Session%205%20-%20Registration%20and%20accreditation-Overview%20of%20issues.pdf.

Ford, T. M., Petersen, R., & Spellacy, P. (2001, October). Better than Letterman: The top 10 policy issues and best practices. Paper presented at the annual meeting of EDUCAUSE, Indianapolis, IN.

Freeman, B. (2010). Benchmarking to Identify Good Practice University Policy Frameworks, Tertiary Education Management Conference, 3-6th October 2010.

Freeman, B. (2012a). Innovative Approaches, Systems and Resources for University Policy Review, Association for Tertiary Education Management and Tertiary Education Facilities Managers' Association, Tertiary Education Management Conference, 16-19th September 2012, p. 91-104.

Freeman, B. (2012b). University policy review: What? Why? How? What's the big elephant? Association for Tertiary Education Management (ATEM) Policy Development Forum VIII, October 2012, University of Melbourne.

Jenkins, W.I. (1978). Policy analysis: A political and organisational perspective, M. Robertson, London.

Kruschke, E.R. & Jackson, B.M. (1987). The Public Policy Dictionary, Oxford, England.

Lasswell, H.D. (1951). 'The Policy Orientation' in Lerner, D. & Lasswell, H.D. (eds) (1951). The Policy Sciences, Stanford University Press, Stanford.

Northern Metropolitan Institute of TAFE (2013). NMIT Higher Education Office Policy Documentation Process.

Petersen, R. J. (2004). A framework for IT policy development. EDUCAUSE Review, 39(2), 54–55.

PhillipsKPA (2012). *Review of Reporting Requirements for Universities Final Report*, LH Martin Institute. Retrieved 3 June 2013 from http://www.lhmartininstitute.edu.au/userfiles/files/news-media/FinalReportReviewofReportingRequirementsForUniversities.pdf.

Sabatier, P. A., & Jenkins-Smith, H. C. (1993). Policy change and learning: an advocacy coalition approach (theoretical lenses on public policy) (POD).

University of Melbourne (2013). Policy on Policy (version approved by Council 29 April, 2013). Not published (refer Appendix 1).

University of Melbourne (2013). Policy Development and Review Procedure (version approved by Council 29 April, 2013). Not published (Refer Appendix 2).

Weible, C. M., Heikkila, T., & Sabatier, P. A. (2012). Understanding and influencing the policy process. *Policy Sciences, 45*(1), 1-21.

Weiss, C.H. (1998). *Evaluation Methods for Studying Programs and Policies* (2nd Edition). Upper Saddle River, New Jersey: Prentice Hall.

The following document was approved by the University of Melbourne Council on 29 April, 2013. I am not responsible for, nor associated with, any amendments made subsequent to this version of the University of Melbourne Policy on Policy.

POLICY ON POLICY

RELEVANT LEGISLATION

University of Melbourne Act 2009 (Vic)
Statute 1.7 – University Governance
Statute 4.1 – The Academic Board

SCOPE

This Policy applies to all University of Melbourne Policies, Procedures, Schedules and Guidelines. This Policy does not apply to policies developed by University of Melbourne controlled entities.

This Policy:
*   defines the range of University of Melbourne policy instruments
*   establishes a classification scheme for University of Melbourne policy instruments
*   defines the application of University of Melbourne policy instruments
*   specifies Approval Authorities for all University of Melbourne policy instruments and
*   establishes the *University Policy Development and Review Cycle*.

POLICY

1. Legislative and policy hierarchy
1.1   Policy instruments are located within a hierarchy as follows:
1.1.1 Legislative instruments:
*   *University of Melbourne Act 2009*
*   University statutes
*   University regulations
1.1.2 Standing Resolutions of Council
1.1.3 Resolutions of the Board
1.1.4 Codes of conduct
1.1.5 Policy instruments:
*   Policies
*   Procedures
*   Guidelines
1.1.6 Local documents (including local provisions, instructions, forms, checklists or business process documents).
1.2   A document lower in the hierarchy must not be inconsistent with a document higher in the hierarchy.
1.3   Where two documents in the hierarchy may otherwise conflict, the document higher in the hierarchy takes precedence.

2. Range of policy instruments
2.1   The range of University of Melbourne policy instruments includes:
*   Policy
*   Procedure
*   Guideline.
2.2   A Policy is a statement of principle that articulates, and aligns with, legislative, regulatory or organisational requirements. Observance of Policy is mandatory.
2.3   A Procedure is a statement that provides information or step-by-step instructions to implement a Policy. Observance of Procedure is mandatory.
2.4   A Guideline is a statement that provides guidance to support the implementation of, and ongoing compliance with, a Policy or Procedure. The term 'guideline' does not refer to a guideline as described in the *University of Melbourne Act 2009*, which may be subject to separate University legislation or Policy.

3. Classification scheme for policy instruments
3.1   Policy instruments are categorised as:
*   governance or
*   academic or
*   administrative.

3.1.1   Policy instruments in the governance category address the broad decision-making and accountability processes of the University, including giving effect to legislative, regulatory and organisational requirements.

3.1.2   Policy instruments in the academic category address the core academic functions of the University and are classified as follows:
- learning and teaching
- courses and subjects
- studying at the University and
- research and research training.

3.1.3   Policy instruments in the administrative category address the University's administrative operations and are classified as follows:
- working at the University
- finance and procurement
- health and safety
- managing buildings and information technology (IT) and
- engaging with the community.

4.   Application of policy instruments

4.1   Policies have university-wide application.

4.2   Procedures may have either university-wide or local application (that is, application to one or more local areas such as a faculty, school, division or organisational unit).

4.3   Guidelines may have either university-wide or local application (that is, application to one or more local areas such as a faculty, school, division or organisational unit).

5.   Approval Authorities

5.1   Governance policy instruments

5.1.1   In accordance with the *University of Melbourne Act 2009* Council is responsible for a governance framework for the University which is consistent with legal requirements and community expectations. In accordance with *Statute 1.7 – University Governance,* Council is also responsible for deciding the expenditure authorisation limits of the Vice-Chancellor and other senior officers of the University.

5.1.2   Council is the Approval Authority for the approval, amendment and disestablishment of Policies in the governance category.

5.1.3   Each of Council and the Vice-Chancellor (delegated to the Senior Vice-Principal) as appropriate is an Approval Authority for the approval, amendment and disestablishment of university-wide Procedures in the governance category. The University Secretary (delegated to the Provost) is the Approval Authority for archives-specific university-wide Procedures in the governance category.

5.1.4   The Responsible Officer for all Policies and Procedures in the governance category is the University Secretary. The University Secretary is also the Approval Authority for the approval, amendment and disestablishment of all university-wide Guidelines in the governance category.

5.1.5   The Responsible Officer (University Secretary) and University Policy Officer may approve minor amendments to Policies in the governance category, and university-wide Procedures and Guidelines in that category. This includes changes that do not otherwise affect document content such as changes to titles, names, structures, references or hyperlinks.

5.1.6   The head of an organisational unit may approve local Procedures and Guidelines in the governance category specific to that organisational unit, including the amendment and disestablishment of all such Procedures and Guidelines.

5.2   Academic policy instruments

5.2.1   The Board is the Approval Authority for the approval, amendment and disestablishment of Policies in the academic category.

5.2.2   In accordance with *Statute 4.1 – The Academic Board*, the Board may delegate any of its powers and duties, including authority for the approval, amendment and disestablishment of Policies in the academic category.

5.2.3   Each of the Board, the Provost and the Deputy Vice-Chancellor (Research) is an Approval Authority for the approval, amendment and disestablishment of university-wide Procedures in the academic category relevant to their respective areas of responsibility. Where the Procedure spans responsibilities or portfolios, the President of the Board will nominate the Approval Authority.

5.2.4   The Responsible Officer for all Policies in the academic category is the President of the Board, or another officer where delegated by the Board (for example, the Provost or the Deputy Vice-Chancellor [Research]).

5.2.5   The Responsible Officer for all Policies in the academic category, or the Academic Secretary, or the University Policy Officer may approve minor amendments to Policies in the academic category and university-wide Procedures and Guidelines in that category. This includes changes that do not otherwise affect document content, such as changes to titles, names, structures, references or hyperlinks.

5.2.6   The head of an organisational unit may approve local Procedures and Guidelines in the academic category specific to that organisational unit, including the amendment and disestablishment of all such Procedures and Guidelines.

5.3   Administrative policy instruments

5.3.1   The Vice-Chancellor (delegated to the Senior Vice Principal) is the Approval Authority for the approval, amendment

and disestablishment of Policies and Procedures in the administrative category. The Vice-Chancellor and Senior Vice Principal take advice on Policies and Procedures for the University's administration and their implementation from Senior Executive and Administrative and Business Advisory Group (ABAG), as applicable.

5.3.2   The Responsible Officer for all Policies in the administrative category is the relevant Function Leader. Where there is no Function Leader for a particular Policy in the administrative category, or where the Policy spans responsibilities of several Function Leaders, the Senior Vice-Principal will nominate the Responsible Officer. The Responsible Officer for Policy instruments in the administrative category is also the Approval Authority for the approval, amendment and disestablishment of Guidelines in that category.

5.3.3   The Responsible Officer for the relevant Policy in the administrative category and University Policy Officer may approve minor amendments to Policies, Procedures and Guidelines in that category. This includes changes that do not otherwise affect document content, such as changes to titles, names, structures, references or hyperlinks.

5.3.4   The head of an organisational unit may approve local Procedures and Guidelines in the administrative category specific to a particular organisational unit, including the amendment and disestablishment of all such Procedures and Guidelines.

5.4   Approval of delegations embedded in policy instruments

5.4.1   Council may delegate its powers or functions to a member of Council, a committee of Council, any member of staff of the University including the Vice-Chancellor, the Board, or any other entity prescribed by the Statutes. Council can not delegate the power to delegate.

5.4.2   In approving this *Policy on Policy*, Council has authorised the relevant Approval Authorities to:
- approve, amend and disestablish Policies, Procedures and Guidelines and
- approve delegations, authorities and responsibilities embedded in policy instruments and
- approve amendments to, or cancellations of, delegations, authorities and responsibilities embedded in the following instruments, provided *substantial* amendments to, or cancellations of, delegations, authorities and responsibilities in:
   o   Procedures in the governance category are reported to Council
   o   Policies in the academic category (where approved by a delegate of the Board) are reported to the Board
   o   Procedures in the academic category (where approved by an Approval Authority other than the Board) are reported to the Board
   o   Policies or Procedures in the administrative category are reported to Senior Executive.

5.4.3   In accordance with the Delegations Policy, Council maintains responsibility for approval of the *Delegations Policy* and its schedules and procedures, as well as the *Register of Authorities and Responsibilities (RoAR)*.

5.4.4   The University Secretary will annually update the *Register of Authorities and Responsibilities (RoAR)* to reflect any amendments to delegations, authorities and responsibilities embedded in Policies or Procedures.

5.5   Summary of Approval Authorities

CATEGORY	INSTRUMENT	APPROVAL AUTHORITIES		
		APPROVAL	AMENDMENT	DISESTABLISHMENT
Governance	Policy and Schedule to Policy	Council	Minor*: Responsible Officer (University Secretary) and University Policy Officer Not minor: Council	Council
	University-wide Procedure	Council or Vice-Chancellor (delegated to Senior Vice-Principal) University Secretary (delegated to the Provost) for Archives Procedures only	Minor: Responsible Officer (University Secretary) and University Policy Officer Not minor: Initial Approval Authority	Council or Vice-Chancellor (delegated to Senior Vice-Principal) University Secretary (delegated to the Provost) for Archives Procedures only
	Local Procedure	Head of organisational unit	Head of Organisational unit	Head of organisational unit
	University-wide Guideline	Responsible Officer (University Secretary)	Responsible Officer (University Secretary)	Responsible Officer (University Secretary)
	Local Guideline	Head of organisational unit	Head of organisational unit	Head of organisational unit
Academic	Policy	Board or delegate	Minor: Responsible Officer (President of Board or delegate of the Board), Academic Secretary, University Policy Officer Not minor: Initial Approval Authority	Board or delegate
	University-wide Procedure	Board or Provost or Deputy Vice-Chancellor (Research)	Minor: Responsible Officer (President of Board, Provost or DVC[R]), Academic Secretary and University Policy Officer Not minor: Initial Approval Authority	Board or Provost or Deputy Vice-Chancellor (Research)
	Local Procedure	Head of organisational unit	Head of Organisational unit	Head of organisational unit
	University-wide Guideline	Responsible Officer (President of Board or delegate of the Board)	Responsible Officer (President of Board or delegate of the Board)	Responsible Officer (President of Board or delegate of the Board)
	Local Guideline	Head of organisational unit	Head of organisational unit	Head of organisational unit
Administrative	Policy	Vice-Chancellor (delegated to the Senior Vice-Principal)	Minor: Responsible Officer (Function Leader or nominee of Senior Vice-Principal) and University Policy Officer Not minor: Initial Approval Authority	Vice-Chancellor (delegated to the Senior Vice-Principal)
	University-wide Procedure	Vice-Chancellor (delegated to the Senior Vice-Principal)	Minor: Responsible Officer (Function Leader or nominee of Senior Vice-Principal) and University Policy Officer Not minor: Initial Approval Authority	Vice-Chancellor (delegated to the Senior Vice-Principal)
	Local Procedure	Head of organisational unit	Head of organisational unit	Head of organisational unit
	University-wide	Responsible Officer	Responsible Officer	Responsible Officer

	Guideline	(Function Leader or nominee of Senior Vice-Principal)	(Function Leader or nominee of Senior Vice-Principal)	(Function Leader or nominee of Senior Vice-Principal)
	Local Guideline	Head of organisational unit	Head of organisational unit	Head of organisational unit

5.6   Approval considerations

5.6.1   Prior to approving any Policy, Procedure or Guideline, or any amendment, the Approval Authority will seek to ensure that sufficient checks have been undertaken to ensure:
- compliance with Commonwealth and State legislation and regulation
- compliance with this Policy
- consistency with existing Policies and Procedures (unless consequential amendments are concurrently proposed or identified)
- consistency with existing delegations, authorities and responsibilities (unless proposed amendments to delegations, authorities and responsibilities embedded in Policy are concurrently proposed or identified to facilitate updating of the *Register of Authorities and Responsibilities*), and reporting of substantial amendments is planned.

6.   University Policy Development and Review Cycle

6.1   The *University Policy Development and Review Cycle*, as outlined in the Policy Development and Review Procedure, applies to all Policies and university-wide Procedures.

6.1.2   The *University Policy Development and Review Cycle* includes the following stages:
- identification and confirmation of policy requirement
- preliminary consultations
- drafting
- benchmarking
- consultation
- revision
- compliance with the Policy on Policy and Melbourne Legislative Framework
- endorsement
- approval
- communication and publication in Melbourne Policy Library
- implementation
- implementation and compliance monitoring
- implementation evaluation
- triennial review

7.   Records management

7.1   Approved and archived versions of Policies and university-wide Procedures will be stored in the Melbourne Policy Library and the university record keeping system (TRIM).

7.2   Records relating to the development and review of Policies and university-wide Procedures will be maintained in accordance with the *Records Management Policy*.

8.   Melbourne Policy Library

8.1   The Melbourne Policy Library will provide the authoritative source for all Policies and university-wide Procedures. Local area websites (that is, managed by a faculty, school, division or organisational unit) will link to the Melbourne Policy Library as the authoritative source.

8.2   The University Secretary will manage the Melbourne Policy Library.

8.3   The Responsible Officer or Function Leader may request that the University Secretary restrict an individual Policy or Procedure held in the Melbourne Policy Library to authenticated users.

8.4   Local Procedures, and university-wide and local Guidelines will be maintained by the responsible local areas, and as required, made available on locally managed websites.

9.   Melbourne Policy Network

9.1   The University Secretary will maintain a Melbourne Policy Network to provide opportunities for policy-related communication, information dissemination and consultation regarding policy development and review.

10.   Documents developed at the organisational unit level ('local documents')

10.1   Policy instruments are supported by documents developed at the organisational unit level (that is, by a faculty, school, division or other organisational unit).

10.2   These local documents may include local provisions. A local provision is a mandatory statement of principle applicable at the level of an organisational unit (that is, at the level of a faculty, school, division or other organisational unit), approved by the head of the local organisational unit.

10.3   These local documents may also include instructions, forms, checklists and business process documents, developed

and approved (where required) as determined at the organisational unit level.

10.4   These local documents may apply university-wide (for example, Human Resources forms), or to one or more organisational units.

11.   Roles and Responsibilities

11.1   The University Secretary is responsible for University Policy management including:
- providing strategic oversight of the implementation of this Policy
- co-ordinating the development, approval, promulgation and review of Policies and university-wide Procedures in accordance with this Policy
- developing and delivering Policy development, evaluation and review resources and support
- maintaining the Melbourne Policy Library
- facilitating consultation and communication to support Policy development, review and implementation
- developing Policy implementation monitoring and evaluation tools
- managing and facilitating the *Policy Review Schedule*.

11.2   The Responsible Officer is responsible for overseeing the development, implementation, monitoring and review of policy related instruments.

11.3   The Implementation Officer is responsible for promulgation, implementation and interpretation of policy related instruments.

11.4   The University Compliance Officer is responsible for ensuring that the overall legislative and policy frameworks of the University meet all applicable compliance obligations.

11.5   University staff are required under their contracts of employment to comply with University legislation, Policies and Procedures when carrying out their duties.

11.6   Students of the University are required under their terms of enrolment to comply with University legislation, Policies and Procedures when undertaking their studies.

SCHEDULES
Nil

RELATED DOCUMENTS
Delegations Policy
Register of Authorities and Responsibilities (RoAR)
Melbourne Legislative Framework
Terms of Reference, Administrative and Business Advisory Group (ABAG)
Policy template
Procedure template
Guideline template
Approval Form
Policy and Procedures Feedback Form
Policy and Procedures Issues Log

DEFINITIONS

Term	Definition
Approval Authority	A body or position that has authority to approve (or otherwise amend or disestablish) University Policy, Procedures or Guidelines.
Guideline	A Guideline is a statement that provides guidance to support the implementation of, and ongoing compliance with, a Policy or Procedure. The term 'guideline' does not refer to a guideline as described in the *University of Melbourne Act 2009*, which may be subject to separate University legislation or Policy.
Function Leader	The officer so designated by the Executive Director (Human Resources)
Local provision	A local provision is a mandatory statement of principle applicable at the level of an organisational unit (that is, at the level of a faculty, school, division or other organisational unit), approved by the head of the local organisational unit.
Melbourne Policy Network	Network of University of Melbourne managers, policy practitioners, interested staff and student organisations established by the University Secretary's Department to communicate university policy matters
Policy	A Policy is a statement of principle that articulates, and aligns with, legislative, regulatory or organisational requirements. A reference to a Policy includes any attached schedule to that Policy.
Policy stakeholder	Those directly affected by a Policy, including those responsible for implementation, periodic monitoring and evaluation. May include university staff and students.
Procedure	A Procedure is a statement that provides information or step-by-step instructions to implement a Policy. A reference to a Procedure includes any attached schedule to that Procedure.
Resolution of the Board	A decision of the Board, recorded as a Resolution of the Board, maintained and published as a formal record by the Academic Secretary

Standing Resolution of Council	A decision of Council, recorded as a Standing Resolution, maintained and published as a formal record by the University Secretary

RESPONSIBLE OFFICER

The University Secretary is responsible for the development, compliance monitoring and review of this Policy and any associated procedures and guidelines.

IMPLEMENTATION OFFICER

The General Manager, University Records and Policy is responsible for the promulgation and implementation of this Policy. Enquiries about interpretation of this Policy should be directed to the Implementation Officer.

REVIEW

This Policy is to be reviewed by 28 February 2016.

VERSION HISTORY

Version	Approved By	Approval Date	Effective Date	Sections Modified
1	Council	29 April 2013	29 April 2013	New policy, replaces in entirety the Melbourne Policy Framework (which will be archived)

Appendix 2 – University of Melbourne *Policy Development and Review Procedure*

The following document was approved by the University of Melbourne Council on 29 April, 2013. I am not responsible for, nor associated with, any amendments made subsequent to this version of the University of Melbourne Policy Development and Review Procedure.

GOVERNING POLICY

This Procedure is made under the Policy on Policy.

SCOPE

This Procedure applies to all University of Melbourne Policies and university-wide Procedures. Faculties, graduate schools, divisions and other organisational units developing Procedures and Guidelines specific to their organisational unit may follow relevant elements of this Procedure. This Procedure does not apply to policies developed by University of Melbourne controlled entities.

PROCEDURE

1.   Identification and confirmation of policy requirement
1.1   A policy development requirement may be established by identifying:
  - existing policy texts yet to be updated to comply with the Policy on Policy or
  - policy gaps where no Policy exists and is required.
1.2   A Policy requirement (being the need for a new Policy or Procedure, or an amendment to an existing Policy or Procedure) must first be confirmed by one of the Responsible Officer, University Secretary, Academic Secretary or Function Leader.
1.3   Once confirmation has been given pursuant to section 1.2, one of the Responsible Officer, University Secretary, Academic Secretary or Function Leader must nominate a person to have carriage of the policy project (that is, the policy developer). Alternatively, the Responsible Officer, University Secretary, Academic Secretary or Function Leader can elect to be the policy developer.

2.   Preliminary consultations
2.1   The policy developer will conduct preliminary consultations with key policy stakeholders.

3.   Drafting
3.1   The policy developer will draft the Policy or university-wide Procedure, as the case may be.
3.2   The policy developer will undertake, or secure support to undertake, sufficient checks to ensure:
  - compliance with all relevant laws, including Commonwealth and State legislation and regulations, the *University of Melbourne Act 2009*, and University statutes and regulations
  - compliance with Standing Resolutions of Council and Resolutions of the Board
  - consistency with the Policy on Policy
  - consistency with existing Policies and Procedures (unless consequential amendments will be concurrently proposed or identified)
  - consistency with existing delegations, authorities and responsibilities (unless proposed delegations, authorities and responsibilities amendments will be concurrently proposed or identified)
  - consistency with University plans and industrial agreements
  - consistency with templates provided by the University Secretary to ensure presentation consistency
  - the use of plain English and inclusive language.

4.   Benchmarking
4.1   The policy developer will undertake benchmarking by examining some other examples of university or related organisation policy.

5.   Consultation
5.1   The policy developer will consult with policy stakeholders in all cases other than with respect to minor amendments of an essentially editorial nature.
5.2   The policy developer will submit a draft of the new, or amended, Policy or university-wide Procedure to the University Secretary for university-wide consultation purposes (including the University Policy Officer for all Policies and university-wide Procedures, and the Academic Secretary for Policies and university-wide Procedures in the academic category).
5.3   The University Policy Officer will make available the proposed new (or amended) Policy and university-wide Procedure via a *Melbourne Policy Network* bulletin and the *Draft Policy Consultation Notice Board*. Drafts will generally be made available for a period of one month to allow consultation, and feedback directly to the policy developer.

5.4 The policy developer may concurrently undertake consultations with policy stakeholders whilst the drafts are available for consultation via the *Melbourne Policy Network* and *Draft Policy Consultation Notice Board*.

6.   Revision
6.1 The policy developer will incorporate feedback, as appropriate, and advise respondents of action taken with respect to feedback submitted.

7.   Compliance with the Policy on Policy and Melbourne Legislative Framework
7.1 The policy developer will submit all draft Policies and university-wide Procedures (including amendments which are more than minor) to the University Policy Officer to ensure compliance with the Policy on Policy and this Procedure, *before* submitting draft documents to any endorsing body (where endorsement is required prior to submission to the Approval Authority).
7.2 The policy developer will submit all draft Policies and university-wide Procedures (including amendments which are more than minor) to the University Compliance Officer *before* submitting draft documents to any endorsing body (where endorsement is required prior to submission to the Approval Authority). The University Compliance Officer will advise the policy developer on compliance with all relevant laws, including Commonwealth and State legislation and regulations, the *University of Melbourne Act 2009*, University statutes and regulations, as well as the Melbourne Legislative Framework and the *Register of Authorities and Responsibilities* (RoAR).
7.3 The policy developer will incorporate feedback, as appropriate, and advise the University Policy Officer and University Compliance Officer of action taken with respect to advice submitted.

8.   Endorsement
8.1 The policy developer may submit draft Policies or university-wide Procedures to an endorsing body for endorsement, as required, prior to submission to the Approval Authority.

9.   Approval
9.1 The policy developer or University Secretary, as applicable, will submit Policies or university-wide Procedures to the appropriate Approval Authority as detailed in the Policy on Policy.
9.2 Where required, the submission should identify or flag the requirement for:
   * consequential amendments to, or disestablishment of, any Statute, Regulation, Policy or university-wide Procedure and/or
   * amendments to or cancellations of delegations, authorities or responsibilities.

10.   Communication and publication in Melbourne Policy Library
10.1 The University Secretary will promulgate Policies and university-wide Procedures, including new documents and significant amendments to existing documents via *Melbourne Policy Network* bulletins.
10.2 The University Secretary will publish Policies and university-wide Procedures in the *Melbourne Policy Library*.
10.3 The Responsible Officer is responsible for ensuring information regarding new and significantly amended Policies and university-wide Procedures is communicated to policy stakeholders.
10.4 The Responsible Officer or Function Leader may publish local Procedures and Guidelines on relevant websites.

11.   Implementation
11.1 The Responsible Officer is responsible for oversight of Policy and Procedure implementation.
11.2 The Responsible Officer or Function Leader is responsible for ensuring that, where necessary, local documents are developed to support Policy and Procedure implementation and facilitate compliance.

12.   Implementation and compliance monitoring
12.1 The Responsible Officer is responsible for the periodic monitoring of Policy and Procedure implementation and compliance.
12.2 The Responsible Officer will establish reporting requirements, as appropriate.

13.   Implementation evaluation
13.1 The Responsible Officer is responsible for the evaluation of Policy and Procedure implementation.
13.2 The Responsible Officer will establish an implementation evaluation plan, evaluation measures and reporting requirements as appropriate.

14.   Triennial review
14.1 Policies, Procedures and Guidelines will be reviewed at least once every three years (that is, at least triennial review).
14.2 Where possible, triennial review dates will be scheduled *to be completed by*:
   * end February or
   * end June or
   * end November

up to three years following the commencement date, or some other date determined by the Responsible Officer.

14.3 Triennial reviews will be conducted to determine whether:
- the objectives are being achieved
- any amendments are required
- the Policy, Procedure or Guideline should continue to apply or be disestablished.

14.4 Amendments may be considered at any time, and as required, a review may be conducted at any time prior to the scheduled triennial review date.

14.5 The scheduled triennial review must proceed regardless of any minor or significant out-of-schedule amendments and informal review outcomes.

14.6 The University Secretary will maintain a *Policy Review Schedule* to identify review completion dates for Policies and university-wide Procedures (including appended Schedules).

14.7 The University Secretary will make available a *Policy and Procedures Feedback Form* and *Policy and Procedures Issues Log* to facilitate submission of proposals for amendment, and facilitate documentation of policy amendment.

14.8 Responsible Officers will be responsible for ensuring that a record of issues is maintained on an *Issues Log* for attention and consideration during subsequent review. The template log may be modified as required by Responsible Officers to meet local requirements.

14.9 The review will involve consideration of:
- internal factors (for example, changes to nomenclature, information-technology based systems, organisational structure, university strategy and planning, or university legislation)
- external factors (for example, changes to professional accreditation requirements, government policy, changes to the law or regulatory authority developments)
- the outcomes of the evaluation of Policy and Procedure implementation.

14.10 The review will determine whether the Policy or Procedure:
- complies with all relevant laws, including Commonwealth and State legislation and regulations, the *University of Melbourne Act 2009*, and University statutes and regulations
- complies with Standing Resolutions of Council and Resolutions of the Board
- is consistent with the Policy on Policy and this Procedure
- is consistent with existing Policies (unless consequential amendments will be concurrently proposed or identified)
- is consistent with existing delegations, authorities and responsibilities (unless proposed delegations, authorities and responsibilities amendments will be concurrently proposed or identified)
- is consistent with University plans and industrial agreements
- is consistent with templates provided by the University Secretary to ensure presentation consistency.

14.11 The University Secretary will make available draft amended Policies and university-wide Procedures (other than those involving minor amendments) via the Melbourne Policy Network bulletin and *Draft Policy Consultation Notice Board*. Drafts will generally be made available for a period of one month to allow consultation and feedback.

14.12 Review outcomes will include one or more of the following:
- no amendment
- minor amendment
- substantive amendment
- disestablishment
- consequential amendment(s) (that is, to a statute, regulation, other Policy, Procedure or Guideline)
- delegations, authorities or responsibilities amendment(s).

14.13 Review recommendations must be submitted to the respective Approval Authority as detailed in the Policy on Policy.

14.14 The University Secretary will promulgate significant amendments to existing documents via *Melbourne Policy Network* bulletins, and amend Policy and university-wide Procedure documentation held in the Melbourne Policy Library.

14.15 The Responsible Officer is responsible for ensuring that review outcomes and any information regarding amendments (other than minor amendments) to Policy and university-wide Procedure documentation are communicated to policy stakeholders.

SCHEDULES

Nil

RELATED DOCUMENTS
Policy on Policy
Delegations Policy
Register of Authorities and Responsibilities (RoAR)
Melbourne Legislative Framework
Terms of Reference, Administrative and Business Advisory Group (ABAG)
Policy template
Procedure template
Guideline template
Approval Form
Policy and Procedures Feedback Form
Policy and Procedures Issues Log

DEFINITIONS

Term	Definition
Approval Authority	A body or position that has authority to approve (or otherwise amend or disestablish) University Policy, Procedures or Guidelines.
Guideline	A Guideline is a statement that provides guidance to support the implementation of, and ongoing compliance with, a Policy or Procedure. The term 'guideline' does not refer to a guideline as described in the *University of Melbourne Act 2009*, which may be subject to separate University legislation or Policy.
Function Leader	The officer so designated by the Executive Director (Human Resources)
Local provision	A local provision is a mandatory statement of principle applicable at the level of an organisational unit (that is, at the level of a faculty, school, division or other organisational unit), approved by the head of the local organisational unit.
Melbourne Policy Network	Network of University of Melbourne managers, policy practitioners, interested staff and student organisations established by the University Secretary's Department to communicate university policy matters
Policy	A Policy is a statement of principle that articulates, and aligns with, legislative, regulatory or organisational requirements. A reference to a Policy includes any attached schedule to that Policy.
Policy stakeholder	Those directly affected by a Policy, including those responsible for implementation, periodic monitoring and evaluation. May include university staff and students.
Procedure	A Procedure is a statement that provides information or step-by-step instructions to implement a Policy. A reference to a Procedure includes any attached schedule to that Procedure.
Resolution of the Board	A decision of the Board, recorded as a Resolution of the Board, maintained and published as a formal record by the Academic Secretary
Standing Resolution of Council	A decision of Council, recorded as a Standing Resolution, maintained and published as a formal record by the University Secretary

RESPONSIBLE OFFICER
The University Secretary is responsible for the development, compliance monitoring and review of this Procedure and any associated guidelines.

IMPLEMENTATION OFFICER
The General Manager, University Records and Policy is responsible for the promulgation and implementation of this Procedure. Enquiries about interpretation of this Procedure should be directed to the Implementation Officer.

REVIEW
This Procedure is to be reviewed by 28 February 2016.

VERSION HISTORY

Version	Approved By	Approval Date	Effective Date	Sections Modified
1	Council	29 April 2013	29 April 2013	New procedure, replaces in entirety the Melbourne Policy Framework (which will be archived)