

Policy Framework

Document Control:

Owner:	Secretary to Council
Author:	Assistant Registrar (Governance)
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Equality Impact Assessment Date:	06/12/23
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Amendment History:

Version Number:	Effective Date:	Summary of Amendments:	Author:
V1.0	24/09/20	Inception of policy framework.	Emma Tew, Assistant Registrar (Governance), Governance Team
V1.1	09/12/21	Minor amendments to clarify roles of POG and policy owners. Inclusion of guidance related to gender neutral language.	
V2.0	13/12/23	Fully revised to take account of internal audit recommendations and best practice.	
V2.1	07/03/2024	Minor amendments following feedback provided by POG at its meeting on 13/12/24.	
V2.2	25/03/24	Minor amendment following feedback provided by POG at its meeting on 07/03/24	

1. Purpose

- 1.1 The purpose of the Policy Framework is to provide guidance on the development, approval and publication of University policies in order to establish a consistent and transparent approach.

2. Scope

- 2.1 The Framework should be applied to all University policies (in accordance with the definition provided in point 3 below). It can also be used as a guide in the development of Guidance, Standard Operating Procedures and Codes of Practice. Charter, Statutes, Ordinances and Regulations are not within the remit of this Framework, although they are defined and referenced to illustrate how they relate to policy.
- 2.2 The Framework applies to all staff members involved in the development and maintenance of University policies.

3. Definitions

- 3.1 The table below provides definitions of official documents currently used within the University. They are presented in a descending order of precedence, beginning with the Charter. The Policy Framework Hierarchy at Appendix 1 provides a diagrammatical representation of this concept.

Charter	The Royal Charter grants Warwick its university status and defines how it will be governed.
Statute	Statutes contain the fundamental constitutional and governance provisions of the University, defining the structures, objects and powers.
Ordinance	Ordinances are informed by the Charter and Statutes and set out, in more detail, the rules of conduct for University business.
Regulation	Regulations contain principles designed to govern conduct or provide direction in an area (often academic) at a more detailed level than Ordinances.
Policy	Policies are the top-level basis for internal decision-making and are binding on the University community (i.e. staff and/or students). They reflect Warwick's values and ensure compliance with external legislation. Policies assign responsibilities and identify an owner who is accountable for implementation. They may be supported by Codes of Practice (COPs), Standard Operating Procedures (SOPs) and Guidance documents.
Code of Practice	COPs provide high-level 'how to' guidance interpreting University policy, bringing together a holistic view of University activity where multiple SOPs apply. A number of different detailed procedures (SOPs) can be referenced/hyperlinked within a high-level COP. A COP is not always required and for some policy areas a single SOP is sufficient.
Standard Operating Procedure	SOPs provide detailed step-by-step 'how to' guidance interpreting University policy. A number of different detailed SOPs can be referenced/hyperlinked within a high-level COP.
Guidance	Guidance encompasses good-practice advice and reference documents.

4. Responsibilities

Role	Responsible for
All staff who have a role in developing and maintaining policy	<ul style="list-style-type: none"> ➤ Familiarising themselves with the Policy Framework and adhering to it.
Department Heads/Policy Owners	<ul style="list-style-type: none"> ➤ Identifying the need for a policy or an update to an existing policy to help the University meet its strategic objectives and/or ensure legal/regulatory compliance. ➤ Delegating policy duties to Policy Authors.
Policy Authors	<ul style="list-style-type: none"> ➤ Developing new policy or revising existing policy in accordance with the Policy Framework, which includes undertaking appropriate consultation and completing an Equality Impact Assessment. ➤ Upon approval, publishing policy on University webpages. ➤ Upon approval, communicating and promulgating the policy across the University as required, as well as monitoring compliance and facilitating any relevant training.
Policy Oversight Group	<ul style="list-style-type: none"> ➤ Ensuring policies comply with the Policy Framework, including that appropriate consultation has been undertaken and policies have been discussed through the relevant governance structures.

	<ul style="list-style-type: none"> ➤ Approving revisions to existing policy. ➤ Recommending approval of new policy to the University Executive Board. ➤ Developing and maintaining the Policy Framework.
University Executive Board or other Approving Body (see point 5.4)	<ul style="list-style-type: none"> ➤ Approving new University policy. ➤ Approving the Policy Framework.
Governance Team	<ul style="list-style-type: none"> ➤ Servicing the Policy Oversight Group. ➤ Maintaining the Policy Zone webpages and hyperlinking approved policy from departmental webpages. ➤ Maintaining a Policy Tracker and prompting Policy Authors when the review date for their policy is approaching.

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Responsible	Assistant Registrar (Governance)
Accountable	Secretary to Council
Consult	Members of the Policy Oversight Group and University Executive Board
Inform	All role holders involved in developing and maintaining policy

5. Policy Development, Approval and Publication Process

5.1 Development

5.1.1 A new or revised University policy can arise in numerous ways, such as:

- An external driver, such as amendment to or new legislation.
- A change in strategy, structure, responsibilities or circumstance.
- The need for clarity or to broaden the scope of a document.
- The regular review of documents.

It should be critically assessed whether a policy is the correct document to address the need, with reference to the definitions provided at point 3 and the Policy Framework Hierarchy at Appendix 1.

5.1.2 Ultimately, Department Heads are responsible for ensuring that effective policy is in place for their area, and they will usually be assigned as the 'Policy Owner' on policy documents. A Policy Owner may delegate the drafting of policy to an appropriate member(s) of their team. This individual(s) is the Policy Author and they are responsible for taking policy through the development, approval and implementation process.

5.1.3 A policy template has been developed to guide Policy Authors. As per the template, each policy should include the following sections:

- Document control: this outlines the Policy Owner/Author, the dates the policy is effective/due for review, and the amendment history which is vital for version control and publication (see points 5.5 and 5.7).
- Purpose: the rationale and context for the policy, including any legal or regulatory requirements the policy is responding to.

- Scope: an overview of what is (and is not) included in the policy and to which University stakeholders it applies.
- Definitions: to define any technical terms which may not be understood by a non-specialist.
- Responsibilities: outlining what is required by different individuals across the University.
- Policy statement: the core section of the document, outlining the guiding principles, values and expectations for the given policy area.
- Implementation/Communication/Training: detailing how the policy will be implemented, how compliance will be monitored, alongside details of the communication tools to be used and relevant training that is required.
- Associated documents: providing links to associated external/internal documentation.
- Appendices: to include supporting diagrams, flowcharts, tables etc.

5.1.4 The format set out in the template should be followed where possible to ensure the consistency and accessibility of University policies (i.e. Calibri black font, 11pt for main body text, bold 14pt for headings). However, the template is not intended to be prescriptive, and adaptations can be made where required.

5.1.5 In terms of writing style, policies should be written in plain English, and use concise, accessible, gender-neutral language throughout. They should not include information that will quickly become outdated (e.g. named individuals) and if acronyms are used, the full word should be used in the first instance with the acronym in brackets.

5.2 **Consultation**

5.2.1 Whilst the policy is at a formative stage and prior to seeking approval, the Policy Author must consider its wider impact and consult with key stakeholders. The individuals who are consulted with will depend on the subject matter of the policy, but some factors to consider are:

- Directors, Department Heads or other equivalents should be made aware of any implications for their area(s) of responsibility.
- A policy should support the University's strategic objectives and priorities. A discussion with the appropriate Executive Board lead could be beneficial in this regard.
- HR might need to be consulted to ensure that the policy does not infringe on employment law or the University's contracts of employment. HR will also be able to advise if formal engagement with the Trade Unions is required.
- Where policies have an impact on students (including UKVI matters), consultation with the relevant student-facing department and/or the Students' Union will help to ensure that a policy is appropriately student focused.
- Legal, compliance, information governance and data protection elements need to be considered, including ensuring that the policy aligns with the Academic Freedom & Freedom of Expression Policy, with advice sought from relevant departments (Legal Services, Health & Safety, Information & Digital Group, and Compliance & Assurance) as appropriate.

- Any financial resource requirements and impacts, both upfront and ongoing, and dependencies on Financial Regulations/Procedures should be considered in consultation with the Finance Office.
- Any impact on campus buildings or facilities should be discussed with the Estates, Space Management and Timetabling Teams. The policy should also be consistent with the principles underpinning the University's sustainability aims, which are also managed by Estates.
- Equality, Diversity & Inclusion considerations must be picked up as part of the required Equality Impact Assessment (see point 5.3).
- Consideration must be given to how a policy will be operationalised and the necessary systems and processes put in place. Consultation will therefore need to cover the operational viability of policy provisions and ensure that the required resources are available for implementation. These discussions with the relevant department/individuals, whilst the policy is still in a formative stage, are critical in this regard.

***Note:** As policy relates to institutional decision-making that applies only to the University community (as per the definition in point 3), it would not usually be expected that consultation with external stakeholders would be required.*

5.2.2 The engagement techniques used to consult with key stakeholders will also vary depending on the nature of the policy. Here are some examples the Policy Author may wish to consider:

- Targeted meetings/presentations with key stakeholders and representatives: this approach is particularly important where the policy has implications for specific stakeholder groups.
- Submission to appropriate committees/working groups: in the later stages of development, prior to submission for approval, a policy can be submitted to a specific committee or working group as a means of consultation (and in some instances this is required – see point 5.4).

However, the remit of the committee/working group as outlined in its terms of reference needs to be kept in mind as it may not be appropriate for the policy to be considered at such a forum. For e.g. the People Committee has explicit duties set out in its terms of reference regarding the development of people policies. It would therefore be appropriate for such policies to be submitted to this committee.

5.3 **Equality Impact Assessment**

5.3.1 To evaluate whether a policy may impact or discriminate against individuals with a protected characteristic an Equality Impact Assessment (EIA) must be undertaken by the Policy Author each time a new policy is developed or an existing one is reviewed. Conducting EIAs helps the University to meet its legal responsibilities under the Public Sector Equality Duty and further information can be found on the [Social Inclusion webpages](#).

5.4 **Approval**

5.4.1 The University's [Scheme of Delegation](#) (SoD) outlines the responsibilities and delegated authorities for making key decisions in the name of, or on behalf of, the University of Warwick. This includes responsibilities around the approval of University policies.

5.4.2 Generally, the University Executive Board (UEB) is responsible for approving policy. The Policy Oversight Group (POG) is a sub-committee of the UEB that has authority to:

- Approve revisions to existing policy.
- Recommend approval of new policy to the UEB.

Therefore, the typical approval route for a policy will be POG > UEB.

5.4.3 However, as per the SoD, some policies must be approved by (or at least be routed through) bodies other than the UEB by virtue of their content. For e.g. the Senate and Finance & General Purposes Committee.

5.4.4 If the UEB is not the approving body, then the policy does not need to be discussed by POG. It is still recommended that the Policy Framework is followed to maintain consistency of policy structure across the University. It is also good practice to inform the POG secretariat of the policy so that it can be added to the Policy Tracker (see point 5.7.3).

5.4.5 During the development process, the Policy Author is advised to refer to the SoD to ascertain the policy approval route. If in doubt, then the Governance Team can provide advice.

5.4.6 Formal committee approval is not required for minor typographical changes to policy; these can be authorised by the Policy Owner. The Policy Author should still inform the POG secretariat of the change (or the other appropriate secretariat if UEB is not the approving body) and ensure that the most up to date version of the policy is available on the departmental webpages (see point 5.5).

5.5 **Publication**

5.5.1 The Policy Author is responsible for publishing approved policy, with any appropriate contextual information, on the University's webpages. These pages should regularly be maintained and only include the most up-to-date version of the approved policy.

5.5.2 The Governance Team maintains a policy directory named the '[Policy Zone](#)' which directs users to where policies are located across the University's website. Policy Authors must advise the Governance Team when a policy has been published to ensure that the Policy Zone is kept up to date.

5.5.3 It is essential that the same document is only hosted in one location with all other references to the policy linking to that location, to ensure that there is a definitive version of the policy available.

5.5.4 Continued publication of a policy beyond its review date does not invalidate it. Approved policies remain in force beyond any expiry of their review date until a new version is available.

Note: *In some instances, it may be necessary for the previous versions of approved policy to be maintained for regulatory (or other) reasons. It is the responsibility of the Policy Author and the originating department to manage and store previous versions of policy. The Policy Zone is intended to be a directory of current, approved policy rather than a repository.*

5.6 **Communication/Implementation/Training**

5.6.1 The Policy Author has responsibility for the effective communication and implementation of the policy to the relevant target audience and consideration should be given to what, if any training will be needed for key stakeholders. This can include staff briefings, departmental emails, bespoke training sessions or other communication or training channels.

5.6.2 It is also the responsibility of the Policy Author to monitor compliance with the policy and manage any instances of non-compliance. Implementation and monitoring of compliance must be aligned to the Compliance and Assurance Framework and advice can be sought from the Compliance & Assurance Team in this regard.

5.7 **Review**

5.7.1 It is essential that policy documents are reviewed, revised and re-published in a timely manner to ensure they are relevant and up to date.

5.7.2 Review dates must be specified by the Policy Author within the Document Control information contained in the policy template (see point 5.1.3). A policy should be reviewed at least every three years and in some cases, review may be required earlier if there is a legislative or regulatory requirement or a change in strategy.

5.7.3 The Governance Team maintains a Policy Tracker and will contact the Policy Author to prompt a review (in advance of the specified date). It is the responsibility of the Policy Owner/Author to maintain a watching brief on the policy and regulatory environment relating to their policy and bring forward the review date if necessary.

5.8 A diagram of the policy development, approval and publication process is provided at Appendix 2.

6. **Associated Documents**

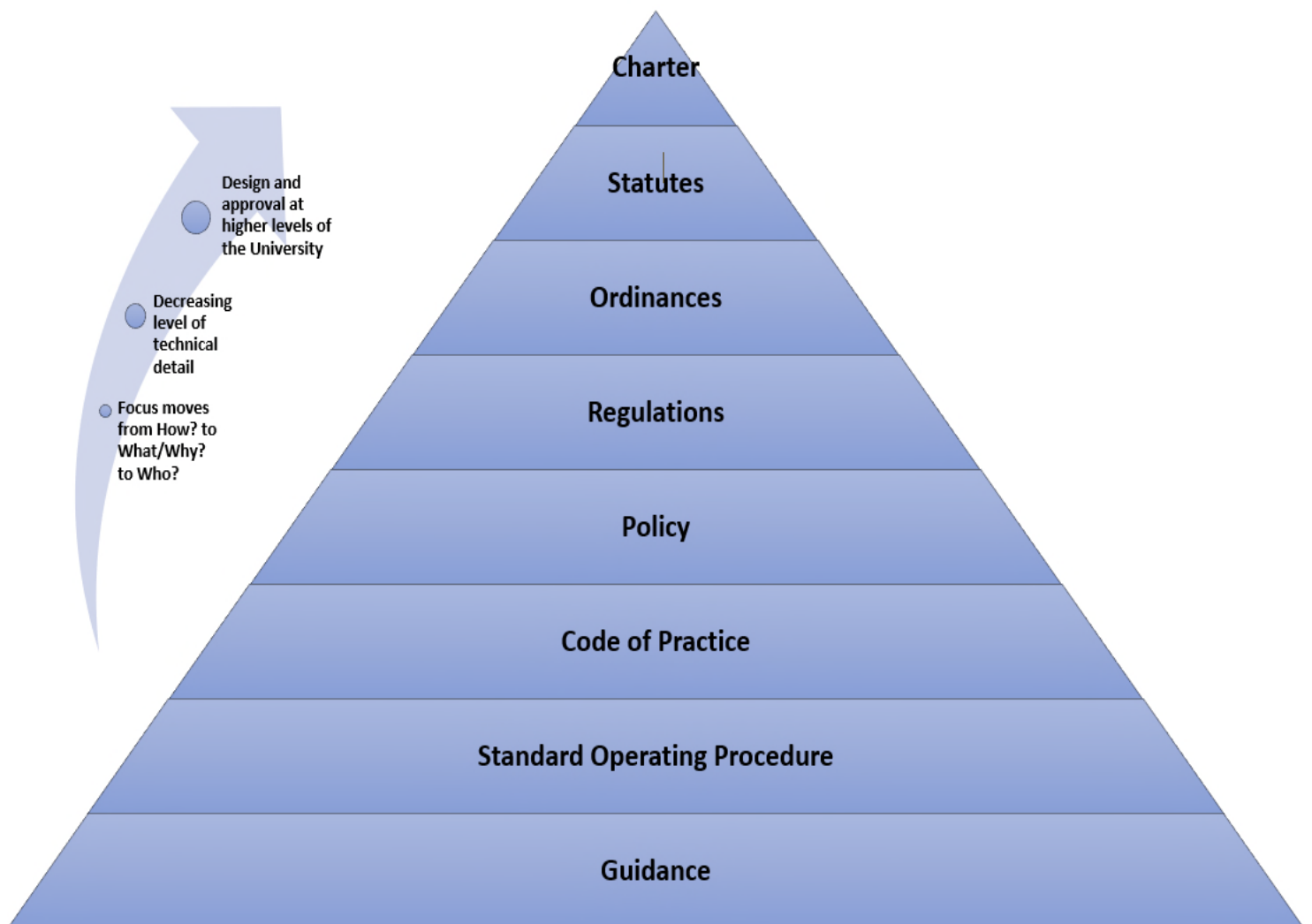
- Policy Template

7. **Appendices**

- Appendix 1 - Policy Framework Hierarchy
- Appendix 2 - Policy Development, Approval and Publication Process Diagram

Appendix 1 – Policy Framework Hierarchy

The Policy Framework Hierarchy encompasses the official documents currently used within the University and presents them in a descending order of precedence, beginning with the Charter.



Appendix 2 - Policy Development, Approval and Publication Process Diagram

