

POLICY ON THE CREATION AND MANAGEMENT OF UNIVERSITY POLICIES ('Policy Framework')

1. OVERVIEW AND PURPOSE

- 1.1 It is important that the University has an appropriate and effective organisational policy framework. This will ensure that organisational expectations are clear and support operational efficiency. A set of robust and up to date policies will help members of the University community understand the values and principles that guide the University's strategic decision making and day-to-day operations, as well as their own responsibilities in ensuring these are upheld. It also plays a critical role in supporting good governance and legal and regulatory compliance.
- 1.2 The purpose of this policy is to ensure that a consistent format and approach is applied to the creation and management of all policies at the University.
- 1.3 The Policy Framework also defines what a policy is and clarifies the difference between policies and other associated documents, sets out responsibilities relating to policies, and details the requirements for the creation, approval, review, and updating of policies.
- 1.4 This policy aims to ensure that policies at the University are:
- fit for purpose, i.e. effective in enhancing operational efficiency and supporting compliance with legal and regulatory requirements;
 - easy to access and understand;
 - approved via the appropriate route(s); and
 - subject to regular checks to ensure they remain correct and up to date.

2. SCOPE

- 2.1 This Policy Framework applies to the creation and management of all policies at the University.
- 2.2 Policies of the University shall apply to any subsidiaries, majority controlled associated undertakings, and joint ventures of the University (as if they are adopted by such entities), unless a policy explicitly states otherwise, or the subsidiary, associated undertaking or joint venture has an equivalent policy in place (as assessed by the University's General Counsel, Governance and Compliance (GCGC) team) that has been approved through its own governance structure.

3. RESPONSIBILITIES

- 3.1 The University's scheme of delegation sets out the responsibilities and delegated authorities for making key decisions, including the approval of certain policies.

3.2 Council

3.2.1 Council has reserved powers in relation to the approval of policies (including the removal of policies) complying with statutory requirements¹ or that constitute a governing document of the University. These policies will be brought to Council through the usual governance structures by the Chief Operating Officer and University Secretary.

3.2.2 Following 3.2.1, Council is responsible for determining whether any policy in relation to which it has reserved powers is redundant or should no longer be designated as a 'policy' (as defined below).

3.3 Senate

3.3.1 Senate is, subject to the provision of the University's Charter and Statutes, responsible for academic standards and the direction and regulation of academic matters of the University, and therefore is responsible for the approval and deletion of related policies in respect of which it has authority.

3.4 Vice-Chancellor

3.4.1 The Vice-Chancellor, on the advice of the University Executive Team, is responsible for approval of all University policies that are not reserved to Council or Senate for approval.

3.4.2 The Vice-Chancellor, on the advice of the University Executive Team, is responsible for determining whether any policy, for which the Vice-Chancellor has approval authority, is redundant or should no longer be designated as a 'policy' (as defined below).

3.5 The Information Manager

3.5.1 The Information Manager is responsible for oversight of policies across the University and for providing support and guidance to those tasked with drafting and updating policies.

3.5.2 The Information Manager is responsible for maintaining the University Policy Template and for the development and management of a central University Policy Library.

3.6 Directors of Professional Services Divisions

3.6.1 Directors of Professional Services Divisions are responsible for ensuring that all policies falling within the remit of their Division (i.e. owned by the Division) comply with this policy and have an appropriate Policy Owner.

3.6 The Policy Owner

¹ Annex 1 of Regulation 10

3.6.1 The Policy Owner is the named role (rather than a named individual) who is responsible for the development, appropriate approval, implementation, review, and update of any policy owned by their Division or institutional area. Where possible the Policy Owner should be a member of the University Executive Team or a Director of a Professional Services Division.

3.6.2 The Policy Owner, or an individual designated by them, is responsible for:

- ensuring that any necessary supporting documents are in place to sit alongside the policy and that other relevant institutional policies, processes etc. are linked to the policy;
- ensuring the policy (once formally approved) is published on the relevant area of the University's website and for liaising with the Information Manager to ensure that policies are linked from the central Policy Library; and
- raising awareness of the policy via the appropriate channels and for facilitating any related training where necessary.

4. POLICY

4.1 Definitions

4.1.1 A **policy** is a high-level statement of principles, requirements or behaviours that apply broadly across the University, which is used as the basis for taking actions or decision making. A policy reflects institutional values and supports the delivery of the University's strategy.

4.1.2 A **policy** will articulate expectations and requirements, and reflect legal and regulatory obligations, sector standards, or high-level operational requirements. As such, policies must be complied with by all individuals within the scope of the policy.

4.1.3 **Procedural or process documents** (which often sit alongside policies and enable compliance with policies in practice) are documents that outline the required ways of doing things and the processes which must be followed. Procedures and processes must also be adhered to.

4.1.4 In some cases, the University may issue, or be required to have in place, a **Code of Practice**, which is a document outlining a set of standards or requirements that must be followed.

4.1.5 **Guidance documents** provide related advice or details of best practice and may also be issued in relation to policies.

4.2 The Policy Format

4.2.1 Each policy must follow the format of the agreed University Policy Template (**Appendix 1**) and should include the following section headings:

- Overview and Purpose;
- Scope;

- Responsibilities;
 - Policy;
 - Legislation and Good Practice (where relevant).
- 4.2.2 Each policy must include a completed 'Review / Contact / References' box at the end of the policy document, which includes links to all related internal policies, procedures, guidance etc., particularly those referred to within the policy itself.
- 4.2.3 Policies should be written in clear, accessible, and straightforward language, and not require technical knowledge or use technical terms (except where they are defined).
- 4.2.4 Whilst all relevant procedures and processes should be signposted to in the policy, policies should not include the details of procedures or operational processes.
- 4.2.5 In some cases, it may be appropriate to include appendices in a policy, for example, where a chart or table is required. In these cases, they should be appended at the end of the main body of the policy, after the 'Review / Contact / References' box, and are considered part of the policy itself for approval purposes. Appendices should not include procedural / process or guidance documents.
- 4.2.6 The University Policy Template is appended to this policy and both the Template and guidance on how to use the Template are linked at the end and are also available from the Information Manager.

4.3 **Development, Approval and Dissemination**

- 4.3.1 The University's Information Manager should be engaged at the drafting stage for any new or updated policies, in order to provide support in relation to adherence to this policy and use of the University Policy Template.
- 4.3.2 GCGC should be consulted where necessary during the drafting or updating of policies, for example where the policy relates to legislative or regulatory requirements.
- 4.3.3 All policies must be approved by Council, Senate, or the Vice-Chancellor. Where Council or Senate is required to approve a policy, the policy should first be endorsed by the Vice-Chancellor, on the advice of the University Executive Team.
- 4.3.4 The Policy Owner must also consider whether additional approvals are needed in line with the University's governance requirements as outlined in the 'Organisation of the University' document. If the governance requirements are unclear, advice should be sought from the Chief Operating Officer and University Secretary, or the Vice-Chancellor's Office.
- 4.3.5 Supporting documents such as procedures and processes are not subject to the same approval process as policies and can be created and amended as and when required by Policy Owners who are responsible for their implementation.
- 4.3.6 Once approved, the Policy Owner must ensure that the policy is published on the University webpages (see 4.4.1) and must liaise with the Information Manager so that the policy can be added to the University's Policy Library.

4.4 Storage, Archiving and Deletion

- 4.4.1 All policies should be uploaded to one consistent location (URL) only and always replaced using the same URL. This ensures that only one, and the latest, version of a policy is available at any given time and avoids broken links.
- 4.4.2 The URL should also be linked from the University Policy Library as managed by the Information Manager.
- 4.4.3 Documents used in the development of policies, and previously approved versions of policies, should be retained locally by the Policy Owner and managed in line with the University's Master Records Retention Schedule.
- 4.4.4 Where a policy is no longer required – rather than being superseded by an updated version – it should be deleted and removed from the Policy Library and University webpages. A decision to delete a policy should be made by the body with approval authority in relation to the policy as set out in paragraphs 3.2 to 3.4 above.

4.5 Review and Revision

- 4.5.1 The Policy Owner is responsible for ensuring that policies are reviewed and updated, as necessary. Policies should have a default review date that is three years from the date of last review and/or approval, unless a shorter review timeframe is required e.g. because of changes to legislation.
- 4.5.2 Where changes are required to a policy, the same approval route should be followed as is required for new policies. Where amendments are only needed to ensure accuracy, for example, changes to School or Divisional names, job titles etc., Council, Senate or the Vice-Chancellor may delegate approval of such amendments to a member of Council, Senate, or the University Executive Team, respectively.
- 4.5.3 Minor or basic amendments to the University Policy Template at Appendix 1 may be approved by the Chief Operating Officer and University Secretary.
- 4.5.4 The amendment of supporting documents such as procedures or guidance, do not need to follow the same review and approval as policies themselves. They should be reviewed and updated as and when required to ensure they remain fit for purpose and reflect current structures and processes.

Review / Contacts / References	
Policy title:	Framework for the creation and management of University policies ('Policy Framework')
Date approved:	12 July 2024
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Last review date:	July 2024 May 2022 October 2019
Revision history:	Version 3: July 2024 Version 2: May 2022 Version 1: October 2019
Next review date:	July 2027
Related internal policies, procedures, guidance:	<p>University Policy Template and Template Guidance https://www.sussex.ac.uk/ogs/information-management/policies</p> <p>Organisation of the University & University Statutes https://www.sussex.ac.uk/ogs/govdocuments</p> <p>Records Management Guidance and Master Records Retention Schedule https://www.sussex.ac.uk/ogs/information-management/records-management</p> <p>Office for Students Public interest governance principles https://www.officeforstudents.org.uk/advice-and-guidance/regulation/registration-with-the-ofs-a-guide/public-interest-governance-principles/ https://www.sussex.ac.uk/webteam/gateway/file.php?name=public-interest-principles.pdf&site=76</p>
Division:	Division of General Counsel, Governance and Compliance
Policy owner:	General Counsel and Director of Governance and Compliance
Point of Contact:	Karen Blackman, Information Manager, Information Management Team, Division of General Counsel, Governance and Compliance