How to seek approval for new University-wide policies or changes to existing policies

1. **Summary**

1.1 This document sets out the approval process for University-wide policies. It applies to new policies as well as to changes to existing policies. It distinguishes between the routes and approvals for policies at operational level and through the University’s formal governance process. A detailed step-by-step guide is set out in Annex A.

1.2 The last section of the paper includes best practice advice on how to approach work on a policy and at what stages to liaise with colleagues in the Governance and Compliance Division (GCD) and the Legal Services.

2. **Background**

2.1. A policy is a statement of the University’s position on a particular matter and/or a set of principles guiding the actions of students and/or staff of the University. It might also include information as to what to do in a particular set of circumstances.

2.2. The terms ‘policy’, ‘procedure’ and ‘guidance’ are sometimes used interchangeably in a day to day context. However, it is important to identify early on in the process if a document is best described as a policy, procedure or guidance, as it will help to determine the appropriate approvals process.

2.2.1. **Policies** set parameters for decision-making and provide the “why” behind an action. Compliance with policy is mandatory unless otherwise indicated.

2.2.2. **Procedures** set out a series of actions that should be conducted in a certain manner and therefore explain the “how.” Compliance with procedure is mandatory unless otherwise indicated.

2.2.3. **Guidelines** set parameters for decision-making and provide the “why” behind an action. Compliance with guidelines is strongly encouraged but there is greater flexibility in comparison to parameters set out in policies.

2.2.4. **Guidance** is provided as a tool to assist with the interpretation and application of policy and procedure, or provides general information and advice on a particular subject. Compliance with guidance is not mandatory.

2.3. For a policy to be valid, it must be approved by the appropriate bodies within the University’s governance structure before it is implemented.

3. **Responsibilities**

3.1. The following section sets out the responsibilities of those involved in the administrative process for obtaining approval for University wide policies:

3.2. The **policy lead** is a member of staff, who is assigned as lead on the work on a policy. The individual is normally a member of the institution that administers the policy. The individual has overall responsibility from the initial stages of gathering ideas on how to position a policy, the drafting of the policy and associated documents (e.g. Notices, Graces, Reports for publication in the *Reporter* and Regent House approval if applicable), through to obtaining all relevant approvals for the policy at operational and governance level.

3.3. The **administrative lead** is normally the Director of the relevant UAS Division (or equivalent) and signs off on final draft of the policy and auxiliary documents before the policy is considered by the academic lead and University committees.

3.4. The **academic lead** is normally a member of the Senior Leadership Team (e.g. Pro-Vice-Chancellor) and signs off on the final draft of the policy and auxiliary documents before the policy is considered by University Committees.
3.5. The **Governance and Compliance Division** is responsible for ensuring that all policies are approved by the relevant University Committees; advises the policy lead on the governance approval process for the policy; liaises with HR to determine if an Equality Impact Assessment is required; liaises with the Legal Services to determine if legal input is required during the drafting stages of a policy. GCD signs off the final drafts of the policy before it is considered by the administrative lead. Where there are time constraints, GCD can advise on which operational and governance approvals can be sought in parallel. Correspondence should be sent to the University Draftsman and copied to the Head of GCD.

3.6. **Legal Services** provides legal input into the drafting of a policy. GCD consults with LSO if legal input is likely to be required in the drafting stages of the policy; if legal input is required, LSO signs off the final draft of the policy before the policy is considered by GCD.

3.7. The **University Draftsman** is a member of GCD advises on governance approval processes for policies in consultation with the Head of GCD; provides advice on the drafting of Notices/Graces/Reports associated with a policy; obtains approval of the Business Committee/Council for Notices/Graces/Reports.

3.8. The **General Board and Council Secretariats** are part of GCD and ensure that the General Board/Council and their committees receive adequate paperwork for policy approvals and that all approvals sought are in line with the University's regulations. The **Sub-Committee Secretariats** either sit in the respective UAS Divisions or are part of GCD. They ensure that the committee receives adequate paperwork for policy approval and that approvals are sought in line with the committee’s terms of references.

4. **Operational approval steps**

4.1. Work on a new policy or changes to an existing policy usually involves consultation with many different groups within the University (e.g. Heads of Institutions; administrative colleagues across multiple Divisions) and sometimes beyond the University (e.g. trade unions, Colleges). These consultations help create consensus across the University and they underpin the approval process by the University committees. However, they are not part of the University's formal governance approval process.

4.2. The operational approval process for final drafts of policies normally includes the following steps:

4.2.1. Approval of the final draft and auxiliary documents (if applicable) by the relevant administrative lead (e.g. Directors of UAS Divisions).

4.2.2. Approval of the final draft and auxiliary documents (if applicable) by the relevant academic lead (member of the Senior Leadership Team).

4.3. Requests for sign-off must include:

- Completed sign-off sheet (see Annex B);
- The draft policy and all auxiliary documents;
- If applicable, a tracked version to an earlier version of a policy and a short summary of the material changes included in the new draft of the policy.

4.4. Approval of the relevant administrative lead must be obtained before approval from the member of the Senior Leadership Team is sought. Approval of the administrative and academic leads must be obtained before the formal governance approval process can start.

5. **Governance approval steps**

5.1. The following paragraphs set out the role of sub-committees, the General Board, the Council and the Regent House in the approval process for policies.

5.1.1. **Sub-Committees**: Sub-committees consider and recommend draft policies to the Council and the General Board.

5.1.2. **The General Board**: The General Board considers and approves policies that impact on teaching or research or academic matters (e.g. policies that apply to academic members of staff). The General Board
generally considers policies on the recommendation of one or more of its sub-committees. Policies that fall within the remit of the General Board need to be considered and approved by the General Board before they can be approved by the Council.

5.1.3. **The Council**: The Council is the principal executive and policy-making body of the University.\textsuperscript{1} All University-wide policies need the approval of the Council, e.g. policies that apply generally to staff and/or students, or implement legislation or government or regulatory advice, or concern the interface between the University with the Colleges. Like the General Board, the Council generally considers policies on the recommendation of one or more of its sub-committees.

5.2. All Secretariats normally require the following set of documents for committees to consider and approve policies. The policy lead is responsible for submitting the documents to the Secretariats.

- Completed sign-off sheet;
- A summary paper that sets out the aims of the policy, the consultation process, and (where relevant) previous discussions and approvals of the policy by committees or sub-committees;
- A clean version of the policy and, for existing policies, a tracked changes version recording all amendments in relation to the existing policy;
- All auxiliary documents as annexes (preferably hyperlinked).\textsuperscript{2}

6. **Potential additional governance approval steps: Regent House**

6.1. Although the Council is the principal executive and policy-making body of the University, it has agreed that in carrying out that function it will consult the Regent House on questions of policy which in the Council’s judgement are likely to prove controversial. In addition, the making, altering, or repealing of Statutes, Special Ordinances, Ordinances and Orders requires approval by Grace of the Regent House.\textsuperscript{3}

6.2. If a policy or a change to an existing policy requires amendments to the University’s Statutes and Ordinances, those changes require the approval of the Regent House. The process for obtaining approval from the Regent House depends on where the relevant regulation sits within Statutes and Ordinances and the significance of the changes.

6.2.1. Changes to Statute or Special Ordinance, no matter how minor, require a Report (which is subject to a Discussion) and a Grace; minor changes to regulations included in Ordinances can be approved by publishing a Grace with an explanatory Notice or footnote.

6.2.2. Changes to a policy that is set out in full in Statute or Ordinance (e.g. the Ordinance on Intellectual Property Rights) will require a Report.

6.2.3. A change only to revise the title of a policy could be handled by Grace.

6.2.4. Changes to policies published as Notices by the Council or the General Board and reproduced in the Statutes and Ordinances should be confirmed by Notice.

6.3. Where there are no changes to the Statutes and Ordinances, but the Regent House has previously approved the establishment of a policy, the Regent House would normally be asked to approve significant changes to that policy (or to consent to its removal) by Grace following publication of a Report. Examples of such policies include the University’s Probationary Policy and the senior academic promotions scheme.

6.4. For policies that are deemed potentially controversial or contentious, the Council can determine that it wishes to refer the policy to the Regent House for approval or that it needs to be set out in Ordinance and therefore that it requires that approval.

6.5. All documents (Notices, Graces and Reports) required for Regent House approval are to be drafted by the policy lead in consultation with the University Draftsman (or drafted by the University Draftsman in

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\textsuperscript{1} See Statute A IV.1.

\textsuperscript{2} Auxiliary documents include all available material related to the policy, in particular material that presents the substance of the policy in reduced format (e.g. high level extracts on a webpage, flyer) or includes further guidance/examples. Materials can be presented via hyperlinks.

\textsuperscript{3} See Statute A III, 3 and Notice by the Council p. 111.
consultation with the policy lead, if the University Draftsman agrees to do this). Notices and Graces that are straightforward (e.g. they contain only information that has already been approved) can be signed off by the University Draftsman in consultation with the policy lead. A Grace seeking the approval of the recommendations of a Report can be signed off by the University Draftsman without any further sign-off. All other Reports, Notices and Graces should be signed off by the academic lead before being provided to the relevant Secretariats.

6.6. In some cases, Council approval of the required Notices, Graces and Reports for publication in the Reporter can be obtained at the same time as approval of the new policy/changes to an existing policy. In others, the preparation of draft Notices, Graces and Reports takes place after the policy is approved. In those cases, the Business Committee, on behalf of the Council, normally approves the documents for publication in the Reporter.
Annex A: Step-by-step guide on how to approach work on policies and how to ensure appropriate sign-off and approvals of a policy:

The following bullet points set out a step-by-step guide describing how to approach work on a new policy/changes to an existing policy and how to ensure appropriate sign-off/approvals at all levels. It details the most important steps throughout the process of work on a policy and provides background to the information recorded on the sign-off sheet.

Before work on the policy begins

- Administrative lead assigns a policy lead: one individual to have overall responsibility for the entire process, from the initial stages of gathering ideas on how to position a policy through to the final approval of the policy by the Council.
- Policy lead agrees plan for approval route (operational and governance) with GCD. GCD liaises with LSO to determine if and to what extend the LSO needs to be involved in the drafting of the policy. GCD confirms the approval route on the sign-off sheet (including whether the proposed new policy/changes to a policy are likely to include changes to the University’s Statutes and Ordinances).
- Policy lead shares the agreed plan for the approval of the policy with the relevant Secretariats so that the policy is included in the work-plan of the respective committees.

At the end of the consultation period

- Policy lead updates GCD about any changes to the intended policy as result of the feedback received during the consultation period (including preliminary consultations with University committees or external bodies).
- GCD determines whether the changes have an impact on the governance approval process; any changes to the approval route are recorded on the sign-off sheet.
- Policy lead shares the amended approval route with the relevant Secretariats (if applicable).

Operational sign-off process for the final draft of the policy

- Policy lead obtains sign-off on the policy and auxiliary documents from the following group (in that order). Documents required for sign-off are detailed in the Guidance above. No sign-off can be obtained without a completed sign-off sheet.
  - HR and Legal Services (if applicable)
  - GCD; GCD also records final advice on governance approval process on sign-off sheet
  - Administrative lead
  - Academic lead
- Policy lead (re-)confirms governance approval process with the relevant Secretariats.

Governance approval process for the final draft of the policy

The following process is iterative until all committee approvals have been obtained.

- Policy lead submits the papers for policy approval to the relevant Secretariat as described in the approval plan.
- Documents required for Committee approval are detailed in the Guidance above. (Note that committees will look at different aspects of the policy in line with their terms of reference. Summary papers need to be tailored to the respective committees and, if applicable, include references to discussions at other committees or sub-committees.)
- Relevant Secretariats liaise with policy lead to determine whether policy lead should attend the committee meeting to answer questions and hear feedback on the final draft. If the policy lead does not attend, the Secretariat will inform them of the committee’s decision, including (if applicable) any changes that need to be made to the policy before further approvals are sought.
**Additional step for General Board/Council approval**

- Policy lead liaises with University Draftsman about a Notice in the *Reporter* in parallel to submitting the papers for approval of the policy to the General Board/Council Secretariat.

**If Regent House approval is necessary**

- Policy lead liaises with University Draftsman to draft additional documents (Notices, Graces, Reports) required to obtain Regent House approval.
- University Draftsman liaises with GB/Council Secretariat or the Business Committee to obtain approval to publish the relevant documents in the *Reporter*.
- University Draftsman liaises with policy lead if further documents are required throughout the Regent House approval process (e.g. response to Discussion remarks) or if a ballot is called.
Annex B: Sign-off sheet – Policies

Sign-off sheet for approval of new policies/changes to existing policies

**Title and summary of the policy:** Policy lead to describe the purpose of the policy. Please also state whether this is a new policy, a policy that replaces an existing policy, or a change to an existing policy. If it is a change to an existing policy please describe the extent of the envisaged changes. (no more than 100 words)

**Responsible individuals:**

Policy lead: Provide name and contact details of the policy lead

Administrative lead: Provide the name of the administrative lead

Academic lead: Provide the name of the academic lead

Consultations (if applicable): Policy lead to provide information on consultations with relevant staff/students and with bodies outside the University (e.g. trade unions, College committees).

Governance approval process: GCD to confirm the governance approval process for the suggested new policy/changes to an existing policy

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<tr>
<td>Yes (complete the rest of this form)</td>
<td>No (only GCD sign-off required)</td>
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<td>Committee</td>
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Regent House approval?

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<td>If yes, please include details of what approvals are needed:</td>
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Additional comments on the governance approval process: GCD to provide any additional comments on the process if applicable.

Sign-off records

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<th>Name</th>
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