

Policy framework

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1. Introduction

The Policy Framework is a structure for managing and maintaining the Commission's policy and procedural documents. It provides instruction for staff in the development, management and control of the processes that define our activities, ensures legislative compliance and helps us in meeting our objectives. This is achieved by:

- Implementing a consistent and comprehensive approach to policy development, management and implementation across NSWEC
- Enabling the development of documents which are clearly recognisable as agency practice and easy to understand and use
- Ensuring policy documents stay current and relevant through regular monitoring, evaluation and review
- Simplifying the creation of policy documents through clear processes and ensuring consistency of required information through standard templates
- Providing flexibility in how policy documents are developed through mandatory and optional content and style conventions

The framework includes:

- This Policy Framework Policy
 - A Policy Hierarchy, including delegations of authority to for the development review and approval of Commission and Local Documents
 - A Policy Development Guideline that describes the process for the development, review and archiving Commission Policy Documents, including templates and flow-charts to support a standardised and consistent approach
 - The Policy Library, a comprehensive, single point of reference for information on NSWEC's policy documents
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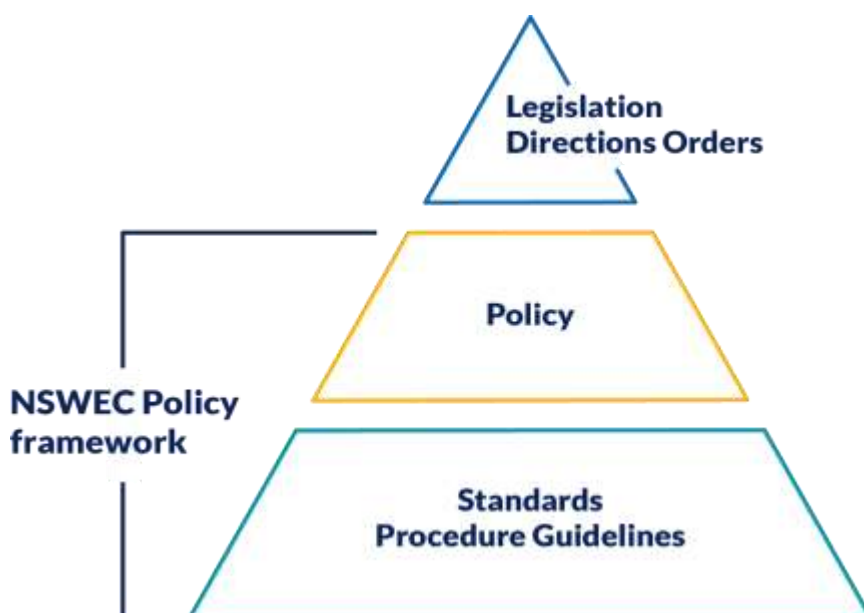
2. Policy details

Framework structure

NSWEC's Policy Framework supports efficient management, good governance, certainty and accountability by:

- Detailing what the NSWEC needs to do to comply with its' legislative obligations
- Establishing minimum standards of conduct and controls
- Provides guidance for Management and Staff so that our decision making is uniform and consistent

The framework operates within a hierarchy, with the requirement that documents lower in the hierarchy must be consistent with documents higher in the hierarchy.



The top level of the hierarchy is formed by compliance obligations as set out in instruments such as Legislation; Directions; Orders; Government Policy, Circulars and Memoranda; Standards or Codes of Practice. The highest level of document with the NSWEC framework is a Policy document. Standards, procedures and guidelines act as support documents to the Policy in no particular hierarchy.

The primary principles for the NSWEC Policy Framework are to ensure that documented processes are:

- Supportive, and are consistent with, the Commission's functions, values and strategic plan
- Consistent with the law and relevant standards
- Developed where there is a clear organisational need
- Principles-based documents, with operational detail incorporated in standards, procedures and guidelines
- Relevant and transparent in their purpose and meaning, and are written and presented clearly and succinctly
- Comprehensive, that all relevant processes are outlined are included

Categories of policy documents

Document	Purpose	Examples
Policy	<p>High level principle statements to guide decision making to support NSWEC objectives. Policies help ensure that NSWEC complies with legislation and meets community expectations.</p> <p>They state:</p> <ul style="list-style-type: none"> • WHAT NSWEC's position is on a specific topic or issue including its view on the interpretation of laws applying to matters that may be enforced by a regulatory agency • WHY it has adopted that position • to WHOM it applies. <p>They are an important mechanism for appropriate, consistent, transparent and fair exercise of NSWEC's powers.</p> <p>Attributes of a policy:</p> <ul style="list-style-type: none"> • Requires compliance. Failure to comply may result in disciplinary action • Are further defined by standards, procedures and guidelines. 	<ul style="list-style-type: none"> • Handbook • Code • Protocol • Factsheets
Standard	<p>Low level mandatory controls designed to ensure uniform application of a Policy.</p> <p>They are often an accepted specification defining materials, methods and outcomes, designed to achieve consistent and acceptable levels of quality, performance, safety and reliability.</p>	<ul style="list-style-type: none"> • Depreciation rates • Password standards • Accounting standards
Procedure	<p>How to perform tasks and duties.</p> <p>It is a sequence of actions, processes and responsibilities required to achieve a particular result or goal.</p> <p>While Policies, Standards and Guidelines outline the controls that should be in place, a Procedure gives a step-by-step explanation of how to implement these controls.</p>	<ul style="list-style-type: none"> • Standard Operating Procedures • Instruction Manuals for Election Officials e.g. Polling Place Manual; flowcharts
Guideline	<p>Recommended, non-mandatory controls that help support policies and standards or serve as a reference when no applicable control is in place. Guidelines should be viewed as best practices that are not usually mandatory, but strongly recommended.</p>	<ul style="list-style-type: none"> • Templates • Style guide

Process Owner for policy development and review

The Policy Owner is the position responsible for:

- Achievement of the process objectives
- Successful integration with any identified linked processes
- Maintaining currency through either a periodic review as specified in the process, or review as a result of business or regulatory change
- Implementation of the process, and communication of changes to affected staff within the Commission

An Executive Director or Director will typically be assigned as the Policy Owner, though this may be delegated where required.

Policy development and review

The development, review, approval and publication of any NSWEC policy document must follow the instructions in the Policy Development Guideline.



The Process Owner is responsible for ensuring that policy authors and implementers follow the approved steps to ensure the efficiency, accountability and certainty in how NSWEC develops and reviews its policy documents.

Important note: Consultation is a key step in the policy development and review process. Impacted people and functions should be consulted during the development/review process (e.g. ECG, Finance, HR), and working groups should be used where relevant. All policies that have general applicability across the organisation must be circulated through the Directors Forum and any relevant working groups. Directors have the responsibility to disseminate as needed through their business units to ensure there is adequate consultation. Also consider engaging with the Policy Coordinator, who can assist through the process of development and publication of the Policy document. The Right to Information Officer may need to be consulted if the document is NFP, or the Privacy Officer if it involves the handling of personal or health information.

Policy Authors can have their documents reviewed by the Communications team to ensure that they are consistent with the corporate style guide. This is particularly important for documents that will be published on the website.

Document management

All approved policy documents must include key governance information, to ensure appropriate document metadata is recorded and maintained. This includes:

- Dates of approval
- Review periods
- Version information
- Related documents (where applicable)
- Publication details
- A completed revision record

Information on the application of this information is included in the Policy Development Guideline.

The Policy Coordinator is responsible for ensuring that a register of all approved documents is maintained, which will include all relevant metadata, including process owners, review dates and publication category.

Policy implementation

Any revised or newly developed policy **must** be supported by a communication or change management strategy to support implementation. Without this in place successful adoption and compliance will be significantly compromised.

This may include:

- How the change is communicated to those impacted
- If training is required to support the implementation, and if so the type of training
- What monitoring and reporting systems might be needed to ensure the policy is implemented, including assessment of the effectiveness of the change

The table below sets out some example steps that should be considered to prepare and support the change. The level of detail required will depend on the nature of the change and target audience.

Action (what is proposed to be done)	Target audience (who is the action directed to)	Responsibility (who is responsible for the action)	Due (when to be completed by)
All-staff email to inform new policy is published	All staff	Governance	31 August 202X
Sample implementation actions: <ul style="list-style-type: none"> • Face to face training sessions • Online training module • 1:1 coaching • Item in staff newsletter • Presentation at divisional/all-staff meeting • Briefing at Director's forum 			

Policy approval

All approved Policy documents are to be published in the Policy Library on the NSWEC Intranet, unless the document is classified as Not for Publication (NFP) (refer to [Public Access to Policy Documents](#)). The following outlines the document approval authorities for the types of policy documents:

Approver	Documents
NSW Electoral Commission	<p>Approval Authority for policy documents relating to the functions of the Commission. The functions of the Commission include:</p> <ul style="list-style-type: none"> • Approving funding to candidates and parties • Conducting and promoting research into electoral matters and other matters that relate to its functions, and publishing the results of any such research • Promoting public awareness of electoral matters that are in the general public interest by means of education and information programs • Enforcing the provisions of the: <ul style="list-style-type: none"> - Electoral Act 2017 - Electoral Funding Act 2018 - Lobbying of Government Officials Act 2011
Electoral Commissioner	<p>Approval Authority to approve, amend or revoke policy documents in relation to the functions of the Commissioner where:</p> <ul style="list-style-type: none"> • non-compliance with the provisions of the proposed policy document presents a financial, reputational or litigation risk • the proposed policy document is informed by an over-arching Government framework with mandatory requirements or • the scope of the proposed policy document extends beyond a single Business Unit and requires change from other Business Units to reduce the risk of non-compliance
Executive Director	<p>Approval Authority for policy documents that do not fall within any of the categories where approval is required by the NSW Electoral Commission or Electoral Commissioner.</p>

Policy library

All approved Policy documents are to be published on the Policy Library, contained within the NSWEC Intranet, as the primary means of access by NSWEC staff.

Staff should access the Policy Library each time they want to view a document to ensure they view most recent issue of that document.

Public access to policy documents

The GIPA Act makes it mandatory for agencies to release “open access information”. An agency’s policy documents constitute open access information unless a policy relates to an excluded function or there is an overriding public interest against disclosure. Where a Policy Document has been determined to be *Not For Publication (NFP)* the Right to Information Officer (RIO) must be notified that this category is to be used.

Category	Description
Not for Publication (NFP)	<p>The policy document will not be hosted in the Policy Library.</p> <p>The RIO will determine whether restricted HPE Content Manager access will apply to NFP policy documents depending on the level of sensitivity.</p> <p>The document will be included on the Policy Register.</p>
Intranet only	<p>The policy document is to be hosted in the Policy Library and is accessible by internal staff only.</p> <p>The document will be included on the Policy Register and HPE Content Manager.</p>
Intranet and Internet	<p>The policy document is to be hosted in the Policy Library and the NSWEC internet site and is accessible by internal staff and the general public.</p> <p>The document will be included on the Policy Register and HPE Content Manager.</p>

3. Roles and responsibilities

The following table outlines the roles and responsibilities under the Policy Framework:

Role	Responsibility
NSW Electoral Commission	Approval Authority for policy documents relating to the functions of the Commission.
Electoral Commissioner	<p>Approval Authority to approve, amend or revoke policy documents in relation to the functions of the Commissioner where:</p> <ul style="list-style-type: none"> • non-compliance with the provisions of the proposed policy document presents a financial, reputational or litigation risk; • the proposed policy document is informed by an over-arching Government framework with mandatory requirements; and • the scope of the proposed policy document extends beyond a single Business Unit and requires change from other Business Units to reduce the risk of non-compliance
Executive Directors	<ul style="list-style-type: none"> • Approval Authority for policy documents that do not fall within any of the categories where approval is required by the NSW Electoral Commission or Electoral Commissioner. • Identify policy gaps and propose policy requirements • Determine policy content and compliance with relevant legislation and organisational requirements • Delegate a policy author to be responsible for developing/amending a policy document

Role	Responsibility
	<ul style="list-style-type: none"> • Delegate a policy implementer to be responsible for implementation of a policy document
Senior Executive Committees	<ul style="list-style-type: none"> • Oversight and approval of policies and standards to establish compliance obligations, and frameworks to define the controls for meeting compliance, in accordance with Committee Terms of Reference.
Directors	<ul style="list-style-type: none"> • Disseminate draft documents as needed through their business units to ensure there is adequate consultation during policy development and review.
Manager Governance	<ul style="list-style-type: none"> • Manages the Policy Framework implementation, gap analysis and reporting • Arranges reports and meetings, at least quarterly, with the Executive Directors and/or Directors on policy gaps and updates • Monitors and responds to staff queries, via the Policy Coordinator email address, and the web content form for external stakeholders
Policy Coordinator (Governance Officer)	<ul style="list-style-type: none"> • Coordinates administration of policy development and review process • Alerts Manager Governance to reviews of policy documents falling due • Maintains Policy Register • Manages the publication, amendment or archiving of approved policy documents
Policy Owner	<ul style="list-style-type: none"> • Develops or amends policy documents as required • Ensures there is adequate consultation during policy development and review • Ensures that an implementation plan is developed where required • Ensures approved policy documents are forwarded to the Policy Coordinator for registration and publication • Monitors the compliance process • Evaluates the implementation process
Right to Information Officer	<ul style="list-style-type: none"> • Assesses policy documents where they relate to open access information under the GIPA Act • Provides feedback to Executive Director and/or Directors relating to Not for Publication policy documents
Privacy Officer	<ul style="list-style-type: none"> • Provides advice on issues relating to the PPIA Act and HRIP Act

4. Abbreviations and definitions

Abbreviations

GIPA Act	<i>Government Information (Public Access) Act 2009</i>
HRIP Act	<i>Health Records and Information Privacy Act 2002</i>
NSWEC	New South Wales Electoral Commission
PCO	Privacy Contact Officer
PPIP Act	<i>Privacy and Personal Information Protection Act 1988</i>
RIO	Right to Information Officer

Definitions

Approval Authority – the authority authorised to approve or revoke policy documents.

Guideline – see [Categories of Policy Documents](#)

Policy – see [Categories of Policy Documents](#)

Policy Coordinator – officer responsible for maintenance of the Policy Library and Policy Register.

Policy Action Form – the formal plan or proposal to develop, amend or revoke a document submitted to the Approval Authority.

Policy Document – any policy, standard guideline or procedure document developed by NSWEC.

Policy Library – the centralised repository for all published NSW Electoral Commission policy documents. Its public documents are on elections.gov.au and those for internal use are on the NSWEC intranet.

Policy Register – the register of all policy documents maintained by the Policy Coordinator. It lists the name of each policy document, its key attributes and status.

Policy Template – the required standard Word document format and used by Policy Authors for Policy, Standard, Template or Guideline development.

Privacy Contact Officer (PCO) – staff member appointed to assist NSWEC to apply the *Privacy and Personal Information Protection Act 1988* (PPIP Act) and the *Health Records and Information Privacy Act 2002* (HRIP Act).

Procedure – see [Categories of Policy Documents](#)

Right to Information Officer (RIO) – staff member with delegated authority to meet the agency's obligations under the *Government Information (Public Access) Act 2009* (GIPA Act).

Standard – see [Categories of Policy Documents](#)



5. Related documents

Associated documents

- Policy Development Guide
- Policy Action Form
- Policy Template

Relevant legislation

- [Government Information \(Public Access\) Act 2009](#)
- [Health Records and Information Privacy Act 2002](#)
- [Privacy and Personal Information Protection Act 1988](#)

6. Document control

Publication details

Document type:	<input checked="" type="checkbox"/> Policy <input type="checkbox"/> Standard	<input type="checkbox"/> Procedure <input type="checkbox"/> Guidelines
Responsible Business Unit: Corporate Governance	Author: Matthew Porter, Corporate Governance	Publication: <input type="checkbox"/> Not for publication <input type="checkbox"/> Internal catalogue <input checked="" type="checkbox"/> Intranet only <input type="checkbox"/> Intranet and website

Revision record

Date	Version	Revision description
21/04/2017	V 2.0	Final draft
29/7/2021	V 3.0	Final draft

Document management

Date approved	Approved by
29/07/21	SPBC

Next review date

This Policy is to be reviewed within 3 years from the date approved, unless review is required by regulatory change or by an identified need for process improvement.