

Trans-Tasman policy borrowing: building resilience in institutional policy systems and processes through local and international sharing, networking and collaboration
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Abstract

New Zealand tertiary education organisations (TEOs) and Australian tertiary education providers both face regulation increasingly reliant on institutional policy to evidence compliance. Whereas the New Zealand Qualifications Authority (NZQA) *Tertiary Evaluation Indicators* require evidence that institutional policies and practices are 'legal and ethical' and 'minimise barriers to learning', Australian providers must comply with the Tertiary Education Quality and Standards Agency (TEQSA) *Threshold Standards* and evidence policy implementation, benchmarking and improvement over time. Policy and compliance practitioners on both sides of the Tasman are grappling with these issues and in some instances, duplicating effort to respond to requirements. This session will draw on a study involving document analysis of publicly available, internet-based institutional meta-policy (that is, policy on policy) and associated resources of some New Zealand and Australian tertiary education providers, and reflect on contemporary policy management themes emerging from Association for Tertiary Education Management (ATEM) Institutional Policy Network forums, ATEM teleconference policy group discussions, and discussions held (December 2012) with staff from select New Zealand universities and polytechnics. These reflections span institutional policy management systems and processes, and experiences regarding policy implementation compliance. While many institutions have established systems for developing institutional policy, few have publicly available information demonstrating how policy is 'legal and ethical', few appear well placed to evidence compliance, and there are limited resources available to support value-adding policy cycle stages required to comply with regulator requirements. This session explores avenues for trans-Tasman policy borrowing, networking, and information-exchange to collaboratively face these regulation-driven institutional policy challenges.

INTRODUCTION

This presentation grew from discussions in December 2012 with staff from select New Zealand universities and polytechnics in Hamilton, Auckland and Otago. Common questions emerged regarding institutional policy systems and processes developed against a backdrop of increasing sector regulation, and focused attention on the vexed question of policy compliance. These questions resonated with similar ones facing Australian policy practitioners participating in Association for Tertiary Education Management (ATEM) Institutional Policy Network discussions, policy forums and workshops, and policy teleconference groups. In particular, these preliminary discussions raised questions regarding institutional meta-policy, or policy on policy. Institutional meta-policy 'matters' to the extent that institutional policy 'matters' as it provides the framework for all institutional policy. Institutional policies 'provide a general, overall, rational canopy for specific actions, procedures, or operations' (Fincher 1999, p. 10); and 'are vital to the well-being of institutions of higher education' (Clarke et al. 2012, p. 12). Trans-Tasman policy borrowing may well be a resilience strategy to progress institution-specific policy agendas. This paper explores current Australian and New Zealand regulatory frameworks for tertiary education providers and provides new insights into New Zealand institutional meta-policy. This presentation represents a preliminary exploration of the nexus between institutional policy, compliance and regulation as a basis for ongoing discussion, information-exchange and research collaboration.

CONTEXT

Australian tertiary education policy context

In Australia, university accountability requirements have been increasing since the 'Dawkins revolution' some 20-25 years ago following the release of the Commonwealth government *Higher education: a policy statement* (Dawkins, 1998), and progressive application of corporatist principles to tertiary education. Institutional planning, quality, risk and compliance functions have subsequently grown, alongside requirements for institutional policy (Shah and Aumann, 2012). In recent years, reporting and regulatory obligations have increased. In large measure this is attributable to government reforms including the introduction of a student demand driven system in response to the *Bradley Review of Australian Higher Education: Final Report*, (2008), introduction of the Tertiary Education Quality and Standards Agency (TEQSA) in 2011, development of the *MyUniversity* website and launch of the Excellence in Research for Australia (ERA) exercise. The potential risk of increasing obligations was anticipated by the Productivity Commission (2009), particularly relating to requirements concerning provider accreditation, qualification standards, Mission-based Compacts¹, student performance, and surveys (Graduate Destination Survey, Course Experience Questionnaire, Australasian Survey of Student Engagement) (p. 312-313). Recommendations arising from the Advancing Quality in Higher Education (AQHE) report (2012) concerning the introduction of a University Experience Survey, survey of employer satisfaction with graduates and remodeled Graduate Outcomes Survey will further exacerbate data gathering and accountability requirements, but provide informative sector performance monitoring data.

Whilst acknowledging the inherent relationship between government funding and public sector accountability, performance monitoring and reporting requirements have increased (PhillipsKPA 2006, cited in PhillipsKPA, 2012) and are now considered onerous. For example, Universities Australia stated that 'Australia's universities are ... subject to a wide range of regulatory reporting requirements which are excessive and are causing inefficiencies' (submission to the Productivity Commission, 2009, p. 1). The *Review of Reporting Requirements for Universities Final Report* (PhillipsKPA, 2012) estimates that on average, universities spent 2,000 staff days – equivalent to between \$800,000 - \$900,000 - complying with 18 Commonwealth Department of Industry, Innovation, Climate Change, Science, Research and Tertiary Education (DIICCSRTE) data collection reporting requirements. Across the sector, this represents approximately 66,000 staff days (\$26 million), and these figures do not encompass reporting requirements of TEQSA, the Australian Skills Quality Authority (ASQA), state governments, the Excellence in Research for Australia (ERA) exercise or Department of Immigration and Citizenship (DIAC) (PhillipsKPA, 2012). Additional reporting obligations are associated with grant-based programs, Australian Bureau of Statistics data collections, professional registration associations and rankings data collections. Reporting requirements relate to specific grants/contracts, input (e.g. student load), output (e.g. higher degree by research student completions, research publications) and performance related data, along with 'reporting requirements that are linked to funding and further information requirements that have broader purposes relating to general accountability for public funding, quality assurance, consumer information and protection, policy development, policy and program evaluation, and the general information needs of the Parliament and the community' (PhillipsKPA, 2012, pp. 27-28).

Some suggest (Coaldrake, 2013) that this trend is symptomatic of ongoing government reform and the never-ending demand for more information. Whilst these statistics relate specifically to

1 According to the *Summary Report on Mission-based Compacts 2011-13* 'Compacts include specific performance targets for universities and are the mechanism through which reward funding will be provided to universities that achieve their specific goals for participation and social inclusion' (Department of Industry, Innovation, Science, Research and Tertiary Education, p. 1).

Australian universities, Jones (2013) states that ‘a range of other education providers which operate in the higher education field must also meet many of these requirements and providers who operate across many, or all education and training sectors, must meet the human and financial cost of an ever-widening expanse of regulatory requirements (Education Services for Overseas Students), regulators (TEQSA and Australian Skills Quality Authority) and government departments’ (p. 24). From the regulator perspective, Nicholls (2012) reaffirms the drivers for increased public sector accountability – ‘value for money from government investment in higher education; ... growing interest in international education; ... positioning students as consumers with a choice; ... pressure to give students an opportunity to make an informed choice ... (through) data about performance; ... (and) unrelenting interest in league tables’ (n.p.).

Tertiary education providers are also subject to legislative and regulatory requirements spanning their diverse range of teaching and learning, research, corporate and community-related operations:

For example, the University of Sydney has some 102 Acts and regulations listed on its Legislative Compliance Framework of significant laws with which the University must comply. Of the 102 statutes on the Framework’s register, 57 are State Acts or regulations, with the remaining 45 being Commonwealth Acts or regulations. Of the total, only five are higher education specific. (PhillipsKPA, 2012, p. 27)

In response to concerns regarding reporting obligations and TEQSA regulation, the Commonwealth has commissioned a review of higher education regulation to ‘achieve the optimal balance between maximising quality of higher education and transparency while minimising red tape burden in our new regulatory and data management arrangements’ (Commonwealth of Australia, 2013, n.p.). Specifically, the ‘red tape’ review will focus on ‘TEQSA’s approach to regulation, including examination of the legislative base of TEQSA, governance structures within the regulatory framework and threshold standards’ (p. 5). The Commonwealth has also flagged that consideration will be given to the introduction of the model of ‘earned autonomy’: ‘a system in which experienced, compliant, high performing higher education providers can earn the right to a minimal level of regulation ... consistent with [the Council of Australian Governments’] best practice regulation framework – it is proportional and risk based’ (p. 4). The ‘earned autonomy’ model could well establish a TEQSA regulation framework which differentiates between university and non-university tertiary education providers.

New Zealand tertiary education policy context

The New Zealand *Education Act 1989* identifies tertiary education organisations (TEOs), principally including the eight New Zealand universities, 18 Institutes of Technology and Polytechnics (ITPs) and three Māori wānanga spanning numerous campuses, including Te Wānanga o Raukawa, Te Whare Wānanga o Awanuiārangi and Te Wānanga o Aotearoa². The *Education Act 1989* and subsequent *Education (Tertiary Reform) Amendment Act 2002* impose obligations on tertiary education organisations to ‘contribute to the sustainable economic and social development of the nation’ (New Zealand Government, Part 13, 159AAA, 1[d]). The legislation also imposes accountability and government reporting requirements (Weir, 2009). The *Education Amendment Act 1990* empowers the New Zealand Qualifications Authority (NZQA) to provide quality assurance for non-university tertiary education organisations, alongside the New Zealand Vice Chancellor’s Committee (NZVCC) quality assurance functions for New Zealand universities.

2 Under the New Zealand *Education Act 1989* a polytechnic ‘is characterised by a wide diversity of continuing education, including vocational training, that contributes to the maintenance, advancement, and dissemination of knowledge and expertise and promotes community learning, and by research, particularly applied and technological research, that aids development’ (section 162[4][b][ii]). Wānanga are ‘characterised by teaching and research that maintains, advances, and disseminates knowledge and develops intellectual independence, and assists the application of knowledge regarding āhuatanga Māori (Māori tradition) according to tikanga Māori (Māori custom)’ (section 162[4][b][iv]).

From 2006, NZQAs evaluative quality assurance framework (EQAF) has involved four inter-related components: 'initial front-end or entry quality assurance processes, self-assessment by tertiary education organisations (TEOs), external evaluation and review by NZQA, and compliance and risk monitoring' (Walker et al., 2012, Appendix 1, p. 21). The Tertiary Education Commission (TEC) *Tertiary Education Strategy 2010-15* announced the linkage of external evaluation and review (EER) findings to institutional funding (Ministry of Education, 2010, p. 14). This includes both research performance-based funding and institutional accountability-based *Investment Plans* negotiated with the New Zealand Tertiary Education Commission (Hanlon et al., 2011). Not unlike Australia, New Zealand tertiary education organisation reporting and quality assurance requirements are significant (Weir, 2009).

INSTITUTIONAL POLICY

Australian institutional policy requirements

Australian tertiary education quality assurance processes have shifted from a 'fitness for purpose' approach which 'involved investigating the alignment between the established goals of an institution and the policies and processes in place for achieving these goals' to a 'standards based' (TEQSA, 2011, p. 4) approach:

Whereas for fitness for purpose the key question might be: *Do policies, processes and outcomes fit the purposes of the particular higher education provider?* The questions from a standards way of thinking might be: *How do the policies and processes lead to the delivery of particular outcomes, and how do these outcomes 'measure up'?* (TEQSA, 2011, p. 4, emphasis in original).

The Commonwealth government's *TEQSA Act 2011* introduced a 'one-size-fits-all' risk-based and proportionate regulatory approach where all 173 tertiary education providers including universities and private providers must comply with the *Higher Education Standards Framework (Threshold Standards) 2011* (Commonwealth, 2011). The standards framework has five components: Provider Registration Standards (inclusive of a sub-standard, Provider Category Standards), Information Standards, Qualification Standards, Teaching and Learning Standards, and Research Standards. Within the context of higher education, standards have been defined as 'a definite level of excellence or attainment or the recognised measure of what is adequate for some purpose, established by authority, custom or consensus' (Sadler, 1987, p. 194).

The Provider Registration Standards oblige tertiary education providers to evidence effective institutional policy development, benchmarking, implementation and review. In addition, recent TEQSA briefings suggest that TEQSA will require 'evidence of implementation; evidence of (a) review schedule; evidence of approval processes ...; (and) evidence of development and improvement over time' (Fitzgibbon and Treloar, 2013, n.p.). Unless or until these regulatory requirements change for some or all tertiary education providers, many will struggle to readily comply, particularly in terms of evidencing policy benchmarking, policy implementation, and effective policy review. More importantly, this represents a paradigm shift from policy development-focused activity to policy implementation- and compliance-focused activity.

This shift will require increased collaboration between institutional organisational units responsible for policy management, compliance, audit, quality, planning and business intelligence functions. In particular, the relationship between policy managers and practitioners with planning units will be strengthened to source institutional research and business intelligence, benchmarking and review outcomes (Shah and Aumann, 2012) required to inform policy and practice improvement. Indeed as the Chief Executive of TEQSA notes 'no quality assurance body or regulator will maintain or improve quality by relying only on compliance with, or assessment of, quality processes. As a sector we must tackle the task of measuring

outcomes, even those that provide elusive, problematic and seemingly impossible to achieve consensus on' (Nicholls, 2012).

New Zealand institutional policy requirements

The NZQA *Tertiary Evaluation Indicators* explicitly require that tertiary education organisations ensure that 'policies and practices are legal and ethical' (2010, pp. 24-25). The concept of 'legal and ethical' policies and practices is linked to harm-minimisation strategies and complaints processes by NZQA on the basis that 'legal and ethical practice protects internal and external stakeholders' (p. 25).

Table 1: Tertiary Education Indicators (New Zealand)

OUTCOME INDICATOR	WHY THE INDICATOR IS IMPORTANT	SOME PROMPTS TO AID EVALUATIVE CONVERSATIONS	EVIDENCE COULD INCLUDE	BACKGROUND INFORMATION
Policies and practices are legal and ethical	Legal and ethical practice protects internal and external stakeholders	How does the TEO know it is meeting its legal and ethical obligations? What are the mechanisms for ensuring that the TEO complies with all legal requirements? How well is the TEO maintaining its compliance with legal requirements and how does it know how well it is doing this? How do staff and management actively seek to avoid harm to students? How do management and staff identify and understand appropriate ethical behaviour?	The use of steps and measures in place aimed at the "avoidance of harm" e.g. principles, professional codes of practice / conduct, professional development activities, case study or critical incident follow-up. The use of complaints processes for dealing with incidents. Any records of evaluation of the efficacy of complaint processes. Absence of incidents featuring behaviour that may be, or are, harmful to others.	The Baldrige Criteria of Education Excellence has identified legal and ethical behaviour as an important part of educational leadership (Baldrige, 2008).
Policies and procedures minimise barriers to learning	Policies and procedures can create barriers to learners	How well do policies that govern progression, transfer, and mobility between institutions take account of the needs and aspirations of learners? How well does information provided to learners meet their needs? How well do learning pathways provided by the TEO minimise barriers to learning? How well does the TEO respond to learners' questions and concerns? How does the TEO identify and seek to remove barriers for learners with a range of literacy and numeracy needs, including English as a second or other language?	Analysis and use of information from: <ul style="list-style-type: none"> • feedback from learners • implementation of RPL procedures • carrying out of student transfers • staircasing statistics 	Learners are more likely to succeed where they feel that their cultures are acknowledged and respected (Thomas 2002 & Rendon et al et al 2000 & Walker 2000). Teaching practices across New Zealand TEOs vary depending on organisational ethos and learner demographics. Successful Māori providers often identify the adoption of a Kaupapa Māori approach as critical to their success (Cram et al 20001). Learners benefit when they feel integrated into the culture of a TEO and feel the institution will adapt its practices to meet their personal needs (Prebble et al 2004). There are multiple reasons for early withdrawal such as institutional factors, academic and social experiences, aspects of courses and programmes, past educational experiences, external influences and personal issues (Brookfield et al 1996 & Te Tari Matauranga Māori 2007).

Source: New Zealand Qualifications Authority 2010, *Tertiary Education Indicators*, pp. 15-16, pp. 24-25.

The NZQA *Tertiary Education Indicators* also establish requirements in terms of policies and procedures that govern academic practices such as those that 'minimise barriers to learning' (p. 15) in areas including student progression, transfer and mobility.

INSTITUTIONAL POLICY ACTIVITY

Concurrently, institutional policy activity has resulted in many tertiary education providers in Australia and New Zealand developing comprehensive suites of academic, administrative and governance policy (refer Appendix 1). In New Zealand, unlike Australia, many of these policies

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(and regulations) continue to be published in institutional academic calendars. Increasingly, New Zealand institutional policies are published online in policy repositories as is the case for Australian universities and more recently, TAFE colleges.

Policy review represents a shared challenge (Freeman, 2012b; Freeman 2012c). Indeed in many instances policy consolidation initiatives are now underway to rein in the 'policy as panacea' approach that has witnessed an extended phase of policy proliferation. In this respect differences between the sectors are apparent. For example, whilst almost all New Zealand and Australian universities have extensive online policy suites and repositories, few TAFE colleges, ITPs or Māori wānanga appear to. ITPs such as the Bay of Plenty Polytechnic are exceptions, evidenced by their comprehensive Quality Management System's policy library.

METAPOLICIES, RESOURCES and CONTEMPORARY POLICY MANAGEMENT THEMES

The following provides detailed information regarding New Zealand tertiary education organisation policy systems and processes as a starting point for Trans-Tasman and cross-institutional dialogue, comparison and policy borrowing.

New Zealand institutional meta-policy

Institutional meta-policy (or policy on policy) establishes the range, application, classification scheme, approval authorities and policy cycle for institution-specific policy instruments (refer Appendix 2). Recent research has established that most Australian universities (Freeman, 2010) and over half of New Zealand universities (Freeman, 2012a; Freeman, 2013) have university meta-policy including the Otago University *Policy Framework* (2010), University of Auckland *Establishment of a Policy Within the University of Auckland Procedure Document* (2010), University of Canterbury *Policies and Procedures Development and Review Policy* (2012), Victoria University of Wellington *Policy Documentation Development Information* (2007) and Massey University *Council Statute on Definition and Establishment of a Policy*. However there is a scarcity of research literature regarding institutional meta-policy at New Zealand ITPs and Māori wānanga, and Australian non-university tertiary education providers, and therefore no available comparative analysis regarding sector differentiation. This is problematic for policy borrowing, so the following descriptive snapshots are provided to facilitate information sharing around institutional meta-policy content and good practices.

The Otago University *Policy Framework* (2010) aims to 'ensure that the University has a set of Policies, Procedures, Guidelines and Codes of Practice which: meet the University's administrative and compliance needs; are consistent and integrated with each other; are practical and easy to implement; are appropriately approved and reviewed' (p. 1). The *Policy Framework* establishes: the institution-specific range of policy instruments (policy, procedure, guideline, code of practice); the policy classification scheme (governance, academic, operational / Human Resources / Other); and policy approval authorities (governance – Council, academic – Senate, operational / Human Resources – Vice-Chancellor). The *Checklist for developing Policies, Procedures and Guidelines* (2010) identifies the stages related to the policy cycle (identify and evaluate need, research and consultation, drafting, approval, communication and implementation, review). The *Policy Framework* refers to the Policy Management Group, 'convened by the Registrar and Secretary to Council that has responsibility for overseeing the Policy Framework, including guidance on best practice and the development of forms and procedures' (p. 2). This group performs an important institutional policy gatekeeper function.

The University of Auckland *Establishment of a Policy Within the University of Auckland Procedure Document* (2010) seeks to 'ensure that University policies are developed, established, approved and operate in an appropriate and consistent manner' (p. 1). The procedure identifies: the institution-specific range of policy instruments (policies, procedures, guidelines); the policy classification scheme (governance, academic, administrative and management) and policy

approval authorities (Council – governance policy, Council, advised by Senate – academic policy, Vice-Chancellor – administrative and management). The procedure indirectly establishes the stages related to the policy cycle and these are more fully identified in an attached process flowchart (identify policy need and initiate action, identify Policy Owner and purpose, develop and draft, consultation, endorsement, approval, publishing, implementation, periodic review). The procedure represents one of the few examples of Australian or New Zealand institutional meta-policy that aligns the concepts of legislative compliance with the context of policy development (that is, legal and ethical considerations of policy substance), and policy implementation compliance. For example, the procedure states that ‘policies must ... comply with, and give effect to, relevant legislation and relevant University Regulations and Statutes with particular regard to the Treaty of Waitangi and equity commitments’ (p. 1), and notes that ‘wording of policy documents is critical, as are legislative and/or ethical considerations. The obligations to comply inherent in a Policy are to constitute the core message of the document and need to be concise and clear so as to determine consequences of a failure to adhere to a policy’ (p. 2).

The University of Canterbury *Policies and Procedures Development and Review Policy* (2012) ‘outlines the development and review process for all policies and procedures in the UC Policy Library and specifies the template and quality control steps that should be applied to all existing – and new – official University of Canterbury policies and procedures’ (p. 1). For the purposes of the University of Canterbury institutional meta-policy, ‘policies and procedures’ refers to ‘all official regulations, statutes, protocols, policies, codes of practice, procedures and guidelines’ (p. 1), which is a very broad interpretation of institutional policy that embraces texts frequently categorised as legislative instruments, policy instruments and related governance documents. The policy establishes: the policy classification scheme (academic, facilities management, finance, health and safety, human resources, information technology, international, library, research consultancy on IP, student services, university management); policy approval authorities (for each of these classifications) and stages related to the policy cycle (decision that policy needed, review existing policies, draft, identify policy sponsor, Senior Management Team consideration, revision, consultation, approval, publication, review), and significant amendment process. In terms of compliance, the policy states that ‘compliance is expected and non-compliance may result in censure, penalties or disciplinary action’ (p. 2). This is one of the few Australian or New Zealand examples of institutional meta-policy that stipulates the repercussions for policy non-compliance.

The Victoria University of Wellington *Policy Documentation Development Information* (2007) is a mature institutional meta-policy which provides a comprehensive ‘Policy Management Framework’ that, in part, ‘ensures that policy documentation supports the University community in complying with New Zealand (NZ) legislation and aligns with the University’s governing documents (the Charter, Strategic Plan and Investment Plan)’ (p. 1). The policy establishes: the institution-specific range of policy instruments (statutes, policies, procedures, guidelines); the policy classification scheme (statutes, academic, employment, management); and policy approval authorities (Council – statutes, Academic Board – academic policy, Vice Chancellor – employment and management policy, various Groups – procedures and guidelines). The policy specifically refers to the Policy Documentation Life Cycle including the various cycle stages (identification, evaluation, development, consultation, integration, quality control, approval, implementation, promulgation, review). There is a discrete cycle referred to as the Document Review Process that illustrates that the generic policy cycle, frequently development-focused, may in fact logically be overlaid by discrete review (and potentially amendment) cycles. The Victoria University of Wellington meta-policy is one of the few in New Zealand that clearly articulates the application of policy instruments by differentiating between university-wide policy, Faculty and Central Services Unit (CSU) policy and school and section documentation, reflecting good practice in this area alongside many others.

The Massey University *Council Statute on Definition and Establishment of a Policy* is a

comprehensive meta-policy that seeks to 'ensure that University policies are developed and established in an appropriate and consistent manner (p. 1). The Council Statute establishes: the institution-specific range of policy instruments (statutes, regulations, frameworks, policies, procedures, guidelines); the policy classification scheme (academic and research, finance, information technology, campus facilities, risk management, people and organisational development, health and safety, university management); and policy approval authorities (Council - statutes, governance policy, academic policy after Academic Board endorsement; management - may be delegated). The policy identifies the policy cycle (identify policy need and initiate action, drafting, consultation, endorsement, approval, publishing, implementation, periodic review). The Council Statute also depicts the specific approvals process for academic policy, management policy and governance policy.

These five New Zealand universities have well established institutional meta-policies that articulate institution-specific provisions regarding the range of policy instruments, classification scheme, approval authorities and policy cycle. Little attention is paid to the concept of 'application of instrument' as the meta-policy generally has an institution-wide focus. As such, whilst the range of policy instruments is broader in several instances, the mandated policy requirements focus on institution-wide, rather than institution-wide *and* locally applicable policy instruments. Three significant points of difference emerge in comparison to Australian institutional meta-policy. Firstly, the New Zealand texts are more heterogeneous in terms of presentation and substance. Secondly, several examples of New Zealand institutional meta-policy explicitly commit to the Treaty of Waitangi and equity. Thirdly, New Zealand texts not infrequently refer to compliance and 'legality'; concepts that have only recently entered the Australian policy practitioner lexicon with the advent of the TEQSA regulation regime. The situation with respect to institutional meta-policy at the remaining New Zealand universities is less clear from an examination of their websites; however, the existence of institutional policy at these universities suggests at least informal policy systems and processes. This area warrants further consideration.

An examination of New Zealand ITP and Māori wānanga websites reveals few examples of institutional meta-policy; however the online publication of academic, administrative and governance policy in the apparent absence of published meta-policy suggests that policy process may be less formalised, publicly promulgated or documented in this sector. However, three examples were identified, including the Bay of Plenty Polytechnic *Creating Policy* (2011), Nelson Marlborough Institute of Technology *Development, Review and Issue of Policies and Procedures* (2012), and Otago Polytechnic *Policies* (2011). These three examples reflect diversity in depth and focus, and may well reflect different approaches to, and progress regarding, institutional policy development and management.

The Bay of Plenty Polytechnic *Creating Policy* (2011) represents a mature example of institutional meta-policy. *Creating Policy* 'define(s) the principles and guidelines which provide the framework for developing policies for effective, sustainable and viable operation of the institution and its services to the highest possible standards and satisfaction of employees, students and other stakeholders' (n.p.). *Creating Policy* establishes: the institution-specific range of policy instruments (policies, procedures, guidelines); the policy classification scheme (academic, financial, management, governance, generic/other); policy approval authorities (Academic Board – academic policy, Council – governance policy, Management Forum – all other policy); and stages related to the policy cycle (drafting, consultation, approval, distribution, review). The Bay of Plenty *Creating Policy* builds in extensive policy stakeholder consultation including consideration by the Management Forum or Academic Board, broad dissemination of drafts and consultation feedback mechanisms. The document includes considered review provisions stating that 'All policies will be reviewed on a regular basis, normally a three year cycle, together with any associated quality standards, performance measures or benchmarks to ensure their continuing relevance and practicality' (2011, n.p.).

The Nelson Marlborough Institute of Technology (NMIT) *Development, Review and Issue of Policies and Procedures* statement is a quality assurance focused institutional meta-policy that provides a framework and comprehensive guidance for policy developers. The institutional meta-policy seeks to 'ensure the Institute's policies and procedures guide and reflect agreed standards and practice' (2012, p. 1). NMIT's policies and procedures collectively form the institution's documented Quality Management System: 'The practices, processes and outputs which contribute to achieving NMIT's quality objectives and fulfil the quality requirements of products and services for students and other stakeholders' (2012, p. 1). The institutional meta-policy establishes the institution-specific range of policy instruments (policies and procedures), approval authorities (Chief Executive, Directorate, Academic Board, Council as advised by the Quality Committee), and policy cycle (policy request – new/review/delete/update, Quality Committee deliberation, consultation, drafting, endorsement, approval, record keeping, communication). The Quality Committee, a standing committee of Academic Board, has been allocated responsibility for the policy gatekeeper function to 'authors(e) the development of new policies and procedures' (2012, p. 2). Attachments include templates, submission coversheets (new, amended and revoked policies), and development plans. NMIT also has a discrete institutional meta-policy, the *Development of Council Policy*, specifically related to the development of Council-approved policy that underpins the Investment Plan.

The Otago Polytechnic *Policies* 'sets out how policies and procedures are initially developed, reviewed, implemented, and made accessible to Otago Polytechnic staff and students' (2011, p. 1). *Policies* establishes the range of policy instruments (policies and procedures), classification scheme (academic, management, Council), approval authorities (Chief Executive – academic and management policies, Council – Council policies) and policy cycle (evaluation of need, consideration by Policies Committee, Leadership Team and Academic Board consultation, Policies Committee review, consultation, approval). *Policies* includes an implementation reporting and feedback mechanism whereby 'Academic Board will be provided with an update each meeting on the progress of both academic and management policies. The Chief Executive will advise Leadership Team and/or Academic Board if advice tendered is not accepted' (2011, p. 2). This represents one of the few examples of policy implementation monitoring mechanisms established in institutional meta-policy.

This preliminary examination of ITP institutional meta-policy suggests points of commonality with both New Zealand and Australian university meta-policy in terms of scope, focus, depth and approach. It also reveals shared gaps, including definitions of 'policy', provisions regarding locally applicable policy instruments (for example, approval authorities for local policy, procedures and guidelines), and provisions regarding legal review of draft documentation. In addition, ITP institutional meta-policy suggests common challenges in terms of the incorporation of value-adding policy cycle stages (such as benchmarking) and the strong focus on policy development with limited provision regarding policy implementation, evaluation and review. Unlike most Australian institutional meta-policy, New Zealand ITP institutional meta-policy recognises the clear relationship between institutional policy and quality, and this reveals a key challenge for Australian tertiary education providers in establishing connections between the policy management, quality and compliance arenas.

Definitions

There is a considerable variation between New Zealand tertiary education organisations with respect to how they conceptualise and define institutional policy, as illustrated below.

Table 2: Definitions of policy derived from New Zealand institutional meta-policy

Bay of Plenty Polytechnic <i>Creating Policy</i>	'Academic Policy - Rules and principles which provide the framework for effective teaching, learning and assessment outcomes for students. Financial Policy - Rules and principles to ensure sound financial management of the Polytechnic. Management Policy - General rules and principles which provide guidance for the day to day organisation and management of the Polytechnic. They provide the framework for the effective and efficient operation of the Polytechnic and assist employees in reaching sound decisions. These policies encompass management of Human Resources, Marketing functions and Physical Resources.'
Victoria University of Wellington <i>Policy Documentation Development Information</i>	'Policies relate to issues where the University requires a certain line of action to be taken. A policy sets out the University's position on a specific matter, but does not necessarily prescribe in detail how to perform certain functions. The main characteristics of policies are that they are formally documented, approved and reviewed. Compliance is required, and non-compliance is actionable through appropriate conduct policy documents. Academic policies are recommended and approved through the Academic Board; University wide policies are approved by the Vice Chancellor. Where a need has been identified and requires a University-wide policy, these may be recommended through senior managers, or from a faculty or central service unit. Policies are intended to be long term in application. They are updated on a regular basis, but less frequently than procedures or guidelines.'
University of Canterbury <i>Policies and Procedures Development and Review Policy</i>	'Principles that identify formal expectations of staff, students and visitors on specified University matters. Policies are formally documented and approved by Council or its delegated authority. Boundaries are defined and a framework provided within which operating procedures may be developed. Compliance is expected and non-compliance may result in censure, penalties or disciplinary action. e.g. <i>Assessed Work in Maori Policy</i> .'
Otago University <i>Policy Framework</i>	'A Policy sets out the University's position on a specific matter and requires a certain line of action to be taken, although it does not necessarily detail that line of action. Policies, except Human Resource (HR) Policies, are formally documented and approved by Council or under its delegated authority. The Vice-Chancellor establishes HR Policies pursuant to his or her authority under the State Sector Act. Compliance is mandatory. Examples: Research and Study Leave Policy, Purchasing Policy, Email Policy.'
University of Auckland <i>Establishment of a Policy Within the University of Auckland Procedure Document</i>	'A policy is an appropriately authorised written statement which defines the University's position or strategy in regard to a core process and function. A policy defines the parameters for decision making and clarifies compliance issues for members of the University.'
Massey University <i>Council Statute on Definition and Establishment of a Policy</i>	'A Policy is a written statement, which defines the University's position or strategy in regard to the matter(s) the policies addresses. A Policy defines the parameters for decision-making and clarifies compliance issues for staff. A Procedure describes the steps to be performed to obtain a specified outcome or output. Establishes the purpose of the activity and who is responsible for the action. Communicates acceptable practice and sets boundaries. A Guideline is a flexible framework that assists and guides people to achieve tasks using a recommended course of action. Regulations are the set of rules governing the University's educational offerings. A structure that outlines the way a policy or concept will be implemented within the University environment which seeks to make explicit the systematic, interrelationships between different issues that the policy addresses. The Council of an institution may make statutes not inconsistent with the Education Act 1989 or the State Sector Act. Generally a statute is defined as a policy that is intended to be permanent.'

Whilst much Australian university meta-policy is relatively homogeneous with respect to definitions of institutional policy, not unlike the University of Auckland definition - 'an appropriately authorised written statement which defines the University's position or strategy', New Zealand tertiary education organisations have taken divergent approaches. Essentially, they restate key elements of institutional meta-policy in their definitions of institutional policy. In addition, the definitions conceive policy as institutional rules, principles, position or strategy, outlining expectations and boundaries, in formally documented texts. In New Zealand institutional meta-policy the centrality of the concept of compliance is clear as it features prominently in almost all definitions.

Classification scheme

Fundamentally, institutional policy potentially spans all institutional activities including teaching and learning, research and research training, corporate and 'third stream' functions as it articulates the institutional position with respect to operations or practices, and in some

instances aspirations. Many Australian universities have adopted the broad typography of 'academic, administrative and governance' policy. New Zealand institutional meta-policy establishes classifications in seven instances, illustrating a similar trend to discretely classify academic policy, broadly classify management or administrative policy (including a number of instances where this is unpacked to specifically identify human resources/employment and other policy categories), and in a small number of instances, discretely identify governance policy.

Table 3: New Zealand tertiary institutions: Classification schemes and policy instruments identified in published institutional meta-policy

INSTITUTION AND INSTITUTIONAL META-POLICY	CLASSIFICATION SCHEME ESTABLISHED IN INSTITUTIONAL META-POLICY	POLICY INSTRUMENTS COVERED BY INSTITUTIONAL META-POLICY
University of Canterbury <i>Policies and Procedures Development and Review Policy</i>	Academic, Facilities Management, Finance, Health & Safety, Human Resources, Information Technology (IT), International, Library, Research Consultancy on Intellectual Property issues, Student Services, University Management	Regulation, statute, protocol, policy, procedure, guideline, code of practice
Massey University <i>Council Statute on Definition and Establishment of a Policy</i>	Academic and Research, Finance, Information Technology, Campus Facilities, Risk Management, People and Organisational Development, Health and Safety, University Management	Regulation, statute, framework, policy, procedure, guideline
Otago University <i>Policy Framework</i>	Academic, Operational / Human Resources / Other, Governance	Policy, procedure, guideline, code of practice
University of Auckland <i>Establishment of a Policy Within the University of Auckland Procedure Document</i>	Academic, General Administration and Management, Governance	Policy, procedure, guideline
Bay of Plenty Polytechnic <i>Creating Policy</i>	Academic, Financial, Management (including Human Resources, Marketing and Physical Resources), Generic	Policy, procedure, guideline
Victoria University of Wellington <i>Policy Documentation Development Information</i>	Academic, University wide policy (Employment, Management)	Statutes, policy, procedure, guideline
Otago Polytechnic <i>Policies</i>	Academic, Management	Policy, procedure
Nelson Marlborough Institute of Technology <i>Development, Review and Issue of Policies and Procedures</i>	Not stated	Policy, procedure

In terms of the range of policy instruments established in New Zealand institutional meta-policy, all tertiary education organisations with published institutional meta-policy have 'policies' and 'procedures'. All universities and one ITP have 'guidelines'. In four instances, other texts are identified as auspiced by the institutional meta-policy and/or referred to as policy instruments including 'codes of practice', 'statutes', 'regulations', 'protocols' or 'frameworks'. Whilst many Australian universities have 'codes of practice', 'statutes' and 'regulations', these are generally not included in the range of institutional policy instruments (most frequently 'policies', 'procedures', 'guidelines'). In Australia, statutes and regulations are considered legislative instruments (being derived from the foundation acts as delegated legislation), and codes of practice, whilst located within the hierarchy of governance texts, are generally not conceived as policy instruments. In this sense, both Australia and New Zealand tertiary education providers have developed idiosyncratic perspectives that reflect a level of national policy borrowing and practitioner dialogue.

Resources

Most if not all New Zealand universities and some ITPs have publicly available online policy repositories. The University of Auckland 'Policies, Statutes, Regulations, Rules and Legislation' repository represents a good practice example as it is comprehensive, searchable, descriptive and integrated with policy review systems. Many New Zealand tertiary education organisations provide resources to support the consistent presentation of policy, such as templates. Some

provide additional guidance for the policy development process. For example, the Massey University *Council Statute on Definition and Establishment of a Policy* details pertinent questions including: 'Who will be responsible for implementation, day-to-day operation of the policy and monitoring for compliance? Proximity – is the policy responsibility related to accountability of function? Indicators – what are the mechanisms that indicate the policy is effective? Feedback – what are the processes for reviewing and updating the policy? Externality – does this policy represent 'best practice'? Clarity and Transparency – Is the policy easily understood and clear in intent? Access –e.g. via the web for staff and students. Consistency – with other University policies' (2010, p. 2). Several flow chart the institutional policy cycle as supporting documentation for institutional meta-policy provisions, and a few provide quality control checklists. Victoria University of Wellington provides one of the few examples of resources specifically for policy review (that is, their *Document Review Process* appended to the institutional meta-policy). As such, New Zealand tertiary education organisations are comparable to Australian tertiary education providers in that their policy resources largely support policy development activity, rather than policy implementation, evaluation or review.

COMPLIANCE WITH REGULATOR REQUIREMENTS

Legal and ethical policy

The question as to whether New Zealand tertiary education organisations adopt policy that is legal and ethical is an important consideration given NZQA's *Tertiary Evaluation Indicators* stipulations. This concept is perhaps clearer in terms of the extent to which institutional policy complies with New Zealand government legislation. At least a few New Zealand tertiary education organisations have legislation registers to facilitate institutional compliance with government legislation and evidence that institutional policy is 'legal and ethical' - to the extent that ethics are a derivation of legislative provisions. For example, Victoria University of Wellington provides an online Register of Key Legislation, and a *Legislative Compliance Policy* (2011). The policy states that 'non-compliance is identified "by omission", and by building on existing practices, i.e. using internal audit, policy guidelines, careful monitoring, reviews, administrative and other risk assessment processes to identify areas of non-compliance' (p. 2). The policy notes further that 'should non-compliance be identified: non-compliance is brought to the 'owner's attention (a manager or a policy sponsor); root cause of non-compliance is analysed; rectification through system changes or training; annual reporting to (Senior Management Team) of steps taken to address any instances of non-compliance' (p. 2).

The sophisticated University of Auckland Legislative Compliance Register identifies relevant legislation (for example, the *Education Act 1989*), provides details regarding compliance obligations (for example, transactions such as selling assets, granting leases, borrowing and raising money), notes potential consequences of non-compliance (for example, illegal transactions, institutional liability, reduction in funding), identifies compliance assurance measures (for example, staff police checks, compliance with the Code of Practice for International Students, ECE centre licensing arrangements) and related institutional policy and statutes (in this instance, including the delegations, conflict of interest and council elections policies). As such, the University of Auckland connects the inter-related concepts of compliance with government legislation and compliance with institutional policy (that is, the latter can evidence the former). This is an extremely comprehensive resource that could provide a model for replication in both New Zealand and Australian jurisdictions.

The relationship between government legislation and institutional policy is not only one directional. For example, in Australia, university foundation acts or delegated legislation (commonly referred to as statutes and regulations) authorise governing bodies to approve institutional policy - or delegate such authority to approval authorities generally via institutional meta-policy. As such, institutional policy is not only subordinate and aligned to government legislation, but it also exists through government legislation. Formal delegations documentation

including delegations policies and registers establish delegations policy provisions and document administrative, academic and governance delegations authorised in accordance with university legislation and institutional meta-policy. As O'Connor (2009) states: 'When the institution allocates decision-making responsibilities within its organisational structure, it must also ensure that the officers or committees are given power to make the decisions allocated to them. An officer or committee does not have power to make the decision just because it is in their duty statement or terms of reference' (p. 1). Further, O'Connor (2009) states that 'For an officer or committee to have power to make a decision, the power must be validly created by the legislation and must be vested in them directly by the legislation or lawfully delegated to them under the legislation. In other words, they must be the right person or body to make that class of decision' (p. 2). Many Australian institutions depict the hierarchy of legislative instruments, policy instruments, local documents and related governance texts (such as codes of conduct) to illustrate the hierarchical relationship between legislation and policy.

New Zealand tertiary education organisation individual policy texts may be explicitly aligned to government legislation to evidence legislative-compliance. For example the Victoria University of Wellington *Policy Documentation Development Information* states that 'a robust Policy Framework ... ensures that policy documentation supports the University community in complying with New Zealand (NZ) legislation' (2007, p. 2). Policy templates frequently require drafters to indicate relevant government legislation. In instances where institutions have international footprints, consideration of different jurisdiction requirements may be necessary in the policy drafting, or policy implementation process.

Finally, New Zealand tertiary education organisations may explicitly embed legal review in the formal policy cycle, or informal policy development, amendment and review processes. In some instances routine review by institutional risk and compliance groups may also be incorporated. Legal review may well be more relevant to some policies than others; for example, to ensure that principles of procedural fairness are accurately reflected in student facing policies. Whilst institutional meta-policy provisions encouraging relationships between policy practitioners and institutional or external legal counsel for the purpose of policy development (and potentially amendment and review) appear to be emerging in Australia, few New Zealand meta-policies stipulate such requirements.

In terms of demonstrating that institutional policy is ethical, some New Zealand tertiary education organisations explicitly refer to this dimension in their meta-policy. As noted, the University of Auckland *Establishment of a Policy Within the University of Auckland Procedure Document* (2010) mandates compliance with the Treaty of Waitangi and ethical considerations. The language of 'ethical policy' is not commonplace in Australia, although the concept of ethically based legislation (such as the Education Services for Overseas Students Act and trades practices legislation), and ethical conduct policy (such as academic integrity policy and research practice policy) would be familiar. The existence of the NZQA's requirement to demonstrate that institutional policy is ethical may well explain why some New Zealand tertiary education organisations refer to codes of ethical conduct as policy instruments; however, this would require further investigation.

Evidence of policy implementation and policy compliance

Consideration of institutional policy websites suggests there are very few examples of policy compliance systems and processes managed through central institutional policy units. This omission is even more glaring in Australia than in New Zealand which is particularly problematic given the Australian tertiary sector regulator's requirements regarding evidence of policy implementation. Having said that, academic board traditions with respect to reviewing academic policy, and the introduction of discrete institutional compliance and audit functions (Shah and Aumann, 2012) suggests much policy compliance activity is operationalised in organisational units dislocated from institutional policy development activity. This disconnect

between policy development and policy implementation monitoring is problematic in terms of establishing coherent policy compliance systems which drive policy and practice improvement over time. This may also reflect the continued focus in Australia on policy development activity, rather than policy implementation review (that is, review of practice), involving the requisite institutional research to support rigorous evaluation.

One Australian example of an established relationship between policy management and compliance functions is provided by Monash University. N. Mitchell and D. Secomb (personal communication, June 18 2013) advise that

Risk and Compliance ... conducts an annual legal compliance certification process with all Heads of Department that focuses closely on compliance with policies and procedures.

Heads are asked to certify, among other things, that they have:

- identified policies and procedures that are relevant to their dept. to satisfy its legislative obligations;
- assessed the risk of non-compliance with these policies and procedures, and where required, taken appropriate actions to mitigate the risk;
- delegated responsible officers to manage adherence to these policies and procedures; and
- inducted and trained all staff on policies and procedures appropriate to their roles within the dept.' (n.p).

New Zealand tertiary education organisations provide some examples of practice in this area. For example, the University of Auckland has developed sophisticated policy compliance monitoring systems and processes that intersect with their Legislative Compliance Register. Faculty Deans are required to provide detailed certifications regarding compliance with institutional policy, for example certifying that:

The University's Human Resources policies have been complied with in my Faculty during the year. There have been no financial irregularities ... that could have an effective on the financial statements. Academic Performance Reviews and/or Professional Staff Development Reviews have been completed ... Where applicable, Teaching and Course Reviews and Evaluations have been carried out as required by the University Policy on Review and Evaluation of Teaching, Courses and Qualifications. ... The Faculty has adequate and appropriate processes, systems and internal controls to ensure compliance with the University's Financial Management policies, the Income Tax Act, Goods and Services Act, and other taxation legislation (example certification statement, p. 1).

Respondents are required to complete a checklist indicating 'non-compliance, errors or omissions to be disclosed' against relevant government legislation and institutional policy. This system is reliant on a detailed matrix identifying institutional policies applicable to respective organisational units, at the level of primary compliance obligations. Recognising the considerable undertaking to establish such systems, replica models could be adapted to other New Zealand tertiary education organisations to evidence policy implementation and compliance. This system is suggestive of policy compliance education rather than policy compliance policing. It represents a best practice model of direct relevance both to New Zealand tertiary education organisations operating within the same jurisdiction, and Australian tertiary education providers in terms of structure and approach.

In other instances, evidence of policy-compliance is actively pursued through audit activities. For example, the University of Waikato has introduced an initiative that requires that policy owners formally confirm, by way of brief survey and signature, compliance with university administrative policy. In addition, in a few instances the University of Waikato has embedded provisions regarding compliance breaches directly into policy. For example, the *Equal Employment Opportunity Policy* (2012) states under the heading 'breach' that 'The Head of

Human Resource Management Division is responsible for monitoring compliance with this policy and reporting any breaches to the Vice-Chancellor. Breaches of this policy may result in disciplinary action under the Staff Code of Conduct' (n.p).

As noted previously, some New Zealand institutional meta-policy explicitly articulates consequences from policy non-compliance - for example, censure, penalties or disciplinary action in the case of the University of Canterbury. By way of comparison, most - if not all - Australian universities establish conditions of employment and consequential breach provisions through contracts of employment, industrial instruments and human resources policies (and in some instances codes of conduct), whereas students are required to agree to institutional policies as a condition of enrolment, and may be disciplined under university delegated legislation (for example, for general or academic misconduct).

CONCLUSION

This examination of Australian and New Zealand regulatory requirements and New Zealand institutional meta-policy suggests that systems and processes at the intersection of the regulation, compliance and institutional policy specialisations are required. Emerging practices include:

- identification of applicable government legislative and regulatory obligations through legislation registers and standards banks (for example, TEQSA standards and NZQA indicators);
- identification of relationships between legislative and regulatory obligations and institutional academic, administrative and government policy;
- embedding legislative and regulatory obligations in institutional policy as appropriate;
- establishment of metrics and qualitative indicators for policy implementation evaluation and review drawing on institutional business intelligence systems;
- implementation of information and educative processes around policy implementation and compliance obligations;
- identification of consequences of legislative, regulatory and policy non-compliance (institution, staff, students);
- development and implementation of policy compliance systems and processes for reporting, certification and audit;
- storage of information regarding policy non-compliance (that is, feedback regarding policy non-compliance 'hot-spots' as potential policy review triggers).

It may well be that policy compliance is of greater concern, from a legislative, regulatory, risk management, quality or equity perspective, for some policies – or indeed categories of policy - than others; however this requires further consideration before differential policy compliance systems are implemented through institutional policy management units. It may also be that some policies are essential but fundamentally esoteric such that establishing institutional policy compliance systems is not feasible. These questions are central to the shift from policy development-focused activity to policy implementation evaluation and review-focused activity, along with establishing connections with colleagues at neighboring and far-off institutions, in both policy, compliance, quality, risk and business intelligence functions.

These are indeed vexed questions. The Association for Tertiary Education Management (ATEM) Institutional Policy Network discussions, forums and teleconference groups provide opportunities for trans-Tasman policy borrowing, networking, and information-exchange to collaboratively explore these regulation-driven institutional policy challenges.

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APPENDIX 1 - POLICY WEBSITES AT AUSTRALIAN AND NEW ZEALAND UNIVERSITIES, ITPS AND WANANGA

This table identifies links to Australian university policy repositories and New Zealand university, institutes of technology and polytechnics (ITSPs) and wananga policy repositories (or home pages) and is provided as a resource to facilitate policy benchmarking exercises.

[Adapted from information prepared by Monash University and the University of Melbourne, for the ATEM Institutional Policy Network, updated June 2013]

AUSTRALIAN UNIVERSITIES	NAME OF POLICY REPOSITORY	URL
University of Adelaide	Policy Directory	http://www.adelaide.edu.au/policies/
Australian Catholic University	Policies & Procedures	http://www.acu.edu.au/policy/
Australian National University	ANU Policies	http://policies.anu.edu.au/
University of Ballarat	Policy Library	http://policy.ballarat.edu.au/
Bond University	Policies, Procedures, Guidelines and Forms	http://www.bond.edu.au/student-resources/student-administration/policies-procedures-guidelines-and-forms/index.htm
University of Canberra	Policy Database	https://guard.canberra.edu.au/policy/
Central Queensland University	Information Management Portal	http://policy.cqu.edu.au/Policy/policy_list.do
Charles Darwin University	Governance Document Library	http://www.cdu.edu.au/governance/Policies.htm
Charles Sturt University	Administration Manual Academic Manual	http://www.csu.edu.au/adminman/ http://www.csu.edu.au/acad_sec/academic-manual/
Curtin University of Technology	Compliance, Legislation and Policy	http://policies.curtin.edu.au/home/index.cfm
Deakin University	The Guide	http://theguide.deakin.edu.au/
Edith Cowan University	Policies Database	http://www.ecu.edu.au/GPPS/policies_db/index.php
Flinders University	Policies and Procedures Manual	http://www.flinders.edu.au/ppmanual/
Griffith University	Policy Library	http://www62.gu.edu.au/policylibrary.nsf/
James Cook University	Policy Library	http://www.jcu.edu.au/policy/
La Trobe University	La Trobe Policies	http://www.latrobe.edu.au/policy
University of Melbourne	Policy Library	http://policy.unimelb.edu.au/
Macquarie University	Policy Central	http://www.mq.edu.au/policy/
MCD University of Divinity	Policies & Procedures	http://www.mcd.edu.au/policies-procedures
Monash University	Policy Bank	http://www.policy.monash.edu/policy-bank/index.html
Murdoch University	Policies Index	http://www.murdoch.edu.au/index/policies/
University of Newcastle	Policy Library	http://www.newcastle.edu.au/policy/
University of New England	Policies	http://www.une.edu.au/policies/
University of New South Wales	Policy List	http://www.gs.unsw.edu.au/policy/findapolicy/index.html
The University of Queensland	Policies and Procedures Library	http://ppl.app.uq.edu.au/
Queensland University of Technology	Manual of Policies and Procedures	http://www.mopp.qut.edu.au/
RMIT University	Policies and Procedures	http://www.rmit.edu.au/policies
University of South Australia	Policies and Procedures	http://w3.unisa.edu.au/policies/default.asp
Southern Cross University	List of SCU Policies	http://www.scu.edu.au/pqr/index.php/19/
University of Southern Queensland	Policy Library	https://policy.usq.edu.au/policy/index.html
University of the Sunshine Coast	Policies and Procedures	http://www.usc.edu.au/university/governance-and-executive/policies-and-procedures/policies-and-procedures.htm
Swinburne University of Technology	Policies & Procedures Directory	http://policies.swinburne.edu.au/ppdonline/
The University of Sydney	Policy Register	http://sydney.edu.au/policies/
University of Tasmania	Policy Repository	http://www.utas.edu.au/governance-legal/policy
University of Technology Sydney	UTS Policy	http://www.gsu.uts.edu.au/policies/index.html

Victoria University	Central Policy Register Online	http://wcf.vu.edu.au/GovernancePolicy/
The University of Western Australia	Policy Directory	http://www.universitypolicies.uwa.edu.au/welcome
University of Western Sydney	Policy Document Development System	http://www.uws.edu.au/policy/policy_dds
University of Wollongong	Policy Directory	http://www.uow.edu.au/about/policy/index.html
NEW ZEALAND UNIVERSITIES	NAME OF POLICY REPOSITORY	URL
Auckland University of Technology	Policies & Regulations	http://www.aut.ac.nz/library/about/pq/policies and http://www.aut.ac.nz/being-a-student/starting-out/undergraduates/academic-information/academic-policies-and-regulations
Lincoln University	Home page	http://www.lincoln.ac.nz/#/Templates/Pages/Semester2
Massey University	Policy Guide	http://www.massey.ac.nz/massey/staffroom/policy-guide/policy-guide_home.cfm
University of Auckland	Policies, Statutes, Regulations, Rules and Legislation	https://policies.auckland.ac.nz/default.aspx
University of Canterbury	Policy Library	http://www.canterbury.ac.nz/ucpolicy/
University of Otago	Policy Database	http://www.otago.ac.nz/administration/policies/
University of Waikato	Official University Information	http://www.waikato.ac.nz/official-info/
Victoria University of Wellington	University Policy	http://www.victoria.ac.nz/home/about/policy
NEW ZEALAND INSTITUTES OF TECHNOLOGY AND POLYTECHNICS (ITPS) and WANANGA	NAME OF POLICY REPOSITORY	URL
Aoraki Polytechnic	Code of Practice, Policies and Procedures	http://www.aoraki.ac.nz/international-students/code-of-practice,-procedures-and-policies
Bay of Plenty Polytechnic	Quality Management System	https://www.boppoly.ac.nz/go/qms
Christchurch Polytechnic Institute of Technology (CPIT)	Policies	http://www.cpit.ac.nz/about-us/policies
Eastern Institute of Technology (Hawkes Bay) (EIT)	Our Policies	http://www.eit.ac.nz/tairawhiti/about-tairawhiti/our-policies/
Manukau Institute of Technology	Student Related Policies	http://www.manukau.ac.nz/about-us/academic-calendar/academic-calendar
Nelson Marlborough Institute of Technology (NMIT)	Policies and Procedures	http://www.nmit.ac.nz/aboutnmit/corporateinformation/nmitpoliciesandprocedures/
Northland Polytechnic (NorthTec)	Policies	http://www.northtec.ac.nz/About-Us/About-NorthTec/Policies.aspx
Otago Polytechnic	Our Policies	http://www.otagopolytechnic.ac.nz/about/our-policies.html
Southern Institute of Technology (SIT)	Policies and Procedures	http://www.sit.ac.nz/pages/services/international_policies
Tai Poutini Polytechnic	Quality Management System (email for copy of policy)	http://www.tpp.ac.nz/governance.php
The Open Polytechnic of New Zealand	Regulation and Policy	http://www.openpolytechnic.ac.nz/study-with-us/planning-your-study/regulation-and-policy/
Unitec New Zealand	Policies and Procedures	https://ds.unitec.ac.nz/dsweb/UnitecSearch
Universal College of Learning (UCOL)	Home page	http://www.ucol.ac.nz/Pages/default.aspx
Waiariki Institute of Technology	Home page	http://www.waiariki.ac.nz/
Waikato Institute of Technology (Wintec)	Policies	http://www.wintec.ac.nz/studentlife/policies/index.aspx
Wellington Institute of Technology (Weltec)	Search for Business Policy Manuals (various locations)	http://www.weltec.ac.nz/
Western Institute of Technology at Taranaki (WITT)	Home page	http://www.witt.ac.nz/
Whitireia Community Polytechnic	Home page	http://www.whitireia.ac.nz/Pages/home.aspx
<u>Te Wānanga o Raukawa</u>	Home page	http://www.wananga.com/ (and 'guiding principles' at http://www.wananga.com/images/pdf/Guiding_Kaupapa.pdf)
<u>Te Whare Wānanga o Awanuiārangi</u>	Home page	http://www.wananga.ac.nz/Pages/Te%20Whare%20Wānanga%20o%20Awanuiārangi.aspx
<u>Te Wānanga o Aotearoa</u>	Home page	http://www.twoa.ac.nz/

APPENDIX 2 - SKELETON INSTITUTIONAL META-POLICY

POLICY ON POLICY

OBJECTIVE - This policy establishes, for the [INSERT INSTITUTION NAME]: the range of policy instruments, the application of policy instruments, the classification scheme for policy instruments, approval authorities for all policy instruments and the policy cycle.

SCOPE - This policy applies to all [INSERT INSTITUTION NAME] policies, procedures and guidelines.

POLICY

1. RANGE OF POLICY INSTRUMENTS

1.1 The range of [INSERT INSTITUTION NAME] policy instruments is:

1. policy
2. procedure
3. guideline
4. other

1.2 A policy is [INSERT DEFINITION].

1.3 A procedure is [INSERT DEFINITION].

1.4 A guideline is [INSERT DEFINITION].

1.5 A (other) is [INSERT DEFINITION].

2. CLASSIFICATION SCHEME FOR POLICY INSTRUMENTS

2.1 Policy instruments are categorised as:

1. governance or
2. academic or
3. administrative.

3. APPLICATION OF POLICY INSTRUMENTS

3.1 Policies have institution-wide application.

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

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

4. APPROVAL AUTHORITIES (INCLUDE A SECTION FOR EACH CATEGORY, FOR EXAMPLE: ADMINISTRATIVE, ACADEMIC, GOVERNANCE)

Summary of approval authorities (insert a section for each of the categories identified: administrative, academic, governance)

CATEGORY	INSTRUMENT	APPROVAL AUTHORITIES		
		APPROVAL	AMENDMENT	DISESTABLISHMENT
[Administrative] [Academic] [Governance] [or other categories]	Policy	[x]	Minor amendment: [x] Not minor amendment: [x]	[x]
	Institution-wide Procedure	[x]	Minor amendment: [x] Not minor amendment: [x]	[x]
	Local Procedure	[x]	Minor amendment: [x] Not minor amendment: [x]	[x]
	Institution-wide Guideline	[x]	Minor amendment: [x] Not minor amendment: [x]	[x]
	Local Guideline	[x]	Minor amendment: [x] Not minor amendment: [x]	[x]

5. APPROVAL OF DELEGATIONS EMBEDDED IN POLICY INSTRUMENTS

5.2 In approving this Policy on Policy, the [approval authority] has authorised the relevant approval authorities to:

1. approve, amend and disestablish policies, procedures and guidelines and
2. approve delegations, authorities and responsibilities embedded in policy instruments and

3. approve amendments to, or cancellations of, delegations, authorities and responsibilities embedded in the following instruments, [provided that amendments to, or cancellations of, delegations, authorities and responsibilities in [x] are reported to the [x]]

6. APPROVAL CONSIDERATIONS

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:

1. compliance with legislation and regulation
2. compliance with this policy
3. consistency with existing policies and procedures (unless consequential amendments are concurrently proposed or identified)
4. 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 delegations register), and reporting of substantial amendments is planned.

7. POLICY CYCLE

7.1 The policy cycle applies to all policies and institution-wide procedures.

7.2 The policy cycle includes the following stages: identification and confirmation of policy requirement; preliminary consultations; drafting; benchmarking; consultation; revision; compliance with the Policy on Policy; endorsement; approval; communication and publication in the policy repository; implementation; implementation and compliance monitoring and evaluation; and triennial review.

[You may wish to establish a separate procedure to identify the required processes associated with implementation of your policy cycle].

8. POLICY REPOSITORY

8.1 The [INSERT INSTITUTION NAME] policy repository will provide the authoritative source for all policies, institution-wide procedures and institution-wide guidelines.

[Your institution may include higher order documents, and/or local documents such as forms as well].

9. DOCUMENTS DEVELOPED AT THE ORGANISATIONAL UNIT LEVEL ('LOCAL DOCUMENTS', or 'SUPPORTING DOCUMENTS')

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

10. ROLES AND RESPONSIBILITIES

10.1 [X] is responsible for institutional policy management including:

1. providing strategic oversight of the implementation of this policy
2. co-ordinating the development, approval, promulgation and review of policies and institution-wide procedures
3. developing and delivering policy development, evaluation and review resources and support
4. maintaining the policy repository
5. facilitating consultation and communication to support policy development, review and implementation
6. developing policy implementation monitoring and evaluation tools
7. managing and facilitating the policy review schedule.

10.2 The [X] is responsible for overseeing the development, implementation, monitoring and review of policy related instruments.

10.3 The [X] is responsible for promulgation, implementation and interpretation of policy related instruments.

10.4 The [INSERT INSTITUTION NAME] Compliance Officer is responsible for ensuring that the overall legislative and policy frameworks of the institution meet all applicable compliance obligations.

10.5 Staff of the [INSERT INSTITUTION NAME] are required under their contracts of employment to comply with institution legislation, Policies and Procedures when carrying out their duties.

10.6 Students of the [INSERT INSTITUTION NAME] are required under their terms of enrolment to comply with legislation, Policies and Procedures when undertaking their studies.

RELATED DOCUMENTS [INSERT RELATED DOCUMENTS]

DEFINITIONS

Term	Definition
Guideline	A guideline is [X]
Minor amendment	Changes that do not otherwise affect document content such as changes to titles, names, organisational structures, references or hyperlinks.
Policy	A policy is [X]
Procedure	A procedure is [X]

REVIEW This policy is to be reviewed by [X].

VERSION HISTORY

Version	Approved By	Approval Date	Effective Date	Sections Modified
[X]	[X]	[X]	[X]	[X]



Minerva Access is the Institutional Repository of The University of Melbourne

Author/s:

Freeman, B

Title:

Trans-Tasman policy borrowing: Building resilience in institutional policy systems and processes through local and international sharing, networking and collaboration

Date:

2013

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