![Hawkesbury City Council logo]

Attachment 1
to
Item 227

Council Policy Framework

Date of meeting: 23 November 2021
Location: By audio-visual link
Time: 6:30 p.m.

Hawkesbury City Council Policy Framework

November 2021

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Hawkesbury City Council – Council Policy Framework

BACKGROUND:

Hawkesbury City Council (HCC) has established a suite of policies and procedures which govern, steer and direct behaviours and actions of individuals and groups across the Council teams and broader community.

This current suite of policies and procedures has no overarching framework in place that assists in providing guidance on policy creation, process development, policy and procedure review and alignment to council governance standards (including expectations).

OBJECTIVES:

There are two primary objectives. These are:

1.   Establish a set of Corporate Governance standards across policy, process and guideline development.

2.   To establish an framework for Council policies (separate to Corporate / Internal policies) which unpacks the core governance standards into a series of steps and expectations.

SCOPE:

The following areas are in-scope:

1.   Councillor and Mayor specific policies set out for the Community and/or Council

2.   Community impacting policies, procedures and guidelines

3.   Council-wide policy, procedure and guidelines relating to Council property, leasing, infrastructure, waste management services and planning

4.   Policies, procedures and guidelines relating to community compliance or adherence to regulation and legislation

5.   Policies mandated by statutory requirements via regulatory bodies (e.g., Environmental Protection Agency)

The following areas are out of scope:

1.   Human resources policy including work, health and safety, recruitment, performance management, and any policy relating to (or connected to) the Local Government (State) Award

2.   Dedicated IT policies and procedures

3.   Policies relating to the General Manager selection, performance review and termination (separation)

4.   Policies and procedures relating to finance

5.   Policies and procedures relating to third party relationships or that are established in Council affiliated incorporated associations / committees

KEY DEFINITIONS:

There are two main types of documents that provide guidance and direction for Council and its community. These are:

Council Policies: Are overarching positional statements that set direction and influence decision making. They change infrequently and emphasise (and explain) why Council is doing or justifying an action or position. Policies are clear on the expectations across the stakeholder groups that are in scope and help influence Council culture and meet community standards.

Procedures: Are connected to a policy and provide a step-by-step breakdown of how to complete a task or action that is compliant to the policy position. Procedures explain the how and outline process steps relevant stakeholder groups must follow. Effective procedure uses language suitable to its audience and is clear and relevant. It addresses how to implement the policy and provides instructions including alternatives or parameters for flexible decision making.

Note: Policy and procedure can also include guidelines. These outline information and requirements which are either best practice or help clarify a requirement or decision which is non-binding or not rooted or embedded in regulatory, legislative or statutory obligations.

In addition, strategies are documents which Council creates to drive the implementation of actions, tactics and decisions. Policy guides the creation of the strategy, while procedures provide the direction on how to execute the strategy in a compliant way.

GOVERNANCE STANDARDS

Underpinning the Policy Framework are five key Governance standards. These are as follows:
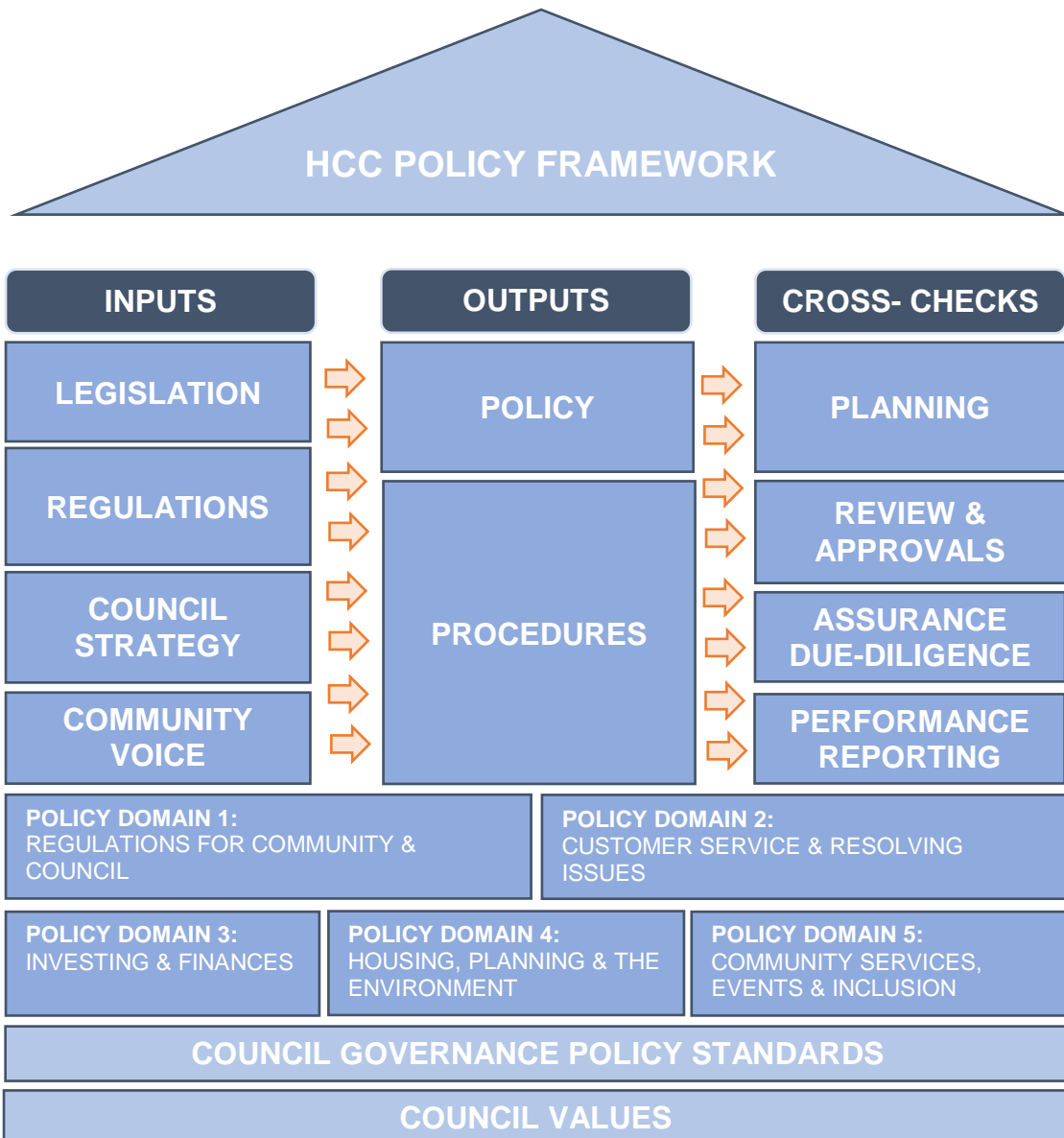
1. **Putting our people first:** Having community, council staff or stakeholders at the centre of what we do

2. **Achievable and effective**: The approach to Governance means that it must be suited to a purpose and achieve a specific outcome

3. **Accountable and Responsible:** Governance is a specific team's accountability but a whole of Council responsibility

4. **Aligned and Compliant**: The Council's approach to Governance is aligned to Council strategic and broader statutory requirements; and enables people to be compliant

5. **Values Driven and Influences Culture**: Governance is underpinned by the Council's core values and helps steer the Council and broader community culture in the right direction.

The Governance policy standards assist by guiding the creation of policy that is easily accessible, readable and engaging; whilst also remaining compliant to relevant legislative and regulatory requirements.

The Council Policy creation checklist contains a series of prompters and questions under each policy standard to ensure all important areas are covered off and considered.

POLICY FRAMEWORK:

The Hawkesbury City Council's Policy Framework outlines and establishes the key requirements and directions for effective policy management. This includes policy, procedure and guidelines development within the scope specified.

HCC POLICY FRAMEWORK

INPUTS		OUTPUTS		CROSS- CHECKS
LEGISLATION	⇨ ⇨	**POLICY**	⇨ ⇨	**PLANNING**
REGULATIONS	⇨ ⇨	**PROCEDURES**	⇨ ⇨	**REVIEW & APPROVALS**
COUNCIL STRATEGY	⇨ ⇨		⇨ ⇨	**ASSURANCE DUE-DILIGENCE**
COMMUNITY VOICE	⇨ ⇨		⇨ ⇨	**PERFORMANCE REPORTING**

POLICY DOMAIN 1:
REGULATIONS FOR COMMUNITY & COUNCIL

POLICY DOMAIN 2:
CUSTOMER SERVICE & RESOLVING ISSUES

POLICY DOMAIN 3:
INVESTING & FINANCES

POLICY DOMAIN 4:
HOUSING, PLANNING & THE ENVIRONMENT

POLICY DOMAIN 5:
COMMUNITY SERVICES, EVENTS & INCLUSION

COUNCIL GOVERNANCE POLICY STANDARDS

COUNCIL VALUES

POLICY FRAMEWORK COMPONENTS

THE INPUTS:

The inputs are the various sources of information and strategy which Council must abide by. Understanding of community needs and gaining insights from the community on expectations should also be considered and factored in as inputs. Finally, Council strategy must also be factored into any policy setting, with guidelines and procedures being aligned and consistent with any overarching strategic approaches.

Legislation – Includes the following examples:

- Government Information (Public Access) Act
- Privacy and Personal Information Protection Act
- Local Government Act
- Associations Incorporation Act

Regulations – Includes the following examples:

- Environmental Protection Agency (EPA) regulations
- Local Government (General) Regulation 2005
- Australian Childs Education and Care Quality Authority (ACECQA) standards
- Building and construction codes, standards
- Environmental planning and assessment regulations
- Impounding regulation 2013

Council Strategy – Includes the following examples:

- Hawkesbury Community Strategic Plan
- Flood Policy 2020
- Hawkesbury Employment Lands Strategy
- Hawkesbury Open Space Strategy
- Hawkesbury Residential Land Strategy

Community Feedback – Includes the following examples:

- Community feedback survey
- Community engagement forums
- Council service feedback programs

THE OUTPUTS

The outputs are piecing the information into either policy, procedure or guidelines. Each document should be developed in their own respective template and not combined or merged.

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Procedures: Are connected to a policy and provide a step-by-step breakdown of how to complete a task or action that is compliant to the policy position. Procedures explain the how and outline process steps relevant stakeholder groups must follow. Effective procedure uses language suitable to its audience and is clear and relevant. It addresses how to implement the policy and provides instructions including alternatives or parameters for flexible decision making.

POLICY DOMAINS

Under the Council Policy framework there are 5 key suggested policy domains which are categories or primary themes of policy.

The policy domains assist to:

1. Engage the community on the different types of policy documents currently in place in a way that is easy to understand

2. Encourage Branch teams to develop policy with a greater degree of relevance and specificity in relation to the policy domain it will fit into

3. Reduce any 'splintering' or duplication that can occur as a result of Branch teams creating policy without regard to what is already in place

The 5 Council policy domains are as follows:

1. **Regulations for Community and Council:** Concerned with providing policies to Council and community in relation to legislative and regulatory requirements. The policies within this domain are typically linked to a rule or law that carries serious consequences if contravened or materially breached.

2. **Customer Service and Resolving Issues:** These policies set out the Customer service standards, Charter and principles which Council espouse in their service delivery across the various Council services. This policy domain also provides direction and guidance on complaint management, dispute resolution, and escalations.

3. **Investing & Finance:** This policy domain contains policies that deliver direction against finance related matters within Council and the community like investing, sponsorship, hardship, borrowing and investment across the board.

4. **Housing, Planning and the Environment**: These policies are concerned with the Council's commitment to providing housing support, planning services, sustainability and maintaining the best environment possible for the community. This policy domain provides policy positions on zoning, sale of land, environment and sustainability practices, waste management and asset management overall.

5. **Community Services, Events and Inclusion:** This policy domain contains all policies relating to the delivery of Community Services and events. It also includes policies relating to multiculturalism, access and inclusion.

CROSS-CHECKS

In order to maintain currency and relevancy in policy, and effectiveness across procedure and guidelines Council must satisfy a number of due diligence requirements. These cross-checks assist in clarifying accountabilities, responsibilities and quality requirements for teams and individuals. The Corporate Governance team is accountable for the Policy Framework, including the review, due diligence and upkeep of the policy, procedures and guidelines.

The various Branches within Council are responsible for the development of their respective policy, procedure and guidelines ensuring these are compliant and aligned to the respective areas 'inputs'.

Component	Description	Who is Responsible
Policy & Procedure Annual Plan	Identify and catalogue the policies and key procedures which require active monitoring. The CG team will support Branch teams in ensuring their policy and procedure requirements are satisfied	Corporate Governance (CG)
Legislative & Regulatory Review	Capture of any significant and relevant legislative, regulatory or statutory changes. Ensuring the relevant Branch team is made aware of these changes and is incorporating these in the next policy, procedure and guideline (PPG) review cycle	Corporate Governance (CG)
Branch Business Plans	The Branch Business Plans will have the relevant policies, procedures and guidelines mapped and identified for the branch team to review and advise the Corporate Governance team of their effectiveness	Relevant Branch Team
Branch PPG Development	Branch team identifies what policy, procedure and guidelines required in respect to their 'inputs' Branch team develops the content and actively monitors PPG for their review and effectiveness. Works with the CG team to ensure the performance of the PPG (primarily measured through any associated risks, breaches or complaints) is monitored	Relevant Branch Team
Governance Assurance	Develops a due-diligence and audit cycle across key PPG and reports back to the Executive and risk team on their effectiveness	Corporate Governance Team
Exec Review	The Council Executive are responsible for the approval and endorsement of the Policy Framework and any associated PPG developed by the Branch teams	Council Executive

The Corporate Governance team can also assist Branches in refining and clarifying the content; and reviewing policy intent and procedural steps.

MODIFICATION OF DOCUMENTS

Minor changes in policies, procedures and guidelines that do not change the intent or responsibilities can be approved by the relevant Director.

All changes in policies and procedures that change the intent or responsibilities must go back through the approval process.

Any changes to system documentation will be noted in the "notes" section of ECM. Notes will outline the changes made to the document and the reason for the change. The updated document version number must be updated.

REVIEWING: DOCUMENT REVIEW

Branch managers are responsible for ensuring that all documents are reviewed:

- As specified for the relevant policy, procedure or guideline.

- Some high-risk policies and procedures may be flagged for a more regular review. This will be noted in the relevant document.

- When there are relevant changes to Legislation, Codes of Practice, Australian Standards or other compliance documents occur.

- When new information becomes available that has application to Council's workplace.

- When opportunities for improvement are identified through audits or other means.

The review of documents shall be undertaken by competent personnel with suitable qualifications, knowledge and experience to ensure that the review is effective, and that the content of the document is current and compliant to all relevant requirements.

When reviewing documents, the following must be checked:

- Currency and Relevancy: Is the document still relevant? If not Branches are to liaise with Administration Support to have the document archived.

- Content Efficiency: Can the Council Policy or Procedure(s) content be included and integrated into existing Policies or Procedure(s) with an aim to keep the number of procedure and forms to a minimum?

- Well Written: The document is in the correct template and follows the guidance in the Corporate Writing and Style guide with the relevant documents hyperlinked (and they still work).

- Collaboration: All relevant stakeholders have been consulted and included particularly where Policy and Procedure overlap or impact more than 1 branch.

- Using the right words: Any terms that need to be defined are included in the [Definitions reference guide.](#) If the procedure is likely to be used in hard copy in the field then critical definitions must also appear in the body of the procedure.

Branch managers will be informed by the Corporate Governance Administrative Support team 3 months prior to document being due for review.

Things to keep in mind:

1. Policies should provide coverage across Council helping mitigate against risk, guide effective decision making or influence Council culture.

2. Not every policy must have a procedure – it is what is most appropriate based on the policy and work needed to be carried out. There may be multiple procedures to a single policy.

3. Policies might guide a number of procedures; with guidelines providing recommended steps or information that people can take under consideration

Example:

1. There could be over 15 procedures could be developed for the Waste Management Facility that align to 2 main policies – Procurement and Waste Management

APPROVALS

HCC maintains a range of documents as detailed below. All documents are stored on ECM; however how they are displayed varies as detailed below.

Document name	Description	Approval	Displayed
Council Policy	Normally addresses a legislative or other compliance requirement. Council policies normally relate to how Council interact with external stakeholders and/or members of the Public.	Council resolution	HCC website Pulse Delegations & Policies Register
Corporate Policy	Addresses a legislative or other type of compliance requirement. Normally do not provide detailed work instructions which are normally included in supporting procedures.	Executive Team	Pulse Delegations & Policies Register
Procedures	Documented instruction for processes that apply to multiple sections. Can have an overarching policy.	Executive Team	Hawkeye
Forms	Eforms are preferred to hard copy if practical. Normally will have a supporting procedure however for simple processes information can be included on the form.	Executive Team	Hawkeye
Work instructions/checklist work plans etc.	Documented processes that only apply to a single section.	Branch Manager	Normally Hawkeye
Safe Work Method Statements (SWMS), Safe Operating Procedures (SOP) and other WHS documents.	Written agreed work practices that are used to communicate safe work practices to all members of a work group.	Approved by the relevant manager then forwarded to the relevant safety officer for final review	Hawkeye
Registers	Registers require meeting a legislative or other compliance requirement that is generally applicable to the public.	Council resolution	HCC website
Corporate Registers	Registers to meet compliance requirements not applicable to the public	Branch Manager	Normally Hawkeye

Aspect	Approved By	Responsible Person
POLICY – INTERNAL	Executive	Branch Director
POLICY – EXTERNAL	Mayor + Councillors	Executive
PROCEDURE – INTERNAL	Branch Director	Branch Manager
PROCEDURE – EXTERNAL	Executive	Branch Director
GUIDELINES – INTERNAL	Branch Director	Branch Manager
GUIDELINES – EXTERNAL	Mayor + Councillors	Executive

DOCUMENT CONTROL & SYSTEMS:

All policies, procedures and guidelines developed must be developed in accordance with the Document Control policy, procedure and template.

Policy related document drafts are stored and modified via ECM. An ECM number is assigned to each document as it is published online (as a PDF). This includes copies of the Executive reports and document creation checklist.

ASSURANCE DUE-DILIGENCE:

The relevant Branch is responsible for delivering the following aspects of due diligence:

CONTENT ACCURACY: Ensuring the content is concise, relevant, and simple to read, understand and follow.

COMPLETE DOCUMENTATION: Developing and completing the required documentation – policy checklist, report and draft policy and/or procedures to send into the Corporate Governance team

REGULATIONS AND LEGISLATION: Ensuring the relevant policies and procedures have the correct and current links to regulations, legislation, and industry standards as relevant.

TRACKING AND REVIEW: Keeping the business plan updated and ensuring the policies and procedures are reviewed and assessed when identified.

REPORTING: Reviewing the policy and procedure effectiveness against complaints, risks, critical incidences and performance issues to understand whether any continuous improvement opportunities exist against the policy or procedure.

Corporate Governance team is responsible for the following aspects of due diligence:

POLICY REVIEW: Maintaining the list of Council Policies under the framework and ensuring their review is completed in a timely and effective manner. This also includes maintaining and communicating a list of new legislative and regulatory requirements across the different work areas.

CONTENT REVIEW: Reviewing the content and ensuring the right templates are used with the content being clear, simple and concise; complementing and non-contradicting across the suite of Council policies.

RISK AND AUDIT CROSS CHECK: Assessing the effectiveness of Council policy and key procedures against audit outcomes and the risks identified on the Council risk register.

COMMUNITY INCLUSION & COLLABORATION: Ensuring community feedback is appropriately considered through the Exhibition process of inviting suggestions and input from the community groups. Corporate Governance also must ensure the right level of collaboration has occurred across the key Council policies with the relevant branches.

POLICY KNOWLEDGE BASE AND ADVISORY FUNCTION: The Corporate Governance team has a responsibility in providing key advice and consulting on the development of Council policy, procedure and other key documentation including the development of Council strategies.

PERFORMANCE REPORTING

Under the Council policy framework, Council branch teams are responsible for assessing the effectiveness of their policy and key procedures against key audit outcomes, risks and complaints received.

Any identified issues should be used within the spirit of continuous improvement to revise and review the policy and procedure as soon as practicable.

The Corporate Governance team is responsible for measuring the effectiveness of the Council policy framework through the assessment of policies and key procedures that area overdue for review in conjunction with escalating or increasing risks and non-conformities for Council.

COUNCIL POLICY REVIEW

In the first calendar quarter of 2021, a review was completed on the Council policy documents online.

There were 107 policy related documents on the Hawkesbury City Council website, and all were reviewed for their applicability under the Council policy definition under the framework.

Some of the older policy documents date as far back as 1992 with some having no known review since adopted date (earliest being 1998). The policy review made several recommendations on a revised number of Council policy documents.

Overall, there there are 42 (38 existing and 4 proposed) key policies within the future suite under the framework. It is recommended Council attempt to maintain the Council policy documents to a maximum of 50 at any one time as a guide under the policy domains within the framework.

The process of reviewing Council policy was as follows:

1.   Reviewing the Council Policy against the framework definition

2.   Noting what template and sections were completed for policy document

3.   Conducting an initial review on the content to understand if it is policy, procedure or another key document

4.   Analysing whether the Council policy documents could be merged or integrated so that they make more sense

5.   Liaising with Branch Managers on the assumptions made on their policy documents to understand any context or historical relevance

Branch Managers will be responsible for updating the content and liaising with the Corporate Governance team on their review and their approval, subject to decisions of the elected Council.

There are different types of Framework Suggestions:

NUMBER = The number matches the document to the proposed policy number in the future suite of policy documents

CHG POL = Change the document to Policy so it meets the definition under the framework

CHG PROC = Change the document to Procedure so it meets the definition under the framework

DELETE = Suggest deletion to either be removed entirely or integrated into another framework or document

NO CHANGE = Policy remains as in, subject to review as legislation requires or pursunt to the framework

The Business Continuity Risk relates to the level of priority and importance ONLY in relation to business continuity.

NOTE: The complete list of policies and recommendations is contained in a separate document.

COUNCIL POLICY PRACTICES

Across the neighbouring councils there are varying degrees of policy 'best practice' in place. See table below:

Council	# of policies online	Ease of use	Mix of Policy / Procedure?	Comments
Hawkesbury	107	Low	Y	Hard to navigate and find which one you want
Hills Shire	23	High	N	Very well laid out, separate from strategies, archived docs, plans
Blacktown	199	Low	Y	Contains more than policies, the register also includes strategies and duplication – not actual documents, poorly designed
Penrith	56	High	Y	Well laid out, easy to understand however policies could be condensed, some appear to just be one sentence
Singleton	55	High	Y	Most are current, easy to understand and reflect true policy
Blue Mountains	50	Low	Y	Hard to find, some appeared outdated and not reflective of true policy