

***PROVINCE POLICY  
FRAMEWORK***

***POLICY 21***



**St Francis Xavier Province of the  
Christian Brothers  
(Queensland and Northern Territory)**

**MAY 2003**



Trustees of the Christian Brothers  
(Queensland)

St Francis Xavier Province

## Province Policy Framework

May 2003

## **INTRODUCTION**

This Province Policy provides a mandatory framework that is to be used by any person who has any responsibility for developing, implementing, monitoring (for compliance purposes) and reviewing a Province policy.

This document models the standardised policy format, describes the roles and responsibilities of delegated persons involved in this framework and explains the steps to develop, implement, monitor and review Province policy.

### **1. RATIONAL/PURPOSE**

- 1.1 This framework has been developed to ensure that each Province policy arises out of a demonstrated need and is:
  - 1.1.1 printed in a consistent format,
  - 1.1.2 formally approved by the Province Leadership Team,
  - 1.1.3 implemented in a manner that ensures all workers have access and training to appropriate policies,
  - 1.1.4 monitored to ensure compliance and accountability, and
  - 1.1.5 reviewed in a timely manner to be responsive to relevant congregational, church, legislative and societal changes, as well as implementation issues.

### **2. GUIDING PRINCIPLES**

The following principles underpin the Province Policy Framework:

- 2.1 The Trustees of the Christian Brothers (Queensland), St Francis Xavier Province, are responsible for the governance of the work of each Ministry in the Province.
- 2.2 The Trustees of the Christian Brothers (Queensland) are committed to excellence and consistency of practice across each Ministry in relation to:
  - 2.2.1 responding to the gospel values and the charism of Edmund Rice,
  - 2.2.2 meeting the obligations as a member of the Church and its Canon Law,
  - 2.2.3 meeting the legal obligations under common law and legislation, and
  - 2.2.4 meeting the standards of industry and professional practice.
- 2.3 Justice to all is to be a guiding and fundamental principle in drafting policy. It is recognised that at times, policy drafting is complicated. Careful and appropriate responses need to be taken to provide flexibility and balance within each policy to reflect the dimensions of justice.
- 2.4 Subsidiarity to respect the rights of those who are affected by policy to be as involved as appropriate in its formation.
- 2.5 Policymaking by definition, is a process, a systematic series of actions that responds to demonstrated need through development, implementation, monitoring and reviewing. The outcome will be a policy document that facilitates excellence in practice within each ministry.

### 3. OBLIGATIONS

- 3.1 The Trustees of the Christian Brothers (Queensland) are obligated to govern all of its ministries throughout St Francis Xavier Province, in the spirit of Edmund Rice, and in a manner that fulfills canonical and legal obligations.

### 4. POLICY STATEMENT

All persons who are part of the St Francis Xavier Province governed by the Trustees of the Christian Brothers (Queensland) will have access to well-articulated and understandable Province Policy, which will provide vision and direction for their actions, in the Spirit of Edmund Rice.

Each Province Policy will have accompanying related and mandatory procedures, and follow the standardised format modelled in this document.

### 5. DEFINITIONS

*Mandatory* means compulsory. Using the verb '*will*' means compulsory (legal perspective).

*Trustees of the Christian Brothers (Queensland)* is the official legal name of the organisation. The Province Leadership Team (PLT) comprise the Trustees.

*St Francis Xavier Province* is the official name of this Province. The geographical area of St Francis Xavier Province is currently Queensland, Northern Territory and East Timor.

*Workers* in this document refers to all staff, religious, ministry workers and volunteers working within the Province.

*Procedures* are the methods used to implement the Policy.

*Annexures* provide additional material including forms, explanations and applications.

*Subsidiarity* means decisions should be made at the local level on matters which affect the local level. A higher authority should only be referred to when authority is lacking at the local level or there is doubt at the local level about which is the best way to proceed.

*Standardised format* identifies the headings that are to be used in the writing of any Province Policy. Definitions of these headings of this document can be found in Annexure One, Standardised Format for a Province Policy.

### 6. PROCEDURES

The procedures provide detail about responsibilities and accountabilities, and describe the four stages to achieve accessible, well-articulated and understandable Province policies.

The four stages are:

Stage 1 The development of a Province Policy,

Stage 2 The implementation of a Province Policy,

Stage 3 Monitoring the implementation for compliance purposes,

Stage 4 The review of a Province Policy.

## 6.1 Responsibilities

6.1.1 The PLT, acting as the Trustees of the Christian Brothers (Queensland) has overall responsibility for ensuring that this framework is implemented. Specifically, the PLT has responsibility to:

- a) determine that a policy needs to be developed,
- b) determine the resource allocation for the development,
- c) formally approve the policy,
- d) appoint the Province Policy Coordinating Group,
- e) ratify the date for the review of the policies,
- f) formally approve any changes to the policy based on a review.

### 6.1.2 Province Policy Coordinating Group (PPCG)

The PLT delegates responsibility to the Province Policy Coordinating Group (PPCG) to:

- a) oversee the development of a new Province Policy, including forming a specific task force to develop the draft Policy, submitting the draft Policy to the PLT for approval, sending the draft Policy to lawyers appointed by the PLT to ensure legal compliance, and then presenting the Policy to the PLT for final approval,
- b) oversee the initial implementation of any Province Policy,
- c) receive the completed Record of Variation Forms and the Observation Forms which give feedback about the non-compliance of policies for review, and ensure that the relevant forms are made available to the specific people undertaking a review of the associated policy.
- d) undertake a review of each Policy where appropriate.

The PPCG is appointed by the PLT. Membership on the PPCG includes:

- a) a PLT representative,
- b) Director of Edmund Rice schools or delegate,
- c) Director of Administration and Finance or delegate,
- d) Coordinator, Edmund Rice Formation and Ministry Support,
- e) Coordinator, Indigenous Ministries Unit, and
- f) any other member as seen appropriate by PLT.

The PPCG will annually elect a Chairperson who will ensure the group performs its role.

### 6.1.3 Director of Edmund Rice Schools

The PLT has delegated responsibility to the Director of Edmund Rice Schools to:

- a) submit to the Province Leader for approval, through the PPCG, draft Province Policies which will apply to all Edmund Rice schools, and from time to time, recommend to the Province Leader for his approval changes and amendments to such Province Policies,

- b) ensure external audits of each Province Policy are carried out in all schools, and
- c) report to the PLT regarding issues of compliance and non-compliance identified by the external audits referred to in b) above and by each School Board.

#### 6.1.4 School Boards

The PLT has delegated responsibility to School Boards to:

- a) "ensure systems and policies, as approved by the Province Leader or his delegate, are in place for compliance with requirements in civil and canon law and Province Policy." (School Board Constitutions),
- b) receive External Audit Reports and follow up any non-compliance issues, and
- c) provide an Annual Compliance Report and Proposed Action Plan to the Director of Edmund Rice Schools.

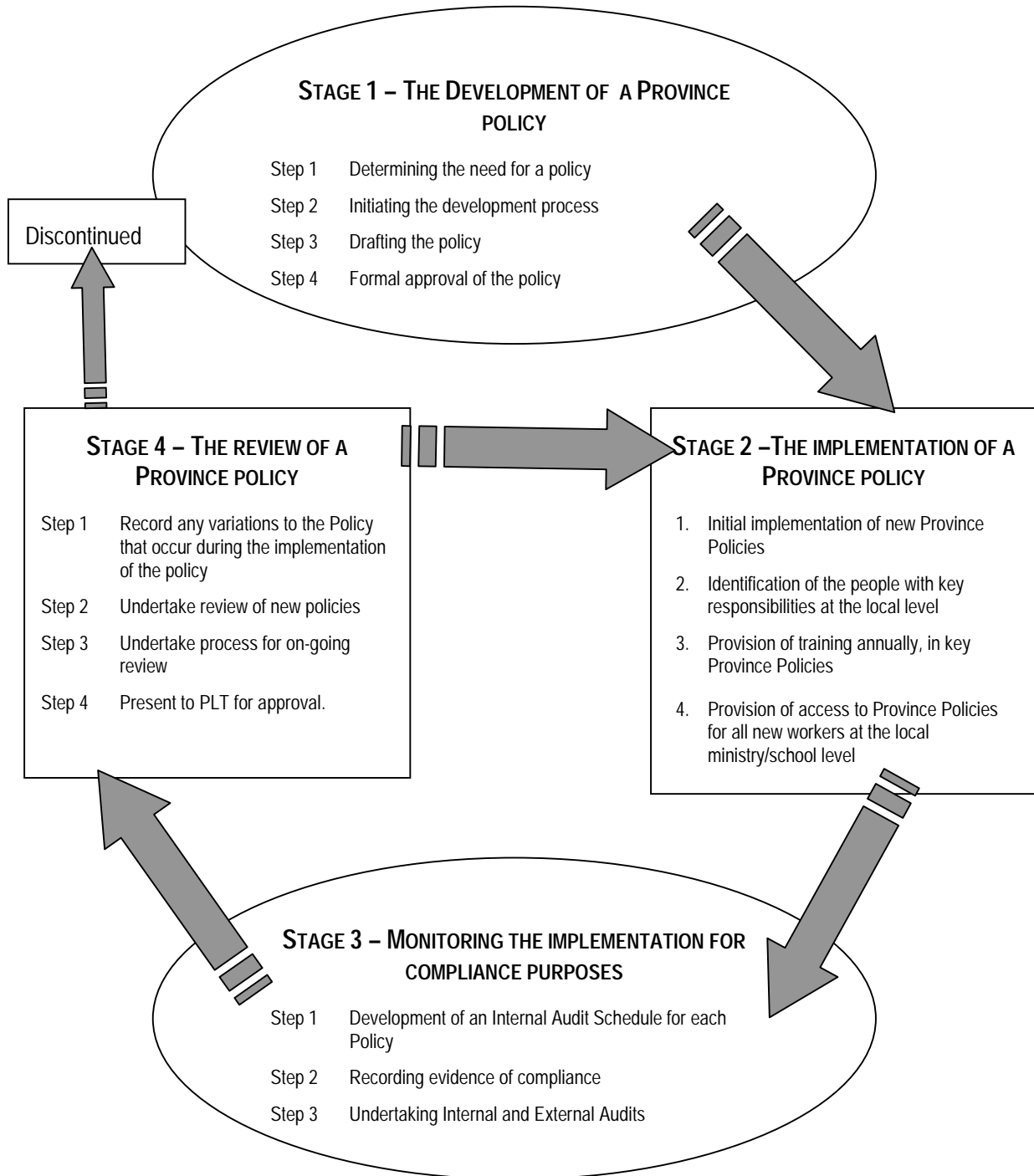
#### 6.1.5 Principals/Ministry Leaders

The PLT has delegated responsibility to School Principals/Ministry Leaders to:

- a) "develop systems, practices and procedures for compliance, as approved by the Province Leader or his delegate, with canon and civil law and Catholic teaching and practice in accordance with Province Policy and School Board policy." (School Board Constitutions,)
- b) ensure Internal Audits of Province Policies are carried out and evidence is available for the person undertaking the External Audit.
- c) ensure that an Annual Compliance Report is prepared and presented to their School Board.

## 6.2 Implementation

### The Four Stages of the Policy Process



## 6.2.1 Stage 1: The development of a Province Policy

### Step 1 Determining the need for a policy

The PLT is ultimately responsible for deciding what issues require the development of a Province policy as a response. These issues are brought to the PPCG via:

- a) Leaders of ministries
- b) Congregational Leaders
- c) Other people associated with the Province e.g. Province legal advisors
- d) State or Commonwealth government representatives
- e) The PLT itself.

The PPCG seeks approval from the PLT to develop a Province policy when

- compliance with the Province's mission, applicable, laws and regulations is required
- operational efficiencies will be gained
- institutional risks will be reduced as a result of the introduction of a Province policy.

(Please note: School Boards, individuals or groups of ministries may develop specific focused 'operational policies and procedures' – for example, Nudgee School Homework Policy. Other documents may also be developed such as the Province Centre Operations Handbook, Nudgee School Student Handbook. These documents are NOT to be called "Province Policies or Procedures" and are to be clearly labeled accordingly. The use of the standardised format is encouraged as outlined in Annexure One: Standardised Format for a Province Policy).

### Step 2 Initiating the development process

Once the PLT determines that a policy should be developed, the resources will be allocated to develop the policy. The PPCG oversees the process for development to ensure all the appropriate people are involved in the drafting of the policy. A taskforce or a delegated person, who has the expertise for the particular policy being developed, will be given responsibility for the development of the policy document.

Sometimes there may be a need for a policy to be introduced quickly. In this case, the PLT determines that an interim policy document is to be developed and instructs the PPCG to appoint a delegated person/s with this responsibility. However, an interim policy is to be reviewed within 12 months. A policy such as this needs to be clearly labeled 'interim' and needs to follow the standardised format. Extensive consultation may not be required for the development of an interim policy.

### Step 3 Drafting the policy

The appointed Task Force is required to:

- a) Provide notice to all Province Ministry Leaders that the policy development work is occurring, with accompanying information about the timelines and consultation processes.
- b) Conduct relevant research e.g. legal obligations, examples of other organisations' policies (in particular that of QCEC).

- c) Use the standardised format for the drafting of any Province policy. (This format is modeled in this document and further detail is attached in Annexure One: Standardised Format for a Province Policy).
- d) Consult with the people/representatives who are going to be affected by the policy.
- e) Consult appropriate personnel associated with the Trustees of the Christian Brothers (Queensland) e.g. Industrial Relations Officer, Province Child Protection Officer, Edmund Rice School's Legal Advisor (if these people are not on the Task Force)
- f) Provide progress reports to the PPCG, as negotiated with that body.
- g) Present the final draft Policy to the PPCG who seek approval from the PLT for the Policy to be sent to the Province lawyers to confirm consistency with the Law.

#### Step 4 Formal approval of the policy

The final form of the policy document is presented to the PLT for approval. Details must also be provided of the development process of the policy document and a justification for the final form.

#### 6.2.2 Stage 2: The implementation of a Province Policy

There are four functions in this stage. These are:

- a) Initial implementation of new Province Policies
- b) Identification of the people with key responsibilities at the local level
- c) Provision of training annually, in key Province Policies
- d) Provision of access to Province Policies for all new workers at the local ministry/school level.

The PLT has overall responsibility for the implementation of Province policy, and has delegated this responsibility to the PPCG.

- a) Initial implementation of new Province Policies

The PPCG will ensure the implementation of new Province Policies. This will include:

- I. distribution of the policies,
- II. drawing up a calendar for training that may be needed for the initial implementation, and
- III. overseeing the development of an appropriate internal auditing system for the new policy.

- b) Identification of the people with key responsibilities at the local level

- I. For particular policies, a person is designated as the contact person, e.g. Student Protection Contact (school based), Province Child Protection Officer (Province based), Harassment Referral Officer, Workplace Health and Safety Advisor, Critical Incident Management Team.

- II. All workers are made aware of who this person/s is within their ministry/school

- c) Provision of training annually, in key Province Policies

- I. Appropriate training is delivered ensuring that all workers have the opportunity to attend.
  - II. Designated contact people for each policy should receive specific training in the key elements and aims of the relevant policy.
  - III. Copies of, or access to copies of, Province policies need to be available to workers when appropriate.
  - IV. Records of participants who attend training are maintained by the individual ministry/school and the appropriate authority, e.g. Child Protection Officer, Workplace Health and Safety Officer.
  - V. A Statement of Attendance is given to each participant on completion of training.
- d) Provision of access to Province Policies for all new workers at the local ministry/school level

In order to meet employee obligations as outlined in the Employment Policy,

- I. At the time of induction each worker is informed about the policies appropriate to their work, and is given time to read and discuss any policy.
- II. Each worker completes the "Policy Induction Form for New Staff" form. This form is filed in the employee personnel file.

### 6.2.3 Stage 3: Monitoring the implementation for compliance purposes

Policies will be monitored at the local level with the appropriate accountabilities built in. The three steps below outline the monitoring process.

A local person conducts the Internal Audit for each policy, whereas a person external to the local ministry will carry out the external audit.

The PLT appoints an external auditor for each of the non-school ministries.

The Director of Edmund Rice Schools or delegate undertakes the external audit for the schools.

#### Step 1 Development of an Internal Audit Schedule for each Policy

- A person in each school and ministry is identified who will be responsible for overseeing policy compliance. It is strongly suggested that each school and ministry incorporates this responsibility into this person's job description.
- Before the implementation of the Policy, or during that time, an Internal Audit Schedule for each policy is developed. (see example in Annexure Two: Internal Audit Schedule)

#### Step 2 Recording evidence of compliance

- Persons responsible for overseeing policy compliance need to be aware of what evidence for each policy, identified on the Internal Audit Schedule, needs to be collected.
- All necessary evidence is collected and filed.

#### Step 3 Undertaking Internal and External Audits

- An annual internal audit is undertaken by reviewing and rewriting of the Internal Audit Schedule for each School and ministry.
- An Annual Compliance Report for all policies showing the level of compliance, and recommendations for future actions is compiled.
- An Annual Compliance Report is presented to the Board (for schools), and the PLT Representative (for each Ministry).
- Each School Board forwards to Director of Edmund Rice Schools their response to the Annual Compliance Report and Proposed Action Plan.
- The PPCG is notified where a policy needs reviewing within the immediate year.
- At least every three years, unless specified in an individual policy, an external audit is conducted to examine the compliance evidence.
- An External Audit Report is attached to the end of the External Audit Schedule and provided to the Board (for schools), and PLT Representative (for each Ministry).

#### 6.2.4 Stage 4: The review of a Province Policy

Any new Policy implemented is to be evaluated at the end of the first year. This will enable the Policy to be trialed at the local level and adjustments made if necessary.

At the end of the first annual evaluation, the PPCG will determine the:

- period within which the next review will be conducted
- process to be used
- criteria for evaluation
- persons to carry out the review.

The PPCG will also monitor Province Policies in the light of changes in legislation and Province Directions and ensure that each policy is reviewed at least every 3 years.

The results of the review will be reported to the PLT. The report will recommend whether the:

- policy has been effectively implemented
- policy should continue with or without alteration, or be discontinued if no longer relevant to the current congregation, church, legislative and societal context.

To ensure ongoing review of the Policy the following steps will be implemented:

Step 1 Record any variations to the Policy that occur during the implementation of the policy

- Training for all those responsible for the implementation of policies in the use of Record of Variations Form and Observation of Implementation Forms is delivered. (See Annexures Four and Five)
- On the Record of Variation Form and the Observation of Implementation Form, document any variations that have occurred in implementing the Policy. A Record of Variation must be made of every policy variation, regardless of whether the variation occurs during or after initial implementation.

- Record of Variation Forms and Observation of Implementation Forms are to be filed in the appropriate policy file, except during the first year of implementation of the policy (see below).
- In the first year of implementation of the Policy, a copy of the Variation Record Forms is sent to the PPCG at the end of each term. PPCG collates Record of Variation Forms and identifies any immediate issues that may need addressing. These Forms will be sent to the Province Secretary for the PPCG.
- After the first year, Record of Variation Forms are filed within the Policy file so they may be part of the Internal and External Audit.

Step 2 Undertake new policy review

- At the end of the first year of implementation, every new policy is reviewed. The data from the Record of Variation and the Observation Forms, and the Internal Audit Reports are taken into consideration.
- If significant changes need to be made, Steps 3 and 4 in Stage 1- Developing the Policy are to be followed.

Step 3 Develop processes for on-going review

- At the end of the first year of implementation and after the new Policy review, a schedule is drawn up to ensure all policies are reviewed every 3 years.
- A range of processes for review, appropriate to each policy are developed. These processes are to ensure the inclusion of relevant ministry leaders with the expertise in the appropriate policy, for example, Province Child Protection Officer, Industrial Relations Officer, Workplace Health and Safety Advisor.
- This process is undertaken under the direction of the PPCG.

Step 4 Present to PLT for approval.

- At the conclusion of the Review Process, the policy is presented to the PLT for approval.

## **ANNEXURES CONTENT**

1. **STANDARDISED FORMAT FOR A PROVINCE POLICY (INC. DEFINITIONS)**
2. **INTERNAL AUDIT SCHEDULE**
3. **(A) INTERNAL AUDIT RECORD**  
**(B) EXTERNAL AUDIT RECORD**
4. **RECORD OF VARIATION TO POLICY**
5. **OBSERVATION OF IMPLEMENTATION FORM**

# ANNEXURE ONE: STANDARDISED FORMAT FOR A PROVINCE POLICY

## INTRODUCTION

Any person delegated the responsibility to develop a Province policy is obligated to use the standardised format, so that policy users become familiar with the structure of the documents.

## STANDARDISED FORMAT FOR A PROVINCE POLICY

### Mandatory Policy Headings

These headings **MUST** be used in any Province policy document.

- Details of Title Page
- Introduction
- Rationale/purpose
- Guiding Principles
- Obligations – Civil and Canon Law
- Policy Statement
- Definitions

### Province Procedures Headings List

Headings to be used in the Province Procedures **MUST** be selected from the below list. It is not mandatory for all the below headings to be used.

- Responsibilities
- Steps/Stages
- Policy Breach
- Implementation
- Compliance (Internal Audit Schedule)
- Review
- Annexures

## GUIDELINES

A Ministry may write its own Guidelines section, which would assist in the implementation of the Province Policy and Procedures in a local situation. There is no prescribed list of headings for this section. It is at the discretion of the Ministry Leader.

## FOOTNOTE

A footer is to be placed at the bottom of each page. It will contain:

- Policy Number and Name
- Issue Date (or version date during development stage)
- Page Number of Total Number of Pages

## **DEFINITIONS – PROVINCE POLICY HEADINGS**

### **Title Page**

Details are to include the name of policy, date of ratification, status of policy, states "Trustees of Christian Brothers (Queensland), St Francis Xavier Province", version date, file name and pathway.

### **Introduction**

Brief summary of what the policy document contains, that the policy is mandatory, and the scope of the policy in regards to who it applies to.

### **Rationale/Purpose**

Provides clearly stated reasons, in simple language, as to why the policy is being produced. The Vision and Mission Statement of the Trustees of Christian Brothers (Queensland), gospel values and laws may be reflected in this section.

### **Guiding Principles**

Statements which have guided the formulation of the policy document.

### **Obligations**

Indicate the relevant legislation and people's legal obligations. For example, in this section, the relevant Act may be referenced, and people directed to read specific parts of that Act. This includes both Civil and Canon Law.

### **Policy Statement**

This section is an authoritative statement that provides direction for action and vision within identified limits in each particular ministry throughout the Province. It states what is to be done, not how, when or by whom. It needs to be expressed in clear, simple, non-technical language. It needs to be stated concisely to enable ease of recall. It needs to be positive.

### **Definitions**

Terms used in the policy, particularly those which have precise spiritual, legal, medical, social or industrial connotations and implications, are defined.

## **DEFINITIONS - PROVINCE PROCEDURES HEADINGS**

Province procedure is included in a policy document when there is a mandatory requirement for the Policy Statement to be implemented in a prescribed manner. This section will clearly describe the "who, when, by whom and where" requirements. There are a number of sub-headings that can be utilised depending on the nature of the Policy Statement. These are:

### **Responsibilities**

Identify specific job positions that carry different tasks and functions in the implementation of the policy.

### **Implementation**

Includes the tasks, steps, and aspects of the policy that need to be taken into consideration in ensuring that the Policy can be operationalised with each ministry. This could include:

- Training that is used to ensure that the necessary people have the understanding, knowledge and skills to implement the policy statement. Training may be a mandatory requirement at times.
- Elements or aspects of how the policy will be actioned in given circumstances.

### **Monitoring**

Indicates how the implementation of the policy is going to be measured. This will include the methods used for ensuring compliance with the Policy, for example, Internal and External Audits.

### **Review**

Indicates that a review of the Policy document will be required. It may indicate a process for collecting feedback and recommending amendments to the policy. It could recommend the length of time between reviews.

### **Policy Breach**

Details the consequences that a person will experience when they do not comply with the Policy document. These consequences can be staged to respond appropriately to the situation.

### **Annexure**

Annexure are usually form documents that have been identified in the policy and must be used when implementing the policy.

### **Other Resources**

Provides more information about a particular topic or examples of documents that could be used for training and implementation, and additional information for clarification of the policy.

## **DEFINITIONS - GUIDELINES**

Are non-obligatory practices which experience, industry standards or best practice suggests will most effectively ensure that policy and procedures are implemented. Specific ministries may develop different guidelines, depending upon the nature of the ministry and environment that it operates within.

### **Flow Charts/Diagrams**

Is a diagrammatic representation of a series of steps/actions.



**ANNEXURE THREE (A)- INTERNAL AUDIT RECORD**

Policy .....

School/Ministry.....

Date conducted:.....

Name of person conducting audit:.....

Signature:.....

Role of person carrying out the audit.....

Name of Person responsible for receiving report:.....

Signature:.....

**Level of Policy Conformance:**

<i>Conformance:</i> <input type="checkbox"/>	<i>Partial conformance:</i> <input type="checkbox"/>	<i>Non-conformance:</i> <input type="checkbox"/>
Comments:	Recommendations for Action:	Recommendations for Action:

**ANNEXURE THREE (B) - EXTERNAL AUDIT RECORD**

Policy .....

School/Ministry.....

Date conducted:.....

Name of person conducting audit:.....

Signature:.....

Role of person carrying out the audit.....

Name of Person responsible for receiving report:.....

Signature:.....

**Level of Policy Conformance:**

<i>Conformance:</i> <input type="checkbox"/>	<i>Partial conformance:</i> <input type="checkbox"/>	<i>Non-conformance:</i> <input type="checkbox"/>
Comments:	Recommendations for Action:	Recommendations for Action:

## ANNEXURE FOUR - RECORD OF VARIATION TO POLICY

This form needs to be completed each time there has been a variation made in following a Province Policy.

Policy that requires a change of procedure.....

Name of person/ministry making the change.....

Date.....

### IDENTIFY THE STEP/PROCEDURE IN THE POLICY NOT FOLLOWED AND WHY?

Major	Minor
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Please tick the appropriate box

### CHANGED ACTION/PROCEDURE UNDERTAKEN

Person responsible for overseeing the action:

### SUGGESTION FOR CHANGES TO POLICY

## ANNEXURE FIVE - OBSERVATION OF IMPLEMENTATION FORM

Policy .....

Name of school/person/ministry of observer.....

Person implementing the Policy.....

Date.....

### AREAS OF DIFFICULTY IN IMPLEMENTING

Major

Minor

Please tick appropriate box

### SUGGESTION FOR CHANGES TO POLICY/ OR OTHER ACTIONS