

Policy Framework

1. Purpose

The Policy Framework aims to support the Governance approach of SGLMG in providing guidance on the development of policies and procedures to ensure that these documents are clear, consistent and in line with the ICARE values.

This framework sets out:

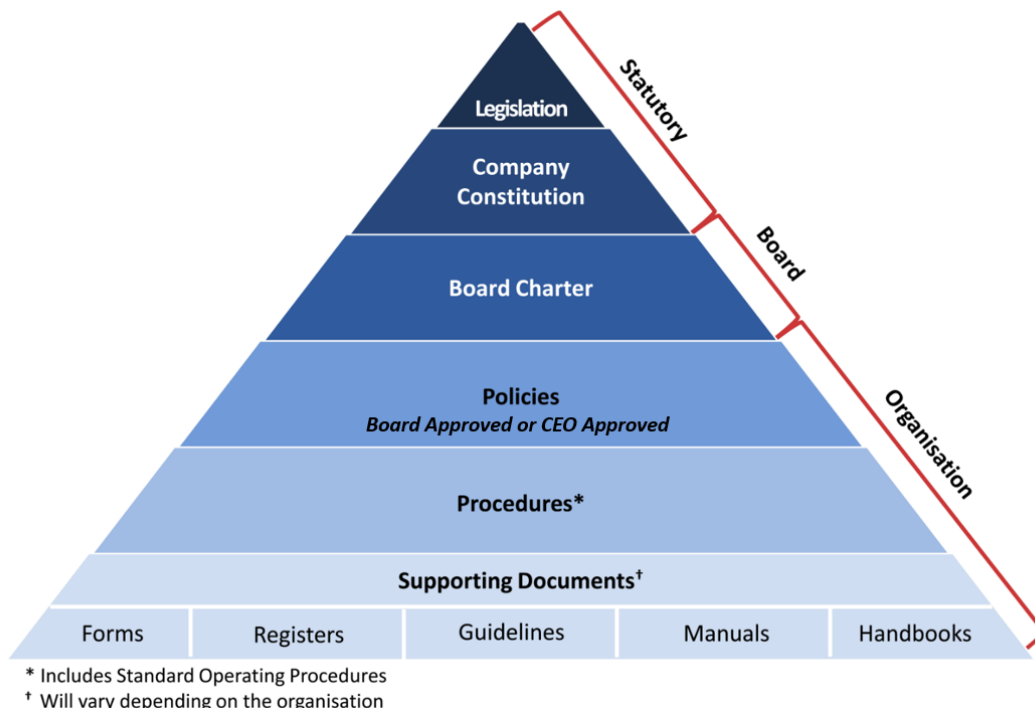
- the intention of policies within SGLMG
- the approach for policy development and maintenance
- roles and responsibilities
- how policies and procedures complement each other; and
- supporting documentation and systems.

2. Intention of Policies

Policies and procedures are a key component of an organisation's governance approach. SGLMG policies are intended to:

- establish principle-based expectations of staff and volunteers
- provide guidelines for mitigating risks across all activities
- assist the Board in meeting their legislative, statutory and regulatory obligations
- provide a baseline for establishing consequence management; and
- provide the objectives that the supporting processes and documentation are intended to achieve.

Policies exist within a hierarchy¹. The diagram below illustrates the documentation that defines and governs SGLMG activities listed in order of precedence.



SGLMG has two levels of policy, Board Approved Policies and CEO Approved Policies. The attributes of these two types are explained below.

¹ www.effectivegovernance.com.au

1. Board Approved Policies:

- a. are governance related
- b. relate to Board level statutory or regulatory requirements
- c. have Board level risk, financial or strategic implications
- d. relate to the processes of decision making and the controls and behaviours that support effective accountability and performance outcomes.

2. CEO Approved Policies:

- a. are operational in nature
- b. define principles under which operational processes are to be established.
- c. are risk management related with regard to a specific activity or group of activities.

3. Approach

SGLMG policy development and maintenance comprises the following components

- Needs analysis
- Development approach
- Roles and responsibilities
- Forms and templates; and
- Systems.

Needs Analysis

The requirement for a new policy or amendment to an existing policy must be considered in the context of current requirements and changes to:

- (a) regulation and legislation.
- (b) Constitution.
- (c) major areas of risk for SGLMG – financial; strategic; people; compliance; third party; operational; reputation; and customers, members & community.

Development

Policy development will progress as follows:

- (a) Identification of a policy author and policy owner.
- (b) Research and data gathering, including:
 - engagement of subject matter experts across the business to contribute as required, and
 - reference to industry standards and best practice as appropriate.
- (c) Drafting of the policy utilising the existing templates as a baseline.
- (d) Consultation with stakeholders (circulation of the draft).
- (e) Amendments and recirculation.
- (f) Policy approval (refer Annexure 1 for further details);
- (g) Inclusion in policy register.
- (h) Communication and implementation of policy; and
- (i) Maintenance and review of policy in accordance with defined timeframes.

Roles and Responsibilities

Role	Responsibilities
Policy Owner	The role in the business responsible for the policy and its implementation. The Policy Owner and policies will be aligned in accordance with the level of control that the owner will have over the requirements and risk the policy is addressing. e.g. Finance Management Policy will sit with the Finance Manager.
Policy Author	The Policy Owner may delegate the writing of the policy to a member of their team. The Policy Author is responsible for researching, data gathering and engaging subject matter experts across the business to complete the draft policy.
Subject Matter Expert	Subject matter experts may be engaged to provide input into the development of a policy. This input may be verbal or may include the writing of sections of the policy.
Human Resources Outsourced	The Human Resources will review policies to ensure they don't contravene any obligations SGLMG has an employer. This is particularly true where elements of consequence management are included.
Board	The Board will be required to review and, where deemed acceptable, approve new and amended policies classified as 'Board Approved Policies'.
CEO	The CEO will be required to review and, where deemed acceptable, approve new and amended policies classified as 'CEO Approved Policies'. The CEO will also need to review and endorse for submission 'Board Approved Policies'.

4. Forms and Templates

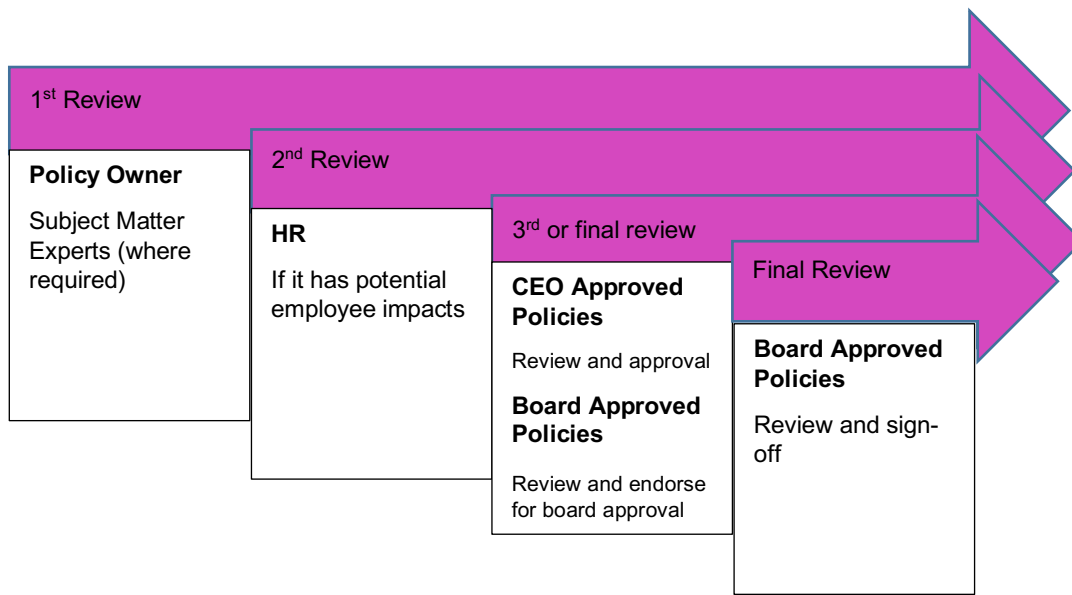
The following has been developed to assist with development and maintenance of policies:

- **SGLMG Policy Template** – provides guidance on things to consider when drafting a policy and consistency of format.
- **SGLMG Policy Register** – includes a list of policies and the policy owner, policy author, policy approver (Board or CEO), approval date and review date.

5. Systems

Policies will be stored on SGLMG Sharepoint to enable version management, search capability and be easily accessible by all employees.

Annexure 1 – Policy Review and Approval Cycle



Annexure 2 – Policy index

Policy	Owner	CEO Approved	Board Approved
Enterprise Risk Management	CEO		X
Financial Management	CFO		X
Code of Conduct	CEO		X
Crisis Management	CEO		X
Recruitment	CEO	X	
Grievances	CEO	X	
Whistleblowing	Chair		X
Complaints	CEO	X	