

POLICY TITLE		DATE OF APPROVAL
Policy Framework		November 2023
APPROVED BY	VERSION NO.	VALID UNTIL
Executive Board	2	November 2026

<b>GROUP EXECUTIVE LEAD</b>	Chief Operations & Compliance Officer		
<b>OWNER</b>	Assistant Director of Governance		
<b>DOCUMENT TYPE</b>	Policy <input checked="" type="checkbox"/>	Group Procedure <input type="checkbox"/>	Local Procedure <input type="checkbox"/>
<b>PURPOSE</b>	<p>The purpose of this policy is to set out the organisational approach to the development, review and approval of policies which ensures that they:</p> <ul style="list-style-type: none"> <li>• Are current and based on the best available evidence.</li> <li>• Are an 'easy read' and accessible to all staff.</li> <li>• Have appropriate consultation and reflect the views of all stakeholders.</li> <li>• Follow a standardised corporate style and format.</li> <li>• Align to NCG's goals and values.</li> </ul> <p>All official policy statements must comply with this policy framework. Existing policies will be refreshed to comply with this document at the next point of review.</p>		
<b>APPLICABLE TO</b>	All NCG employees, as well as consultants, vendors, agency workers, contractors, service users, trainees / students, volunteers and / or any other parties who have a business relationship with NCG [amend as appropriate].		
<b>EQUALITY IMPACT ANALYSIS COMPLETED</b>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	(If EA not applicable, please explain)		
<b>KEY THINGS TO KNOW ABOUT THIS POLICY</b>	<ol style="list-style-type: none"> <li>1. There are three types of document – policies, group procedures and college or departmental procedures.</li> <li>2. Policy documents apply to the whole Group and must be approved by Executive Board or Corporation Board.</li> <li>3. Group procedures apply to the whole Group. Group procedures must be reviewed and endorsed by the Policy Review Council prior to approval by Executive Board.</li> <li>4. Departmental or college procedures apply to a particular department (e.g. Finance or IT) or College. Departmental procedures must be approved by the Lead Executive. College Procedures must be approved by the College Principal.</li> </ol>		

	<p>5. Policies and procedures are valid for three years (with the exception of a finite list of policies which require annual review and approval by Corporation Board).</p> <p>6. The governance team shall maintain the master list of approved policies and procedures and only documents contained on that list are considered valid.</p>
<b>EXPECTED OUTCOME</b>	Readers are expected to understand the organisational position on the development of policies, know their responsibilities in relation to the policy and comply with the terms of the policy.

<b>MISCELLANEOUS</b>	
<b>LINKED DOCUMENTS</b>	<ul style="list-style-type: none"> <li>• NCG policy template</li> <li>• Equality, Diversity, Inclusion and Belong <a href="#">policy</a> and <a href="#">strategy</a>.</li> <li>• Equality Impact Assessment</li> </ul>
<b>KEYWORDS</b>	<ul style="list-style-type: none"> <li>• Policy</li> <li>• Procedure</li> <li>• Equality Impact Analysis</li> </ul>

## Equality Impact Assessment

EQUALITY IMPACT ASSESSMENT			
	Yes	No	Explanatory Note if required
<b>EIA 1 - Does the proposed policy/procedure align with the intention of the NCG Mission and EDIB Intent Statement in Section 2?</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The answer to this must be YES
<b>EIA 2 - Does the proposed policy/procedure in any way impact unfairly on any protected characteristics below?</b>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Age</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
<b>Disability / Difficulty</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
<b>Gender Reassignment</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
<b>Marriage and Civil Partnership</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
<b>Race</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
<b>Religion or Belief</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
<b>Sex</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
<b>Sexual Orientation</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
<b>EIA3 - Does the proposed policy/processes contain any language/terms/references/phrasing that could cause offence to any specific groups of people or individuals?</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
<b>EIA4 - Does the policy/process discriminate or victimise any groups or individuals?</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
<b>EIA 5 - Does this policy/process positively discriminate against any group of people, or individuals?</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
<b>EIA 5 - Does this policy/process include any positive action to support underrepresented groups of people, or individuals?</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this could be yes or no as positive action is lawful. However, an explanation must be provided for clarity.
<b>EIA 6 - How do you know that the above is correct?</b>	This policy has been consulted on by Policy Review Council.		

## **GENERAL POLICY STATEMENT**

- 1.1. NCG is committed to providing clear direction to colleagues in the form of articulate, evidence-based policies and procedures.
- 1.2. All approved policies and group procedures are housed on the NCG policy website / intranet for staff to view.
- 1.3. Colleges and departments should refrain from uploading NCG policies onto their own websites and must instead link to the main NCG policy page.
- 1.4. The NCG governance team shall maintain the master list of approved policies and procedures. Only documents contained on that list are considered valid.

## **2. POLICY CATEGORIES**

- 2.1. There are three categories of document:
  - 2.1.1. Policy - apply to all Colleges and Professional Services across the Group and must be accepted as written. Policies are approved by Executive Board or Corporation Board. Policies relating to Governors must also be approved by Corporation Board.
  - 2.1.2. Group Procedures – those procedures which apply across the Group. Group procedures must be reviewed and endorsed by the Policy Review Council prior to approval by Executive Board.
  - 2.1.3. Local Procedures – those procedures relevant to a particular department (e.g. Finance or IT) or College. Local procedures must be approved by the relevant Lead Executive or College Principal.

## **3. PROCESS FOR DEVELOPING A NEW POLICY**

- 3.1 Where a new document is required, the owner must first determine the category of document required (see section 2 above).
- 3.2 Owners must first review existing documents to determine whether an existing document can be revised to incorporate the new requirements. The revision of an existing document is preferable where possible – should this be the case, the requirements of sections 7 and 8 should be followed.

#### **4. STYLE AND FORMAT**

- 4.1. All policies must be written using the standard template available at **Appendix 1** which sets out the font and type size as well as the standard headings.
- 4.2. Any queries regarding the policy template and its completion should be directed to [clerk@ncgrp.co.uk](mailto:clerk@ncgrp.co.uk)
- 4.3. Policy documents must be evidence-based and referenced accurately. Working hyperlinks can be included.

#### **5. EQUALITY IMPACT ASSESSMENTS**

- 5.1. All new policies and existing policies undergoing a scheduled review must be accompanied by an Equality Impact Assessment (EIA).
- 5.2. The purpose of an EIA is to review the impact of the new or revised policy on staff and service users who may have protected characteristics.
- 5.3. The EIA template is attached at **Appendix 2** to this policy.
- 5.4. Further information on the Group's approach to Equality, Diversity, Inclusion and Belonging can be found in the following [policy](#) and [strategy](#).

#### **6. CONSULTATION**

- 6.1. It is the responsibility of the owner to agree and undertake the appropriate consultation with relevant stakeholders on the policy, prior to presenting it for approval. This should include those individuals with a direct interest in the policy, those who may be subject matter experts on aspects of the policy, interested parties such as staff network representatives, as well as those who may be able to identify linkages or inconsistencies with other Group documents.
- 6.2. Any groups / individuals consulted during the development or review of the policy, must be included in the "Statement of Consultation". It is good practice to give consultation periods of at least two weeks to ensure that staff on leave and / or staff prioritising workloads can give the document appropriate attention. The owner should review the feedback obtained as part of the consultation process and incorporate as relevant.
- 6.3. Once the required amendments have been made to the policy it is ready to be presented to the appropriate governance group for approval.

## 7. PROCESS FOR APPROVAL OF POLICIES AND GROUP PROCEDURES

- 7.1 Group policies and procedures must be presented to the Policy Review Council (PRC) for review and endorsement with the exception of Higher Education policies which follow a separate governance process.
- 7.2 The PRC will require the following documents for review:
- The draft policy or procedure
  - The completed EIA (policies only)
- 7.3 Document owners are expected to attend the PRC to present the document and the supporting documentation.
- 7.4 The PRC will review the policy to ensure it meets expected standards both in terms of content and format.
- 7.5 PRC meetings are minuted to ensure an audit trail for decisions and approvals.
- 7.6 The PRC will either:
- **Recommend** a policy or group procedure to the Executive Board or Corporation Board for approval. This may be subject to the owner making minor amendments to the content before submission to Executive Board.
  - **Request** the owner make material changes to the content and re-submit to a subsequent PRC meeting.
- 7.7 Once PRC have endorsed the policy or procedure, the policy team will forward the final document to Executive Board / Corporation Board for review and approval, ensuring that any recommended changes have been captured prior to submission.
- 7.8 The majority of policy documents will be approved by Executive Board, with the exception of a finite list of policies which are required to be approved by Corporation Board in accordance with the Scheme of Delegation (see **Appendix 3**).
- 7.9 There is no requirement to submit the EAA to Executive Board or Corporation Board.
- 7.10 The policy owner is not required to attend Executive Board to present the policy. The Chair of the PRC will provide an overview of the PRC discussion on an exception basis, including assurance around the completion of the EAA and consultation process.
- 7.11 Executive Board can either:
- **Approve** the policy - this may be subject to minor amendments which the owner is provided with the delegated authority to undertake.

- **Reject** the policy and request further work is completed on its content before it is either brought back to Executive Board for further consideration.
  - **Recommend** the policy to Corporation Board for approval (see **Appendix 3**).
- 7.12 The decision of the Executive Board will be communicated to the owner and the policy team by the Executive Board minute-taker.
- 7.13 Once the policy has been approved, the owner will be requested to make any minor changes requested by Executive Board and then submit the document to the governance team at [clerk@ncrgp.co.uk](mailto:clerk@ncrgp.co.uk)
- 7.14 If no changes are required, the minute-taker will inform the governance team to use the version of the policy submitted to Executive Board.
- 7.15 The governance team will complete the approval and review dates on the cover sheet and upload the policy onto the policy internet / intranet pages.
- 7.16 Policies are valid for three years with the exception of a finite list of policies which are required to be reviewed and approved by Corporation Board on an annual basis (**see Appendix 3**).
- 7.17 Policies will be uploaded within two working days of receipt. If there is an urgent need for a policy to be uploaded within a shorter timeframe, then the owner must specify this when contacting the governance team.

## **8. PROCESS FOR APPROVAL OF LOCAL PROCEDURES**

- 8.1 Local procedures are valid for three years.
- 8.2 Local procedures must be approved by the Executive Lead for the department or by the College principal if it is a College procedure.
- 8.3 All college and departmental SOPs, guidelines, instructions are in effect local procedures. Document owners are requested to implement the standard NCG terminology (procedure) upon the next review of their document.

## **9. PROCESS FOR FULL SCHEDULED REVIEW OF POLICIES AND PROCEDURES**

- 9.1. Policy and procedure owners must review their documents three years from the date of approval.
- 9.2. The governance team will provide document owners with three months' notice that their document is due for review and build into the document approval cycle.

- 9.3. The review in year three shall follow the process outlined in section 7.1 to 7.4 depending on the document type. This includes scenarios where the owner does not make any changes to the content of the document. It is still important to consult and go through a robust approval process – other interested parties may be aware of developments which require changes to be made to the document content.
- 9.4. Where an owner becomes aware of changes that need to be made prior to the review date then it is the owner's responsibility to instigate an earlier review.
- 9.5. Where a policy has not been reviewed prior to its review date then the existing policy will continue to apply until the policy has been reviewed.
- 9.6. The EIA should also be updated as part of the scheduled review to reflect the latest data available to help understand the impact on protected groups.

## **10. PROCESS FOR CHANGES OUTSIDE OF SCHEDULED REVIEW**

- 10.1. Major changes to the content of a document will trigger a full document review and the owner is expected to follow the process outlined in sections 7.1 to 7.4 above. A new review date would be set at three years from the date of approval. Major changes made include the need to reflect new legislation and resulting requirements.
- 10.2. Minor changes to content between review dates do not trigger the process outlined in sections 7.1 to 7.4 above. Examples of minor changes include but are not limited to:
  - Spelling corrections.
  - Updates to job titles, committees or groups.
  - Updated links/references to other documents.
  - Additional text to provide clarity which does not affect the overall process and intention of the document.
- 10.3. The revised document and a summary of the changes can be sent directly to [clerk@ncgrp.co.uk](mailto:clerk@ncgrp.co.uk) for publishing. The governance team must notify the Chair of PRC so that PRC are informed of minor changes to existing policies.
- 10.4. A minor change does not adjust the previously set review date, as it does not constitute a full review of the policy content.

## **11. EMERGENCY APPROVAL PROCESS**

- 11.1. There may be occasions where a new or existing policy requires urgent approval and communication to staff. This should be in exceptional unforeseen circumstances only.



An example would be the pace of change of government requirements relating to infection, prevention and control during the COVID-19 pandemic, where it was critical for the Group to be able to act at speed for the safety of staff and students.

- 11.2. In such circumstances the requirement for all corporate policies to be reviewed by the PRC may introduce additional risk for staff and / or students by protracting the process. At the direction of the Executive Lead for a policy, the PRC can be bypassed prior to a new policy being approved.
- 11.3. A retrospective report should be made to the PRC to explain why the emergency approval process was enacted. This ensures that there is a clear audit trail and that the Group are aware of the rationale for enacting this process.
- 11.4. The policy will also still be reviewed by the PRC recognising that it will already be live at this point. This is to ensure consistency of approach and provide retrospective feedback to the owner and Executive Lead on any material issues noted.

## **12. PUBLICATION AND DISSEMINATION OF POLICIES**

- 12.1. Once new / revised policies are published, they will be communicated to staff via the weekly Business Round-up. This highlights to all staff that changes have been made to key documents.
- 12.2. It is the responsibility of the owner to undertake any other communication / dissemination that is necessary to ensure that the appropriate staff are made aware of the new / revised policy.

## **13. STATEMENT ON POLICY IMPLEMENTATION**

- 13.1. Upon approval, this policy will be uploaded to the policy portal and communicated to staff via The Business Round-Up.
- 13.2. No other specific training is required in relation to this policy, but staff are encouraged to contact the governance team at [clerk@ncgrp.co.uk](mailto:clerk@ncgrp.co.uk) if they require advice or guidance on the content of this policy.

## **14. STATEMENT ON EQUALITY AND DIVERSITY**

- 14.1. NCG is committed to providing equality of opportunity. Further details of our aims and objectives are outlined in our [Equality Diversity Inclusion and Belonging Strategy](#).

14.2. This policy has been assessed to identify any potential for adverse or positive impact on specific groups of people protected by the Equality Act 2010 and does not discriminate either directly or indirectly. In applying this policy, we have considered eliminating unlawful discrimination, promoting equality of opportunity and promoting good relations between people from diverse groups. Any issues highlighted in the assessment have been considered and incorporated into the policy and approved by the Lead Director and relevant committee.

## 15. STATEMENT ON CONSULTATION

15.1. This policy has been reviewed in consultation with the Policy Review Council.

VERSION CONTROL					
Version No.	Documentation No.	Section/Page	Description of Change and Rationale	Author/Reviewer	Date Revised
02	Full re-write		Updated to include new policy categories as well as clarification around the consultation process and approval pathway for policies and procedures.	Asst. Director of Governance	October 2023

## Appendix 1 – NCG POLICY TEMPLATE

POLICY TITLE		DATE OF APPROVAL
		Leave blank
APPROVED BY	VERSION NO.	VALID UNTIL
		Leave blank

<b>OWNER</b>			
<b>GROUP EXECUTIVE LEAD</b>			
<b>DOCUMENT TYPE</b>	Policy <input type="checkbox"/>	Group Procedure <input type="checkbox"/>	Local Procedure <input type="checkbox"/>
<b>PURPOSE</b>	The purpose of this [policy / procedure] is to		
<b>APPLICABLE TO</b>	All NCG employees, as well as consultants, vendors, agency workers, contractors, service users, trainees/students, volunteers and/or any other parties who have a business relationship with NCG [amend as appropriate].		
<b>EQUALITY ANALYSIS COMPLETED [POLICIES ONLY]</b>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	(If EA not applicable, please explain)		
<b>KEY THINGS TO KNOW ABOUT THIS POLICY</b>	1. 2. 3.		
<b>EXPECTED OUTCOME</b>	Readers are expected to understand the organisational position on [insert as relevant], know their responsibilities in relation to the policy and comply with the terms of the policy.		

MISCELLANEOUS	
<b>LINKED DOCUMENTS</b>	<ul style="list-style-type: none"> <li></li> <li></li> <li></li> </ul>
<b>KEYWORDS</b>	<ul style="list-style-type: none"> <li></li> <li></li> <li></li> </ul>

**1. GENERAL [POLICY / PROCEDURE] STATEMENT**

1.1 NCG is committed to...

1.2

1.3

**2. [POLICY CONTENT - ENTER AS MANY SUB-HEADINGS AS REQUIRED]**

2.1

2.2

2.3

**3. [POLICY CONTENT - ENTER AS MANY SUB-HEADINGS AS REQUIRED]**

3.1

3.2

3.3

**4. [POLICY CONTENT - ENTER AS MANY SUB-HEADINGS AS REQUIRED]**

4.1

4.2

4.3

**5. [POLICY CONTENT - ENTER AS MANY SUB-HEADINGS AS REQUIRED]**

5.1.

5.2.

5.3.

**6. STATEMENT ON POLICY IMPLEMENTATION [REQUIRED, DO NOT DELETE]**

6.1 Upon approval, this policy will be uploaded to the policy portal and communicated to staff via The Business Round-Up and [insert any additional measures of communication if relevant].

6.2 List any additional measures needed to ensure the policy is implemented and any training that may be available.

**7. STATEMENT ON EQUALITY AND DIVERSITY [REQUIRED, DO NOT DELETE]**

7.1 NCG is committed to providing equality of opportunity. Further details of our aims and objectives are outlined in our [Equality Diversity Inclusion and Belonging Strategy](#).

7.2 This policy has been assessed to identify any potential for adverse or positive impact on specific groups of people protected by the Equality Act 2010 and does not discriminate either directly or indirectly. In applying this policy, we have considered eliminating unlawful discrimination, promoting equality of opportunity and promoting good relations between people from diverse groups. Any issues highlighted in the assessment have been considered and incorporated into the policy and approved by the Lead Director and relevant committee.

**8. STATEMENT ON CONSULTATION [REQUIRED, DO NOT DELETE]**

8.1 This policy has been reviewed in consultation with [list here any individuals or groups who were consulted during the drafting of this policy].

8.2 A summary of the consultation output and any subsequent amendments to the policy content was shared with the Policy Review Council as part of the policy approval process.

VERSION CONTROL				
Version No.	Documentation Section/Page No.	Description of Change and Rationale	Author/Reviewer	Date Revised
02				October 2023

## Appendix 2 – Equality Impact Assessment

EQUALITY IMPACT ASSESSMENT			
	Yes	No	Explanatory Note if required
<b>EIA 1 - Does the proposed policy/procedure align with the intention of the NCG Mission and EDIB Intent Statement in Section 2?</b>	<input type="checkbox"/>	<input type="checkbox"/>	The answer to this must be YES
<b>EIA 2 - Does the proposed policy/procedure in any way impact unfairly on any protected characteristics below?</b>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Age</b>	<input type="checkbox"/>	<input type="checkbox"/>	The answer to this must be NO
<b>Disability / Difficulty</b>	<input type="checkbox"/>	<input type="checkbox"/>	The answer to this must be NO
<b>Gender Reassignment</b>	<input type="checkbox"/>	<input type="checkbox"/>	The answer to this must be NO
<b>Marriage and Civil Partnership</b>	<input type="checkbox"/>	<input type="checkbox"/>	The answer to this must be NO
<b>Race</b>	<input type="checkbox"/>	<input type="checkbox"/>	The answer to this must be NO
<b>Religion or Belief</b>	<input type="checkbox"/>	<input type="checkbox"/>	The answer to this must be NO
<b>Sex</b>	<input type="checkbox"/>	<input type="checkbox"/>	The answer to this must be NO
<b>Sexual Orientation</b>	<input type="checkbox"/>	<input type="checkbox"/>	The answer to this must be NO
<b>EIA3 - Does the proposed policy/processes contain any language/terms/references/phrasing that could cause offence to any specific groups of people or individuals?</b>	<input type="checkbox"/>	<input type="checkbox"/>	The answer to this must be NO
<b>EIA4 - Does the policy/process discriminate or victimise any groups or individuals?</b>	<input type="checkbox"/>	<input type="checkbox"/>	The answer to this must be NO
<b>EIA 5 - Does this policy/process positively discriminate against any group of people, or individuals?</b>	<input type="checkbox"/>	<input type="checkbox"/>	The answer to this must be NO
<b>EIA 5 - Does this policy/process include any positive action to support underrepresented groups of people, or individuals?</b>	<input type="checkbox"/>	<input type="checkbox"/>	The answer to this could be yes or no as positive action is lawful. However, an explanation must be provided for clarity.
<b>EIA 6 - How do you know that the above is correct?</b>	<p>This is 'reality check' question to ensure that this is not a simple box ticking exercise.</p> <p>A simple way of ensuring that this is the case is to ensure that the policy/process author has consulted with peers and appropriate groups of people in the Group.</p> <p>As a general rule, the wider the reach and potential impact of the Policy the wider the consultation.</p>		

### **Appendix 3 – List of Policy Approvals Reserved to Corporation Board**

The following is the list of policy approvals which are reserved to Corporation Board in accordance with the Scheme of Delegation.

- a. Attendance of Non-Committee Members at Committee Meetings
- b. Anti-Bribery and Corruption
- c. Anti-Money Laundering
- d. Careers Guidance
- e. Code of Conduct
- f. Code of Conduct for Suppliers and Subcontractors
- g. Code of Practice on Freedom of Speech
- h. Complaints
- i. Data Protection
- j. Equality, Diversity, Inclusion and Belonging (incl. approving Group EDIB annual report)
- k. Financial Regulations (as per the below)
- l. Freedom of Information
- m. Further Education Fees
- n. Higher Education Fees / access agreement with OFFA
- o. Health and Safety (incl. approval of annual report)
- p. Information
- q. Modern Slavery
- r. Quality (improving teaching, learning and assessment)
- s. Risk Management (incl. high level risk register)
- t. Safeguarding
- u. Subcontracting Provision
- v. Supply Chain Fees and Charges Policy
- w. Treasury (as per the below)
- x. Whistleblowing / Disclosure Policy

## Appendix 4 - Policy Approval Pathway





