



Policy Framework

| Revision | Author | Reviewed by | Date | Approved by | Date |
|----------|---|---------------------------------|---------|-------------------|---------|
| v1 | Susan Stoker Head of Corporate Governance | Steve Sherry Chief Executive | 02/2021 | Board of Trustees | 03/2021 |
| | | | | | |
| | | | | | |

Contents

| | |
|---|----|
| 1. Introduction | 1 |
| 2. Purpose | 1 |
| 3. Scope | 1 |
| 4. Related Documents..... | 1 |
| 5. Roles and Responsibilities | 2 |
| 6. Document Hierarchy..... | 2 |
| 7. Definitions..... | 3 |
| a) Strategy | 3 |
| b) Policy | 3 |
| c) Procedures | 3 |
| d) Guidelines..... | 3 |
| e) Manuals and Handbooks | 3 |
| f) Work Instructions | 4 |
| 8. Stages of Policy Framework..... | 4 |
| 8.1. Development – General..... | 4 |
| 8.2. Development – Details | 5 |
| 8.3. Approval..... | 6 |
| 8.4. Dissemination | 7 |
| 8.5. Review..... | 7 |
| 8.6. Revision..... | 8 |
| 9. Version control..... | 8 |
| Appendix 1 – Compliance Checklist | 9 |
| Appendix 2 – Document Template..... | 10 |

Policy Framework

1. Introduction

To ensure that Royal British Legion Industries (RBLI) continues to maintain compliance with relevant legislation, contractual obligations, and regulatory requirements it is important to have appropriate policies and procedures in place. These form an integral part of the organisation's governance structure. To ensure their continued effectiveness the documents need to be effectively managed and reviewed.

In a complex and diverse organisation such as RBLI it is essential that this documentation, in terms of policies, procedures and guidelines, are developed within a framework thereby ensuring consistency. Such a framework defines documents, determines how they originate and are developed and the method of maintenance.

2. Purpose

The purpose of this document is to:

- Provide a framework for the development and maintenance of organisational documentation, including approval processes
- Ensure that relevant documentation is in date, being subject to regular review and updated when required, for example because of legislation changes
- Establish a corporate style and ensure all documentation is of a consistently high standard
- Ensure members of staff continue to have access to RBLI's most up-to-date policy statements, policies, procedures etc.
- Ensure continued compliance with other relevant policies

3. Scope

This Policy applies to all members of staff, volunteers and trustees within RBLI.

4. Related Documents

The following documents should also be read in conjunction with this Policy:

- Information Classification
- Information Security Policy
- Records Retention and Protection Policy

5. Roles and Responsibilities

An essential part of an effective policy framework is the definition of clear roles and responsibilities. The general principles in relation to roles and responsibilities are noted below:

| Person | Roles & Responsibilities |
|------------------------------|--|
| Board of Trustees | Overall responsibility and accountability for ensuring that RBLI complies with all relevant legislation and follows best practice. Approves all strategy documents and Policy Statements and, as necessary, other relevant documents. |
| Chief Executive | Creating a culture of compliance and adherence to organisational policies and procedures. Ensuring that there are suitable resources to support the implementation of the policy framework. Overall oversight of organisational documentation. |
| Senior Management Team | Overseeing the development and maintenance of key policies and procedures and related documentation within their divisions |
| Head of Corporate Governance | Overseeing the development of and compliance with the policy framework. Engaging with Senior Management to aid review and maintenance of key documentation. |
| All staff | Working within the current policies, procedures, and guidelines in use and specific to their area of work. |

6. Document Hierarchy

A policy framework contains several levels, each of which will have different objectives and all of which will be developed flowing from the organisational objectives and strategy and within the applicable statutory and regulatory framework, as shown in diagram 1 below. The writing in italics indicates the purpose of the relevant level.

Diagram 1: Policy Hierarchy



7. Definitions

The main documentation definitions are shown below:

a) Strategy

A strategy document is the written articulation of a long-term plan and approach designed to achieve goals or objectives. A strategy document recognises that the current state does not match the desired state and that this needs to be addressed. It is often a broad statement and will be supported by policies and procedures.

b) Policy

A policy is a statement of intent, describing the approach or course of action the organisation is taking and detailing the principles to guide and influence decisions, for example a Health & Safety Policy Statement. They outline the direction rather than the implementation and as such are short and succinct documents. Policies enable management and staff to make correct decisions, work effectively and comply with relevant legislation and RBLI's aims and objectives. As these are of high importance, they will be approved at Board level.

Documentation hierarchy allows for two tiers of policy:

Tier 1 A summary of intent, as detailed above, which will be Board approved.

Tier 2 These are longer policy documents that are typically written in the style of a procedure, however rather than describing a sequence of activities or a process they are normally a 'rule based' document, detailing what will be done. Where these are based on legislation and therefore RBLI-wide, for example financial legislation such as IR35 and anti-money laundering, they will be Board approved. These documents can also be operational in nature and both RBLI-wide, for example IT or HR related, or specific to particular areas, such as quality assurance relate.

Policies are underpinned by relevant evidence-based procedures and supporting documentation such as guidelines.

c) Procedures

Procedures are the documentation of the sequence of tasks, steps and decisions required to achieve a desired outcome. They are required to define what, when, where and by whom something will be done. Having procedures ensures that required tasks and steps will always be undertaken in an agreed and consistent manner.

d) Guidelines

Guidelines are used for areas where there are not specific standards to be followed and they provide recommendations based on best practice. By their nature they are open to interpretation and therefore do not have to be followed to the letter.

e) Manuals and Handbooks

A handbook is used to set the tone of the organisation by outlining expectations and policies. A manual will set out the procedures that underpin these policies, ensuring that the expectations and policies are consistently applied.

f) Work Instructions

Work instructions are the documentation of steps that must be followed to correctly perform specific activities or tasks.

8. Stages of Policy Framework

There are six stages in relation to organisation documentation:

- Development
- Approval
- Dissemination
- Implementation
- Review
- Revision

Details of each of these are given in the sub-sections below.

8.1. Development – General

Development of a new policy or procedure will always have a trigger. These may include changes to the external operating environment, a review of the strategic direction of the organisation or changes to government policy or legislation. The aim during development is to reflect best practice and to ensure compliance with relevant legislation and regulations. Policies however should only be created for essential business determinants such as legislation, regulations, customer requirements etc.

Once the need for a new policy or procedure has been identified it is the responsibility of the author to review existing documentation to ensure that the relevant triggers are not already covered and thereby avoid duplication. Consideration should be given as to whether an amendment or addition to existing documentation is more appropriate than a new standalone document. It is important that the number of policies is not so large as to be prohibitive to compliance.

The consultation process should be planned and carried out by the author. It is the responsibility of the author to ensure that the consultation is carried out if appropriate, prior to the policy being submitted for approval and that it includes relevant groups that could be affected by the policy, including, where appropriate, beneficiaries.

A database of policies and procedures is maintained by the Head of Corporate Governance. This is a key tool in the management of the policy framework, particularly the review process. All authors are required to inform the Head of Corporate Governance of all new documentation once approved.

8.2. Development – Details

Within RBLI authors are provided the flexibility to design the documents in the best way for the business. There are however several general rules that should be followed and standard content that should be included in policies and procedures. These are detailed below.

General rules:

- The language used should be plain English, using short sentences and, where possible, avoiding technical terms. If technical terms are used, they should be explained using a glossary or footnotes.
- The names of individuals **must not** be contained within policies and procedures. Individuals with responsibilities will be identified by their job title only.
- The content of each document should demonstrably comply with all relevant legal and statutory requirements, guidance, and policy in force at the time of writing or reviewing the policy.
- Procedures are built on policies and state what it is that is needed to implement the policy. They should therefore not be written in isolation.
- Wherever possible hyperlinks should be used for related documents. For example, a policy document should include hyperlinks to all relevant procedures and vice-versa.
- The compliance checklist included at Appendix 1 should be used as a tool to ensure a robust development process has been utilised.
- Version control should be utilised during the development of the document. This will also be used during the revision stage. Section 8 details the approach to version control within RBLI.

Writing a Policy:

The structure of a policy (and strategy) document should include as a minimum:

- **Introduction:** used to explain the need for the policy
- **Context:** used to highlight the environment that RBLI works within e.g. as a charity regulated by the Charity Commission and the nature of RBLI and its overall strategic direction
- **Scope:** used to specify the area of RBLI that the policy covers, including exclusions
- **Purpose:** explains the business objectives of writing and enforcing the policy
- **Roles & Responsibilities:** outlines who is responsible for what
- **Related Documents:** should list all related policy documents and any procedures developed for implementation
- **Principles:** outlines the principles on which the policy has been developed
- **References:** if applicable details all publications and guidance referred to during the development of the policy
- **Equality Impact Assessment:** articulation of the process used to ensure that the policy treats all groups and individuals equally and fairly
- **Stakeholders & Consultation:** details of any key stakeholders and consultation undertaken in the development of the policy

Writing a Procedure:

Procedures specify what it is that will be done, by whom and how and therefore need to:

- Identify all the people who are to act
- Describe the precise actions required
- State when the actions are to occur
- Reflect the sequence of events
- Be clear, specific and to the point. They should exclude statements such as 'as applicable', 'as necessary' or 'may include'

The structure of a procedure should include:

- **Scope:** used to specify the area of RBLI that the procedure covers, including exclusions
- **Purpose:** used to explain what the procedure is trying to achieve
- **Abbreviations / Definitions:** used to describe any acronyms and define principles
- **Related documents:** should list all high-level documents that are associated with the procedure e.g. policies and, where appropriate, include hyper-links
- **Expected outputs:** details of any records created as a result of using the procedure e.g. template forms that need to be completed
- **Requirements:** listing sequentially the tasks and steps required

Questions to ask in relation to procedures:

- Are the required actions described thoroughly and accurately or are there details left open to interpretation?
- Is there consistency in content across documentation?
- Is the document compliant with current legislation and regulations?

Document format:

A standard format should be used for all documents. The template is included at Appendix 2.

8.3. Approval

Approval of an organisational document must be by the highest delegated authority, which has been set as follows:

- Board for all new or major amendments to existing RBLI-wide strategy and policy documents (tier 1 and tier 2 where based on legislation)
- Chief Executive or a delegated authority for new or major amendments to existing operational policy documents, for example information security policies, quality assurance policies, and absence management policies
- Relevant SMT member for procedures
- Managers for supporting documentation

When presenting the documentation for approval the author must indicate whether this is a major review or if only minor amendments or updates are required. The date and source of approval must be recorded on the document.

All approved policies and procedures remain extant until notification of an amended policy or procedure.

The approval process must be complete before documents can be implemented and members of staff are expected to adhere to them.

8.4. Dissemination

Once the document is approved it is the responsibility of the author to save within the relevant folder as a PDF version. Any old versions must be removed at this point. There is a central 'Policies' folder within the shared drive, with sub-folders such as HR, GDPR, IT and Finance.

Regular communication from the Business Systems Team will update all staff on changes to policies and procedures, such as updated and new documents. There will also be an index of documents to ensure that users can easily find what they need.

The author is responsible for sending a communication via email to all relevant members of staff in relation to the new document. For Board approved documents a voting button will be included within this email for members of staff to confirm that they have read and understood the document in question. Where appropriate, training programmes will be undertaken to support the implementation and ongoing compliance with policies.

It is the responsibility of all members of staff to ensure that they follow all the approved documents that apply to them or the area they work within.

8.5. Review

Policy review ensures that documentation remains consistent, relevant and effective. Nothing remains static and changes of documentation may be required as a result of customer requirements as well as changes in legislation and regulations. RBLI is an organisation that strives for continuous improvement, a key part of which is the frequent review of policies and procedures.

Out of date policies may result in the failure to adhere to relevant legislation and regulations. Reviewing policies and procedures is especially important in organisations that are regulated and that contain areas of high-risk such as the provision of care.

All documents will be subject to review within the standard review period of **3 years** and will include an identified review date agreed at the time of development. This will also be recorded within the central database. The author will be expected to ensure that the document is reviewed by the agreed review date.

8.6. Revision

Documentation revision will occur when the review stage noted above identified required changes. Once changes have been made the relevant document will need to be approved and disseminated in the same way as new policies and procedures. Outside of the review period documents may be updated for identified changes, which will fall under the following categories:

| Category | Definition | Approval required |
|-----------------------|---|-------------------|
| Administration | Small, minor changes such as spelling mistakes or updating job titles | No |
| Material | Fundamental changes to the document, which will need to be communicated to stakeholders | Yes |

Revision requires robust document management. As such version control must always be used. Details of the version control methodology utilised within RBLI are provided in Section 8 below.

9. Version control

Version control is the means by which different versions of a document, including at draft and review stage, are managed. It involves the process that allows various versions of a document to be distinguished and provides an audit trail for the revision and update of draft and final versions.

At development stage it is important to be able to track the potential versions, for examples where stakeholders have made comments and / or changes and additions to a draft version. Using a standard version control process will ensure that multiple versions of documents can be distinguished, and the latest version identified.

During development the version control will be included within both the document itself and the electronic file name. Once the document is final it is saved as a PDF with 'FINAL' in the title. The version is shown on the final document in both the footer and the document control table, an example of which is shown on the front page of this document.

Each successive draft of a document will be numbered sequentially from v0.1 until a finalised version is submitted for approval. The first approved version will be v1. Minor changes made will be v1.1 etc. Major changes will mean the version number moves sequentially through v2 onwards.

If appropriate, for example for large or complex documents, a version control table can be used. This can be added at the beginning or the end of the document itself. If used it should be updated every time a made to the document in question. An example is provided below:

| Version number | Change made by | Details of change | Date of change |
|----------------|------------------------------|--|----------------|
| v1.1 | Head of Corporate Governance | Incorrect job title originally used on page 1 - updated | Jan 2021 |
| V1.2 | Project Manager | Change of reporting timeframes from 10 working days to 5 working days on page 15 | Feb 2021 |

Appendix 1 – Compliance Checklist

| <i>[insert title of document]</i> | | Yes, No or N/A | Comments |
|-----------------------------------|---|----------------|----------|
| 1 | Title | | |
| 1.1 | Is the title clear and unambiguous? | | |
| 1.2 | Is it clear whether the document is a policy or procedure? | | |
| 2 | Rationale | | |
| 2.1 | Are reasons for development of the document stated, e.g. in the Introduction or Context sections? | | |
| 3 | Development Process | | |
| 3.1 | Were the relevant people involved in the development process? | | |
| 3.2 | Is this reflected in the 'Stakeholders and Consultation' section? | | |
| 3.3 | Was relevant expertise used during development? | | |
| 4 | Content | | |
| 4.1 | Is the objective of the document clear in the 'Introduction' or 'Context' section? | | |
| 4.2 | Is the target population clear and unambiguous and defined in the 'Scope' section? | | |
| 4.3 | Are related documents identified? | | |
| 4.4 | Are roles and responsibilities made clear? | | |
| 4.5 | Are relevant definitions clearly explained? | | |
| 5 | Approval and Review | | |
| 5.1 | Is the approval of the document clear? | | |
| 5.2 | Is the review date identified? | | |
| 6 | Dissemination and Implementation | | |
| 6.1 | Is there a clear plan for ensuring that the existence of the document and compliance therewith is communicated to all relevant staff? | | |
| 6.2 | Is there a need for a training plan? | | |
| 6.3 | If 'yes' to above has this been developed? | | |

Appendix 2 – Document Template



(insert current logo in left-hand corner)

Document Heading (font size 14)

1. Section Heading (bold, font size 12, spacing 12 before)

Main body text (font size 11, font type determined by author)

Line spacing – Multiple 1.15

Spacing – 6 before and after

Paragraph Heading (bold, font size 12, spacing 12 before)