

Document Management Case Study

Background

We were engaged to assist the client improve the accountability and governance of its internal business process documentation. The organisation had a new ownership structure, a new Board, a complete restructure and substantial reductions in staffing.

The Challenge

The Organisation was concerned that:

- The reduction in staff numbers may impact the ability to complete complex tasks.
- Staff may be in unfamiliar situations with no one to provide guidance.
- There might be increased insurance claims as a result of inadequate training of contract staff.

They recognised that:

- There was a potential loss of knowledge as senior, experienced staff took redundancy.
- An increased use of contractors would increase the need for relevant information and training.
- The new regulator had a higher level of scrutiny and may impose potentially punitive outcomes for non-compliance.
- Many policies and procedures were out of date and/or not being complied with.
- The corporate vision meant an increased need to engage with non-technical stakeholders such as customers, the community and new owners.

Scope of work

Our initial analysis indicated that:

- There were 6 separate systems with controlled documents, with approx 6500 documents that needed reviewing.
- There was a lot of repetition between documents at different levels to link them into the system.
- There was a lack of understanding or clarity about which document type was appropriate eg contents might be describing policy but be in a document called a procedure.
- The stated purpose of a document was not always achieved by the contents.
- It was extremely difficult to find the key content in the existing template. It was generally at section 5, several pages into the document, and some was in the accountabilities and responsibilities section.
- Responsibilities seemed to overlap making it difficult to see who was the key person responsible.
- The content was not reader-focused, often it was not clear who the intended reader was.

The Vision

The vision was for a management system that had simple documents that

- supported employees in doing their jobs
- were linked to identifiable risks
- were easy to find, understand and use
- were reader-focused
- allowed the reader to use judgement when appropriate.

The Framework

The solution needed to address 3 dimensions:

- Content – determine what sort of documents were needed, templates etc
- Presentation – how content is displayed
- Document governance – managing the document lifecycle including the definition of metadata.

The first outcome was the development of the document governance framework for that described how controlled documents were written, approved, published and reviewed in accordance with the Document Governance policy.

The Framework defined the main controlled document types which are supported by three templates which provide a starting point and a suggested structure for writers.

Type	Definition
Policy or Rules-based document	<p>A rules-based document is a high-level statement of what objectives are to be achieved and the principles necessary to achieve implementation of the objective.</p> <p>Examples of rules-based documents are policies, network standards, Code of Conduct.</p> <p>These are at Board or Company level only.</p>
Approach document	<p>An approach document describes how an outcome is achieved. It details</p> <ul style="list-style-type: none"> • what the task is • who does it and how it is done • the associated risks and any rules being applied • supporting material including any required records so there is consistent delivery of outcomes. <p>Examples are company procedures, frameworks, technical guides, manuals, standard operating procedures.</p>
How-to document	<p>A How-to is a detailed document that describes the tasks to be performed by an individual in a consistent manner, so the end results are within specified requirements. A How-to is linked to at least one Approach document.</p> <p>Examples of how-to documents are cheat sheets and instruction manuals.</p>
Supporting document	<p>A supporting document is used to assist an individual in achieving an outcome.</p> <p>Examples include forms, registers, FAQ, checklists, training materials.</p>

Content standard

The next step was to develop templates for the 3 key document types and rewrite a sample set of documents using the templates. We then ran training sessions for those in the company responsible for writing and updating material.

Before and After Example

The change is illustrated using a Before and After version of a Policy. In this case the Organisation took the opportunity to update the rules so the new content is not identical to the original.

Changes that can be seen include:

- The policy is much shorter - now only 2 pages long (previously 8). This was achieved by removing
 - material duplicated across documents such as the role of the CEO
 - material that is related to document governance such as recordkeeping and metadata – now housed in specific documents
 - definitions – these now available in a corporate-wide glossary
 - implementation content.
- The policy is reader-focused
 - Sentences are shorter and contain only necessary information.
 - The layout is more visually pleasing with more white space and the use of bullet points.
 - Labels down the LHS permit quick identification of topic.
 - It includes How To blocks to avoid the need to refer to another document.
- Best practice features
 - Examples of compliance and non-compliance
 - Written to permit readers to use their judgement where appropriate.

Company Procedure

GOVERNANCE

Document No	:	GV000-P0020
Amendment No	:	1
Approved By	:	CEO
Approval Date	:	29 July 2014
Review Date	:	28 February 2017 (F)

(Minor administrative amendments approved 29 April 2016)
(Review date extension approved 28 June 2016)

GV000-P0020

GIFTS, BENEFITS AND INVITATIONS

1.0 PURPOSE

To outline the process the company undertakes for the management and registration of gifts, benefits and invitations received by, or offered to employees in the course of their work in a manner that is consistent with the Code of Conduct.

2.0 SCOPE

This procedure applies to employees who are offered or receive gifts, invitations and/or benefits during the course of their work.

3.0 REFERENCES

Board Policy (Governance) – Governance
 Board Policy (Governance) – Preventing Fraud and Corruption
 Board Policy (Leadership) – Principles and Values
 Company Procedure (Governance) – Investigating Alleged Wrongdoing & Criminal Conduct
 Company Procedure (Governance) – Reporting and Responding to Alleged Wrongdoing & Criminal Conduct
 Company Form (Governance) – Gifts, Benefits and Invitations Form
 Code of Conduct
 Statement of Business Ethics
 Annexure A – Gifts, Benefits and Invitations Flowchart

External

AS Records classification handbook – HB5031 – 2011
 Bribery, corrupt commissions and rewards – ICAC Tip sheet November 2009
 Managing Gifts and Benefits in the Public Sector – ICAC Toolkit June 2006
 General Retention and Disposal Authority: Administrative Records GA28

4.0 DEFINITIONS

Benefit

An item of value such as a new job or promotion, preferential treatment or access to confidential information, that one person or company confers on another. This could include employee bestowing benefit to another employee.

Bribe

A gift or benefit offered to or solicited by a public official to influence that person to act in a particular way.

Ceremonial gift

An official gift from one company to another company. Such gifts are often provided to a host company when conducting official business with delegates from another organisation. Although these gifts may sometimes be offered to express gratitude, the gratitude usually extends to the work of several people in the company, and therefore the gift is considered to be for the company, not a particular individual.

Charity

An institution or organisation that is registered as a charity whose primary purpose is helping those in need.

Document control

As a minimum requirement, controlled documents will be identified by a unique number, be signed or noted as approved by the appropriate approving officer, have the current amendment number and approval date clearly displayed.

Note: Employees who work with printed copies of documents must check the Business Management System (BMS) regularly to monitor version control. Documents are considered “uncontrolled if printed”, as indicated in the footer.

Employee

Permanent employees (full time or part time) and any other person undertaking work in the company including contractors and their agents or employees.

Executive Leadership Team

Chief Executive Officer, General Manager Safety Human Resources and Environment (SHRE), General Manager Customer and Corporate Services, General Manager Asset Management, General Manager Network Services, Company Secretary and Chief Financial Officer.

Gift

An item of value (including a benefit and a ceremonial gift) which a person or company gives to another, eg cash (including gift cards and gift vouchers), gift baskets, bottles of wine.

A gift does not include a ‘mass produced branded item’.

Gifts, Benefits and Invitations Register

An official company record that details all gifts, benefits and invitations received by employees and how they were managed.

Gifts, Benefits and Invitations Register Summary

A report provided to the Executive Leadership Team quarterly providing an analysis of all new entries made into the Gifts, Benefits and Invitations Register.

Invitation

Includes, but is not limited to, invitations to restaurants, theatres, shows or sporting events, professional awareness sessions or briefings provided by suppliers across the industry or a client base. Unless other considerations come into play (see flowchart at Annexure A), invitations will not generally include lunches provided during meetings, meals arising from paid conferences, seminars and corporate memberships.

Mass produced branded item

An item that is offered in a business situation to a company or employee representing the company. These items are small office or business accessories, eg pens, calendars, folders that contain a company logo. They are promotional products that are mass produced and have a retail value of less than \$20.

Recordkeeping

Making and maintaining complete, accurate and reliable evidence of business transactions in the form of recorded information (Source: AS Records classification handbook – HB5031 – 2011).

Review date

The review date displayed in the header of the document is the future date for review of a document. The default period is three years from the date of approval however a review may be mandated at any time where a need is identified due to changes in legislation, organisational changes, restructures, occurrence of an incidence or changes in technology or work practice.

Surrendered

When a gift is handed in to the Governance, Risk & Compliance Branch for distribution to a charity.

5.0 ACTIONS**5.1 Gifts – principles to apply**

No gift is to be accepted by an employee of the company. In the situation where a gift is given without the ability to return the gift, it must be surrendered to the Governance, Risk & Compliance Branch (for donation to a suitable charity) and must be recorded on the Gifts, Benefits and Invitations Register.

A mass produced branded item of less than \$20 is not a gift for the purposes of this procedure. Mass produced branded items may be accepted by employees with transparency of their manager, and do not require surrendering to the Governance, Risk & Compliance Branch nor recording in the Gifts, Benefits and Invitations Register.

Employees must never solicit or request any gift for themselves or anyone else in connection with their employment or contract, eg employees must not accept any personal benefits that are offered under Frequent Flyer Schemes, Fly Buys or other promotions as a result of the expenditure of the company's funds or in connection with any official travel.

If an employee receives a gift, irrespective of whether they return it to the provider or surrender it to the Governance, Risk & Compliance Branch, they must declare it by completing Company Form – Gifts, Benefits and Invitations within seven days of receipt and submit the completed form to their manager/supervisor with any gift being surrendered. Employees should keep a copy of the form for their own records.

Managers/supervisors must forward the completed Company Form – Gifts, Benefits and Invitations to the Ethics & Fraud Risk Manager within seven days of receipt.

If at any time an employee believes the gift is being offered as a bribe, the employee must report the offer by making a disclosure in accordance with the Code of Conduct and Company Procedure – Reporting and Responding to Alleged Wrongdoing & Criminal Conduct.

The Ethics & Fraud Risk Manager will facilitate a process for the gift details to be entered into the Gifts, Benefits and Invitations Register and provide confirmation to the employee who surrendered the gift that it has been registered. Gifts handed in will be passed to the Manager Corporate Affairs who will arrange for the gift to be donated to an appropriate charity.

The Manager Corporate Affairs will advise the Ethics & Fraud Risk Manager (or other delegate) of the date the gift was donated and the charity it was given to for entry into the Gifts, Benefits and Invitations Register.

The Manager Governance, Risk & Compliance will conduct a quarterly analysis of the gifts received data in the Gifts, Benefits and Invitations Register and report the results to the Executive Leadership Team.

5.2 Invitations – principles to apply

Employees must never solicit or request any invitation for themselves or anyone else in connection with their employment. Solicit includes entering competitions/free draws.

A series of questions should be asked in deciding whether or not to accept an invitation. These questions are outlined in Annexure A – Gifts, Benefits and Invitations Flowcharts.

An employee can only accept an invitation if the employee and their manager/supervisor believe that a reasonable person would not think it affected the employees' ability to impartially perform their professional duties.

5.2.1 Declining invitations

If an employee receives an invitation that they wish to decline, the employee should decline the invitation via email with a cc to advise both their manager/supervisor and the Governance, Risk & Compliance inbox.

5.2.2 Accepting invitations under \$50

If an employee receives an invitation valued at under \$50 and intends to accept it, the employee must ask the questions outlined in Annexure A – Gifts, Benefits and Invitations Flowcharts to confirm that it is appropriate to accept the invitation. If the invitation is appropriate to accept, the employee should accept the invitation via email with a cc to advise their manager/supervisor and the Governance, Risk & Compliance Inbox.

Company Form – Gifts, Benefits and Invitations does not need to be submitted for registration. However, the form may be completed as an alternative (instead of the GRC Inbox email) option if the employee elects to.

5.2.3 Accepting invitations over \$50

If an employee receives an invitation valued at over \$50 and intends to accept it, the employee must ask the questions outlined in Annexure A – Gifts, Benefits and Invitations Flowcharts to confirm that it is appropriate to accept the invitation. If the invitation is appropriate to accept, the employee must seek prior approval of their manager/supervisor and complete Company Form – Gifts, Benefits and Invitations. Employees should keep a copy of the form for their own records. Managers/supervisors must forward the completed Company Form – Gifts, Benefits & Invitations to the Ethics & Fraud Risk Manager within seven days of receipt.

If at any time an employee believes the invitation is being offered as a bribe, the employee must report the offer by making a disclosure in accordance with Code of Conduct and Company Procedure – Reporting and Responding to Alleged Wrongdoing & Criminal Conduct.

The Ethics & Fraud Risk Manager will facilitate a process for the invitation details to be entered into the Gifts, Benefits and Invitations Register and provide confirmation to the employee that the invitation has been registered.

The Manager Governance, Risk & Compliance will conduct a quarterly analysis of the invitations received data in the Gifts, Benefits and Invitations Register and report the results to the Executive Leadership Team.

5.3 Ceremonial gifts

When a ceremonial gift is received, the gift should be provided to the Manager Governance, Risk & Compliance who will display it in an appropriate location in consultation with Corporate Affairs (or arrange for the gift to be stored) on the company's premises and record the receipt of the gift in the Gifts, Benefits and Invitations Register.

6.0 RECORDKEEPING

Type of Record	Storage Location	Retention Period*
Gifts, Benefits and Invitations Form	HPRM	Retain minimum of 7 years after action completed, then destroy – GA28 - 19.5.1
Gifts, Benefits and Invitations Register	HPRM	Retain minimum of 7 years after action completed, then destroy – GA28 - 19.5.1

* The following retention periods are subject to change eg if the records are required for legal matters or legislative changes. Before disposal, retention periods should be checked and authorised by the Records Manager.

7.0 AUTHORITIES AND RESPONSIBILITIES

Chief Executive Officer has the authority and responsibility for approving this procedure.

Executive Leadership Team members and **Managers** have the authority and responsibility for:

- promoting knowledge of this procedure;
- monitoring compliance with the requirements of this procedure;
- determining whether employees can accept invitations in accordance with this procedure; and
- submitting completed forms for gifts/invitations received and any gift surrendered to the Manager Governance, Risk & Compliance or Ethics & Fraud Risk Manager (as appropriate).

Manager Governance, Risk & Compliance has the authority and responsibility for:

- promoting knowledge of this procedure;
- reviewing and providing the Gifts, Benefits and Invitations Register Summary quarterly to the Executive Leadership Team; and
- overseeing the review of this procedure at least every two years.

Manager Corporate Affairs has the authority and responsibility for:

- arranging for all gifts forwarded to the Corporate Affairs Branch to be gifted to a charity or, if a ceremonial gift, displayed (or stored) in a manner consistent with this procedure; and
- providing the name of the charity and the date of donation to the Manager Governance, Risk & Compliance to be recorded in the Gifts, Benefits and Invitations Register.

Policy – Gifts and Entertainment

Purpose

To provide clarity on when a gift or entertainment can be accepted.

Applies to

This policy applies to anyone working for or on behalf of the Company.

Introduction

Labels to aid
skimming

From time to time employees may be offered gifts or entertainment as part of their role with Company. Not all gifts and entertainment represent a conflict of interest or the appearance of a conflict. Inexpensive 'token' non-cash gifts, infrequent moderate meals and invitations to local cultural/ sporting or musical events may be accepted provided they aren't excessive or create the appearance of impropriety.

However, gifts or entertainment can influence or give rise to a sense of obligation, which may conflict (or be seen to conflict) with your duties as an employee or representative of Company and which may conflict with the Code of Conduct.

Policy

Clear policy
wording

Generally, a gift or offer of entertainment of a value of up to \$300 can be accepted if you and your manager agree that it

- is not associated with fraudulent activity
- does not create a conflict of interest or damage the reputation of Company
- is not inconsistent with our values.

Guidelines to assist you and your manager in making a decision on whether to accept a gift can be found later in this policy.

In addition, the following items must also be registered via an email to 'Gifts & Entertainment':

Bullets for
easier reading

- all gifts or entertainment over \$300
- all monetary/financial gifts – regardless of value (this includes gift cards, instant scratchies, gift vouchers)
- regular items (i.e. received twice or more in a 3-month period).

Protocols for registering gifts and entertainment can be found later in this policy.

Any gifts or entertainment valued in excess of \$300 must be approved by your Divisional Executive / General Manager in advance of accepting (or in the case of a gift, keeping).

Example of compliance

At Christmas John was sent a generous hamper (worth around \$150) by one of his suppliers who indicated it was for the team. John discussed this with his manager who agreed that the hamper could be shared amongst the team. As there was no procurements activity underway and it was a once off gesture, this is allowed.

Example of non-compliance

Every time Jane added a few hours to the external contractor timesheet, she received a gift card and did not tell anybody else. This is **not** allowed because it is fraud. Jane should not add extra hours to a timesheet. She should refuse the gift card being offered to compromise her decisions and she should have raised it with her manager or supervisor.

How to decide if a gift or entertainment can be accepted

Guidelines allow reader to exercise judgement

If you wish to accept a gift or entertainment, you must declare that it is appropriate to accept. Do this by answering the following questions

Simplification removes need for flowcharts and detailed text

1. Has the gift or entertainment invitation been offered in exchange for me doing something in my official capacity? **(If yes, decline it)**
2. Could it be perceived to compromise any decisions I make for the company? **(If yes, decline it)**
3. If receiving this gift or entertainment were reported in the news, would it damage my reputation or Company's reputation? **(If yes, decline it)**

If, after considering the above questions, you believe it is appropriate to accept the gift or entertainment, discuss it with your manager/supervisor and seek their approval. Any items with a value in excess of \$300 must be approved by your Divisional Executive / General Manager.

How to register a gift or entertainment over \$300

How to instructions

You must register the approval of any gift or entertainment if it is valued at more than \$300, is a monetary/financial gift (regardless of value) or is a repeat gift. You can register by emailing the following information to 'Gifts & Entertainment':

- Your Name
- Your Service Number
- Division
- Date of Offer
- Person or company making offer
- Details of the gift or entertainments (including date of event)
- Estimated value
- EGM approval and date (if required).

Policy Ownership and Oversight

The Corporate People function is the document owner for this policy and is responsible for the oversight of its implementation and ongoing success. This includes

- maintaining the 'Gifts & Entertainment' address and inbox
- communicating the intent of this policy and providing timely reminders of compliance throughout the year (i.e. at Christmas)
- monitoring compliance with this policy including monitoring for patterns indicating fraud
- investigating breaches of this policy.