Hazard Identification, Risk Assessment and Control Procedure

Section 1 - Preamble

(1) Charles Darwin University ('the University', 'CDU') is committed to fostering a safe workplace and learning environment, through effective hazard identification, risk assessment and control by eliminating the risk, so far as reasonably practicable across the life of a product, activity or project to mitigate adverse impacts on achieving objectives. If not reasonably practicable to eliminate those risks to health and safety - minimise risks so far as is reasonably practicable using the hierarchy of controls as defined by Work Health and Safety (National Uniform Legislation) Regulations 2011, Sections 34 - 38.

Section 2 - Purpose

(2) This procedure outlines how to identify "reasonably foreseeable" work health and safety hazards, assess the risk associated with those hazards, implement controls to eliminate or minimise the risk so far as is reasonably practicable and review the implemented controls to ensure they are and remain effective.

(3) This procedure ensures those responsible for conducting assessments of risk have the information available to ensure risk assessments have been completed for all activities identified on the Faculty (including research areas), TAFE, Hub & Spoke and Central Services Registers or Hazard listing(s) and Safety Leadership Walks where required.

Section 3 - Scope

(4) This procedure applies to all workers, as defined by the Work Health and Safety (National Uniform Legislation) Act 2011 NT including higher degree by research candidates and affiliates, who undertake any activities on University premises, or who execute work for or on behalf of the University either on or off campus.

Section 4 - Procedure

Hazards

(5) Hazards are likely to be identified during normal work activities and movement around the respective Faculty (including research areas), TAFE, Hub & Spoke and Central Services and/or Location. Hazards may be in the form of a hazardous or sub-standard condition or an act by an individual and may be identified through a range of activities such as:

a. Inspections and Audits;
b. Risk Assessments;
c. Safe Work Method Statements;
d. Work Health and Safety Committee Meetings;
e. Team Meetings and discussions;

f. Leadership Safety Walks;
g. Incidents;
h. Health and Safety planning activities; or
i. Observations.

(6) All staff and students are encouraged to proactively identify hazards in work areas.

Hazard reporting process

(7) Hazards are reported in the Incident Report form.

Communicate and consult

(8) Internal and external communication and consultation underpins effective risk management and should be developed at an early stage. Manager/Supervisor and key personnel need to involve participants in risk planning wherever practicable to develop a common understanding of the environment, threats, opportunities, and risk controls.

Process overview

(9) Prior to conducting a task/activity, a process of risk identification must be conducted and steps taken to eliminate, or where this is not possible, minimise identified threats and exploit opportunities so far as reasonably practicable. The process of identifying risks (or the hazards from which the risk originates) may be done reactively, proactively or predictively as follows:

a. Reactive methodology: involves analysis of past outcomes or events. Risks are identified through investigation of safety occurrences. Incidents and accidents are clear indicators of system deficiencies, and therefore can be used to determine the hazards that either contributed to the event or are latent.
b. Proactive methodology: involves analysis of existing or real-time situations, which is the primary job of the safety assurance function with its audits, evaluations, employee reporting, and associated analysis and assessment processes. This involves actively seeking hazards and associated risks in the existing processes.
c. Predictive methodology: involves data gathering to identify possible negative future outcomes or events, analysing system processes and the environment to identify potential future risks, and initiating mitigating actions.

The right to stop work

(10) All University staff and students have the right to either stop work or not commence an activity or task if they feel the activity is unsafe. If this occurs the task or activity Supervisor must revisit the risk management tools with the staff and students and ensure the risks have been managed in accordance with the hierarchy of controls and the principle of so far as reasonably practicable.

Reasonably practicable

(11) On completion of reviewing each risk we must make sure reasonably practicable judgement is made for each risk.

(12) The reasonably practical judgement is based on a hierarchy of control measures where elimination of risk must always be the first consideration before applying risk minimisation measures.

(13) If any of the analysed hazards and risks cannot be eliminated or minimised so far as is reasonably practicable, then the activity must be either not permitted to go ahead or referred to a higher authority.

(14) The reasonably practical judgement is made after considering the following criteria:

a. The likelihood of the hazard or the risk concerned occurring;
b. The degree of harm i.e. consequence that might result from the hazard or the risk;
c. What the person concerned knows, or ought reasonably to know, about:
    i. the hazard or risk; and
    ii. ways of eliminating or minimising the risk;
d. The availability and suitability of ways i.e. risk treatment(s)/control measure(s) to eliminate or minimise the risk; and
e. After assessing the extent of the risk and the available ways of eliminating or minimising the risk, the cost (in terms of time, money, effort, capability, reputation and morale) associated with available ways of eliminating or minimising the risk, including whether the cost is grossly disproportionate to the risk.

(15) Once all reasonable risk controls have been identified, the responsible person with the subject matter knowledge is able to decide what is reasonably practicable in the circumstances.

(16) This decision is a declaration that all reasonably practicable control measures have been identified for each risk associated within the activity. The risk appreciation is then passed to the task or activity manager for a decision to be made as to whether to proceed or not.

Risk decision

(17) Inherent risk is the risk associated with a hazard or activity prior to the implementation of suitable control measures to minimise the risk. The inherent risk is the level of risk based on an evaluation using the risk matrix to establish the risk level associated with a hazard prior to any mitigation measures being put in place.

(18) Residual risk level is estimated using the risk matrix as a function of likelihood and consequence. The risk level matrix will enable the risks to be prioritised according to severity so that the priority of effort for review purposes can be applied to those risks that have exceeded or are likely to exceed the delegated threshold for the activity Supervisor.

Key hazard identification, risk assessment and control principles

(19) For hazard identification to be effective, managers and supervisors at all levels are to comply with the following principles:

a. Do not assume unnecessary risk. An unnecessary risk is any risk that if taken will not contribute meaningfully to the task or activity accomplishment or will needlessly endanger lives or waste resources.
b. Do not be risk averse, be risk aware. Conduct a task only when the benefits outweigh all the costs.

(20) Make risk decisions at the appropriate level. As the level of assessed risk increases, the level of authority required to approve, assume or retain that risk also increases.

Risk culture

(21) The University will continue to develop a proactive risk culture where managers/supervisors at all levels assess and communicate threats and opportunities and implement hazard and risk management strategies. The University's risk culture is enabled by:

a. Leaders who are proactive and are supported by clearly articulated policy and procedural guidance;
b. Risk training that is integrated within existing training systems, and is tailored to meet personnel development and Faculty (including research areas), TAFE, Hub & Spoke and Central Services and/or Location needs;
c. Hazard identification, risk assessment and control processes that become part of normal business; and

d. Clear communication of hazards and risks, mitigation strategies and lessons throughout the University.

(22) Hazard Identification, Risk Assessment and Control is reinforced by Managers and Supervisors' risk guidance. If before or during an activity a risk is likely to exceed an allocated risk threshold, then guidance is to be sought from the next level of management.

Types of risk assessments

(23) Take 5 is used for a simple one person task that is usually only performed for one shift. Contact Work Health and Safety or UniPrint for Take 5 booklets.

(24) An Activity Risk Assessment (ARA) must be completed for teaching and research activities.

(25) Safe Work Method Statement (SWMS) must be completed for any high risk construction teaching or research activities.

(26) Chemical risk assessment (CRA) must be completed for all high consequence hazardous chemicals.

(27) Plant and Equipment pre-purchase risk assessment (PRA) must be completed prior to the purchase of any plant or equipment.

(28) Faculty (including research areas), TAFE, Hub & Spoke and Central Services and/or Location Risk Register: each area must create and maintain Risk Registers or Hazard Listing(s). These are required to be reviewed and updated bi-annually. Completing a Completing a Health and Safety Risk Register provides more information on how to complete a risk specifically.

(29) Master Risk Register is a combination of all Faculty (including research areas), TAFE, Hub & Spoke, Central Services and Location. This is held by Work Health and Safety and must be reviewed at least annually.

(30) For further advice on which type of risk assessment you require see Hazard Identification - Risk Assessment Decision Tool.

Actions

SMARTE action plans

(31) When writing actions consider the following SMARTE method:

(32) Specific:

a. Ensure the action is well defined and clear on what needs to be accomplished.
b. Articulate using action words what outcomes are needed in order to close out the action i.e. photograph, completed checklist etc.

(33) Measurable:

a. Provide a way to evaluate whether or not the action has been achieved.
b. Articulate how you will decide whether the action is achieved or not.

(34) Agreed:

a. Each action needs to be assigned to someone who can be held accountable for the timely implementation of the action.
b. Articulate the person(s) involved in the action setting process and speak with the person before assigning the

Action.

(35) Relevant:

a. How does the action once completed “value add” to the area.
b. Articulate why this action is required and how it meets the needs of External Legislation and Internal Policy, Procedure, Guideline etc. Reference the particular documentation you are referring to.

(36) Time-Based:

a. Set a specific timeframe the action is required to be completed by.
b. Articulate a specific date the action is required to be done by and evidence provided to the relevant personnel. Ensure follow up with Business Unit occurs to close out the action. A guide to time frames are as follows:
    i. Level 1 – Low as per risk matrix – Timeframe one to four months
    ii. Level 2 – Moderate as per risk matrix – Timeframe one to three months
    iii. Level 3 – High as per risk matrix – Timeframe one to two months
    iv. Level 4 – Critical as per risk matrix – Immediately - one month

(37) Evidence Required:

a. What specific piece(s) of evidence does Work Health and Safety need to be informed of to close out the action.
b. Articulate the exact physical documentation Work Health and Safety is looking for to close the action e.g. a photo of what has been put in place, the completed inspection/induction etc.

Hierarchy of control measures

(38) When considering risk controls, the hierarchy of control measures must be applied in the order of most effective to least effective as follows, also see Hierarchy of control measures:

a. Elimination: The most effective risk controls are ones that eliminate the risk entirely (level 1 control). This can be done by not introducing the hazard or not conducting the associated task. Examples of risk elimination are:
    i. eliminating risk of falls by conducting work at ground level; and
    ii. eliminating a phase of an activity for which the risk does not outweigh the benefit of the activity.

(39) If it is not reasonably practicable to eliminate a risk, the risk must be minimised so far as is reasonably practicable, by implementing one or more of the following level 2 controls:

a. Substituting: Substitute (wholly or partly) the hazard giving rise to the risk with something that gives rise to a lesser risk. For example, substituting a hazardous chemical with something less harmful.
b. Isolating: Physically separate the source of harm from people by distance or by barriers – for example ensuring that metal grinding activities are conducted well away from hazardous or combustible chemicals.
c. Engineering: An engineering control is physical in nature, including a mechanical device or process – for example, using mechanical devices such as trolleys or hoists to move heavy objects.

(40) If a risk remains following the application of level 2 controls, it must be minimised so far as is reasonably practicable using one or more of the following level 3 controls (in order of precedence):

a. Administrative: Administrative actions are work methods or procedures that are designed to minimise a risk. For example, checklists, signage, training, and practice or rehearsals.
b. Personal Protective Equipment (PPE): PPE limits harmful exposure to a hazard when it is worn correctly and is

suitable for the task. Examples of PPE include earmuffs, gloves, safety glasses and helmets.

(41) Administrative actions and PPE are under level 3 to highlight that neither of these risk controls control the hazard at the source. They rely on human behaviour and supervision and, used on their own, tend to be least effective in minimising risks.

a. Level 3 does not necessarily mean they carry equal legal status or effectiveness – PPE is rated less effective than administrative actions; hence the order of precedence to consider administrative actions before PPE.

(42) A variety of risk controls should be used to manage a risk as no single element of the hierarchy operates effectively in isolation.

Person responsible for the action closeout

(43) The Manager/Supervisor/Team Leader is responsible for the implementation of the action or the escalation of the action.

(44) Where an action is escalated, the Manager/Supervisor/Team Leader must:

a. Ensure that a suitable responsible person is identified;
b. Contact the person to advise them of the recommended action; and
c. Determine the nature and the timeframe of mitigation measures.

Escalation process

(45) Actions that are not completed by the agreed due date will be escalated as follows:

a. Action originates. Issue communicated to the area Supervisor and action agreed upon.
    i. 1st escalation: If action not completed by due date then the action will be escalated to the relevant Directors, Deputy CEOs or Managers and a 1st escalated due date agreed upon and communicated to all parties involved including Work Health and Safety.
    ii. 2nd escalation: If action not completed by the 1st escalated due date then the action will be further escalated to the Pro Vice-Chancellors and a 2nd escalated due date agreed upon and communicated to all parties involved including Work Health and Safety.
    iii. 3rd escalation: If action not completed by the escalated due date then the action will be further escalated to the Vice-Chancellor.

Roles and responsibilities

Planning stage

(46) Pro-Vice Chancellors, Directors, Deputy CEOs and Managers are responsible for ensuring:

a. that the hazards and risks associated with the Faculty (including research areas), TAFE, Hub & Spoke and Central Services and/or Location operations are managed and controlled, following the four-stage hazard management process:
    i. Stage 1: Identify hazards.

    ii. Stage 2: Assess the level of risk.

    iii. Stage 3: Appropriate control measures are applied.

iv. Stage 4: Control measures are monitored and reviewed.

b. there is a process for workers to receive the relevant information on the hazards and associated control measures in their area(s) of work, during their induction or before they undertake the activity;
c. that there is a documented Faculty (including research areas), TAFE, Hub & Spoke and Central Services or Location Risk Register, that includes all the activities, where a risk assessment is required in accordance with this procedure;
d. the risk register is available in the local area, in either hard copy or electronic copy, and is included in the Faculty (including research areas), TAFE, Hub & Spoke and Central Services or Location induction process (as applicable); and
e. all workers and students have access to risk assessment templates electronically or in hard copy.

Stage 1 – identify all reasonably foreseeable hazards

(47) All workers are responsible for:

a. Considering the activity/task you are about to undertake and determine if:
    i. it is a new process, item of plant/equipment or substance;
    ii. you are unfamiliar with the method of work;
    iii. it is to be conducted in a different workplace/environment to normal and modification to the workplace or process is required; or
    iv. you have concerns that the activity may place you or any other person at risk of injury/illness.

(48) If yes to any of the above, do not undertake the activity and proceed to Stage 2.

Stage 2 – assess the associated risk with each hazard

(49) All workers are responsible for:

a. Checking the Faculty (including research areas), TAFE, Hub & Spoke and Central Services or Location Hazard/Risk Register for any existing risk assessments and either:
    i. implementing the existing controls; or
    ii. adding any new hazard(s) and control measures to the overarching risk assessment; or
    iii. commencing a new risk assessment if not on the Risk/Hazard Register.

(50) A Safe Work Method Statement (SWMS) is required if there are high risk construction works as defined by Work Health and Safety (National Uniform Legislation) Regulations 2011 Section 291. High risk construction work:

a. involves a risk of a person falling more than 2 m; or
b. is carried out on a telecommunication tower; or
c. involves demolition of an element of a structure that is load-bearing or otherwise related to the physical integrity of the structure; or
d. involves, or is likely to involve, the disturbance of asbestos; or
e. involves structural alterations or repairs that require temporary support to prevent collapse; or
f. is carried out in or near a confined space; or
g. is carried out in or near:
    i. a shaft or trench with an excavated depth greater than 1.5 m; or
    ii. a tunnel; or
h. involves the use of explosives; or

i. is carried out on or near pressurised gas distribution mains or piping; or
j. is carried out on or near chemical, fuel or refrigerant lines; or
k. is carried out on or near energised electrical installations or services; or
l. is carried out in an area that may have a contaminated or flammable atmosphere; or
m. involves tilt-up or precast concrete; or
n. is carried out on, in or adjacent to a road, railway, shipping lane or other traffic corridor that is in use by traffic other than pedestrians; or
o. is carried out in an area at a workplace in which there is any movement of powered mobile plant; or
p. is carried out in an area in which there are artificial extremes of temperature; or
q. is carried out in or near water or other liquid that involves a risk of drowning; or
r. involves diving work.

(51) If in doubt, then use the Activity Risk Assessment (ARA)tool to manage the risks.

Stage 3 – control the risk

(52) All workers, in consultation with your Manager/Supervisor are responsible for:

a. ensuring that the control(s) selected provide the highest level of protection and reliability i.e. elimination, if this is not reasonably practicable, minimise the risk(s), so far as is reasonably practicable. (See Hierarchy of control measures).
b. consulting as far as reasonably practicable with the workers who carry out the activity, or are likely to be directly affected, including Health and Safety Representatives (if applicable), when controlling and reviewing the risk.
c. checking if there are any relevant Approved Codes of Practice or Australian Standards which outline the controls which are to be followed, unless there is another solution which achieves the same or a better standard of health and safety.
d. ensuring that safety procedures are documented as part of the hazard management process, where specific steps/directions are required to perform the activity safely (e.g. operate hazardous plant/equipment, handle hazardous chemicals) using the Activity Risk Assessment (ARA) form (or equivalent template).
e. checking the residual risk rating after control measures have been determined.

Low or moderate residual risk

(53) All workers, in consultation with your Manager/Supervisor are responsible for:

a. Risk assessments where the residual risk is low or moderate obtain the relevant authorisations on the risk assessment; and
b. Conducting the activity and implementing the identified control measures in accordance with the risk assessment.

High or very high residual risk

(54) Pro-Vice Chancellors, and if applicable Directors, Deputy CEOs or Managers and Vice-Chancellor are responsible for:

a. Reviewing the risk assessment;
b. Determining additional controls which will reduce the risk and advise the Manager/Supervisor;
c. If it is not possible to reduce the risk: determining if the activity is to proceed or cease;
d. If the activity is to cease: advising the Manager/Supervisor accordingly;

e. If the activity is to continue: signing off of a risk assessment in accordance with Risk Matrix and Risk Management Authority Matrix;and
f. Attaching the authorisation email to the Risk Assessment template. Where a signature is required, an email authorisation from the relevant Manager/Supervisor/Director is acceptable.

(55) The cost of controlling a risk may be considered in determining what is reasonably practicable but cannot be used as a reason for doing nothing to address the risk. You may select short-term control measures pending a long-term solution. (Cost Benefit Analysis)

(56) All workers, in consultation with your Manager/Supervisor, are responsible for:

a. Any risk assessments where the residual risk is high or very high
    i. Do not commence the activity,
    ii. Review the risk assessment, and
    iii. Act to minimise the risk further i.e. to moderate/low.
b. If not possible to reduce the residual risk from high or very high advising the Manager/Supervisor and providing a copy of the risk assessment with the rationale as to why the activity should continue.
c. Not conducting the activity until the appropriate level of formal authorisation has been given in accordance with the Risk Matrix and Risk Management Authority Matrix.

Stage 4 – monitor and review control measures

(57) The Manager/Supervisor for the area or activity is responsible for:

a. Ensuring that control measures are and remain:
    i. fit for purpose;
    ii. suitable for the nature and duration of the work; and
    iii. installed, set up and used correctly.
b. Reviewing the control measures if:
    i. a new/previously unforeseen hazard has been introduced;
    ii. requested by a Health and Safety Representative;
    iii. new legislation is introduced; or
    iv. new information becomes available which could eliminate or minimise the risk.
c. Ensuring that risk assessments and controls are reviewed following an incident to determine if control measures are ineffective in controlling the risk.
d. Updating the Risk Register on a regular basis to ensure they remain current.

Stage 4 – ongoing management of hazards

(58) Pro-Vice Chancellors and Directors, Deputy CEOs or Managers are responsible for:

a. ensuring that workers are informed of the relevant hazards and control measures in their area of work as part of their induction program. This is to include the activities that are recorded on the Faculty (including research areas), TAFE, Hub & Spoke and Central Services and Location Risk Register.
b. monitoring that control measures are being implemented and provide additional supervision if/where required based on the level of risk and experience of the worker(s).
c. ensuring that, when there is a change to the work place/work practice which is likely to give rise to a new or different health and safety risk, the activity, plant/equipment or chemical is assessed a risk assessment completed and training provided if required.

d. ensuring that the Faculty (including research areas), TAFE, Hub & Spoke and Central Services or Location Annual Hazard Review Template, which is informed by the Risk Register, is completed when requested by the chair of the University Health and Safety Committee.
e. ensuring that, where a control measure requires regular programmed testing or maintenance, the activity is added to the Faculty (including research areas), TAFE, Hub & Spoke and Central Services or Location Safety Assurance Activity Schedule (SAAS), unless this requirement is centrally managed.
f. ensuring that any training required by a risk assessment (e.g. proficiency-based training) is added to the Faculty (including research areas), TAFE, Hub & Spoke and Central Services and Location Training Needs Analysis (TNA) (or equivalent) and training provided to relevant workers.

(59) Any of these tasks can be delegated to staff, e.g. Managers/Team Leaders/Activity Supervisors, however the Pro-Vice Chancellors and Directors, Deputy CEOs or Managers must monitor the tasks on a regular basis to ensure they are completed.

(60) Workers are responsible for:

a. following reasonable instructions, safety measures (e.g. lab rules) and safe operating procedures (where applicable) for any activity you are required to undertake.
b. assisting in any hazard management process where required/requested by your Manager/Supervisor or Work Health and Safety.
c. reporting to your Manager/Supervisor or Health and Safety Representative where you consider that a control measure is not effective in controlling the risks associated with any activity, or you have concerns that the activity may place you or any other person at risk of injury/illness.

Stage 4 – documentation

(61) Pro-Vice Chancellors, Directors, Deputy CEOs or Managers are responsible for:

a. Ensuring there is a system for retaining static and dynamic risk assessments for the duration of an activity. If the activity, plant/equipment or chemical/substance used resulted in a notifiable or dangerous incident in which case all records, including risk assessments, are to be kept on file as part of the incident investigation documentation by Work Health and Safety.
b. A copy of the risk assessment must be retained for at least 28 days after the work is completed if the activity is related to:
    i. work in a confined space;
    ii. work on energised electrical equipment; or
    iii. diving work.
c. Ensuring risk assessments pertaining to any item of registered plant is kept for the life of the plant and transferred to any new owner of the plant.
d. Ensuring workers have access to current risk assessments, other guidance material, Safe Operating Procedures (where applicable) and the Risk Register either electronically or in hard copy.

(62) Any of these tasks can be delegated to staff, e.g. Managers/Team Leaders/Activity Supervisors, however the Pro-Vice Chancellors and Directors, Deputy CEOs or Managers must monitor the tasks on a regular basis to ensure they are completed.

Performance measures

(63) The Work Health and Safety will use the performance measures listed below to assist in identifying areas of success and/or where corrective action is required to meet the objectives and targets of this process. The level of

compliance with the Procedure and effectiveness will be determined during the internal audit process.

(64) Measure 1: All risk assessments identify the hazards associated with the activity, and the control measures address and manage each hazard identified, in accordance with the hierarchy of controls:

a. Objective Evidence - Risk Assessments for activities as applicable.
b. Frequency - As per the Internal audit plan.
c. Indicator of Success - Success = 100% and Less than 100% = Corrective action.

(65) Measure 2: Hazard Listing(s) or risk assessments (if control banding is applicable) are held for each Faculty (including research areas), TAFE, Hub & Spoke and Central Service and area of work (as applicable) and include activities determined as Objective Evidence - Risk Assessments for activities as applicable:

a. Objective Evidence - Hazard Listing(s) (if required). Risk assessments Note – If a Faculty/Research/Operational Area or Location does not have any activities requiring a risk assessment then a Hazard Listing is not required.
b. Frequency - As per the Internal audit plan.
c. Indicator of Success - Success = 100% and Less than 100% = Corrective action.

Section 5 - Non-Compliance

(66) Non-compliance with governance documents is considered a breach of the Code of Conduct - Employees or the Code of Conduct - Students, as applicable, and is treated seriously by the University. Reports of concerns about non-compliance will be managed in accordance with the applicable disciplinary procedures outlined in the Charles Darwin University and Union Enterprise Agreement 2025 and the Code of Conduct - Students.

(67) Complaints may be raised in accordance with the Complaints and Grievance Policy and Procedure - Employees and Complaints Policy - Students.

(68) All staff members have an individual responsibility to raise any suspicion, allegation or report of fraud or corruption in accordance with the Fraud and Corruption Control Policy and Whistleblower Reporting (Improper Conduct) Procedure.

Status and Details

Status	Current
Effective Date	2nd June 2026
Review Date	31st July 2026
Approval Authority	Vice-President Governance and University Secretary
Approval Date	2nd June 2026
Expiry Date	Not Applicable
Responsible Executive	Peta Preo Director People and Culture
Implementation Officer	Peta Preo Director People and Culture
Enquiries Contact	Leah Kenna Senior Manager Work Health and Safety Work Health and Safety

Glossary Terms and Definitions

"University" - Charles Darwin University, a body corporate established under section 4 of the Charles Darwin University Act 2003. The University is comprised of the various faculties, CDU TAFE, organisational units, and formal committees, including the governing University Council and Academic Board.

"Governance document" - means policy or procedure published in the Governance Document Library. Policies and procedures are collectively called ‘governance documents’ and are often referred to as ‘policy’ or ‘University policy’.