

Policy Redesign Project

All policies and procedures are being reviewed as part of this project. This document is pending review, but remains in effect until the review is carried out.

Establishment: Council, 7 June 2007

Last Amended: EDA, January 2011

Nature of Amendment: Consequential amendments arising from a restructure of Central Administration / VCs office and the creation of new senior executive positions replacing the EDA and Registrar

Date Last Reviewed: 2014

Responsible Officer: Vice-President (Corporate Services)

1. Introduction

The University wishes to encourage and support its staff undertaking consultancy and other outside professional activity and undertakes to approve all reasonable proposals, subject to the requirements of this Policy. The University recognises that such opportunities to make the skills, knowledge and expertise for which staff are employed by the University available to Government, industry and the wider community:

- advances the community service goals of the University;
- enables staff to remain at the forefront of their professional area; and
- enables staff members and the University to share in the financial benefits of paid professional work.

This policy:

- aims to ensure that staff understand the general obligation to inform the University, through their supervisor, about any existing or proposed outside professional activity and to disclose any conflicts of interest, and the reasons for the University seeking to regulate outside professional activities of its employees to meet standards of public accountability and risk management (clause 3);
- applies to all Flinders University staff and in certain circumstances to persons with honorary appointments (clause 4.1).
- lists a range of activities, which are normally associated with the academic or scholarly work or professional standing of a staff member ('exceptions') and which therefore do not require formal approval (clause 4.3);
- lists those activities which are not allowed (clause 4.4);
- lists some common examples of outside professional activity requiring formal approval (clause 4.5);

- provides for outside professional activities to be approved as either 'University' outside professional activity (preferred), or 'private' outside professional activity (clause 5) (Unless the circumstances of the activity are such that the benefits to the University are unclear and/or it would not be appropriate for the University or one of its controlled entities to accept responsibility, liability or risk associated with the activity, it is expected that most outside professional activities will be approved as University outside professional activity);
- sets out the requirements in relation to use of, and payment for University resources and provides that payments for approved University outside professional activities and professional activities deemed as exceptions must be invoiced by the University (clause 6);
- sets out the requirements for seeking approval and provides for a generic or blanket approval to be granted where there are likely to be multiple requests for the same or similar types of activities requiring formal approval (clause 7);
- sets out general conditions for approval (clause 8);
- provides that if outside professional activity is approved for performance in a private capacity, the staff member is not permitted to use the University's facilities or name in association with the activity and is responsible for all financial and taxation arrangements, as well as their own legal liability and insurance, unless the Vice-Chancellor decides to waive one or more of these requirements (clause 9);
- provides that payments from private outside professional activities can only be received into University accounts under an arms length arrangement with the staff member, such as by formal donation or a private funding agreement (clause 10); and
- provides for monitoring and reporting of outside professional activity in conjunction with a staff member's annual performance review (clause 11).

1.2 Policy benchmark

This Policy takes account of the NSW Parliament Legislative Assembly Public Accounts Committee Inquiry into Academics' Paid Outside Work Report No. 7/53(150), published in September 2004.

1.3 Other relevant University policies

This Policy should be read in conjunction with the [Cost Recovery and Pricing Policy](#) for information on pricing of, and distribution of income from, outside professional activities where the University or one of its controlled entities will be responsible for billing the client.

2. Definitions

For the purposes of this policy,

Business or company interests refers to professional activity involving the staff member in a partnership or as a company director or scientific advisor and/or other business involvement arising from a staff member's professional work, qualification, academic discipline, University duties or association with the University, shareholding, proprietary or other personal interest; or other position of influence with a business or company, including with externally funded research centres or University controlled entities and spin-off companies.

Controlled entity means an entity that would be regarded as a subsidiary or under the control of the University under the Corporations Act 2001 (Cth) or Australian Accounting Standards – see the [Controlled Entities Policy \(PDF\)](#).

Cost Centre Head means the Vice-Chancellor or nominee, e.g. Deputy Vice-Chancellor, Executive Dean or nominee, e.g. the Dean of a relevant School, University Librarian, Vice-President and the Manager of any other major cost centre that Council may approve from time to time.

Normal University duties for academic staff means the responsibilities as agreed from time to time by the staff member and their supervisor, with respect to teaching, research and/or creative activity, administration and service to the University, and professional activity including service to the community. For professional staff it means the responsibilities prescribed in the staff member's position description (previously, duty statement).

Non-professional work means work that is:

- not related to the staff member's academic discipline, University duties or association with the University; and

- does not involve a person or entity (the 'client') receiving or benefiting from the experience, professional skills and expertise attributable to, or otherwise arising from the staff member's association with the University.

The University does not indemnify staff and/or their clients in relation to such work. Examples of such work include providing services or selling products unrelated to the University e.g. selling Amway products, or teaching a yoga class as a second job. Staff are not bound by this policy in respect of such activities, except if the activity impacts on the performance of their University duties, or involves use of University facilities.

3. University and Staff Obligations

3.1 University obligation to regulate outside professional activities

The University has an obligation to regulate outside professional activities in order to meet standards of public accountability and risk management, where the University's interests and reputation are at stake and to ensure the continued availability of resources for the University's core activities of teaching and research. In particular the University's obligation to regulate outside professional activities relate to:

- managing staff workload;
- protecting the University and its staff from incurring liability to clients of outside professional activities;
- protecting the University's reputation;
- protecting the University against claims that public funds are being misused or wasted;
- ensuring adequate compensation for the use of the University's resources and name;
- protecting the University's confidential information and intellectual property;
- protecting against damage to the University's or a controlled entity's interest arising from a conflict of interest;
- protecting the University's staff from breaching the obligations they owe as employees to the University as employer.

3.2 Employee duty of care obligations

3.2.1 Staff members, as employees, have a duty of care to the University as employer, which is imposed by the common law and the nature of the relationship between employer and employee. These duties include, but are not limited to:

- acting honestly and rendering faithful service to the University;
- not using or disclosing any confidential information, including know-how developed within the University, acquired in the course of their employment except with the consent of the University;
- avoiding improper use of the University's resources or name for private gain or the gain of a third party;
- not profiting, personally, from the employment relationship at the expense of the University and refraining from wilfully damaging the University's interests.

3.2.2 The duty of care obligations of University staff are not restricted to normal working hours; they govern all the activities of the employee, whenever undertaken, which are within the sphere of the University's operations and which could materially affect the University's interests.

3.2.3 For the protection of both the University's interests (as outlined at clause 3.1) and the staff member (in order not to expose themselves to situations which may inadvertently breach their duty of care obligations), staff should inform their supervisor about any outside professional activity in which they intend to engage and seek the formal approval of the University, where required, in accordance with this Policy, whether the activity is remunerated or not.

3.3 Conflict of interest

3.3.1 Staff members, as employees, have a duty to avoid actual and potential conflicts between personal interests and the interest of the University.

In relation to the performance of outside professional activity, if a member of staff who has a direct or indirect personal or pecuniary interest, or is or becomes the holder of an office, such that it is reasonably

foreseeable that a conflict might arise with the interests of the University, the staff member must declare full and accurate details of the interest or office, in writing, on a continuous disclosure basis.

3.3.2 The term 'conflict of interest' is used to describe situations where there are facts or circumstances present which would confer an actual, potential or prospective pecuniary or other personal benefit (or appearance of same) upon a staff member or upon an associate, including a spouse, child or more distant relative or business associate. For example, where the staff member or associate has a position of influence or partnership in a business that:

- may provide goods and services to the University;
- is dealing with the same type of goods and services as in that area of the University in which the staff member is employed.

3.3.3 A staff member must follow the directions of their supervisor or Cost Centre Head as to the avoidance of any actual or potential conflict of interest.

4. Scope

4.1 Application of the policy to staff and persons with honorary appointments

This policy applies to:

4.1.1 all continuing and fixed-term full time staff employed by Flinders University, including during approved periods of absence on duty. Where staff are employed through a research grant with conditions on paid outside work, this policy will also apply to the extent that it is not inconsistent with those conditions.

4.1.2 staff employed on a part-time basis (casual or fractional) where the conduct of the outside professional activity affects their ability to fulfill the duties of their employment, where the work is associated with the University, or when University facilities are used for the work.

4.1.3 persons who have a Visiting, Adjunct or Conjoint appointment with Flinders University, when the outside professional activity is done in the name of the University, where the activity is associated with the University, or when University facilities are used for the activity.

4.2 Exclusions

This Policy does not apply to:

4.2.1 work undertaken by part-time staff in their own time for another employer or on a self-employed basis, providing the activity does not involve the use of University resources or infrastructure, including the staff member's University office.

4.2.2 teaching by full time staff at another higher education institution pursuant to an agreement between the institutions.

4.2.3 **non-professional work** by professional staff outside their normal hours of work, providing the activity does not involve the use of University resources or infrastructure, including the staff member's University office. If it is undertaken during hours for which the professional staff member is remunerated by the University, there must be prior notification and approval of an appropriate type of leave.

4.2.4 **non-professional work** by academic staff, subject to the normal accountability to a supervisor providing the activity does not involve the use of University resources or infrastructure, including the staff member's University office. If it will impinge upon the staff member's performance of their normal University duties, there must be prior notification and approval of an appropriate type of leave.

4.2.5 clinical services provided as part of a staff member's clinical academic appointment.

4.2.6 clinical services provided by members of staff in University-operated clinics, which constitutes all or part of their normal University duties (e.g., Flinders University Psychology Clinic, Flinders University Hearing Service).

4.3 Exceptions

4.3.1 Subject to clause 4.3.3, a staff member is not required to seek approval in accordance with this Policy for the following outside professional activities, which are normally associated with the academic or

scholarly work or professional standing of a staff member and which require only the normal accountability to a supervisor:

- private clinical practice where the staff member elects to be part of an affiliated hospital's private practice scheme (noting that such schemes provide insurance cover to the staff member and for a portion of the private practice income to be available for hospital/University purposes);
- media broadcasts, telecasts and contributions to the media;
- co-supervision of research students of other academic institutions and examining duties for other academic institutions on an occasional basis;
- refereeing of articles for learned journals;
- services for government committees, learned societies or academies and statutory bodies, and sitting on a statutory board or board of an entity as the representative of the University;
- service of a public benefit nature on or for community bodies, professional associations and charitable, sporting or other like organisations where the particular professional expertise of the staff member is the main reason for their service;
- contracts with publishers for writing, reviewing, editing and/or publishing works of conventional scholarly output (such as books, chapters in books, book reviews, journal articles, editing) where such activity occurs as part of the staff member's normal University duties;
- reviewing research grant applications for outside organisations;
- occasional public lectures or creative performances and/or exhibitions;
- occasional advice to members of the general public without charge;
- organisation of and participation in academic conferences, symposia and seminars.

4.3.2 If there is doubt about whether a particular activity requires approval or not, the staff member should consult with the supervisor who will resolve the matter, taking advice as required from the Cost Centre Head.

4.3.3 If outside professional activities of a type described in clause 4.3.1 interfere with the normal University duties of the staff member, formal approval for the activity must be sought in accordance with this Policy.

4.4 Outside professional activity which is not allowed

4.4.1 The following activities are unacceptable and will not be approved:

- private tuition of Flinders University students by academic staff;
- work solicited by an individual member of staff through any form of paid advertisement (except non-professional work); and
- activities which compromise the reputation of the University or give rise to situations of conflict of interest that are not able to be managed and resolved.

4.4.2 With the exception of activities that are excluded under clause 4.2 or excepted under clause 4.3.1, activities that compete with services provided by the University or its controlled entities are not allowed unless approved in accordance with this Policy.

4.5 Outside professional activities requiring approval

With the exception of professional activities of a type described in clause 4.3.1 and subject to clause 4.3.3, a staff member must obtain the prior written approval of the University before engaging in any other outside professional activity, including any business or company interest, for a person or entity other than the University, whether remunerated or not. Examples of outside professional activities requiring approval include:

- professional activity proposed to be undertaken by full-time staff on a self-employed basis or under an employment or service delivery relationship with another organisation;
- teaching at another higher education institution other than pursuant to an agreement between the institutions, including during periods of outside studies, recreation leave or other leave of absence from the University;

- consultancies, including those organised through a University controlled entity, e.g, Flinders Consulting Pty Ltd, which, when accessing the expertise of University staff are contracting with the University, not the individual staff member, who provides the services on the University's behalf;
- acting as an expert witness, the provision of such professional opinions being voluntary rather than a legal requirement and not warranting 'exception' status under clause 4.3.1;
- conduct of clinical trials for third parties, unless these form part of an approved University research project;
- conduct of workshops and short courses if University resources are used and/or the activity attracts funding to the University and/or the staff member;
- routine analyses surveys, and testing and other contract services for third parties, unless these form part of an approved University research project;
- a scientific or other advisory role to an external entity;
- directorships and partnerships, even when these are with externally funded research centres and University controlled entities or spin-off companies, but not where the staff member is nominated to the Board by the University.

5. Two Types of Approved Outside Professional Activity

5.1 Outside professional activity for which the University or one of its controlled entities takes responsibility ('University outside professional activity')

5.1.1 In this preferred form of outside professional activity, the University or one of its controlled entities manages and accepts responsibility, liability and risk associated with the activity. It is the form preferred by the University because:

- the University or one of its controlled entities can ensure there are appropriate contractual arrangements in place to protect the interests of staff and the University;
- staff undertaking the activity will be covered by University insurance policies for professional indemnity, workers' compensation and public liability;
- use of the University's name is permitted, raising the profile of the University with Government, industry and the wider community;
- use of University resources and facilities is permitted;
- the University or controlled entity is responsible for billing the client and the University can ensure there is adequate compensation for use of the University's resources and name;
- the income from the activity can be expended for University purposes (reinvestment in the University); and
- projects can be evaluated for reporting as research income to DEST.

5.1.2 In performance of University outside professional activities, staff have an obligation to comply with all reasonable directions of the University to meet contractual obligations to third parties and to display due care, diligence and skill in the performance of the activity, including maintaining records of the activity and ensuring that arrangements are made with the supervisor/Dean of School for the records and data to be stored and referenced in the event of a dispute or legal proceedings.

5.2 Outside professional activity for which the individual staff member takes responsibility ('Private outside professional activity')

5.2.1 Outside professional activities may be approved by the University for performance in a private capacity when:

- the nature of the outside professional activity is such that the benefits to the University are unclear; and /or
- it would not be appropriate for the University to accept any responsibility, liability or risk associated with the activity,

Examples of private outside professional activity include:

- private medical practice;

- legal advice to private clients, but if the advice is being provided only indirectly through a legal firm by helping to draft opinions, giving seminars, writing articles, etc, the activity should be appropriate for approval as University outside professional activity; and
- business or company involvement where the University has not nominated the staff member to the position or role in the company.

5.2.2 In performance of private outside professional activities, staff have an obligation to ensure that all other parties and interested persons understand and acknowledge that the University is not responsible for, nor does it provide any implied or expressed warranty or guarantee in respect of the activity.

6. Use of and Payment for University Resources and Name in the Conduct of Outside Professional Activities

6.1 Where use of the University's resources is approved in the conduct of University outside professional activities, the charges for use of the University's resources must comply with the University's [Cost Recovery and Pricing Policy](#).

6.2 Permission of the relevant Cost Centre Head must be obtained for the involvement of professional staff in an academic staff member's outside professional activity. In considering whether to grant permission, the Cost Centre Head must take account of the employment contract of the member(s) of professional staff and determine if the proposed work is consistent with that contract and may require the written consent of the staff member.

6.3 With the exception of private clinical practice where the staff member elects to be part of an affiliated hospital's private practice scheme, any remuneration associated with professional activities of the type described in clause 4.3.1 (Exceptions) and activity approved as University outside professional activity will be invoiced and levied by the University, in accordance with the [Cost Recovery and Pricing Policy](#), to ensure that the University is compensated for use of the University's resources or name.

6.4 Authorisation and monitoring of the use of cost centre resources and infrastructure associated with outside professional activity is the responsibility of the relevant Cost Centre Head.

6.5 Unauthorised use of University resources or infrastructure will be dealt with in accordance with the disciplinary procedures of the relevant Industrial Agreement.

7. Seeking Approval for Outside Professional Activity

7.1 Applications

7.1.1 [Applications \(DOC 185KB\)](#) for approval or re-approval of outside professional activity must be discussed with the staff member's supervisor and submitted on the appropriate form, for endorsement and referral by the supervisor to the Cost Centre Head.

7.1.2 The Cost Centre Head will ensure that completed applications are lodged for filing with Central Records.

7.2 Re-approval

A staff member must seek re-approval for involvement in business or company interests, annually, and Cost Centre Heads have discretion to require a staff member to seek re-approval of other activities, annually, or as otherwise directed.

7.3 Responsibility for approval

The approval of applications is the responsibility of:

7.3.1 the Deputy Vice-Chancellor (Research), on the recommendation of the Cost Centre Head, in the case of applications for involvement in business or company interests; or

7.3.2 the Cost Centre Head, in the case of all other applications for professional activity.

7.4 Review

Applicants may seek to have a decision not to approve/endorse an application reviewed:

7.4.1 in the case of a decision under clause 7.3.1, by the Vice-Chancellor; and

7.4.2 in the case of decisions under clause 7.3.2, by the Vice-President (Corporate Services) for professional staff and the Vice-Chancellor for academic staff.

7.5 Changes in circumstances

A staff member must provide further information promptly to the Cost Centre Head, through their supervisor, should there be a change in any of the circumstances related to their outside professional activities.

7.6 Direction to cease outside professional activity

A staff member must cease the professional activity and must resign from a company position or other outside role as soon as possible if the Vice-Chancellor, after consultation with the staff member, decides that to do so would be in the best interests of the University.

7.7 Failure to obtain approval

Failure to obtain approval for outside professional activity will be dealt with in accordance with the disciplinary procedures of the relevant Industrial Agreement.

7.8 Interim informal approval

The University acknowledges that certain opportunities to engage in outside professional activity require an urgent response e.g., involvement in, and preparation of a tender. Staff should consult with their supervisor and Cost Centre Head and, if appropriate, the Deputy Vice-Chancellor (Research) (see clause 7.3.1), to obtain at least informal approval for the activity, pending a written application being submitted and processed, and providing that written approval is able to be secured before it is necessary to make any formal commitment to the client.

7.9 Generic or blanket approval

Where there are likely to be multiple requests for approval of the same or a similar type of outside professional activity, the supervisor may recommend generic or blanket approval for the activities, subject to clause 7.5.

8. General Conditions for Approval

8.1 For professional activity to be approved, the Cost Centre Head and in the case of business or company interests, the Deputy Vice Chancellor (Research) must be satisfied that the following general requirements are met:

8.1.1 Satisfactory performance of duties

The staff member has maintained a satisfactory level of performance of normal University duties and the activity can be undertaken in conjunction with and without adverse impact on the discharge of their normal University duties;

8.1.2 Use of University resources, including professional staff

The activity does not adversely impact on availability of resources for core University activities of teaching and research and any approved use of University resources will be in accordance with clause 6.

8.1.3 Involvement of students

The engagement of students in any form of outside professional activity by members of staff

- must be voluntary and evidence of the agreement of students submitted in writing;
- can only occur with the permission of the Cost Centre Head;
- can be remunerated;
- must not adversely affect or prejudice the study program of the student(s);
- for postgraduate students must not exceed the time allowed for outside work as specified in scholarship award conditions that might apply at any given time;
- must be on the basis of full indemnity for the University.

8.1.4 Competition

The activity does not compete with the activities or services of the University or its controlled entities, nor is it contrary to the best interests of the University.

8.1.5 Conflict of interest

The staff member has completed the Declaration of Interests section of the application form for the purpose of drawing attention to the existence, or otherwise, of any potential conflicts of interest between the staff member's personal or pecuniary interest with the activities or interests of the University or its controlled entities.

If conflicts of interest are identified, appropriate mechanisms for managing or avoiding conflicts of interest have been put in place.

8.1.6 Risks

The activity is not likely to compromise the reputation of the University and any identifiable risks have been properly addressed. In the case of University outside professional activity, there will generally be a suitable contract between the University or a University controlled entity and the client before the activity is undertaken, which will address issues including intellectual property, physical damage or injury indemnities.

8.1.7 University confidential information and intellectual property

Any potential disclosure of University confidential information or know-how and any other intellectual property matters have been considered and dealt with in accordance with the University's Intellectual Property Policy.

8.1.8 Compensation for use of University resources or name

There has been proper consideration of any University costs and if the activity is approved as a University outside professional activity, the activity has been priced in accordance with the [Cost Recovery and Pricing Policy](#) and the GST exclusive revenue from the activity will be subject to a University levy (the 'infrastructure levy') in accordance with the [Cost Recovery and Pricing Policy](#).

8.1.9 Adherence to University policies

The activity will be undertaken in accordance with this Policy and the general statutes, policies and procedures of the University.

8.2 Time allowance

The Cost Centre Head will have complete discretion to only approve outside professional activity to an agreed maximum time commitment or to require the staff member to move to a reduced fractional appointment. As a guide, where a staff member is full time, up to one day per week would normally be considered to be the maximum.

9. Additional Conditions of Approval Required for Private Outside Professional Activity

9.1 This clause 9 does not apply to private clinical practice performed under the private practice scheme of an affiliated hospital.

9.2 Subject to the circumstances outlined at clause 5.2, staff may be granted approval for private outside professional activity, providing that the staff member satisfies the following additional requirements:

9.2.1 the activity is undertaken in its entirety at a location other than the University campus and no University resources are used, including, for example, the staff member's office, University support staff, stationery, billing arrangements, library resources or services, or use of University e-mail account and other ICT facilities; and

9.2.2 the activity does not involve transfer of intellectual property rights to the client; and

9.2.3 the staff member does not use the University name, crest, or letterhead, or make any other explicit association with the University in conjunction with the [activity](#); and

9.2.4 the staff member accepts responsibility for the outcomes of the activity and for all financial arrangements including billing, taxation and insurance; and

9.2.5 the staff member has provided evidence that he/she holds adequate professional indemnity and public liability insurance for the activity; and

9.2.6 the staff member has provided evidence of informing his/her client/s or customers, in writing, that the professional services are not provided as an agent of the University and the University bears no liability for the staff member's performance of the services.

9.3 If all of the criteria at clause 9.2 cannot be met:

9.3.1 the activity may, in general, only be approved if conducted as University outside professional activity (see clause 5.1); or

9.3.2 where a special case can be made that there is no net cost or detriment to the University, the Cost Centre Head or Deputy Vice-Chancellor (Research) may refer the application to the Vice-Chancellor for a decision to waive one or more of the requirements of clause 9.2.

9.4 Subject to clause 9.3.2, conduct of private outside professional activity by a staff member in breach of the clause 9.2 conditions will be dealt with in accordance with the disciplinary procedures of the relevant Industrial Agreement.

Academic staff may continue to use their academic title (e.g Associate Professor, Professor), providing the staff member takes steps to ensure that all other parties and interested persons understand and acknowledge that the activity is not associated with, or sponsored by, the University.

10. Receipting Income from Private Outside Professional Activities

10.1 The University accepts no responsibility, liability or risk associated with private outside professional activity and income to a staff member from professional practice in a private capacity therefore cannot be received into the University's accounts unless formally donated and where an amount is donated, there must be an arms length relationship between the donor and the application of the donation.

10.2 In accordance with the principle of enabling staff members and the University to share in the financial benefits of paid professional work, the University encourages its staff to make arrangements with the Cost Centre Head for a share of the income from the private practice activity to be formally donated to the University.

10.3 If a staff member wishes to apply revenue received by a private company in which they have an interest, to their University activities, there must be a formal agreement in place between the University and the company, identifying the respective obligations of the parties and addressing any identifiable risks, including conflict of interest, intellectual property, and physical damage or injury indemnities.

For further information on donating to the University, contact the Office of Communication and Engagement and/or refer to the following University policies:

[Policy on Receipting for Donations](#) and
[Policy on Recognition of Service, Donations, Significant Contributions](#)

11. Monitoring and Reporting

Performance of outside professional activity will be monitored by the staff member's supervisor, normally in conjunction with the staff member's annual performance review and will include consideration of:

11.1.1 actual time commitments involved in the professional activity;

11.1.2 any positive impact on the University's reputation and visibility in the community;

11.1.3 any adverse impact on performance of the staff member's normal University duties or the University's or its controlled entities' interests or reputation;

11.1.4 use of University resources for the activity;

11.1.5 earnings from the activity and any financial compensation owed to the University; and

11.1.6 management of any actual or potential conflicts of interest arising from the activity.

11.2 Notwithstanding that the record of review will remain confidential to the supervisor and the staff member, the supervisor will report to the Cost Centre Head, for referral to the Vice-Chancellor:

11.2.1 any instances of outstanding outside professional activity, for the purposes of the University's general reporting and publicity about research and community engagement;

11.2.2 any instances of outside professional activity not conducted in accordance with this Policy or any other related matters that properly concern the Cost Centre Head and/or the Vice-Chancellor.

12. Policy Review

The Vice-President (Corporate Services) will initiate review of this Policy every three years, or earlier, as the need arises.