

## What's included

This document type includes any material that is rule based. Besides policies, examples include guidelines, standards, laws, codes of conduct and warnings. In fact, anything where you are trying to say what should or should not be done.

## Best practice for policies

Policies should

- be written in clear, concise, simple language
- avoid information that may be quickly outdated (eg names)
- focus on the rule and describe what should or must be done rather than what not to do
- make it clear what **must** be done (required) vs what **should** be done (recommended)
- make it easy for the reader to find relevant information
- make important, critical information stand out
- be readily available .

## The Challenge

One of the greatest challenges in writing rule-based material is getting people to read it and then follow the rules. The ideal policy is 2-3 pages long but standards and guidelines often need to be much longer than this.

As the Before samples show, they can be full of complexity and present a 'wall of information' making it hard for a reader to find the information they are seeking.

## The Solution

The After documents show how this information can be broken into chunks with labels providing a summary and an aid to skimming. Visual techniques such as tables and bulleted lists make the information more accessible.

In the case of a policy, the inclusion of examples that show situations that demonstrate compliance and non-compliance can enhance clarity and understanding.

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## 6.1 AEO engineering management guidance

TfNSW expects AEOs to address all of the general principles of engineering management in the provision of engineering products and services. The extent to which an AEO is required to address these principles is determined by the levels of responsibility and the complexity of the work that an AEO is to perform, or the authorisation level that an AEO seeks.

The level of AEO engineering management 'responsibility' is determined in accordance with the role an AEO performs in providing engineering products and services to TfNSW, under the provisions of lawful acts, regulations and standards.

The level of AEO engineering management 'complexity' is determined by the role an AEO performs in providing engineering products and services to TfNSW, over the system life cycle. Engineering management 'complexity' for an AEO in its role is factored by the diversity of engineering disciplines requiring systems integration.

The level of rigour in applying engineering management practices should be commensurate with the risk of the activity. That is, the design of a safety critical component requires more rigour than the design of non-critical components.

Engineering management arrangements should typically be documented in an engineering management plan (EMP) or manual.

The EMP is typically supported by sub-plans or manuals, depending on the scope of AEO engineering services over the asset life cycle.

Typical life cycle 'phase-specific' sub-plans (depending on the AEO scope) are:

- the design management sub-plan, including design assurance
- the construction management sub-plan, including construction assurance
- the manufacturing management sub-plan, including manufacturing assurance
- the integration, test and commissioning sub-plan, including assurance
- the maintenance management sub-plan, including maintenance assurance
- the decommissioning management sub-plan, including maintenance assurance

Typical whole of life cycle sub-plans (relevant to all AEOs) are:

- the systems engineering (SE) sub-plan, including specific SE activities
- the competence management sub-plan
- the configuration management sub-plan
- the engineering document management sub-plan
- the safety management sub-plan
- the environmental management sub-plan
- the quality management sub-plan
- the risk management sub-plan

Depending on the scope and complexity of the engineering services, an AEO may incorporate some or all sub-plans within a single engineering management plan (EMP). For example, a specialist supplier of geotechnical and potholing services will have a relatively simple EMP compared to a supplier of multi-discipline, multi-phase services covering systems integration.

## 6.1 AEO engineering management guidance

Address all general principles

Bullets for easy reading

AEOs are to address all the general principles of engineering management in the provision of engineering products and services. The extent of coverage is determined by

- the levels of responsibility
  - the complexity of the work that an AEO is to perform
- or
- the authorisation level that an AEO seeks.

Level of responsibility and complexity

Tables to simplify understanding

When an AEO provides engineering products and services to TfNSW,

the level of ...	is determined by the role performed ...
responsibility	under the provisions of lawful acts, regulations and standards.
complexity	over the system life cycle, factored by the diversity of engineering disciplines requiring systems integration.

Level of rigour related to risk

Information broken into chunks for skimming

The level of rigour used in applying engineering management practices should be commensurate with the risk of the activity.

**Example:** the design of a safety critical component requires more rigour than the design of non-critical components.

Documented in a plan (EMP)

Engineering management arrangements should be documented in an engineering management plan (EMP) or manual.

The EMP is typically supported by sub-plans or manuals, depending on the scope of AEO engineering services over the asset life cycle.

Sub-plans may be incorporated in EMP

An AEO may incorporate some or all sub-plans within a single engineering management plan (EMP).

**Example:** a specialist supplier of geotechnical and potholing services will have a relatively simple EMP compared to a supplier of multi-discipline, multi-phase services covering systems integration.

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**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.

## Policy – Gifts and Entertainment

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### Purpose

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

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### Applies to

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

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### Introduction

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.

Labels to aid skimming

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.

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### Policy

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

Clear policy wording

- 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).**

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### 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.

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### 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.

Simplification removes need for flowcharts and detailed text

### How to decide if a gift or entertainment can be accepted

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

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.

Guidelines allow reader to exercise judgement

### How to register a gift or entertainment over \$300

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).

How to instructions

### 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.