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## **UNESCO Chairs / UNITWIN Networks Policy Brief**

Under the UNESCO World Higher Education Conference ([WHEC2022](#))  
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### **Defining and Developing ‘Enabling’ Open Education Policies in Higher Education**

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## **Abstract**

Open education (OE) aims at increasing educational access, effectiveness and equity. The 2019 UNESCO Open Educational Resources (OER) Recommendation calls on governments and educational institutions to create enabling policies. Such policies should aim to foster open educational practices in a wide sense, including creation and use of OER. Key elements of OE policies are identified: capacity building; learning accreditation/credit transfer; access and inclusivity; diverse access to knowledge; platform governance; and fostering a culture of openness. OE policies, whether standalone or incorporated into a wider openness policy, should be designed to cohere with other policies addressing open content and practices. This brief seeks to promote the involvement of a wide range of stakeholders in institutional policymaking process via a co-creation approach. Co-creation of policy enables stakeholders' voices to be heard, supports shared understanding and ownership of policy goals, while also ensuring policy is relevant and fit for local purposes, contexts and communities.

### **UNESCO Chair(s):**

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## **Acronyms**

Higher education (HE)

Higher education institution (HEI)

Open Educational Practices (OEP)

Open Educational Resources (OER)

Universal Design for Learning (UDL)

## Introduction

Open education (OE) aims at increasing educational access, effectiveness and equity through fostering participation and knowledge co-creation, especially by marginalised and traditionally under-represented groups (Campbell, 2020a; Cronin, 2020). This brief directly responds to (or aims at supporting) the implementation of the 2019 UNESCO Open Educational Resources (OER) Recommendation<sup>1</sup> that calls on governments and educational institutions to create enabling OER and OE policies. Indirectly, the brief also supports the implementation of the 2021 UNESCO Recommendation on Open Science<sup>2</sup>.

Since 2002, when the concept of OER was coined in a UNESCO Forum<sup>3</sup>, numerous initiatives have promoted the development of strategic frameworks and policies for the adoption and use of OER and Open Educational Practices (OEP) in formal and informal education contexts. Guidance has been provided in the shape of guidance and recommendations from UNESCO (2012; 2016b,c; 2017; 2019d<sup>4</sup>; 2021), Commonwealth of Learning (2011), European Union JRC (2017)<sup>5,6</sup>, UNIMED (2019), Open Education Policy Lab<sup>7</sup>, and the National Forum for the Enhancement of Teaching and Learning in Higher Education (upon which elements of this brief have been based<sup>8</sup>).

The landscape of digital and higher education (HE) has changed dramatically since 2020. Educators responding to the COVID-19 pandemic often found the open sharing of practices just as vital as sharing of open resources (Biernat et al., 2020; Havemann & Roberts, 2021). There is a growing recognition that institutional policies for online teaching, learning and assessment sometimes do not exist or do not sufficiently meet the needs of students, staff and institutions. In addition, many students and staff do not feel involved in related policy-making and decision-making processes.<sup>9</sup> In this context, this brief provides guidelines for the HE sector to develop

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<sup>1</sup> UNESCO (2019) Recommendation on Open Educational Resources (OER)

[http://portal.unesco.org/en/ev.php-URL\\_ID=49556&URL\\_DO=DO\\_TOPIC&URL\\_SECTION=201.html](http://portal.unesco.org/en/ev.php-URL_ID=49556&URL_DO=DO_TOPIC&URL_SECTION=201.html)

<sup>2</sup> UNESCO (2021) Recommendation on Open Science

<https://unesdoc.unesco.org/ark:/48223/pf0000379949.locale=en>

<sup>3</sup> UNESCO (2002). Forum on the Impact of Open Courseware for Higher Education in Developing Countries, UNESCO, Paris, 1-3 July 2002: final report <https://unesdoc.unesco.org/ark:/48223/pf0000128515>

<sup>4</sup> UNESCO - Miao, F., Mishra, Orr & Janssen (2019) Guidelines on the development of open educational resources policies <https://unesdoc.unesco.org/ark:/48223/pf0000371129>

<sup>5</sup> Inamorato dos Santos, A., Nascimbeni, F., Bacsich, P., Atenas, J., Aceto, S., Burgos, D. & Punie, Y. (2017). Policy Approaches to Open Education - Case Studies from 28 EU Member States (Open Edu Policies). European Union. Retrieved from <https://ec.europa.eu/jrc/en/publication/policy-approaches-openeducation-case-studies-28-eu-member-states-openedu-policies>

<sup>6</sup> JRC. Going Open: Policy Recommendations on Open Education in Europe (OpenEdu Policies) (No. JRC107708). Joint Research Centre

[https://publications.jrc.ec.europa.eu/repository/bitstream/JRC107708/jrc107708\\_jrc\\_107708\\_final\\_going\\_open\\_-\\_policy\\_recommendations\\_on\\_open\\_education\\_in\\_europe.pdf](https://publications.jrc.ec.europa.eu/repository/bitstream/JRC107708/jrc107708_jrc_107708_final_going_open_-_policy_recommendations_on_open_education_in_europe.pdf)

<sup>7</sup> Atenas, J. et al. (2020) Open Education Policies: Guidelines for co-creation. Open Education Policy Lab

<https://doi.org/10.5281/zenodo.4032993>

<sup>8</sup> National Forum for the Enhancement of Teaching and Learning in Higher Education (2021). Guide to Developing Enabling Policies for Digital and Open Teaching and Learning (CC BY 4.0)

<https://hub.teachingandlearning.ie/resource/guide-to-developing-enabling-policies-for-digital-and-open-teaching-and-learning/>

<sup>9</sup> National Forum for the Enhancement of Teaching and Learning in Higher Education (2020). Irish National Digital Experience (INDEX) Survey: Findings from students and staff who teach in higher education, Section 4.3.

<https://hub.teachingandlearning.ie/resource/irish-national-digital-experience-index-survey-findings-from-students-and-staff-who-teach-in-higher-education/>

and update enabling institutional Open Education policies, in consultation with students and staff.

It is hoped that this brief will provide opportunities for those engaged, and willing to be engaged, in institutional policy development in the area of open education—including the adoption of technologies and platforms, blended learning and hybrid teaching—to reflect on their aims and challenges and to consider approaches in their own contexts to co-create sustainable and enabling open education policies.

### **Aim of this policy brief**

Our aim is to encourage as wide a range of people as possible to become policymakers, opening up conversations and consultations about institutional policies related to OE. This includes those who are already involved, and those willing to be involved in any stage of policy development, ensuring policies that are fit for their purposes, contexts and communities. Policymaking is not the remit of senior managers alone; institutional policymaking should engage individuals across the organisation, providing an opportunity for meaningful involvement by all stakeholders, students and staff. This is especially important when policies relate to aspects of OE that will affect all who teach or learn or provide support to them (e.g. OER, lecture recording, virtual classrooms, online assessment).

Assuming that ‘openness policies’ need to create public value, a transversal and democratic approach to policy making is advocated here. Co-creation is central to policy effectiveness; a sense of co-ownership can enhance the shared responsibility to achieve policy goals. Embedding participatory principles at the heart of the process can promote successful policy implementation and sustainability (Voorberg, Bekkers & Tummers, 2015; Cox and Trotter (2016; Bryson et al., 2017; Lesko, 2019; Atenas et al. 2020).

### **What is Open Education policy?**

At a basic level, a policy can be defined simply as a set of principles to guide decision-making. OE policies can be understood as:

written or unwritten guidelines, regulations and strategies which seek to foster the development and implementation of Open Educational Practices, including the creation and use of Open Educational Resources. Through such policies, governments, institutions and other organisations allocate resources and orchestrate activities in order to increase access to educational opportunity, as well as promote educational quality, efficiency and innovation. (Atenas et al., 2020, p.3)

Precision is needed when talking about policy as the deceptively simple word is used to describe instruments that operate at multiple levels: institutional, sectoral, national, regional, etc. Institutional OE policies are the focus of this policy brief. Areas requiring support for decision-making related to OE may include blended, hybrid and online learning, assessment, lecture recording, use of third-party resources, software and platforms, open science, learning analytics, OER and open textbooks, as well as intellectual property (IP), copyright reforms, access to knowledge and culture, libraries, digital wellbeing, and widening participation.

Institutional policies are highly interdependent; they require the combined actions of multiple people to achieve desired outcomes. As shown in Figure 1, institutional policies typically operate within a hierarchy; they guide decision-making in ways that support the larger strategic aims and/or vision of the institution and are usually accompanied by procedures, guidelines and resources to support the implementation and monitoring of the policy.

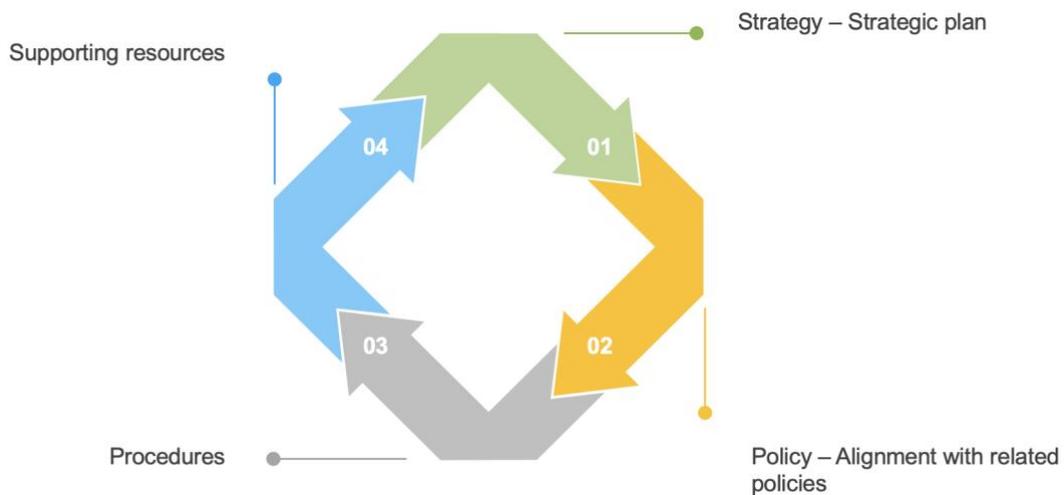
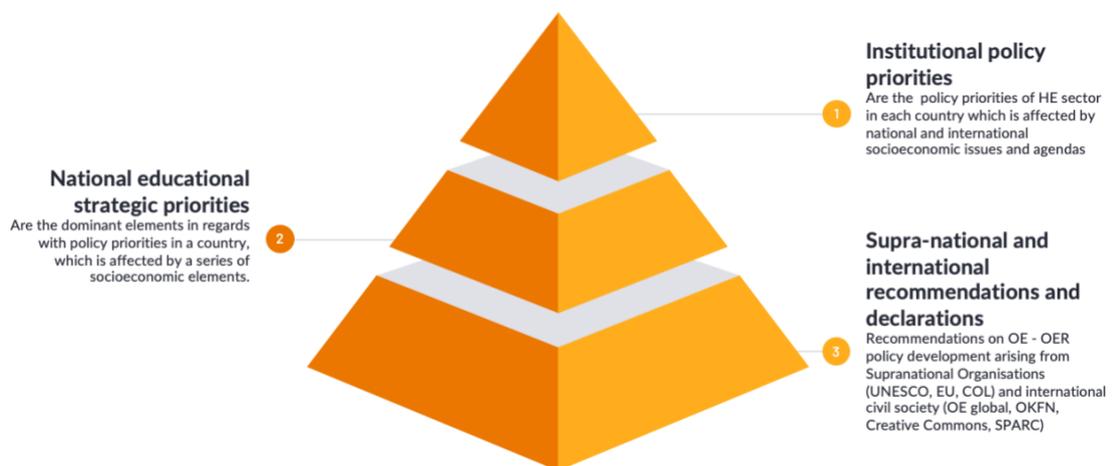


Figure 1 - Policy hierarchy and alignment

In addition, institutional OE policies should be aligned with other institutional priorities, with national educational strategic priorities, and with supranational and international guidelines in order to ensure coordination (see Figure 2). For example, an OE policy, in addition to supporting key goals of the institution’s strategic plan, might also link to the institution’s policies for learner disability and learner support, learner access and widening participation, digital and/or online learning, and data protection, as well as national, regional and international regulations and strategies.



Atenas & Havemann (2021) - OE policy pyramid

Figure 2 - Open Education policy pyramid

Inamorato dos Santos and Punie (2016) recommend empowering all stakeholders through a collaborative and transversal approach to policymaking. In order to foster such an approach, a co-creation process is recommended (as used in Open Government contexts). A fundamental principle of co-creation is participation, in which every stakeholder has a place and a voice, in order to develop policy through dialogue and engagement across all phases of the policy cycle.

To develop a cohesive and comprehensive policy, there must be discussion on several strategic considerations that will constitute the framework of the policy (Miao et al., 2019). Policies to

support OE particularly must aim towards achieving SDG 4<sup>10</sup> through being inclusive, culturally and gender diverse, promoting formal and informal lifelong learning, and supporting OEP of both teachers and students.

In addition to developing a holistic vision for policy aims and benefits, policymakers should also consider the risks or problems that under-developed OE policies may engender, and how these might be avoided through thoughtful design (Colebatch, 2018; Fingerle, 2019). For example, there may be increasing demand for third-party ‘solutions’ which perform data collection from learning activities to enable analytics; unanticipated ‘reforms’ of copyright regulations; and furthermore, changes of management, priorities and governments, as any of these elements might affect or even derail an OE policy (Atenas et al., 2019).

### Criteria of an ‘enabling’ policy

Prefacing policy with the word ‘enabling’ suggests that there are aspects of any policy that make it more enabling than non-enabling for individuals who are affected by and/or engaged with it. This policy brief adopts the National Forum (2021) definition of enabling policies, i.e. comprising 15 criteria across three categories: (i) Policy Content, (ii) Policymaking Process, and (iii) Policy Form and Style (see Figure 3).

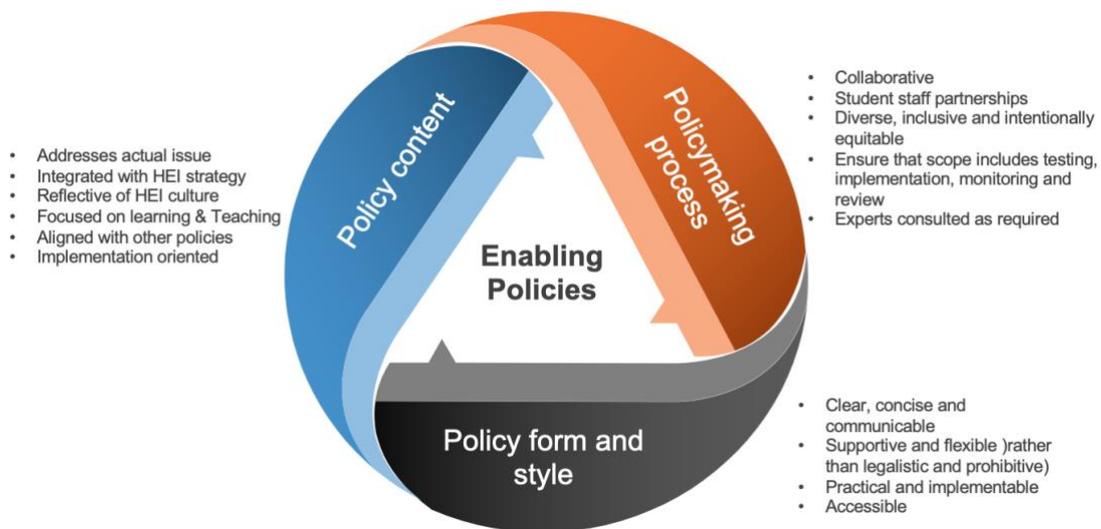


Figure 3 - Criteria of enabling policies

**Policy Content:** The content of an enabling policy...

- Is meaningful, addressing an actual issue or problem;
- Is integrated with the institution’s vision and strategy;
- Is reflective of the broader institutional culture;
- Is focused on teaching and learning;
- Supports an integrated approach, aligns with other relevant policies within the HEI and
- Includes an implementation plan and procedures, clearly outlining roles and responsibilities, procedures, guidelines, resources, etc.

<sup>10</sup> UN Sustainable Development Goal 4 (SDG 4) is the education goal: it aims to “ensure inclusive and equitable quality education and promote lifelong learning opportunities for all.” <https://sdg4education2030.org/the-goal>

**Policymaking Process:** An enabling policymaking process...

- Is collaborative, with a focus on collective ownership;
- Builds on existing student-staff-society-society partnership approaches;
- Is diverse, inclusive and intentionally equitable;
- Ensures that the process scope is defined broadly, including policy design and drafting, testing, implementation, monitoring and review; and
- Engages with experts as required to clarify questions, ensure legal compliance, and support an integrated approach.

**Policy Form and Style:** An enabling written policy...

- Is clear, concise and easily communicable to all staff and students;
- Uses language that is supportive and flexible, whether the policy mandatory or permissive;
- Is practical, ensuring that it is easy to implement; and
- Is accessible by all, following relevant accessibility guidelines.

### Key elements of Open Education policies

OE policies ideally should be designed with an expansive focus on a broad range of OEP, not only to foster OER, but also to support innovation in learning and teaching, encouraging and empowering students and educators to experiment by reusing and adapting content and practices, and co-creating knowledge (Teixeira et al., 2013; Cronin, 2017; Croft & Brown, 2020; Proudman, Santos-Hermosa & Smith, 2020). It is vital to consider the relationships between policy, stakeholder groups, and pre-existing open, digital and other policies, initiatives and practices, with which the OE policy should ideally dovetail. For example, aspects such as open access to research publications and data, may already be well established in institutional policy. OE might perhaps become included under a broad umbrella that could integrate or unify openness policies across a range of areas to promote synergies and coherence.

This section outlines six key elements of OE policies to be considered by policy makers (see Figure 4): capacity building; learning accreditation/credit transfer; access and inclusivity; diverse access to knowledge; platform governance; and fostering a culture of openness.

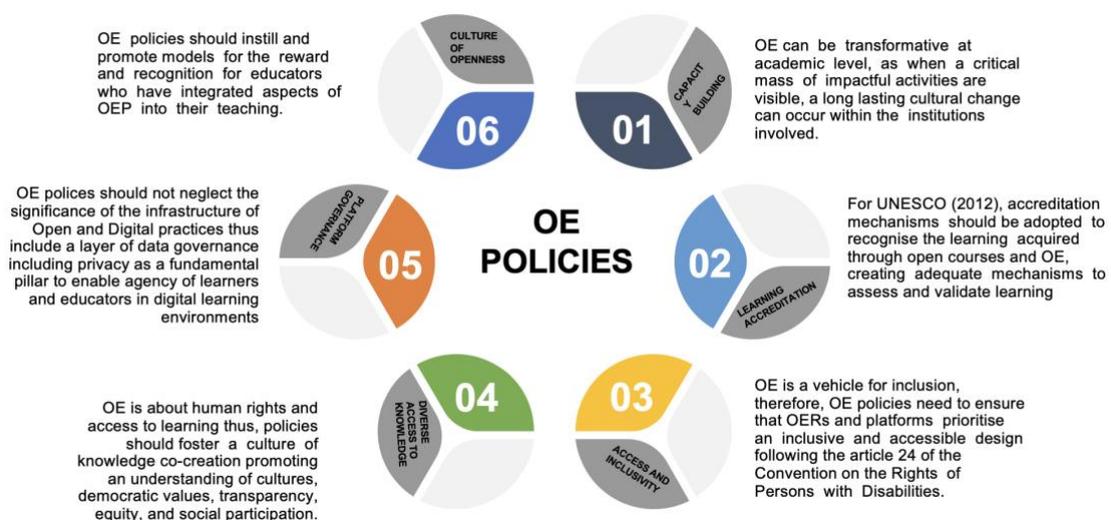


Figure 4 - Key elements of OE policies

### **Capacity building**

OE can be transformative at academic level. When a critical mass of impactful activities are open/visible, a long lasting cultural change can occur within an institution enhancing the experience of learners and teachers and the institutional recognition and reputation having an impact at local, national and international level (Bell & Stevenson, 2006; Urbančič, Polajnar & Jermol, 2020). OE policies should enable informal and certified continuous professional development opportunities to support educators and instructional designers, therefore incorporating learning opportunities both in pre- and in-service training programmes to enhance capacity in OEP with an emphasis in pedagogic and technical competences for the creation, use and reuse of OER and engagement with wider learning and teaching communities through open social learning with peers (Nerantzi, 2018; Neumann, Orr & Muuß-Merholz, 2018; Morgan, 2020; Tur et al., 2020). The practices and products derived from these approaches should be aligned with teacher professional development policies, as well as considered in promotion and tenure processes (Rodés & Gewerc, 2021).

### **Learning accreditation and credit transfer**

OE policies should work in harmony with and promote the accreditation of prior and micro-units of learning, as well as credit transfer (Witthaus et al., 2015; Czerniewicz, 2017), in line with the Global Convention on the Recognition of Qualifications concerning HE (UNESCO, 2019c) to widen opportunities for credential attainment arising from learning. If this space is filled by for-profit ventures, there is a risk of further disadvantaging marginalised groups, as well as promoting precarity in academic employment (Atenas et al., 2019). For example, research has found that many mainstream MOOCs cater largely for the already educated (Bass & Eynon, 2017; Czerniewicz, 2017; UNESCO, 2018). However, as MOOCs have evolved, course formats, platforms and audiences have diversified, creating low- or no-cost opportunities to develop skills, encounter specialists and cutting-edge knowledge. Consequently, for UNESCO/OECD (2005) and UNESCO (2012b), mechanisms should be adopted in order to formally accredit the knowledge gained through open learning, e.g., via completion of MOOCs or through assessment of learner competencies gained through use of OER.

### **Access and inclusivity**

OE can support innovative pedagogical and approaches as well as widen participation, not just by facilitating access to content, but by fostering communities of open practice (Cronin, 2017). Through sharing practices as well as resources, educators can adapt activities and designs of others, as well as developing students' abilities to collaboratively (co-)construct knowledge in the open (Havemann, 2016). Reaching out to local communities, identifying knowledge needs and skills gaps, and developing OE initiatives can build community capacity in lifelong learning in an inclusive and participatory manner (Sabadie et al., 2014).

Learning resources and environments should be accessible for all participants, aligning with UNESCO (2009, 2016b), as well as UN SDG 4 which calls for the international community to “ensure inclusive and equitable quality education and promote lifelong learning opportunities for all”. For example, OER design should be grounded in principles such as Universal Design for Learning (UDL).

### Diverse access to knowledge

OE supports human rights and access to learning for the benefit of all, fostering a culture of developing knowledge (Blessinger & Bliss, 2016), promoting mutual understanding across cultures and groups, democratic values, transparency, equity, and social participation. OE policies must consider the cultural richness of each context while promoting diverse access to knowledge (Harley, 2008; Richter, 2011; Deimann & Farrow, 2013; Pirkkalainen, Jokinen & Pawlowski, 2014; Rodés, Gewerc-Barujel & Llamas-Nistal, 2019). Policymakers should foster international and inter-institutional cooperation to encourage the creation and exchange of locally relevant, adaptable content (Ball, 1998; Harley, 2008), to complement existing resources (Nascimbeni et al., 2020), and thereby to increase the global pool of culturally diverse, gender-sensitive, accessible OER in multiple languages and formats (Hockings, Brett & Terentjevs, 2012).

### Platform governance

OE activities occur within educational ecosystems which typically encompass a range of institutional and vendor-operated, open and closed, non-profit and commercial systems and services. Thus, OE policies should not neglect the significance of infrastructure. Institutional policies can help to guide the process of assessment, selection, procurement, adoption and/or design of technologies to be used in OE in order to ensure sustainable and equitable access to ethical open software and platforms (Atenas & Havemann, 2013; Havemann & Atenas, 2014; AbuJarour et al., 2015; Decuypere, 2019). According to Privacy International (2017), privacy is crucial for the protection of human dignity and constitutes one of the fundamental bases of democratic societies. HEIs require ethical approaches to procure technology as well as to prevent the tracking and monetising of data generated as a result of learner interaction with OER and open platforms in a context of datafication of education and the broader rise of surveillance capitalism (Privacy International, 2017; Atenas et al., 2019; ALT, 2021).

It is essential to understand that AI applications (UNESCO, 2019b) can impose various kinds of bias. OE policies need to consider ethics, privacy- and security-by-design as overarching pillars that enable the exercise of the rights of learners and educators, guaranteeing in practical terms the right to privacy in the context of digital and open learning environments, including those enabled by AI (Farrow, 2016; Regan & Bailey, 2019; Marín, Carpenter & Tur, 2020). Following UNESCO's OER Recommendation (2019), policies should "apply the highest standards to privacy and data protection during the production and use of OER, OER infrastructure and related services."

### Foster a culture of openness

Design of OE policy should consider the need for instilling a *culture of openness*, resting upon foundations of transparency, trust and collaboration within, across and beyond educational institutions. It is important that institutions embrace the underlying values of OE as they work to steer profound cultural changes (Corrall & Pinfield, 2014), taking account of a series of elements that can ensure their success and impact, or prevent policy derailment. For example, it is important that policies are harmonised with national and institutional copyright and intellectual property regulations as the first obstacle these policies may face is the inability of opening up content because of such regulatory frameworks. Also, as noted earlier, it is important to ensure cohesion and coherence amongst educational strategies and openness policies<sup>11</sup> at national and institutional level, to prevent duplication of efforts and to share

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<sup>11</sup> Openness policies here refers to policies focused on the broader range of open activities and content including Open Data, Open Access, Open Education, Open Science, Open Source and Open Governance, see also: <https://opendatahandbook.org/glossary/en/terms/open-movement>

activities and platforms wherever possible. It is essential to encourage educators and researchers to engage in practices related to OER, open science, open design, open data, citizen science, etc, by favouring by the creation of open communities of practice around collaborative, interdisciplinary projects involving students and wider communities. Finally, policies should foster a culture in which participation in OEP-based initiatives is understood, recognised and rewarded as educational innovation and equity work.

### The concept of policy co-creation

Co-creation can be understood as a transparent and collaborative process in which participants have a central role (Atenas et al., 2020), and holds real promise as a way to facilitate innovation in policymaking (Nelson, Folhes, & Finan, 2009; Gouillart & Hallett, 2015). Co-creation is not just a methodology that enables stakeholder voices to be heard; it is a way of making better policies which can help institutions to ensure success. Co-creation leverages collective intelligence, which can help to anticipate issues and problems, preventing the derailment of a policy; just as importantly it fosters stakeholder 'buy-in' (shared ownership and responsibility), while ensuring the uniqueness of each context is taken into consideration<sup>12</sup>.

Deriving from core values from the International Association for Public Participation (IAP2<sup>13</sup>), co-creation must:

- Be based on the belief that those who are affected by a decision have a right to be involved in the decision-making process.
- Include the promise that participants' contribution will influence the decision.
- Promote sustainable decisions by recognising and communicating the needs and interests of all participants, including decision makers.
- Seek out and facilitate the involvement of those potentially affected by or interested in a decision.
- Seek input from participants in designing how they participate.
- Provide participants with the information they need to participate in a meaningful way.
- Communicate to participants how their input affected the decision.

Inclusive and ongoing dialogue should be facilitated using a variety of spaces and platforms, following a series of guidelines such as:

- Ensure participation by facilitating access in person and/or remotely to promote inclusion of those unable to attend in person.
- Welcome and include diverse representation and have a non-discriminatory approach to selection.
- Promote direct communication with stakeholders to respond to process questions and keep a record of communications and responses to make available to any interested party.
- Conduct outreach and awareness raising activities to relevant stakeholders to inform them of the policy process.

If open education seeks to be a democratising, participatory movement, it should embody these values in its fundamental processes including policymaking, embracing the convergence of top-

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<sup>12</sup> Praxisrahmen für Open Educational Resources (OER) in Deutschland [http://mapping-oer.de/wp-content/uploads/2016/02/Praxisrahmen-fu%CC%88r-OER-in-Deutschland\\_Online-1.pdf](http://mapping-oer.de/wp-content/uploads/2016/02/Praxisrahmen-fu%CC%88r-OER-in-Deutschland_Online-1.pdf)

<sup>13</sup> IAP2 Core Values for Public Participation <https://www.iap2.org/page/corevalues>

down and bottom-up approaches, considering diversity in stakeholders, practices and contexts, shifting from hierarchies to networks, and from ‘command and control’ to co-operation.

### Developing enabling Open Education policies

To co-create an enabling policy, an HEI needs first to acknowledge a policy gap or need, then set up a process support framework which incorporates essential elements for participation and co-creation. These include the adoption of *participation principles* to guide the process, the formation of a *co-creation forum* consisting of all relevant stakeholders, and the development of *mechanisms for dissemination of information, spaces and platforms for dialogue and co-creation, and co-ownership and joint decision making.*

Below, we provide a set of guidelines to co-design and co-create OE policies across the entire policy cycle, grounded on the principles of participation, inclusion and democracy. The following five steps are recommended (see Figure 5):



Figure 5 - Developing an enabling Open Education policy

### Step 1. Identify need for policy

The need to develop or redevelop a policy may arise from a specific prompt (such as new legislation, request by students and/or staff, external events) or analysis of current practice (such as gap analysis, survey data, policy review). In conducting an analysis of current practice, the following questions may be considered:

- What is the gap between existing policy and expectations for this policy area?
- If there are existing policies in this area, to what extent are they enabling? Are there current practices outside the remit of existing policies? Do existing policies need to be amended or is a new policy required?
- What is the gap between existing resources and expectations for this policy area?

The outcome of this step will be an initial draft of the needs, aim and scope of the proposed policy, as well as an identified policy owner responsible for implementation and review.

### Step 2. Co-create policy

It comprises a dynamic cycle of interrelated actions. It is advisable to spend as much time working on this step as possible to ensure that all stakeholders can contribute as the policy draft evolves, all relevant experts are consulted, and the criteria for enabling policies are met. A truly inclusive consultation will help to ensure a transparent and collaborative approach. This approach also can maximise the likelihood that the policy will be accepted/approved and then be effectively implemented.

#### Consultation and collaboration

An enabling policymaking process begins by identifying all possible stakeholders who may use and/or be impacted by the proposed policy. Stakeholders typically include students, academic staff, L&T staff, IT staff, library staff, administrative staff, and senior and middle management, including groups of individuals that are (or may be) affected by the proposed policy more than others, such as individuals with disabilities, international students or part-time staff, for example.

This policymaking process requires a participatory, multi-stakeholder, *co-creation forum* representing key stakeholders. At the initial stage it is important to set the scope, objectives, boundaries, expectations and workload forecast for the participants, as well as specifying the activities to be carried out and the means of participation. In addition to the co-creation forum, wider consultation with stakeholder groups and relevant experts at different stages of the development process are also advisable (e.g. via meetings, interviews, questionnaires, focus groups). The aim of consultation and collaboration is to facilitate open discussions amongst stakeholders, including around developing a clear vision for the HEI's future practice, ensuring that policy reflects institutional aims and culture, including alignment amongst policies, clarifying what the HEI is capable of supporting, and determining how enabling practice can be sustained.

#### Research and analysis

Several strands of research and analysis are likely to be important as policy design and development evolves:

- Analyse the *policy prompt* to determine the specific needs and requirement(s) and short- and long-term expectations for the new policy. As noted above, the policy prompt may be new legislation, a request from students and/or staff, an analysis of existing policies or other data etc.
- Conduct *bench research*, exploring policy and related resources from national and international bodies as well as similar policies from other organisations (sample policies are included in Part II of this guide; your research will likely extend beyond this).
- Identify *expected barriers* (structural, cultural, personal) to the proposed policy and determine how these might be overcome.
- Identify areas of *expertise* that may be required to craft an informed, robust and ethical policy, such as legal, data protection, copyright, technology, etc.

### Design and (re)draft

It is important to be aware of the specific policy development and approval process within the institution. Some HEIs have a policy on policies and most use specific policy templates. The design and (re)drafting of an enabling policy will be guided by asking and answering questions that address the needs, issues and concerns of stakeholders. The criteria for enabling policy content, although the detail of this step will depend on the specific policy topic and institutional context. Once the text of the policy nears its final draft, a policy implementation plan should be developed, identifying how the impact on existing operations and systems will be managed.

### Evaluate and review

As a policy draft is refined, each version should be evaluated and reviewed by stakeholders. This process should include scenario-based testing to determine whether the draft policy is sufficient to respond to the expectations of stakeholders. This may entail going beyond the co-creation forum for feedback from various stakeholder groups at specific stages in the process. Some questions which may be considered at this stage include:

- What effect will the policy have on digital well-being and on equitable access to learning?
- Does the policy comply with legislation and ensure data privacy and a secure teaching and learning environment?
- How are staff and student rights of intellectual property, copyright and open licensing understood, determined and supported by the policy?
- How does the policy seek to provide technical and skills support?
- How will the policy affect the HEI as a whole, specific disciplines and/or programmes?

### Step 3. Approve policy

The approval process for policies differs across institutions, although most involve being approved by an academic sub-committee(s) before being submitted for approval by a senior committee. Policies going forward for approval typically require a specified policy owner, an implementation plan, policy instruments such as procedures, a stated review period, and details on policy monitoring. Following approval, policies are usually published on the institution website. To further the aims of openness, consider adding an open licence to policy documents to facilitate access, communication, adaptation and reuse.

#### **Step 4. Implement and communicate policy**

Implementation of a policy requires the combined actions of multiple people to achieve desired outcomes. Thus, communication is an integral part not only of policy development, but also implementation. Policy implementation will likely include dissemination of the policy and accompanying documents, communications, information, training and openly accessible resources. Collective ownership of the policy is an enormous asset at this stage. Stakeholders can be consulted as to the most effective and impactful ways to communicate a new policy to various groups, and to facilitate dialogue and engagement.

#### **Step 5. Monitor and review policy**

Finally, monitoring of the policy should be managed by the policy owner. Policy monitoring can be implemented by setting up a communications channel for reporting policy problems or issues (such as a policy log) and/or adopting an indicator system to measure the policy's effectiveness against a set of criteria. All policies should be reviewed within a stated period of time (specified in the policy document). Regular reviews of policies ensure that they remain relevant and aligned with newer policies. The conditions under which a policy can be updated should be clarified.

### **Conclusion**

Ensuring that the policymaking process is diverse, inclusive and intentionally equitable is an essential aspect of enabling policymaking at all stages of the process. In summary, whether a policy is being created in an area where no previous policy exists or a current policy is being updated, it is important to acknowledge that institutional policymaking is changemaking. Thus, the policy considerations and suggested steps in this policy brief should be considered within the broader context of making change, where empathy, thoughtfulness, creativity, collaboration and collaborative leadership are required. In a sector which is often currently focused on competition, taking up an OE lens on institutional practices means looking instead for ways to network, collaborate and share with others. Development of an enabling OE policy through co-creation is an opportunity for an organisation to reconnect with its values and consider how it can be a force for good in the world; the adoption of the policy is a moment to announce and celebrate that change is coming.

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**END**

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**Annexes**

**Annex 1: Open Education Policy Canvas**

Open Education Policy Canvas				
<p><b>Co-Creation Process:</b> Describe key proposed stages/events of your co-creation process.</p>	<p><b>Context:</b> What are the relevant social/cultural issues at play in the policy environment</p>	<p><b>Policy design partners:</b> Who needs to be involved in the policy co-creation process?</p>	<p><b>Implementation:</b> Who is needed to implement the policy? What kinds of support are needed?</p>	<p><b>Stakeholders:</b> Who will benefit from the policy? Who will be affected by the policy?</p>
	<p><b>Policy opportunities:</b> Who is needed to implement the policy? What kinds of support are needed?</p>		<p><b>Policy challenges</b> What challenges or barriers does your policy face?</p>	
<p><b>Policy aims:</b> Which are the key aims of your OE policy?</p>		<p><b>Risks:</b> What could derail your policy?</p>		
<p>Developed by Javiera Atenas and Leo Havemann. With contributions from Cristina Stefanelli and Fabio Nascimbene</p>				