



Revision History

Version	Approved By	Amendment Notes
HPCA_PCP_20YY_0XX Month-20YY	HPCA Executive Committee	New HPCA Policy Compliance Procedure

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1. Background

The Health Professional Councils Authority (HPCA) supports the 15 Health Professional Councils in NSW, providing regulatory and administrative functions critical to public safety and health system integrity. The HPCA operates in a high-stakes regulatory environment requiring consistent, reliable staff presence and collaboration.

Flexible work practices have been embraced across NSW Health to promote work-life balance, retention, and workforce diversity. At the HPCA, such arrangements must also uphold the organisation's regulatory responsibilities. This Policy Compliance Procedure (PCP) supports operational clarity and consistency in how flexibility is offered and managed.

1.1. About this document

This PCP outlines how flexible work arrangements are to be implemented, monitored, and managed at the HPCA. It aligns with the *NSW Health Flexible Work Policy (PD2025_005)* and incorporates related legislative and policy frameworks to support consistent, equitable, and operational application of flexible work practices ([PD2025_005, Section 1.2.1](#)).

The PCP clarifies the roles and responsibilities of HPCA staff, managers, and Human Resources (HR) in administering Flexible Work Arrangements (FWAs), including the processes for approval, variation, and review. It ensures that flexible work supports individual wellbeing, team collaboration, and efficient service delivery, without compromising the HPCA's regulatory obligations.

1.2. Scope

This PCP applies to all HPCA employees, contractors and contingent workers who:

- work under, or wish to request an FWA
- supervise or approve FWAs
- support the administration and compliance of FWAs, including executives and Human Resources (HR) staff.

Both ongoing and temporary arrangements, including short-term variations, are covered by this document.

1.3. Key definitions

Director	Senior manager responsible for final approval of work arrangements variations.
Office days	Days employees are required to be physically present in the HPCA Pitt Street or Gladesville offices as per their FWA. Under this PCP, staff are expected to nominate a planned pattern of remote working days in their FWA request.
HPCA Workplace/Office	Level 6, 477 Pitt Street, Haymarket 45 Campbell Drive, Gladesville
Flexible hours	Adjustments to when work is performed. This includes variations to start and finish times within the daily bandwidth (7:30am-6:30pm)



	and must occur within agreed core hours (9:30am-3:30pm).
Flex Time	A system that allows HPCA non-executive employees to accumulate time worked more than the standard hours within a six-week settlement period. Staff members may take up to three flex leave days per cycle, if service delivery is not impacted. See NSW Health Local Working Hours Agreement for more information.
Flexible Work Arrangement (FWA)	A temporary, approved arrangement that changes the time, location, or pattern of work to provide flexibility for an employee while maintaining service delivery. It includes options such as hybrid working, flexible start/finish times, compressed hours, part-time work, job sharing, and remote working. FWAs are subject to trial periods, ongoing review, and approval by management.
Hybrid work	A combination of remote work (e.g. from home) and in-office attendance at a designated HPCA workplace.
HR	Human Resources unit responsible for advice, record-keeping, and policy compliance oversight.
Job share	A formal arrangement where two or more employees share the responsibilities of one full-time position. Job share agreements are approved based on operational requirement and reviewed periodically.
Part-time work	A formal, temporary reduction in standard working hours. Reviewed regularly, with proportional pay and leave accrual.
Remote work	Performing work duties from a location other than an official HPCA workplace. This includes working from home but excludes working from public or shared environments not approved by this organisation.
SARA	Search and Request Anything (SARA) is NSW Health's central system for submitting and managing FWAs. All requests and approvals must be lodged through SARA.
StaffLink	The primary human resources and payroll system for NSW Health and the HPCA. It supports employee records, timesheets, leave management, and payroll processing. StaffLink integrates with systems like SARA to ensure accurate and up-to-date workforce information.
Ad-hoc variation	A one-off or short-term change to an existing FWA such as a shift in office days. Ad-hoc variations must be approved by a manager or director.
Manager	People leader with Stafflink delegation and management responsibilities

1.4. Relevant NSW Health and other NSW government policy documents

This PCP is aligned with the following NSW Health and whole-of-government policies:

Table 1. Related NSW Health and other NSW government policy documents

Policy document number	Policy document title
PD2015_035	NSW Health Code of Conduct
PD2025_005	NSW Health Policy Directive Flexible Work
M2010-18	Procedures for Managing Non-Work Related Injuries or Health Conditions
PD2015_049	NSW Health Policy Directive Managing Misconduct
C2024-03	NSW Premier’s Department Circular NSW Government Sector Workplace Presence
	NSW Health Local Working Hours Agreement 2010
C2020-10	Managing Sick Leave Policy

1.5. Legal and legislative framework

This PCP is informed by key legislation that governs public sector employment, workplace safety, and employment entitlements. These include:

- [Government Sector Employment Act 2013 \(NSW\)](#)
- [Work Health and Safety Act 2011 \(NSW\)](#)
- [Crown Employees \(Public Service Conditions of Employment\) Reviewed Award 2009](#)

These laws require the HPCA to manage flexible work arrangements in a manner that maintains safe work practices, meets operational objectives, and ensures fair treatment of all employees.

2. Roles and responsibilities

The *NSW Health Flexible Work Policy* ([PD2025_005](#)) outlines a shared responsibility for flexible work between employees, managers, organisations, and corporate services. At the HPCA, these roles are defined as follows:

Table 2. Roles and responsibilities of HPCA employees

Role	Responsibilities
HPCA staff	<ul style="list-style-type: none"> • Comply with the policy and terms of their approved FWA, including office days and working hours • Discuss proposed arrangements with their manager before submission • Submit formal requests for new or changed arrangements through SARA • Apply for appropriate leave with supporting evidence or medical justification as required i.e. it is important to not work from home if you are unwell, in the same way that you would not attend work if unwell



Role	Responsibilities
	<ul style="list-style-type: none"> • Ensure remote work conditions meet expectations, including confidentiality and productivity • Notify their manager of any changes in personal circumstances impacting their arrangement, and seek relevant approvals prior to making changes to flexible working arrangements
Managers	<ul style="list-style-type: none"> • Engaging in meaningful discussions with staff on flexible work suitability • Assessing requests regarding service delivery, team needs, and equity • Approve flexible working arrangements requests that comply with the requirements of the policy i.e. principally office-based • Consult with HR and escalate for approval with the relevant director on any FWA request that is not consistent with the policy requirements (i.e. where an employee has requested to work principally remotely) • Documenting decisions and ensuring expectations are clearly communicated • Monitoring compliance with FWAs, including attendance and work quality • Reviewing arrangements after trial periods (1-3 months) and then annually • Appropriately addressing any issues of non-compliance or misuse
Directors	<ul style="list-style-type: none"> • Consider any FWA request that is not consistent with the policy requirements, following consultation with HR and approve where appropriate • Ensure consistent and fair application of flexible work arrangements across their teams • Consider operational requirements and service performance when supporting flexibility • Support strategic workforce planning and workplace presence obligations • Manage the compliance with the policy for their directorate
HR	<ul style="list-style-type: none"> • Maintain central records of FWAs and variation approvals • Provide advice to staff and management on policy application • Support the review and renewal of FWAs • Monitor compliance trends and assist in managing breaches of this PCP

3. Workplace presence

The default expectation for flexible work at the HPCA is that employees work principally in an approved HPCA workplace. This hybrid standard reflects NSW Government requirements outlined in [C2024-03](#) and is designed to support collaboration, accountability, and on-site service continuity ([PD2025_005, Section 1.4](#)).

Requests which deviate from this standard arrangement require approval from the relevant director, following consultation with HR and where appropriate must have supporting evidence based on individual circumstances.



4. Requesting and managing FWAs

4.1. Submitting an FWA

Staff members must begin by discussing their interest in an FWA with their line manager. This initial discussion is vital to establish mutual understanding of expectations, assess the suitability of the role for flexibility, and identify any immediate barriers.

Following this, staff must submit a formal Flexible Work Arrangement Request through SARA ([PD2025_005, Section 3.1.1](#)). This application should include the following:

- type of flexibility requested i.e. hybrid, remote
- proposed working days and hours
- justification for the arrangement and,
- any potential impact on team operations.

Managers will then assess the request based on the role's operational needs, WHS considerations (including adequacy of the remote working environment), and broader team impacts ([PD2025_005, Section 3.1.2](#)).

Once approved, the arrangement is to be recorded in SARA and continued updates must be made in StaffLink to reflect any changes to working hours, locations, and payroll implications.

4.2. Approval requirements

FWAs that follow the standard model i.e. principally office-based, can be approved at the manager level. More complex or non-standard requests require approval from the relevant director, in consultation with HR ([PD2025_005, Section 3.1.2](#)).

Each approved arrangement must also define a trial period, usually between **1-3 months**, and outline the conditions under which the arrangement will be assessed ([PD2025_005, Section 3.1.4](#)). All decisions must be documented and approved in SARA.

4.3. Trial period and ongoing monitoring

During the trial period, regular check-ins between the manager and staff member should be scheduled to evaluate the arrangement's impact. Discussions should cover:

- work output and delivery against agreed KPIs, workplans and, performance and development goals
- communication and responsiveness
- integration within the team and,
- any logistical or technical issues.

At the end of the trial period, a formal review is conducted to confirm whether the arrangement will continue, be adjusted, or cease. All outcomes must be documented in SARA, in accordance with [PD2025_005, Section 3.1.5](#).

4.4. Annual review

All FWAs are to be reviewed at least annually. These reviews provide an opportunity to revisit the appropriateness of the arrangement, especially in the context of changing business needs or role responsibilities.



The review process includes a structured discussion between the manager and staff member, during which both parties assess performance, WHS compliance, and alignment with team and service delivery needs.

The review must be documented in SARA via submission of a new request. Where a new agreement is to be implemented following the assessment, it can be approved for a further period of up to 12 months. ([PD2025_005, Section 3.1.5](#)).

Managers should ensure FWA reviews are aligned with the end of year review and performance planning period where possible.

4.5. Ad-hoc variations

There may be one off, ad-hoc, short-term situations for a duration of two weeks or less, where staff need to temporarily alter their remote working schedule due to personal or unforeseen circumstances. In such cases, both staff members and managers must ensure continued compliance with the policy requirement to maintain principally office-based work wherever reasonably possible.

Employees seeking variances to their scheduled office days for short-term, one-off reasons must submit a written request to their manager. This process ensures compliance with the policy requirement that staff remain principally office-based wherever possible.

In the first instance, staff should request to swap their remote and office days. If a swap cannot be accommodated and an additional remote workday is requested, managers should exercise professional judgment when considering approval. In doing so, managers must:

- Assess the genuine nature of the request.
- Review any emerging patterns of similar requests from the employee.
- Ensure that granting additional remote days does not undermine the intent of the office-based work policy.

Where the reason for the request relates to a medical condition or an emerging pattern is identified, managers are required to consult with the HR team prior to approving.

The process for requesting a variation includes:

- submitting the request to their manager at least 24 hours in advance (where possible)
- stating the reason, duration, and proposed alternative arrangement
- gaining manager approval for swapping remote working days
- these requests must be discussed with the manager and endorsed prior to their implementation. If temporary variations occur frequently i.e. more than twice within a month, managers should review the arrangement with the staff member and submit a new FWA request in SARA with the correct pattern of days ([PD2025_005, Section 3.1.1](#)).
- any extension requests exceeding 2 weeks from the initial approval date will require director level approval in accordance with section 4.6.



4.6. Short-term variations to an approved FWA

Where an employee seeks to work principally remotely for a short-term period exceeding two weeks, the following process applies:

- i. **Written Request:** The employee must submit the request in writing to their manager (e.g. via email) prior to the proposed start date.
- ii. **Details and Supporting Evidence:** The request must include the reason for the variation, the proposed duration, and any relevant supporting documentation where appropriate.
- iii. **Manager Review and Consultation:** The manager will review the request and consult with Human Resources (HR) and the relevant Director.
- iv. **Approval:** The variation requires manager endorsement and final written approval from the relevant Director and a new FWA is required to be submitted and approved in SARA.
- v. **Record Keeping:** HR will maintain a record of all approved variations.

5. Leave entitlements and flexible work

The use of leave entitlements is a fundamental element of employee wellbeing and workforce management. Flexible work arrangements are not designed to replace or bypass formal leave processes. Staff members must continue to manage personal and health-related absences through appropriate leave channels, consistent with [PD2025_005, Section 3.1.2](#).

Staff members are expected to:

- apply for and take sick leave when unwell
- use carer's leave when responsible for supporting dependents
- avoid working remotely as a substitute for approved leave, particularly in circumstances involving illness or caregiving.

Managers play a critical role in monitoring and upholding these standards. They must:

- ensure all leave is recorded and accurately reflected in StaffLink
- identify and address patterns of behavior where remote work is used inappropriately in place of formal leave
- provide guidance to staff on when leave should be accessed and help facilitate access to support where needed.

6. Flex time and flexible hours

Under the NSW Health Local Working Hours Agreement, non-executive employees may accrue flex time to manage personal needs and support work-life balance ([PD2025_005, Section 2.3](#)).

Flex time is accrued by working additional hours within a prescribed six-week settlement period. During this time, staff may build up time credits and subject to eligibility and manager approval, take up to three flex leave days within the same cycle.

To maintain fairness and service continuity, flex time is governed by the following parameters:

- the daily working bandwidth is between 7:30am and 6:30pm
- core hours, when all staff are expected to be working, are 9:30am to 3:30pm



- employees must discuss and agree on flex time arrangements with their manager
- time worked and leave taken under this agreement must be recorded and monitored.

Under the agreement, actual working hours and patterns of work will be determined by mutual agreement between a staff member and their manager. Decisions regarding working hours and patterns of work will be made by taking into account the operational requirements and the customer contact hours of the department.

Flex time is not an entitlement and is subject to operational requirements. Managers should regularly review time records to ensure equity and that workload requirements are being met.

7. Grievance resolution

If a staff member disagrees with a decision related to a flexible work request or its implementation, they are encouraged to raise the issue directly with their manager in the first instance. Where this does not resolve the matter, the following steps should be followed:

- Escalation to the above manager or director for further consideration.
- If unresolved, referral to HR for mediation
- If still unresolved, use of formal dispute resolution mechanisms outlined in the *Resolving Workplace Grievances Policy Directive (PD2016_046)* or relevant industrial instruments.¹

All grievances should be addressed promptly and fairly, ensuring transparency and respect throughout the process.

8. System integration and record management

Accurate and consistent use of SARA and StaffLink is essential to ensure the proper administration of FWAs at the HPCA.

HR will:

- maintain up-to-date records of all approved FWAs and variations
- support audit processes and respond to data requests related to flexible work.

Managers must:

- submit complete and timely documentation for all FWA approvals and variations
- retain copies of local correspondence related to flexible work decisions
- monitor adherence to the terms of each FWA and initiate reviews when needed
- liaise with HR when changes to StaffLink or SARA entries are required.

These responsibilities are aligned with procedural obligations under [PD2025_005, Sections 3.1.1 and 3.1.5](#), and ensure legal, operational, and workforce transparency across the HPCA.

¹ [Industrial Relations Act 1996 \(NSW\)](#) provides the legislative basis for managing employee grievances, industrial disputes, and protections for staff in the NSW public sector.



9. Non-compliance and consequences

Failure to comply with the requirements of this PCP can impact team performance, public accountability, and operational integrity. Non-compliance will be addressed promptly and appropriately in line with relevant policies and procedures. Managers are responsible for consulting with the HR team for further advice and support on any non-compliance matters.

Consequences of non-compliance may include:

- review and possible revocation of the FWA
- performance management or supervisory intervention
- formal disciplinary action, depending on the nature of the breach.

Staff members and managers are encouraged to raise concerns early to prevent escalation.

10. Review and continuous improvement

This PCP will be reviewed every five years, or earlier if required due to legislative or policy changes. The review process will align with the governance principles outlined in the [Government Sector Employment Act 2013 \(NSW\)](#) and relevant NSW Health requirements to ensure the document remains current, fit-for-purpose, and compliant with operational standards. The review will include consultation with staff, management, and HR, and will incorporate findings from:

- annual FWA reviews
- audit and compliance reports
- feedback and grievance trends.

Updates to this PCP will be communicated to all staff and incorporated into relevant induction and training materials.

11. References



12. Appendices

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