

GoA IMT Policy Program:

# Program Overview

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IMT Policy and Governance Team

Office of the Corporate Chief Information Officer, Service Alberta

Service Alberta, Government of Alberta

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GoA IMT Policy Program

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# Revision History

Ensure that this document is current. Printed documents and locally copied files may become obsolete due to changes to the master document.

Revision	Date	Author	Description of Change
1.0	31May19	Christine Pastuzyk	Creation
2.0	08Aug19	Christine Pastuzyk	Updated to include a section on IMT Policy Extensions

# Introduction

This document provides an overview of the information management and technology (IMT) Policy Instruments program and its associated processes, as well a brief description of the roles and responsibilities of participants in the IMT Policy Program.

The scope of the IMT Policy Program is:

- A government-wide IMT Policy Program that includes oversight, program principles, evaluation criteria, a prioritization framework, and governance.
- A governance structure that defines who is accountable and responsible for approvals, exceptions, communications, implementation and compliance by IMT Policy Instruments type.
- A central repository for IMT Policies Instruments. It should be considered the primary source of truth for current and accurate information and documentation regarding IMT Policy Instruments.
- Prioritized IMT policy projects and their start-end dates, sequencing, dependencies, resources requirements and milestones.

## IMT Policy Program

The IMT Policy Program Team is part of the Strategy and Governance team, Office of the Corporate Chief Information Officer (OCCIO) within Service Alberta. This team manages the IMT Policy Program, processes, subject matter expert (SME) groups, and the IMT Policy Instruments repository for the GoA.

There are three main components of the IMT Policy Program:

- 1) **IMT Policy Enablement:** enable the consistent delivery of projects/programs by;
  - a. Identifying new or enhanced policy instrument opportunities and/or obstacles to remove
  - b. Coordinating (orchestrating) the development, review, approval, rescindment of dependent IMT policy requirements
  - c. Providing access to an IMT Policy central repository
- 2) **IMT Policy Continuous Improvement:** the ongoing refinement of existing IMT Policy including the planning, design and implementation of any new IMT Policy that may be required.

The IMT Policy Continuous Improvement includes:

  - a. IMT Policy Instrument Rationalization initiatives

- b. Responding to Office of Auditor General (OAG) and Corporate Internal Audit Services (CIAS) audits or Office of the Information Privacy Commissioner (OIPC) investigations
  - c. Standardizing and improving IMT Policy compliance by enabling Sector service delivery, operations and/or by preventing risks from materializing.
- 3) **IMT Policy Program operations** must be maintained, including:
- a) Policy oversight
  - b) Annual reviews
  - c) Central Repository
  - d) Templates
  - e) Governance coordination
  - f) Communication
  - g) Training
  - h) Reporting and compliance

## IMT Policy Program Principles

IMT Policy Program principles are intended to provide a basic framework for sound, long-term oriented governance in the IMT Policy Program.

1. All employees understand and accept their accountability
2. IMT Policy Instruments are defined, including:
  - Appropriate level of approval, supported by delegation of decision-making
  - May be linked to other relevant policy instruments, according to context and authority
3. Each step of the IMT Policy process is clearly defined, including:
  - Criteria for decision or action
  - Templates, practice, and supporting documentation
  - Education and compliance, to support implementation
  - Repeatable steps that follows precedence
  - Roles and responsibilities
4. IMT Policy instruments are reused wherever possible

# IMT Policy Instruments

The list below identifies the Policy Instruments that are in scope of the IMT Policy Program. Acts and Regulations are managed via a partnership with the Service Alberta Corporate Policy team.

The Policy Instruments listed order of authority are:

**Act** legislation; the laws of the province.

**Regulation** falls under an Act and carries out the intent of legislation.

**Records Retention and Disposition Schedule** a 'schedule' outlines the length of time (retention) and final disposition (archive or destruction) of government records.

**Policy** defines a course of action or a set of principles approved by elected officials within government that directs guides or influences decision-making and actions.

**Directives** establish expected behaviours and actions of ministries and employees to support policy approved by elected officials. Directives provide formal instruction that oblige ministries to take or avoid specific actions or provide specific objectives that must be met.

**Circulars**<sup>1</sup> are documents that outline records management requirements set by the Alberta Records Management Committee (ARMC).

**Control Framework** are the policies, procedures, practices and organizational structures designed to provide reasonable assurance that business objectives will be achieved and undesired events will be prevented or detected and corrected.

**Standards** are a set of mandatory operational or technical measures, procedures or practices for government-wide use.

**Procedures** are specific steps that instruct how to complete a specific task or accomplish a specific objective.

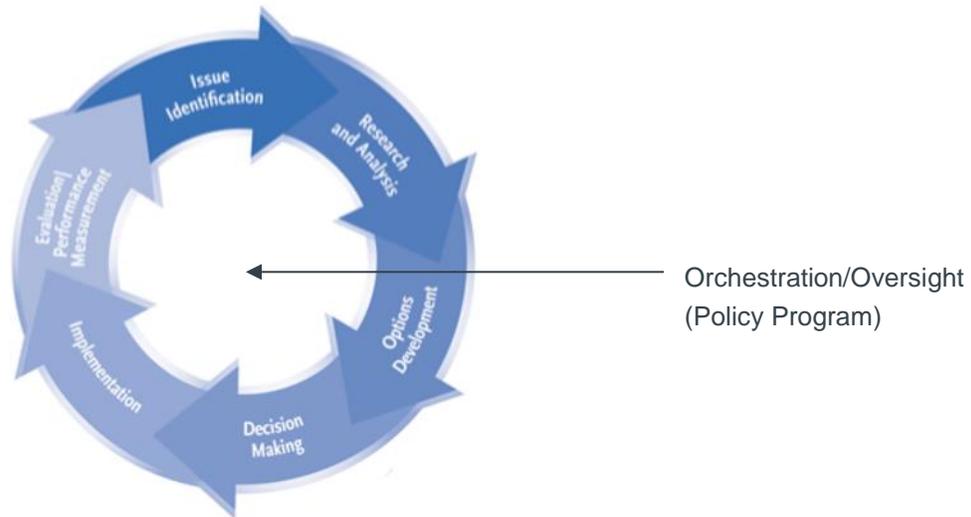
**Guidelines** provide information, advice, or explanation to assist in implementation of a policy, directive, or standard.

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<sup>1</sup> Circulars are under review. Information contained in the circulars will be redistributed to other approved IMT Policy Instruments and the Circulars will be decommissioned.

# IMT Policy Instrument Cycle

The IMT Policy Instrument cycle aligns to the [Government of Alberta Policy cycle](#) below and describes the seven processes across the policy cycle.



## 1. Issue Identification

### Roles:

Anyone can identify an issue, whether this be the policy instrument owner, subject matter experts or peer groups.

### Tasks Include:

- Identifying the issue, stakeholders, timeline, impact, and owner
- Validate. Is it important enough to solve?
- Formulate/ideation

### IMT Policy Instruments Assessment

The following questions can be asked to help determine if an IMT Policy Instruments is required for the GoA.

1. Does the Policy Instrument enable business?
2. Does the Policy Instrument prevent risk?
3. Is an IMT control objective needed within the GoA?

4. Is the IMT Policy Instruments required for multiple business units within IMT Sectors or Departments?
5. Do we need the IMT Policy Instruments to communicate outside of the GoA? For example, is an IMT Standard required for procurement to acquire assets for the GoA or for vendors to develop assets for the GoA?
6. Does another policy instrument (Policy, Directive, etc.) already cover the proposed IMT Policy Instruments?
7. Is the proposed IMT Policy Instruments related to information and technology?

A new IMT Policy Instruments request is initiated by sending a request to [imt.policy@gov.ab.ca](mailto:imt.policy@gov.ab.ca). The review process for both new and existing updated IMT Policy Instruments is dependent on the IMT Policy Instrument type and is managed by the IMT Policy Program Team.

Policy Instruments in the IMT Policy Program are prioritized by:

- Legislative requirements
- the IMT Sector Roadmaps
- The Evaluation Matrix score (Assessment)
- Dependencies. If changes are made to an IMT Policy Instrument – what downstream impacts must be mitigated

More information is provided in the IMT Policy Assessment Process section in this document. For the complete assessment process, please refer to the IMT Policy Program Operations document.

**Policy Program Orchestration tasks:**

- Project plan
- Facilitate meetings
- Advice or provide impact analysis
- Tie to Roadmaps

## 2. Research & Analysis

**Roles:**

The IMT Policy Program team, the IMT Policy Instrument owner or peer groups may complete research and analysis.

**Tasks Include:**

- Defining the scope
  - Determine the Authority for the policy instrument
  - Determine the Accountability for the policy instrument
  - Define the level of detail required for the policy instrument
- Determine the type of policy instrument required that best fits the issue
- Research
  - Perform research and identify the benchmark
  - Synthesize research data
  - Perform a jurisdictional/environmental scan
- Stakeholder consultation
  - Consult with the stakeholders or SMEs
- Analyze the impact to other policy instruments

**Policy Program Orchestration tasks:**

- Provide research guidance
- Templates
- PSCIOC services
- Collaborative analysis
- Research resources
- Stakeholder connections

### 3. Options Development

**Roles:**

The IMT Policy Program team, the policy instrument owner, or program leads may complete the option development.

**Tasks Include:**

- Gather input
- Determine if the policy instrument options are feasible
- Determine if the policy is achievable
- Determine if the policy instrument is sustainable
- Prepare recommendations and identify delivery risks
  - Provide pro/con list for three options
- Plan the implementation of the policy instrument (i.e. schedule, resourcing)
- Determine compliance and audit requirements for the policy instrument

**Policy Program Orchestration tasks:**

- Providing guidance
- Tie to Roadmap outcomes, strategic plans, government mandate

## 4. Decision Making

**Roles:**

The Executive Director, Sector CIO, Deputy Minister, Sector Councils, IMT IC, ADM IMT, DM CSI, DMC may participate in the decision making.

**Task Include:**

- Seek clarification of the policy instrument
- Approve the policy instrument
- Reject and request amendments/updates to the policy instrument
- Deny and reject the policy instrument

**Policy Program Orchestration tasks:**

- Presentation templates
- Shepherding and coordinating materials for governance bodies
- Provide next steps from each governance body

## 5. Implementation

**Roles:**

The Executive Director, Sector CIO, Program lead, Communications, Peer Groups, IMT IC may perform one or all of the implementation tasks.

**Tasks Include:**

- Implement that policy instrument Train the business areas impacted by the policy instrument
- Communicate and sustain the policy instrument
- Determine and finalize the performance metrics for the policy instrument

**Policy Program Orchestration tasks:**

- Post Policy Instrument on repository
- Assist with high-level communications (ie. Governance committees)

- Schedule reviews

## 6. Evaluation, Performance and Measurement

### Roles:

Program or business area, central policy team, governance committee may complete the evaluation, performance and measurement tasks.

### Tasks Include:

- Follow-up and reinforce the implementation of the policy instrument
- Monitor and report on the use of the policy instrument
- Escalate as required
- Manage issues related the policy instrument

### Policy Program Orchestration tasks:

- Monitoring and tracking
- Support policy instrument owners

## 7. Policy Program Orchestration

The IMT Policy Program manages the Policy Program Orchestration. The IMT Policy Program team provides IMT Policy oversight and support for the IMT effectiveness of the policy instrument and the IMT Policy Program.

# Roles, Responsibilities and Accountabilities within the IMT Policy Program

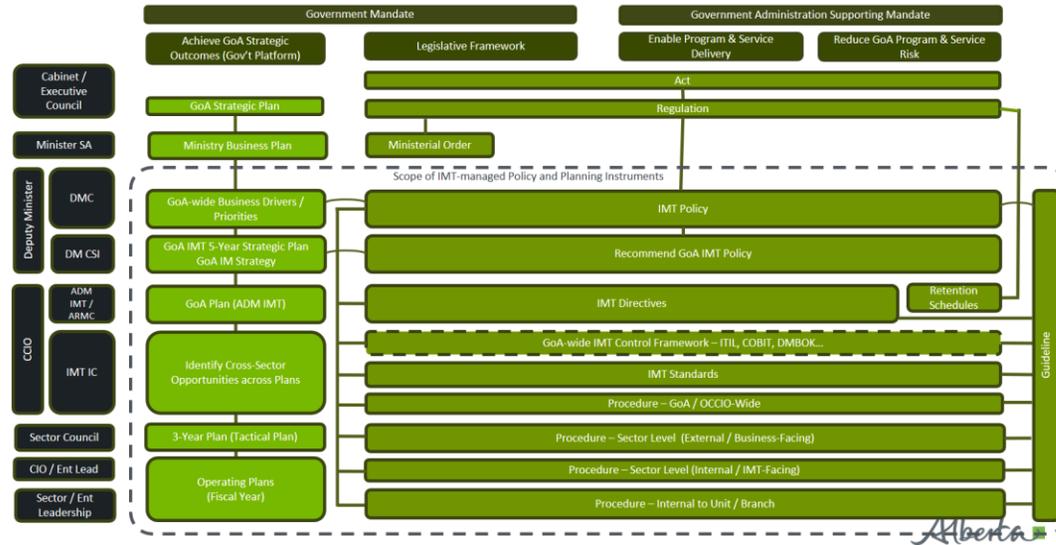
Each section below describes the major roles within the IMT Policy Program.

## IMT Policy Program Governance Structure

The goal of the IMT Policy Program Governance is to promote consistent service delivery and decision-making across government. Desired outcomes include improved IMT Policy instrument sharing, collaboration, and reduced IMT duplication and costs. The IMT Policy Program Governance provides proper oversight and establishes the responsibilities and accountabilities for the IMT Policy Program.

The model below is for new and existing IMT Policy and Planning instruments. The model shows how IMT Policy Instruments relate to each other and who is accountable for each IMT Policy Instrument type.

## IMT Governance



- The Black boxes (far left column) shows the roles and committees who make decisions and are accountable for IMT Policy Instruments
- The Green columns show the hierarchy of IMT Policy Instruments to support the elected governments mandate or government administration.
  - Planning instruments used to achieve the GoA Strategic Plan outcomes
  - The GoA Legislative Framework is used to set laws, regulations and supporting IMT Policy Instruments to enable the governments mandate
  - IMT Policy instruments may also be used to enable the Alberta Public Service to deliver government programs and service delivery or to reduce risk in how these programs and services are delivered.
- The grey dashed box shows the scope of the IMT Policy Program and the planning instruments that are developed, managed, and approved by the IMT Governance Bodies, monitored by the IMT Policy and Planning team.
- The OCCIO may contribute to Acts and Regulations related to IM and/or IT when required. However, these IMT Policy Instruments are not updated frequently and require Deputy Minister and Ministerial level coordination.

## IMT Policy Program Team

The owner of the IMT Policy Program. The IMT Policy Program team provides IMT Policy oversight and support for the IMT effectiveness of the policy instrument. The team manages the policy instrument review cycle and maintains the IMT Policy Instrument repository.

When a new IMT Policy is proposed, the team reviews the IMT Policy Instrument assessment and evaluates the need for the policy. For all IMT policies, new or updates to existing IMT Policies, we;

- Organize the scheduling and collaboration with committees
- Manage issues related to the policy instrument
- Review the Policy Instrument Assessment
- Provide consultations related to writing new policy instrument, existing the policy instrument, the policy instrument processes
- Provide policy project management oversight if required. Depending on the IMT Policy requirements we can provide full or lite policy project management to move a policy through the IMT Policy Instrument cycle
- Assess next steps for a policy instrument

## IMT Policy Instruments Owners

The IMT Policy Instruments Owner is responsible for their IMT Policy Instrument(s) and the content in their IMT Policy Instruments. They ensure that the IMT Policy Instrument remains up-to-date and reflects the GoA's requirements across all departments. When an IMT Policy Instrument is created or the IMT Policy Instruments Owner updates the instrument content it will require a review.

During an IMT Policy Instrument review, the IMT Policy Instrument Owner will review and respond to feedback and concerns raised by the reviewers and will determine if the IMT Policy Instrument requires updates based on the reviewers' comments. IMT Policy Instrument Owners own the content and can reject recommendations made by the reviewers.

The IMT Policy Instrument Owner will participate in the review of a Policy Instrument exception requests and provide their recommendation and reasons for approval or rejection of the exception request. For more information on Exceptions, please go to the IMT Policy Instrument Exception Request Process section.

The IMT business unit that creates the IMT Policy Instruments will typically become the IMT Policy Instrument Owner, but an IMT Policy Instrument may be reassigned to a more appropriate

owner once it has been ratified. Ownership is usually assigned to the IMT business unit that is most impacted by Policy Instrument, or the lack thereof. If multiple IMT business units are affected the IMT Policy Program Team may look upward in the organization to find where the accountability for those IMT business units converges as either a management role or a governance

## IMT Policy Instrument Reviewers

The IMT Policy Instrument Reviewers are responsible for reviewing proposed IMT Policy Instruments and review proposed updates to existing IMT Policy Instruments.

IMT Policy Instrument Reviewers are members of subject matter expert (SME) groups or are a committee member from the governance structure. One or more review groups depending on the IMT Policy Instrument type may review the IMT Policy Instruments. The Reviewers represent the interests, requirements, and objectives of the GoA as well as their individual departments.

## IMT Policy Instruments Approvers

The IMT Policy Instruments approver is responsible for the final governance review of the Policy Instrument. The approver may provide additional feedback and concerns back to the IMT Policy Instrument owner for review. The IMT Policy Instrument approver give the final approval/ratification of the IMT Policy Instrument.

## Roles, Responsibility, and Accountability Matrix

The matrix below describes the roles and responsibilities for approvals, exceptions, communications, implementation, and compliance by Policy Instrument type within the IMT Policy Program.

Policy Types	Final Approval of Policy Instrument	Implementing and Deploying the Policy Instrument	Communicating the Policy Instrument	Approve Exceptions to Policy Instrument	Ensures Compliance to Policy Instrument
Act	Cabinet (A)	Cabinet (A)  Business / Program Area (R)	Cabinet (A)  Minister's office / Internal Communications (R)  Business / Program Area (R)	Cabinet (A, R)	Cabinet (A)  Business / Program Area (R)
Regulation	Cabinet (A)	Cabinet (A)  Business / Program Area (R)	Cabinet (A)  Minister's office / Internal Communications (R)  Business / Program Area (R)	Cabinet (A, R)	Cabinet (A)  Business / Program Area (R)
'Schedules'	ARMC (A)	ARMC (A)	ARMC (A)	ARMC (A)	ARMC (A)

		EIM (R) Sector (R) Business / Program Area (R)	EIM (R) Sector (R) Business / Program Area (R)		EIM (R) Sector (R) Business / Program Area (R)
Policy	Deputy Minister Council (A)	Deputy Minister Council (A)  Assistant Deputy Minister (R)  Executive Directors (R)  Information Controllers (R)	Deputy Minister Council (A)  Deputy Minister/Internal Communications (R)  Change Management (R)	Deputy Minister Council (A)  Assistant Deputy Minister (R)  (Delegated to Sector CIO / Executive Director)	Deputy Minister Council (A)  OCCIO (R)  Business/Program Area (R)
Directive	ADM IMT (A)	ADM IMT (A)  Sector CIO (R) or, Delegated (R)	ADM IMT (A)  Sector CIO (R) or, Delegated (R)	ADM IMT (A)  Sector CIO (R)  Executive Director(R)	ADM IMT (A)  OCCIO (R)  Business/Program Area (R)
Control Framework	IMT IC (A)	IMT IC (A)  Sector CIO / Executive Director(R)	IMT IC (A)  Sector CIO / Executive Director(R)	IMT IC (A)  Sector CIO / Executive Director/ Enterprise Executive Directors (R)	IMT IC (A)  Sector CIO / Executive Director/ Enterprise Executive Directors (R)

		Operational teams (R)	Operational teams (R)		
Standard	IMT IC (A)	Corporate CIO (A)  Sector CIO / Executive Director(R)  Operational teams (R)	Corporate CIO (A)  Sector CIO / Executive Director(R)  Operational teams (R)	Corporate CIO (A)  Sector CIO / Executive Director(R)  Operational teams (R)	Corporate CIO (A)  Sector CIO / Executive Director(R)  Operational teams (R)
Procedure	<b>GoA/OCCIO:</b> Corporate CIO (A)  <b>Sector:</b> Sector Council / Sector CIO (A)	<b>GoA/OCCIO –</b> Corporate CIO (A)  <b>Sector:</b> Sector Council / Sector CIO (A)  Operational Teams (R)	<b>GoA/OCCIO –</b> Corporate CIO (A)  <b>Sector:</b> Sector Council / Sector CIO (A)  Operational Teams (R)	<b>GoA/OCCIO –</b> Corporate CIO (A)  <b>Sector:</b> Sector Council / Sector CIO (A)  Operational Teams (R)	<b>GoA/OCCIO –</b> Corporate CIO (A)  <b>Sector:</b> Sector Council / Sector CIO (A)  Operational Teams (R)
Guidelines	According to IMT policy instrument	According to IMT policy instrument	According to IMT policy instrument	According to IMT policy instrument	According to IMT policy instrument

# IMT Policy Program Operations

The following sections describe the IMT Policy Instrument processes that are completed during the Policy Instrument lifecycle and managed by the IMT Policy Program.

A more comprehensive Guide on Operational Processes is available.

## IMT Policy Instrument Assessment Process

A new IMT Policy Instruments request is initiated by sending a request to [imt.policy@gov.ab.ca](mailto:imt.policy@gov.ab.ca). The review process for both new and existing updated IMT Policy Instruments is dependent on the IMT Policy Instrument type and is managed by the IMT Policy Program Team. All IMT Policy Instruments in the IMT Policy Program are prioritized by;

- Legislative requirements
- the IMT Sector Roadmaps
- The Evaluation Matrix score (Assessment)
- Dependencies. If changes are made to an IMT Policy Instrument – what downstream impacts must be mitigated

New IMT Policy Instruments are created to enable business or to prevent risks or both. A need for a new IMT Policy Instrument is usually driven by a project, mandate or a change in an Act or Legislation. Anyone in the GoA can propose an IMT Policy Instrument for the GoA but IMT Policy Instruments are typically defined and written by IMT business units or via project work groups. The IMT Policy Program Team may also propose an IMT Policy Instruments and work with the appropriate IMT business unit to draft an IMT Policy Instruments (i.e. after a review of GoA and IMT Sector roadmaps).

All IMT Policy Instruments are written using the IMT Policy Instruments templates. Once the IMT Policy Instruments has been drafted, the IMT Policy Instruments along with the IMT Policy Instruments Request form is emailed to [imt.policy@gov.ab.ca](mailto:imt.policy@gov.ab.ca) for review.

The IMT Policy Instruments Template and IMT Policy Instrument Request Form is available on the IMT Policy Instruments repository.

## IMT Policy Instrument Review and Approval Process

The IMT Policy Instrument review process may be completed in stages, with GoA Wide representation. Depending on the type of Policy Instrument a SME Group, governance committee(s), and/or the final approver may complete the reviews. The IMT Policy Instruments

Governance structure describes the proposed IMT Policy and Planning accountability/governance model for new and existing IMT Policy instruments.

The review is initiated when a new IMT Policy Instrument is created or a IMT Policy Instrument owner has made an update to an existing IMT Policy Instrument.

During the IMT Policy Instrument reviews, the reviewers are asked to review the IMT Policy Instrument and provide feedback or concerns back to the IMT Policy Instrument owner. The reviewer will be given 10 business days to complete the IMT policy review and provide their feedback and/or concerns. The IMT Policy Instrument Owner will review the feedback and determine if revisions are required.

After the reviews are completed, the IMT Policy Instrument is sent to the final approver for ratification. The final approver may differ depending on the IMT Policy Instrument type as defined in the roles, responsibilities, and accountabilities section.

## IMT Policy Instrument Review Schedule

IMT Policy Instruments reviews are completed as per defined schedule, unless a business area has a requirement to initiate an earlier review. The IMT Policy Instrument owner reviews the IMT Policy Instrument and submits the updates to the IMT Policy Instrument Program. Once the updates are received by the IMT Policy Program the review process, described above is initiated.

The IMT Policy Instruments are reviewed as follows:

Policy Instrument Types	Review Cycle
Policy	Every 5 Years*
Directive	Every 2 Years*
Control Framework	Annually*
Standard	Annually*
Procedure	As needed
Guidelines	As needed

*\*or As Needed, an IMT Policy Instrument can be reviewed and updated any time prior to the scheduled review date if required.*

The review schedule for all IMT Policy Instruments is available on the IMT Policy Instrument Repository; <https://imtpolicy.sp.alberta.ca/SitePages/Home.aspx>

## IMT Policy Instrument Compliance and Implementation

The [\*Government of Alberta Information Management and Technology Policy Definition\*](#)<sup>2</sup> states, “Ministries will implement and demonstrate compliance with mandatory policy instruments.”

We do not currently audit compliance to the GoA IMT Policy Instruments. The current compliance policy is the honor policy. The roles responsible for implementing the IMT Policy Instrument and maintaining compliance to the IMT Policy Instrument is defined in the roles, responsibilities, and accountabilities section.

Non-compliance will result in remediation to comply with the IMT Policy Instrument or the department can request an exception request against the IMT Policy Instrument.

A business area can choose to exceed the minimum requirements defined in the IMT Policy Instrument by creating an IMT Policy instrument extension. This will not result in non-compliance and does not require an exception request against the IMT Policy Instrument.

## IMT Policy Instrument Extensions

When a business area has a need to exceed the minimum requirements defined in the IMT Policy Instrument an IMT Policy extension is required. The IMT Policy instrument extensions use the same policy template but are identified as an extension to the main policy. The extension must be referenced both in the main IMT policy and will be posted on the IMT Policy Instruments repository.

IMT Policy extensions can be easily identified by the title of the policy. Where there is a policy extension the following naming convention will be followed;

- [Title of Policy] – Extension [Title/Description of Extension]

IMT Policy extensions follow the same IMT Policy Program processes as all IMT Policy documents as described in this document and Operational Processes document.

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<sup>2</sup> IMT Policy: <https://imtdocs.internal.alberta.ca/directives/imt-policy-definition.aspx>

# IMT Policy Instruments Repository

The [IMT Policy Instruments SharePoint Site](#) was created as a central repository for all IMT policies, directives, circulars, control frameworks, standards, procedures and guidelines of the GoA. It should be considered the primary source of current and accurate information and documentation regarding IMT Policy Instruments.

The IMT Policy Instruments SharePoint site is used by internal employees, vendors for Request for Proposal (RFP) purposes, extended GoA users, federal, provincial, municipal government users, as well as the general public.

The IMT Policy Instruments security classification determines if the document can be available to external stakeholders, outside of the GoA network. All IMT Policy Instruments, including protected IMT Policy Instruments, are available to GoA employees.

The IMT Policy and Planning Program Team within the OCCIO owns the repository and manages the IMT Policy Instrument information on this site.