Policy Development Guidelines

Introduction

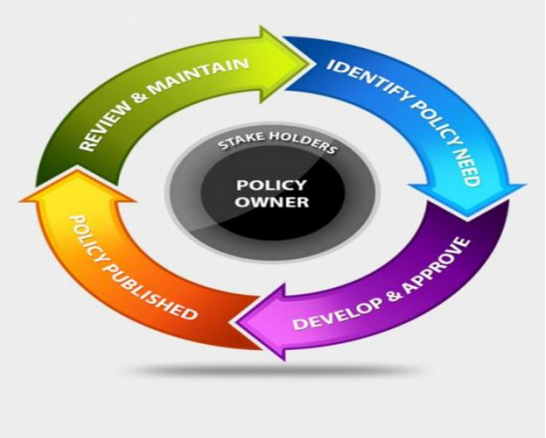
This guide is intended for staff who are engaged in the process of developing a new policy for Dublin City University or who are intending to amend/update an existing policy. It originates from the University's 'Policy on University Policies' and both this guide, and the policy, are intended to be applied together. Accordingly, certain sections which would normally be included in a university guide (e.g. 'Scope') are not restated here where they are already dealt with in the related policy. Where there are differences between the two on the same issue the policy will take precedence.

The guide is intended to assist in all stages of policy development, from the initiation of a new policy (or the amendment of an existing one), through to the publication of a policy on the University's website. This guide has been developed by the Risk and Compliance Officer (RCO) and any queries regarding its application should be directed to the RCO.

Overview of Policy Management within the University

The diagram in Fig.1 provides an overview of how a policy is to be developed, published and maintained. Policy Owners are responsible for the development of new policies, as well as the maintenance, regular review and updating of existing policies. Once the decision to develop a new policy, or update an existing one, has been taken the steps set out in this guide should be applied.

Fig. 1 – Policy Management Cycle



Step 1 - Identify Policy Need

The first step in the process is to identify the need to create a new policy, or in the case of existing policies to identify where they require an update or revision. In both cases this is primarily the responsibility of the Policy Owner.

New policies are generally developed to set out the University's position in regard to an emerging issue or a new set of circumstances. Alternatively, an existing policy may need amendment if the circumstances on which it was based change, or where the existing policy is no longer appropriate or fit for purpose.

Step 2 – Review Existing Policies
A master list of policies is maintained on the University's Central Policies Webpage (CPW). The policies listed on the CPW are owned by Policy Owners from across the University but the CPW itself is maintained by the Risk & Compliance Officer.

The list of policies on the CPW is not exhaustive as there may be some policies which, for whatever reason, have not been included but these are the exceptions. All approved University policies should, with some exceptions, be published on the CPW and they are to be regarded as the 'Master' version for any given policy. Policy Owners are encouraged to create a link from their own unit's webpage to the CPW's URL location of their policies to keep consistency across the University's website.

Policy Owners should check that the University does not already have a policy on the relevant issue by reviewing the list of policies published on the CPW. However, as the list of policies published on the website is not exhaustive, Policy Owners should also consult with relevant members of university staff to check that another policy does not already exist that addresses the issue being considered.

Step 3 – Drafting a Policy
When drafting a new policy, or amending an existing one, Policy Owners are obliged to follow the rules set out in the Statement section of the Policy on University Policies referred to earlier. In addition, the following additional principles should also be applied.

Principle 1: Consider whether the proposed document should be designated as an official 'University Policy'

Prior to the approval by the Executive of the University's first 'Policy on Policies' in October 2015 there was no formal guidance on how an official University Policy should be developed. To address this issue a 'Hierarchy of University Documents' guide was created and Policy Owners should review the guide to consider whether the new policy being developed, or the current policy under review, meets the definition of a 'Policy' as set out in the hierarchy.

a) New Policies
Prior to drafting a new policy, the Policy Owner should consider whether the proposed policy meets the definition of a valid DCU policy as set out in the Hierarchy. Where it does not it may be more appropriate to designate the document as a 'Procedure' or 'Regulation' or one of the other alternatives set out in the Hierarchy guide rather than as a policy.

b) Existing Policies

Where an existing policy is being reviewed the Policy Owners must use the same criteria as outlined in (a) above to determine whether the revised policy will continue to meet the definition of a University Policy as set out in the Hierarchy. It is expected that some documents formerly categorised as a 'Policy' will, on review and comparison against the definition of a policy set out in the Hierarchy, be re-classified to another more appropriate category of document from the Hierarchy.

Principle 2: Brevity – Keep 'Procedures' & any other related documents, separate to the Policy

While it may not always be possible University policies should be relatively brief and not exceed 4 - 5 pages in length. As policies are intended to be stand-alone statements on a particular matter or position they should not be used to set out in detail the procedures or forms by which they are to be implemented. Where references can be made to the means by which a policy is to be implemented (e.g. through a procedure, protocol or an alternative document category - see the Document Hierarchy for guidance) the Policy Owners should merely refer to these in the policy and list them as separate documents in the 'Related Documentation' section. It should not be necessary to quote extensively from these documents within the policy as they can be made available for reference elsewhere and to do so would lead to unnecessary duplication within the policy.

It is also expected that some former policies will, on review, be extensively amended to extract sections that are more suitable for publication in separate documents such as 'Procedures' or 'Protocols' or one of the alternative categories set out in the Hierarchy (see Principle 2 below) rather than keeping those sections in the revised policy.

One of the reasons for separating policies from their related procedures is that it allows for procedures to be revised from time to time without also requiring changes to their related policies. By considering this point, when drafting a new policy or revising an existing policy, it should remove the need to have a policy regularly updated and approved for relatively minor changes in a procedure or other category of document related to the policy.

Principle 3: Consider your Audience

Policies are written for a general audience and will be available publicly on the University's website when approved. When drafting a policy, the Policy Owners should use clear and precise language, brief sentences and common words. The use of jargon is to be avoided but where it is used it should be included in the definitions section of the policy.

Principle 4: Standard Policy Template

A standard template for University Policies is available on the University's CPW. The template is mandatory for all new policies (and for existing policies undergoing revision) and it is designed to assist Policy Owners in organizing the contents and layout of a policy. The template is split into a number of sections, some of which are mandatory, and others that are optional.

When reviewing existing policies that are not in alignment with the template Policy Owners must create the new version policy in alignment with the template. It is expected that over time, as existing policies are reviewed and rewritten, that they will adhere to the policy template.

Principle 5: Gender / Minority Sensitivity & Inclusive Language

The University respects the human rights and dignity of all members of the DCU community and is committed to providing an environment in which all members of the community should expect to be able to thrive and be respected and valued for their unique perspectives and contributions so that they can achieve their fullest potential. All members of the DCU community are welcomed and valued equally and the University is committed to ensuring that all staff and students can participate freely and fully in the life of the University. All members of the DCU Community are expected to work to develop and maintain a high degree of respect and to participate in creating a positive environment.

Therefore, and where appropriate, when drafting a new policy or updating an existing one, the Policy Owner must give due regard to ensuring that the policy is fair and does not present barriers to participation or disadvantage any protected groups from participation. Policy Owners should also strive to use inclusive language at all times when writing a policy.

Principle 6: Sentence Structure

When drafting a policy consider the following:

- Keep sentences short and to the point;
- Avoid padding or language that does not add to clarity;
- Use active language where possible i.e. language that is clear and direct and provides for the assignment of responsibility (e.g. 'person X shall do activity Y' rather than 'activity Y may be done');
- Avoid using words such as 'should' or 'may' in the policy statement section as compliance with a University policy is mandatory;
- Avoid using words such as 'ensure', 'certify', 'guarantee' as these may place an obligation on a unit or officer of the University that, in practice, is very difficult to deliver or achieve;

- Where a policy contains rules they should be stated first in the policy's text with any exceptions from the rules to be stated and highlighted separately in a subsequent section or paragraph.
- Use consistent terms throughout the policy. Where a technical phrase or staff position is referred to it should be stated once in full and thereafter referred to by its acronym e.g. Chief Operations Officer (COO), Student Support & Development (SS&D), Vice President for Academic Affairs (VPAA).
- Refer to forms and other documents by title and list them separately in the 'Related Documentation' section, or as an appendix to the policy.

Step 4 - Policy Approval

The process by which policies are approved is set out in the 'Policy on University Policies' and Policy Owners are responsible for steering draft policies through the relevant approval process by the appropriate Governance Body.

The process will vary depending upon the nature / context for the policy. For example:

- Policies that have a University wide scope are normally approved by the University Executive, or a sub-group or committee as delegated by the Executive;
- Policies whose scope is limited to a single unit of the university may be approved by the Head of that Unit;
- Policies that refer to academic matters can only be approved by the Academic Council; &
- Certain policies may only be approved by the Governing Authority (e.g Risk Management, Treasury, Equality & Access).

Prior to a draft policy being presented to the appropriate Governance Body for review and approval it should be reviewed by the RCO who will check that the draft policy adheres to these guidelines and is in alignment with the University's Policy Template.

Step 5 – Publishing a Policy

Once a policy has been approved it is published on the University's website in two separate website locations:

a) *Central Policies Webpage (CPW) – Master Version*

The location for all 'Master' versions of any University policy is the CPW which is managed by the RCO.

b) *Unit Webpage*

In addition, policies are often also listed on Policy Owner's unit webpage by creating a link to the location of the master version of the policy on the CPW.

Policy Toolkits

Where a policy relies upon other documentation such as related procedures, guides, and forms to support and implement the policy then it is recommended that they are all published together on one webpage within the Policy Owner's section of the website. Two examples of how such a webpage might be set out are:

i) Annual Leave Policy Toolkit – created by DCU People
ii) Child Protection Policy Toolkit – created by Office of the Chief Operations Officer

A separate guide to creating a Policy Toolkit webpage is available at the same webpage location as this guide.

Step 6 – Periodical Review of Policies

Once a policy is approved it will be necessary for the policy to be periodically reviewed to check that it is still appropriate and correct. This role is the responsibility of the Policy Owner and the length of time between reviews will vary from policy to policy. The Risk & Compliance Officer will remind owners of this responsibility on a periodical basis.

Version Control

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End.