

# Guidelines on Policy Development

## Introduction

These guidelines are intended for members of staff who are engaged in the process of developing new policies and / or amending existing policies. The guidelines originate from the ‘Policy on the Formulation and Issuance of University Policies’, also known as the ‘Policy on Policies’, which was approved by the University Executive on October 20<sup>th</sup> 2015. These guidelines were drafted to assist staff in all stages of policy development from the initiation of a new or amended policy right through to having an approved policy published on the university’s website. The guidelines were drafted by the Risk and Compliance Officer (RCO) and any queries or suggestions regarding the guidelines should be directed to the RCO.

## Definitions

Definitions of words and phrases used throughout these guidelines are shown below.

### *Policy Owner*

The Policy Owner is the appropriate academic or support unit of the university whose remit / responsibility covers the subject matter of the policy. The unit shall be responsible for the substance of policy documents and for promoting compliance with the policy unless as stated otherwise within the policy.

## Related Documentation

Throughout these guidelines the documents listed below will be mentioned. Staff involved in policy development should refer to these related documents when developing a new policy or amending an existing one.

### 1) *Policy on the Formulation and Issuance of University Policies – ‘Policy on Policies’*

This policy governs the process by which university policies are to be developed, approved, published and maintained. Once approved, the policy will support the guidelines on policy development set out here.

### 2) *Hierarchy of Documents*

This document outlines the hierarchy of documents that are in use within the Dublin City University community. The hierarchy is designed to assist staff and others in understanding where a document resides within the overall governance documentation framework of both the university and all other entities that are ultimately governed by the University’s Governing Authority. In addition, the hierarchy also outlines definitions for the various categories of documents referred to in the hierarchy.

### 3) *Policy Template*

The policy template is designed to assist Policy Owners in organizing the content and format of a policy according to the ‘Policy on Policies’ referred to above.

## Overview of Policy Management

The diagram in Fig.1 gives an overall view of how university policies should be developed, published and maintained. The aim of these guidelines is to assist Policy Owners in meeting the requirements of the framework for policy management. There are many stakeholders involved in the process of developing and maintaining a university policy and they will be referred to as necessary throughout this guide. However it is not possible to list all stakeholders as some of these will vary from policy to policy.

Policy Owners are responsible for the development, maintenance, and regular review and updating of existing policies. Once the decision to develop a new policy, or amend an existing policy, has been taken the steps set out in these guidelines should be followed.

**Fig. 1 – Policy Management Cycle**



The sequential steps in the Policy Management Cycle above are as follows.

### Step 1 - Identify Policy Need

The first step in the process to develop a new University Policy, or to amend an existing one, is to identify the need to do so. It is primarily the responsibility of the Policy Owner to identify this need. Policy Owners are responsible for the substance of the policy documents and for promoting compliance with the policy. A new policy may be developed to set out the university's position in regard to a new issue or a new set of circumstances. Alternatively an existing policy may need amendment if the circumstances on which it is based change, or where the existing policy is no longer appropriate for whatever reason.

### Step 2 – Review Existing Policies

A list of policies in existence within the university is maintained in an A – Z format on the university's website under the 'Policies' link on the university's landing page. The policies listed on the A – Z are owned by Policy Owners throughout the university and this section of the website is owned by the Office of the Chief Operations Officer and maintained by the RCO. The list of policies shown on the website is not exhaustive as there may be other policies in existence which, for whatever reason, were not included at the time this section of the website was developed in late 2014. However in future, as set out later in these

guidelines, all approved university policies shall be published in both the A – Z policies section and the homepage of the Policy Owner.

Policy Owners should firstly check that the university does not have an existing policy on the relevant issue by reviewing the list of policies shown in the policies A – Z. However, as the list of policies shown on the website cannot be guaranteed to be exhaustive, Policy Owners should also consult with relevant members of staff to ensure a policy does not already exist which addresses the issue under consideration.

### **Step 3 – Drafting a Policy**

When drafting a new policy, or renewing / amending an existing one, Policy Owners should consider the points referred to below.

#### **1) Consider the draft document’s designation as a “University Policy”**

Prior to the approval by the Executive of the university’s first ‘Policy on Policies’ in October 2015 there was no guidance on how an official University Policy should be presented or what it should address. To regularise this situation the university developed the ‘Hierarchy of Documents’ guide. Policy Owners should review the guide to consider whether the new policy being developed or the current policy under review / renewal meets the definition of a policy as set out in the hierarchy guide.

##### ***a) New Policies***

Prior to drafting a new policy the Policy Owner should consider whether the proposed policy meets the definition for a valid university policy as set out in the hierarchy guide. It may be more appropriate to designate the document as a ‘Procedure’, ‘Regulation’ or one of the other alternatives set out in the hierarchy guide rather than as a ‘Policy’.

##### ***b) Existing Policies on renewal or review***

For existing policies that are undergoing a process of renewal or review, the Policy Owners are advised to use the same criteria as outlined in (a) above in determining whether the revised policy continues to meet the definition of a University Policy as set out in the hierarchy. It is expected that some documents formerly categorised as ‘Policies’ will, on review and comparison against the definition of a policy set out in the hierarchy, be reclassified under another category of document. It may also be the case that some former policies will be extensively amended to extract those elements that are more suitable for publication in separate documents such as ‘Procedures’, ‘Protocols’ or one of the alternative categories set out in the hierarchy once the template for policies is used. The RCO will assist Policy Owners with this.

#### **2) Brevity**

While it may not be possible or desirable in all cases, in general University Policies should be relatively brief and not exceed 4 - 5 pages in length. Where references are made to the means by which a policy is to be implemented, through procedures, protocols or an alternative document category (see the ‘Hierarchy

of Documents' for guidance) the Policy Owners should refer to these in the policy and list them as separate documents in the 'Related Documentation' section. It is not necessary to quote extensively from these documents as they shall be available for reference elsewhere.

The means by which a policy is implemented can change from time to time but such changes in no way affect the fundamental original reason(s) for the policy. By considering this point when drafting a 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.

### **3) Consider the audience**

Policies shall in general be written for a general audience and shall be available publically on the university's website. Therefore, when drafting a policy, the Policy Owners should use clear and precise language, brief sentences and common words. It is good practice to avoid the use of jargon and where it is used to include a definition of the word or phrase in the definitions section of the policy.

### **4) Policy Template**

A template for University Policies is available on the university's website under the 'Policies' section. The template is designed to assist Policy Owners in organizing the contents of a policy. The policy template is split into a number of sections, some of which are mandatory, while the inclusion of others is optional. When reviewing current policies it is expected that revised policies will substantially follow the format for policies as set out in the template regardless of the format previously used. This approach should be taken to ensure compliance with the 'Policy on Policies'. It is expected that over time, as existing policies are reviewed and renewed, that they will adhere to the layout and content set out in the policy template.

### **5) Gender / Minority Sensitivity**

The University respects the human rights and dignity of all members of the University community. DCU is committed to providing an environment in which all members 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; 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 University Community are expected to work to develop and maintain a high degree of respect and to participate in creating a positive environment.

Therefore, 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 ensure the use of inclusive language at all times.

## 6) Sentence Structure

- Policy Owners shall keep sentences short and to the point.
- Policy Owners shall avoid padding or language which does not add to the clarity of text contained within the policy.
- Policy Owners shall use active language that adds to the clarity of text. Active language is clear and direct and requires the assignment of responsibility i.e. ‘person X shall do activity Y’ rather than ‘activity Y may be done’.
- Policy Owners shall avoid using words such as ‘should’ or ‘may’ in the policy statement section. As compliance with a University Policy is mandatory the action words used in the policy statement section should reflect this.
- Policy Owners shall 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, are very difficult to deliver or achieve.
- Policy Owners shall note that where a policy contains rules that they are to be stated first and any exceptions from the rules shall be stated and highlighted separately in a subsequent section or paragraph.
- Policy Owners shall use consistent terms throughout the policy. Where a technical phrase or staff position is referred to it shall be stated once and where possible thereafter referred to by its acronym e.g. Chief Operations Officer (COO), Student Support & Development (SS&D), Vice President for Academic Affairs (VPAA).
- The policy shall refer to forms and other documents by title. These are to be listed in the ‘Related Documentation’ section of the policy.

## Step 4 - Policy Approval

The process by which policies are approved is set out in the ‘Policy on Policies’. Policy Owners are responsible for steering draft policies through the required approval process. The process for reviewing and approving draft university policies may vary depending upon the nature of the policy. Policies that have a university wide scope shall be approved by the University Executive or a sub-group delegated by the Executive. Policies whose scope is limited to a single unit may be approved by the Head of Unit.

## Step 5 – Publishing a Policy

Once a policy is approved it will, in the vast majority of cases, be necessary to publish the policy on the university’s website. The policy shall be shown in two locations on the website as follows:

**a) *On the Unit home webpage of the Policy Owner***

All policies are owned by a Policy Owner and the majority of University units have a section on their homepage labelled 'Policies'. It shall be within this section that the policy will be published.


**b) *On the central University Policies webpage***

In addition to publishing the policy on the unit's home webpage the policy shall also be published on the University's 'Policies' webpage which is administered by the RCO. Policy owners shall liaise with the RCO to arrange for the policy to be included in the A – Z of section of the university policies website.

## Step 6 – Periodical Review of Policies

Once a policy is approved it shall be necessary for the policy to be periodically reviewed to check that it is still appropriate and correct. This role is primarily the responsibility of the Policy Owner but senior management at Executive level may also be involved. The length of time between reviews will vary from policy to policy.

## Version Control

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