

A GUIDE TO DEVELOPING POLICIES AT UWS

Introduction

The University operates an online policy development, approval and publication site Policy DDS, short for Policy Document Development System. The purpose of this site is to enhance the quality of UWS policies generally and to provide ready access to information and links relevant to policy considerations. Key features of the site are:

- Flexible, intuitive search options
- Interactive consultation interface for policy development and review
- Up to date notifications to users of new, amended and draft policies
- Clear cross references, contact information, and easy access to related information
- Automated approval process
- Version control and online access to historic and future versions

Associated with this the University is adopting a more integrated and consultative approach to the development of policies and their review of which the provision of online commentary on draft policies via the Policy DDS is but one feature.

What Are UWS Policies?

The UWS policy framework consists of policies, procedures and guidelines that are approved in accordance with the Delegations (Administrative) Policy. Essentially the approval authorities are the Board of Trustees, the Academic Senate and the Vice-Chancellor. Policies, procedures and guidelines are defined in the Policy on Policies but in essence they are:

Policy – what must be done and/or what we adhere to

Procedure – how this is to be achieved

Guideline – how to do it well

These documents are written in a common format and the template is available from the Policy and Governance Unit. A standardised template assists in ensuring consistency across the UWS policy documentation as well as assisting policy authors to order their information and present it in a logical sequence. This benefits end users in terms of being able to more readily find and understand policy information. The format also enables the production of interactive side menus when the policy is published in Policy DDS.

The University's policies are by and large directed at employees and students. In the case of employees the policies are extensions of the contract of employment in that staff are required to meet the terms of their employment including adherence to the University's policies. In the case of students while the relationship is not as precisely defined in a legal sense as is the case with employment, the relationship is certainly becoming more contractual in nature.

In this kind of legal framework it is important to understand that compliance with policies is just as much an issue for the organisation/employer as it is for the student or staff member. In this context it is important that our policies are:

- Consistent with each other and use common terminology
- Applied consistently in the University
- Clear and mean what we say (reflect real requirements)
- Up to date and are reviewed regularly
- Reasonable, sensible and can and will be implemented and adhered to
- Available to all staff and students and that staff and students are aware of that
- Compliant with relevant external statutory and regulatory requirements applicable to the University

They should:

- Explain any breach provisions and their consequences very clearly
- Not contain statements or provisions that cannot or will not be implemented

In short, words and practice must align.

There are three approval authorities for University policies:

- Board of Trustees – high level policies and particularly policies that delegate major functions to the Senate or the Vice-Chancellor
- Academic Senate – the academic policies of the University
- Vice-Chancellor – all other policies including those dealing with core management issues such as human resources, finance etc.

The DVCs are delegated to approve University procedures and guidelines.

When Do We Need a Policy?

The starting point here is that the University has in place a clear set of delegations related to policies and procedures and these documents are approved and published under a formal process. As a consequence if a policy type document is created and applied within the University, but it has not gone through the formal process, it may be open to challenge. There is case law where universities have failed in legal disputes simply on the basis that so called policies were not approved according to the university's established processes (see [Victoria University of Technology –v- Wilson \[2004\] VSC 33](#)).

As a general rule these matters should be promulgated by way of approved policies and procedures:

- where there is a need to prescribe matters that will affect individuals, staff and students, particularly in a potentially adverse manner; or
- where significant requirements are placed on individuals; or
- the expression of principles that are to be adhered to.

Beyond this policies should be in place to regularise the handling of matters so that the University can operate in an efficient and effective manner. Consideration of whether a policy is needed or not can have regard to factors such as the need to:

- Avoid confusion about how to deal with a matter; or
- Provide a structure to process matters; or
- Comply with statutory requirements; or
- Manage compliance and risk; or
- Establish equitable standards and processes; or
- Provide rights and protections to individuals; or
- Protect health and safety.

The Policy Development Process

Step 1 – Preliminary Considerations

The need for a policy can be identified at any level within the University. Each policy must have a policy owner who takes responsibility for the development and implementation of the policy, usually the Director of the unit with prime functional responsibility for the subject matter of the policy to be developed. Where the need for a policy has been identified it is critical that preliminary investigation and analysis is undertaken before any consideration is given to drafting. The purpose of this is to understand the basis of the need for the policy, the context within and outside the University that relate to the issue under consideration, and the interrelationships with other policies and with other functions and units within the University.

Hence the first stage is one of scoping the coverage of the policy, the issues that will need to be addressed, and the nature of the implementation. Flowing from this is the identification of a small but targeted reference group that will assist in the development of the policy and ensure that it addresses the needs of the University and can be implemented effectively. While all policies are published in draft form for general comment it is critically important to be proactive at this preliminary stage to in canvassing issues with key staff and units to ensure that the policy meets the needs of the organisation as a whole.

At this stage reference to the senior executive of the University can be important in ensuring that the policy direction being considered aligns with the key strategic directions of the University.

All policy development should be reported to the Policy and Governance Unit which can provide advice in relation to the existing policy context and the need for consistent standards and processes, the key areas to be involved in the development process and the need for pre-approval. For some policies for instance, it will be essential that Legal Counsel is involved in the development of the policy content.

Step 2 – Research and Analysis

This is really about analysis of the basis behind the policy, the issues that need to be addressed and the information or research that will be needed. Issues for consideration at this stage include:

- Compliance with external regulations and statutes
- Scoping out the coverage and content of the policy
- Scoping of the likely implementation needs, resources needed, impact on other areas and associated procedural issues – e.g. recordkeeping
- Identification of best practice guides and standards (e.g. Standards Australia documents)
- Identification of implications for other policies, inter-relationships and boundaries
- Consideration to the issue of a discussion paper rather than a draft policy
- Examination of any particular policy or implementation issues that may need addressing before the full Policy can be developed – i.e. some matters may require specific consideration and approval beforehand.

Step 3 – Preparation of a Draft

In general a draft should be prepared and discussed among the reference group first and this should be followed by a period of broad exposure to the wider University community.

Drafts should be written according to the Policy Template and use plain English. Information should be organised in a logical sequence and groupings to assist the reader. It is recommended that writers use the 5 section structure of the template to provide the overall structure of the document and that the various parts and sub-headings within those sections be developed gradually as the draft progresses. Proper version control is also essential at this stage and can be managed within Policy DDS. Initial drafts can be circulated via Policy DDS to a restricted group prior to wider dissemination. The Policy DDS System also allows for a questionnaire to accompany the draft document.

A Note on Writing

Policies are largely prescriptive in nature. Because they are owned by relevant operational units, the approach to writing and presentation is often 'unit-centric' in style and content. The emphasis can often be on what the operational area requires rather than what the reader needs.

A well written policy must balance the needs of both sides. So in the case of travel, a policy must on one hand clearly outline the institutional requirements, but on the other, enable the traveller to get from A to B without fuss.

It is important to bear in mind that readers are not experts on the subject matter – that is why they are reading the policy – and it may be that they are accessing the document for the first and only time. The need is for policies and associated documents to be clear and simple and written in Plain English.

A useful summary of the concept of Plain English is:

“Despite the name, Plain English is only partly about language. It also emphasises the importance of document design. Any document needs a clear layout, in sections or paragraphs that express the structure of the information, and with effective headings and subheadings to identify local content. Adequate white space between sections and in lists also makes information more accessible. Where language comes in, it’s broadly a matter of seeking simple, everyday words whenever possible, and speaking more directly to the reader. Sentences need to be shorter and less intricate, with punctuation that ensures reliable reading. An average of 20 words is recommended, though individual sentences will of course vary around that. The most important principle of Plain English is to keep the reader in mind as you write. Think of yourself as communicating to someone across the table, and of how each sentence sounds. Your writer’s ‘ear’ should react whenever sentences leave the reader gasping for breath.”¹

Some of the key considerations when writing UWS policies are:

- Use the template and the heading styles to organise and structure the document;
- The numbering system applies to paragraphs and is the basis for composition;
- Acronyms – the standard practice is to provide the full text with the acronym in brackets in the first instance and thereafter the acronym is used;
- Use the active voice and put statements in positive form as it makes the meaning clearer;
- Use simple concrete language and fewer words;
- Use shorter sentences and avoid joining sentences together with ands and buts;
- Avoid ambiguity in terms like ‘may’ or ‘could’ – if flexibility is to be provided make that clear, if not make that clear as well; and
- Stick to the same tense.

Step 4 – Consultation

All draft policies should be released for consultation via the Policy DDS web site. The length of time for consultation will depend on the complexity of the policy and its audience. In addition to the general release of the draft via Policy DDS, authors should send targeted notifications to individuals or groups that will have a particular interest in the draft drawing their attention to the availability of the draft for comment. Strategies such as workshops, placing the draft on the agendas of relevant meetings, one to one meetings and the like should be employed so that the policy ends up reflecting the needs of the University and that it can and will be implemented.

All comment should be assessed and all comment should be acknowledged.

If necessary more than one draft version can be released for comment.

¹ The Cambridge Guide to English Usage, Pam Peters, Cambridge University Press, 2004, p. 425

The Policy DDS also provides to the author the responses of each commentator and a consolidated report that groups all comments according to clauses, sections etc.

Step 5 – Development of Approval Draft

Following analysis of comments received and any amendment to the policy document a final draft for approval should be prepared. That may be referred back to the core reference group for final perusal.

Step 6 – Approval

The path for approval will vary according to the approval authority. Academic policies will be processed through the Senate structure by the Academic Secretariat. All other policies whether being approved by the Board of Trustees or the Vice-Chancellor will normally be considered beforehand by the UWS Executive.

Policies must be submitted via the Policy DDS which incorporates an online approval submission module. The module includes a detailed submission, completed by the policy author that explains to the endorsing and approval authorities the rationale for the policy, its intended outcomes and the implementation issues associated with it. The emphasis will vary according to the subject matter but the core matters covered in the approval submission are:

- Purpose of the Policy
- The nature of the changes being made
- Consultation undertaken
- Issues identified during consultation
- Resource implications – Training/Financial/Staffing/Compliance

Step 7 – Communication and Implementation

The Policy and Governance Unit publishes a regular email to staff advising all approvals to new policies, amendments to existing policies and the availability of drafts for comment. Units that have functional responsibility for the Policy are responsible for managing in depth communication, training and implementation as necessary.

Step 8 – Review

All policies are subject to a cycle of review and the Policy and Governance Unit determines a review date for all policies in consultation with the Policy owner.

Policy review should cover the following:

- Any issues or concerns that have been identified in the operation of the policy

- An evaluation of the level of compliance with the policy and evidence that it is having the intended effect
- Whether the information is up to date and remains consistent with any external or other regulatory requirements
- The effectiveness of any training associated with the operation of the Policy

All policies have set review dates ranging from one to three years, depending on the nature of their content and Policy DDS generates automated notices to Policy owners when review dates arise. However, policies can and should be amended as and when changes occur that affect the relevance and application of the policy.

A short review should be undertaken within the first year for all new policies (and policies that have been subject to substantial amendment) in order to ensure that the policy is operating and being implemented in the way that was intended.

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MORE INFORMATION

For a copy of the Policy Template, go to the [Policy Development and Review Resources](#) web page.

USEFUL REFERENCES

Some useful references that may assist in the writing of policy documentation

The Association of College and University Policy Administrators (ACUPA)
<http://process.umn.edu/acupa/>

The Plain English Campaign
<http://www.plainenglish.co.uk/>

Write Mark – New Zealand’s Plain English Standard
<http://www.writemark.co.nz/mainsite/Home.html>

Writing at Work – Neil James, Allen & Unwin, 2007

The Cambridge Guide to English Usage – ed. Pam Peters, Cambridge University Press 2004

Style Manual – Sixth Edition, John Wiley and Sons, 2002

The Cambridge Grammar of the English Language – Rodney Huddleston and Geoffrey Pullum, Cambridge University Press, 2002