

# Policy Development and Review Procedure

## Section 1 - Purpose

(1) This procedure supports the [Policy Framework Policy](#) by describing the processes of policy development and review and stating detailed requirements for these.

### Scope

(2) This procedure applies to all staff, adjunct staff and students of Charles Sturt University (the University), and to consultants and contractors who are engaged to develop a rule, policy, procedure or guideline for a policy owner.

## Section 2 - Glossary

(3) The glossary section of the [Policy Framework Policy](#) defines most of the terms used in this procedure. For the purposes of this procedure the following additional terms have the definitions stated:

- a. Core stakeholder – a senior manager or their nominee from a unit that is or will be a substantial user of the rule, policy or procedure and directly affected by its provisions.
- b. Stakeholder group – a group of staff who will use or be affected by the rule, policy or procedure. Where the rule, policy or procedure affects students, student representatives and student advocates are a stakeholder group.

## Section 3 - Policy

(4) This procedure supports the [Policy Framework Policy](#) and should be read alongside that policy.

## Section 4 - Procedure

### Responsibilities

(5) Core stakeholders are responsible for gathering the views of other staff in their unit, and for leading preparations in their unit to implement the rule, policy or procedure.

(6) Policy developers are responsible for leading development of rules, policies and procedures in such a way that stakeholders will trust and value the resulting texts because their concerns and needs have been considered respectfully.

### Development and review cycle

(7) The development process for rules, policies and procedures involves the following stages, which may occur consecutively, concurrently or be repeated as needed. The review process for these types of text involves all of these steps except the first.

- a. proposal to develop (new rules and policies only);

- b. research and benchmarking;
- c. consultation and implementation planning;
- d. drafting;
- e. review of drafts;
- f. posting for comment;
- g. approval; and
- h. implementation.

(8) Notwithstanding clause (7), rules that only establish a committee of Council or Academic Senate and/or authorise the committee's membership, terms of reference or a delegation of functions, are not required to follow the development and review process stated in this procedure.

## **Proposal to develop**

(9) Before development of a new rule or policy can start, the proposed policy owner must submit a proposal to develop to the University Secretary for review and recommendation to the Vice-Chancellor for approval. The proposal must use the template for such proposals, which requires the proposed policy owner to state:

- a. why the new rule or policy is needed; and
- b. why it is not sufficient to add sections to or change provisions of existing rules, policies and procedures.

(10) The University Secretary will provide the proposal to the policy owner reference group, which will consider whether to recommend the proposal to the Vice-Chancellor for approval to develop the new rule or policy.

## **Research and benchmarking**

(11) Policy developers will carry out research to identify leading practice in the activity across the tertiary education sector either before or alongside the consultation stage. This may include:

- a. desktop reviews of any regulatory or legislative requirements, national guidelines, standards or codes for the activity;
- b. desktop reviews of other institutions' equivalent rules, policies and procedures and related professional literature; and
- c. interviews with managers of the activity at other institutions to understand these institutions' rules and/or policies for the activity and operational challenges in implementing them.

(12) As part of research and benchmarking policy developers will record:

- a. which other institutions' rules and/or policies were considered in benchmarking and what was learned from them; and
- b. if managers at other institutions were contacted for information about their rules and/or policies, which managers, and what was learned from them.

## **Consultation and implementation planning**

(13) Policy developers will carry out consultation activities with all stakeholder groups before they draft comprehensive drafts of the rule or policy and procedures.

(14) These activities may involve:

- a. establishing a working group of core stakeholders and asking them to consult within their units;

- b. convening workshops, forums and focus groups with knowledgeable staff and/or students; and/or
- c. initial rough drafts as a way of stimulating discussion.

(15) Consultation should:

- a. identify any issues stakeholders are experiencing with the activity;
- b. consider the findings of research and benchmarking on possible improvements to practice;
- c. identify how the effectiveness of the rule or policy in achieving its objectives will be measured;
- d. consider how any process changes or new requirements proposed for the draft rule or policy and procedures will be implemented; and
- e. support the policy developer to prepare an implementation plan.

(16) Policy developers should consider which divisions and offices of the University will be users of or affected by the rule, policy or procedure, and approach their leadership to nominate core stakeholders.

- a. For academic rules or policies, faculties should be approached for this purpose.
- b. For rules or policies that will set requirements for students, a student representative should be identified as a core stakeholder.

(17) Policy developers will prepare an implementation plan using the implementation plan template, which will set out:

- a. activities and resources necessary to enable policy users to implement the rule or policy;
- b. communication activities to ensure policy users are aware of changed requirements and how to comply with them; and
- c. a realistic time-frame for these activities and in which to provide any resources.

(18) Where information and communication technology development is necessary for implementation, the relevant Division of Information Technology manager must be included in the core stakeholder group. The resources and time-frame for the development must be confirmed before the implementation plan can be included in the submission of the draft rule, policy or procedure for approval.

(19) The policy developer will keep a record of consultation activities, who participated, issues raised and how these are handled in the drafts, using the consultation and comments record template.

(20) It is good practice for the policy developer to provide a response to issues and concerns raised by participants in consultation so that participants can understand how these have been handled in drafting and, where their suggestions have not been taken up, the reasons for this.

(21) The record of consultation activities, and implementation plan, will be included in the submission of the final draft rule, policy and/or procedure for approval.

## **Drafting**

(22) Policy developers must draft rules, policies, procedures and guidelines in such a way that they:

- a. contain only the appropriate content (see the definitions of types of text section in the [Policy Framework Policy](#));
- b. are clear, concise, rigorously reasoned, in a coherent order of contents;
- c. are consistent with Charles Sturt University style;
- d. are in as plain English as will convey their content;
- e. state objectives that are measurable so the document's effectiveness can be monitored; and

- f. do not duplicate material in legislation, rules or other policies or procedures, but cross-refer to these where readers need to be aware of them.

(23) The guidelines on policy writing provide guidance on plain English and other aspects of the style required for writing policies and procedures for the University.

(24) Where the proposed changes will necessitate minor changes to another rule, policy or procedure, the policy developer must collaborate with the policy owner of that text to draft the consequential changes, which must be included in the approval submission.

## **Review of drafts**

### **University Secretary review**

(25) The policy developer will prepare drafts in the policy library and inform the University Secretary that they are ready for review. This review must occur before the drafts are posted on the policy library bulletin board for comment.

(26) The University Secretary review comprises:

- a. editorial review; and
- b. checking that decision-making authorities stated in the draft are consistent with delegations in the schedules to the delegations and authorisations policy.

(27) The University Secretary or their nominee is authorised to:

- a. return a draft to the policy owner for redrafting to ensure that it meets the requirements in clause (22); and/or
- b. edit the drafts to ensure they meet the requirements in clause (22), in consultation with the policy developer to ensure the content is not changed in substance.

### **Legal review of drafts**

(28) Developers of rules must draft these in collaboration with the University's Legal Office, to achieve legal soundness expressed in plain English.

(29) Policy developers must ask the University's Legal Office to review policy and procedure drafts before they are posted for comment, where they define the process, rights and entitlements for major administrative decisions that are likely to give rise to dispute.

(30) The University Secretary is authorised to ensure that any resulting changes to achieve legal soundness of the drafts are in plain English, in consultation with the Legal Office.

## **Posting for comment**

(31) Once the University Secretary office has reviewed the drafts, the policy owner will post a draft rule, policy and/or procedure for comment from the University community for a minimum period of two weeks.

(32) Where the drafts are substantial and/or introduce a number of changes in processes or requirements, the period of posting for comment may be up to six weeks.

(33) The policy developer will inform core stakeholders when the drafts are posted, so they can gather and collate comments from within their unit.

(34) It is good practice for the policy developer to provide a response to issues and concerns raised by commenters on the drafts, so that commenters can understand how these have been handled in drafting and, where their suggestions

have not been taken up, the reasons for this.

(35) The policy developer will keep a record of how issues raised in comments were handled in the drafts, using the consultation and comments record template.

## **Approval**

(36) The policy owner will submit the final drafts to the University Secretary for review, along with:

- a. a Word document of the relevant committee cover-sheet that:
  - i. describes the consultation activities and who participated in them;
  - ii. recommends the expiry of any texts that are to be expired as a consequence of the approval;
  - iii. recommends any consequential changes to other rules, policies or procedures that are required as a result of the approval;
  - iv. identifies any delegations in the schedules under the delegations and authorisations policy that need to be changed, and the changes to be approved by Council, before the policy can take effect;
- b. the record of issues raised in consultation and comments on the policy library posting of the drafts for comment, and how these have been handled in the drafts; and
- c. the implementation plan developed with the core stakeholders.

(37) The University Secretary will then submit the approval submission to:

- a. any bodies whose endorsement is required; and, once all endorsements have been given
- b. the approval authority.

(38) On approval, the University Secretary will decide the date the text(s) will take effect by being published in the policy library.

(39) On publication, the University Secretary or their nominee will:

- a. notify the policy owner and policy developer that the text(s) have been published; and
- b. list the publication in the next monthly announcement to users of the policy library.

(40) The policy owner is responsible for informing the University community of new/changed texts as part of the implementation and communication activity.

## **Consequential changes**

(41) Where a new rule, policy or procedure is approved, or changes to a rule, policy or procedure are approved, this may necessitate changes to other texts as a consequence.

(42) Where consequential changes are merely changes to or replacement of titles of texts referred to in other documents, the Policy team in the Office of Governance and Corporate Administration will identify the changes, and the University Secretary will approve them as editorial changes.

(43) Where consequential changes are minor changes:

- a. if the authority approving the rule, policy or procedure has authority to approve the other text to which a consequential change is needed, the approval proposal will include a draft of that text with the consequential change and a recommendation to approve it; or
- b. if a different authority has authority to approve the other text to which a consequential change is needed, the

approval proposal will include a draft of that text with the consequential change and a recommendation to endorse it for the approval of the other approval authority.

## **Implementation**

(44) The policy owner will lead and coordinate implementation of new or changed rules, policies and procedures, and changes to processes and requirements arising from these.

(45) Core stakeholders will lead and coordinate implementation within their units.

(46) Both the policy owner and core stakeholders will monitor compliance with new or changed requirements, to understand why users may not be complying, and correct any misunderstandings of the requirements. Core stakeholders will inform the policy owner of instances of non-compliance and actions taken.

(47) The policy owner will convene the core stakeholder group to review the implementation within six months after the new or changed rule or policy takes effect. Where the core stakeholder group consider the implementation has been unsuccessful or have significant concerns about the policy's effectiveness, the policy owner will consult the University Secretary about holding an early review.

## **Monitoring and reporting**

(48) The policy owner will monitor the effectiveness of the rule or policy and procedures on an ongoing basis, using qualitative information and, where possible, quantitative data. Sources of information and data may include:

- a. feedback gathered from core stakeholders;
- b. surveys of stakeholders;
- c. workshops, forums and focus groups with stakeholders and users;
- d. logs of issues and instances of non-compliance;
- e. logs of complaints or appeals about aspects of the rule, policy or procedures; and
- f. data extracted from systems used to manage the activity.

(49) The Internal Audit office advises policy owners on ways to monitor policy compliance and effectiveness and may carry out an audit of compliance with a policy and its effectiveness.

(50) The approval authority for a rule or policy may require the policy owner to report on its effectiveness.

## **Review**

(51) The University Secretary or nominee will remind the policy owner of the due date for review of a rule or policy, a year before the date.

(52) When a rule or policy is reviewed, its supporting procedures will be within the scope of the review.

(53) The process for review is the same as for policy development, except that after research and benchmarking, the policy owner may hold an initial meeting with core stakeholders to establish whether they believe major changes to the rule, policy or its procedures are needed.

(54) Where:

- a. research and benchmarking do not indicate that the University's practice in the activity needs improvement; and
- b. core stakeholders advise that the rule or policy and its procedures are currently effective without major changes

the policy owner may recommend to the approval authority that the rule or policy and procedures be approved as reviewed without major changes.

(55) Otherwise the policy developer will initiate consultation and implementation planning, and follow the rest of the process outlined in the development and review cycle section of this procedure.

### **Minor and editorial changes**

(56) Where a policy owner identifies the need for a minor change or editorial change, their policy developer will draft the change in a new version of the policy library document, and submit it for approval, stating the reason for the change in the covering memo.

(57) The University Secretary will determine whether the change meets the definition for the type of change, as stated in the glossary section of the [Policy Framework Policy](#).

(58) If the University Secretary agrees that the change is a minor change, they or their nominee will submit it to the authority who approves minor changes for that rule, policy or procedure, for approval.

(59) If the University Secretary agrees that the change is an editorial change and is needed, they will approve it.

(60) If the University Secretary considers that the change is a major change, they will consider the submission as a request to start an early, partial review of the policy or procedure in question. They or their nominee will advise the policy owner to follow the process outlined in the development and review cycle section above.

## **Section 5 - Guidelines**

(61) The guidelines on writing policy provide guidance on drafting rules, policies, procedures and guidelines.

## Status and Details

<b>Status</b>	Current
<b>Effective Date</b>	9th December 2020
<b>Review Date</b>	9th December 2025
<b>Approval Authority</b>	University Secretary
<b>Approval Date</b>	8th December 2020
<b>Expiry Date</b>	Not Applicable
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