



## **GUIDE TO DEVELOPING POLICY DOCUMENTS**

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## SECTION ONE – CONTEXT

### Western Sydney University Policy Documents

The Western Sydney University policy governance environment consists of rules, charters, frameworks, plans, policies, procedures, and guidelines that are approved in accordance with the [Delegations of Authority Policy](#).

Documents are defined in a hierarchy provided in the [Policy Framework](#):

Document	Purpose
Rule	An absolute requirement and mandatory for all members of the University community
Code, Charter, Plan, Policy, Framework	Outlines the key principles underlying the University's activities in a specific area and is mandatory for all members of the University community (why)
Procedure	Outlines the mandatory steps for all people and activities captured within the scope of the Procedure (how)
Guideline	Advisory and explanatory document that explains how to carry out the procedures but does not contain mandated actions

This Guide provides advice on the processes for the development and review of policy documents at the University in accordance with the Policy Framework.

### Head Policy Model

To provide a coherent framework and prevent the proliferation and fragmentation of policies over time, the University uses a 'Head-Policy' model. Individual policies are succinct and principles-based with linked procedures using the Head Policy naming convention to ensure they are located together in the University's Policy Document Development System (Policy DDS).

***All proposals for new or to-be-reviewed policies are tested for fit into the Head Policy model by Policy and Governance.***

Head Policies with a single procedure will usually be embedded with its 'parent' policy, that is it will flow straight on from the policy under a separate heading. Where there are multiple procedures there will be separate procedure documents, with the naming convention "*Head Policy name Procedures - <name of procedure>*".

### Approval Authorities

There are three approval authorities that have the delegation to approve policy documents at the University:

- the Board of Trustees – codes and high-level policies and particularly policies that delegate major functions to the Academic Senate or the Vice-Chancellor
- the Academic Senate – academic policy documents of the University
- the Vice-Chancellor – core management policy documents such as human resources, finance.

### The Policy Document Development System (Policy DDS)

The Policy DDS is the online development, approval, and publication site for the University's policy documents. The Policy DDS provides access (both public and restricted) to the University's policy documents and associated information such as links to other websites, forms, and diagrams. The Policy DDS also assists Unit Heads (responsible for operational management. The policy owner is the executive sponsor) and nominated authors to develop and review policy documents through its

interactive consultation interface and an automated approval process. Other key features of the Policy DDS are:

- flexible, intuitive search options
- cross references, contact information, and access to related information
- access to historic versions.

## **Templates**

All University policy documents must use the appropriate Policy DDS template. These are available from the [Policy Development and Review Resources webpage](#).

## **Role of the Policy and Governance Unit**

Any proposals for the development or review of a policy document held in the Policy DDS must be reviewed by the Policy and Governance Unit (P&G) prior to commencing the development or review process (see Section Three). In addition to providing approval to proceed P&G will provide advice and assistance in relation to:

- the existing head policy context
- facilitating reference groups
- key stakeholders and how to incorporate them into the policy document development
- how to maximise consultation
- appropriate language type including active voice
- approval processes.

## **SECTION TWO – THE DOCUMENT DEVELOPMENT AND REVIEW PROCESS**

### **Policy Documents**

As a general rule, University-wide policy documents are required where:

- there is a need to prescribe matters that will affect staff and / or students, and potentially other cohorts in the University community (such as visitors, contractors, or volunteers)
- significant requirements are placed on individuals (by cohort, or all individuals in the University community)
- the University wishes to express principles that must be adhered to
- there are external requirements imposed by legislation or regulation that require a policy response to demonstrate compliance.

Beyond this, policy documents help to regularise the handling of matters so that the University can operate in a consistent, efficient and effective manner and assist the University to:

- manage and minimise risk
- operationalise strategic initiatives
- avoid confusion about how to deal with a matter
- provide a structure to process matters
- comply with statutory requirements
- manage compliance
- establish equitable standards and processes
- provide rights and protections to individuals
- protect health and safety.

Policy documents are most effective, useful, and likely to aid with meeting the University's compliance obligations when they:

- look and feel like they are part of the same 'family' of documents to readers
- are integrated and harmonised with other related policies, so all documents act to reinforce each other
- use a consistent voice, tone and style, and common terminology
- are written in a standardised format and template
- are very clear in stating any compliance requirements created by the document
- prioritise helping the reader to understand their obligations and any restrictions on their actions.

### **Development and Review Channels**

The University uses three channels for policy document development and review. They are:

- Administrative or Editorial
- Brief
- Full.

### Administrative or Editorial

P&G facilitate administrative or editorial amendments to all policy documents through University advices and/or direct requests in accordance with the Delegations of Authority Policy. These amendments relate to corrections or clarifications, updating terminology or University structure nomenclature, legislation name changes and associated information updates.

### Brief Channel

The Brief Channel is used for all changes to guidelines, most changes to procedures, minor changes to other Policy Documents or where the Unit Head of a document due for a timely review considers limited changes are required. This process requires:

- targeted consultation with the key stakeholders
- endorsement from the Unit Head and approval by the Executive Sponsor.

### Full Channel

The Full Channel does not apply to guidelines. It is used for all new and changes to Codes and Rules, new or changes to Procedures past their review date, or new or major changes to other Policy Documents or all changes when past the standard review period. This process requires:

- both targeted and broad consultation
- endorsement and approval from designated committees/positions.

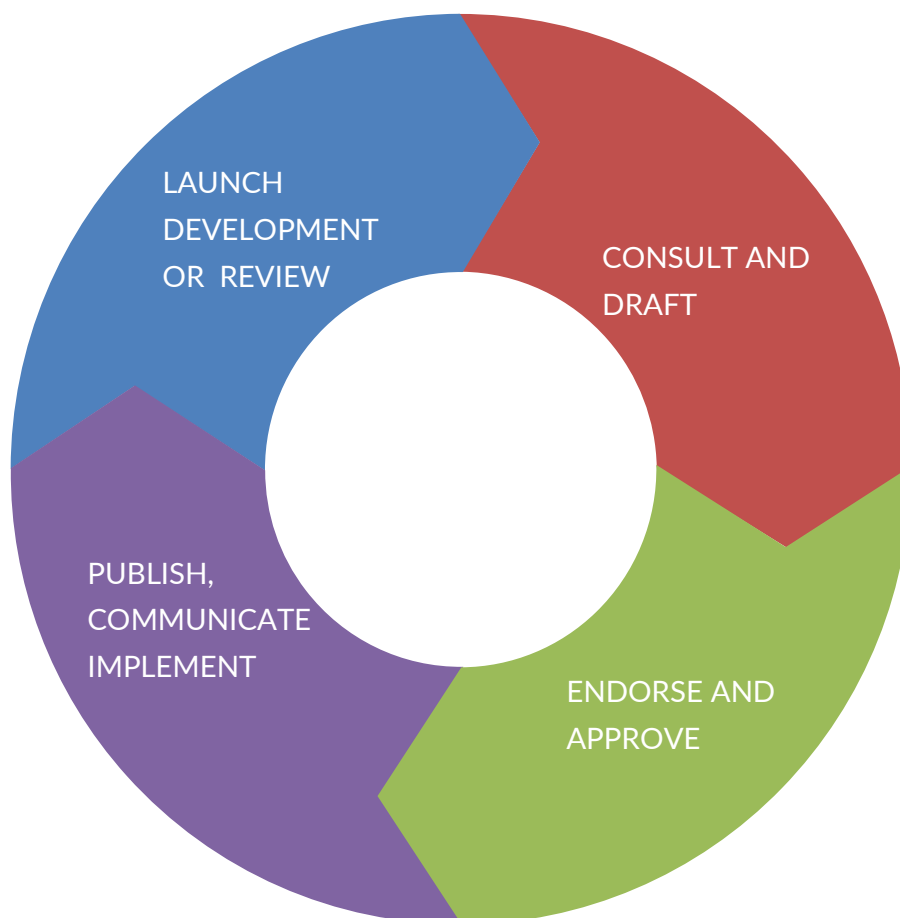
P&G will provide advice on whether a proposed new policy document, or change to an existing policy document, must follow the Full or Brief Channel.

## **New Policy Documents**

Where the need for a new policy document (other than Guidelines) arises, the Director, Governance Services must be contacted in the first instance to provide:

- advice on existing policy documents and/or approval to proceed with development of a new policy document
- where the proposed new or revised policy document fits within existing policy groupings
- what document status is most appropriate
- whether the Administrative, Brief or Full development and approval Channel is required.

## Policy Documents Review Cycle



Key steps	Full Channel	Brief Channel
<b>Launch development or review</b>	<ul style="list-style-type: none"> <li>- Advise P&amp;G – approval for new policy document</li> <li>- Announce via Viva Engage and/or E-Update</li> </ul>	<ul style="list-style-type: none"> <li>- Where review is within scheduled review date</li> <li>- Advise key stakeholders</li> </ul>
<b>Consult and Draft</b>	<ul style="list-style-type: none"> <li>- Identify all stakeholders</li> <li>- Establish reference group</li> <li>- Research and benchmark</li> <li>- Consult using existing committee structures</li> <li>- Post on Policy DDS Bulletin Board for minimum of two weeks</li> </ul>	<ul style="list-style-type: none"> <li>- Consult stakeholders</li> <li>- Research and consult as required</li> </ul>
<b>Endorse and Approve</b>	<ul style="list-style-type: none"> <li>- Seek P&amp;G advice on structure of draft</li> <li>- Check interaction with other policy documents</li> <li>- Submit for endorsement and approval</li> </ul>	<ul style="list-style-type: none"> <li>- Seek P&amp;G advice on amendments</li> <li>- Check any interactions</li> <li>- Unit Head / Executive Sponsor approval</li> </ul>
<b>Publish, communicate, and implement</b>	<ul style="list-style-type: none"> <li>- Fulsome plan required</li> </ul>	<ul style="list-style-type: none"> <li>- Decide if standard P&amp;G comms are sufficient</li> </ul>

## SECTION THREE – GUIDANCE ON DEVELOPMENT AND REVIEW STEPS

**Unit Head** – is responsible for the operational management of the Policy Document.

**Executive Sponsor** – is the owner and has overall accountability of the policy document.

This section provides detailed guidance about each of the steps in the development and review of policy documents. Options for adapting steps for the Brief Channel are outlined where appropriate.

The Unit Head that has operational responsibility for the subject matter of the policy is responsible for the development, implementation, compliance with and review of their policy documents. The Executive Sponsor has overall accountability and approves progress through the development process.

### Step 1 – Launch Development or Review

#### Proposals for new policy documents

Consideration of the need for a new policy document (other than Guidelines) must take into account the factors outlined in the *Policy Framework* and these Guidelines, subject to advice from the Director, Governance Services and the Policy and Governance Unit. This will include whether the need may be better met by another type of new policy document or amendment of an existing policy document.

**All proposals for new policy documents must be submitted via the Policy Document Proposal WesternNow form.**

In this step the Unit Head or nominee scopes the coverage of the new policy document, the issues that need to be addressed, and the extent of the impact of the new document. Sourcing and analysing evidence, including benchmarking, to support the need for the development of the document is important. Evidence may include legislative, organisational or institutional data, student-related data, and financial or other relevant data and statistics.

The Executive Sponsor will ensure that the policy direction being considered aligns with the strategic directions of the University.

For some documents, the Office of General Counsel may also need to be involved at this stage of the development.

The Director, Governance Services must grant approval for the development of any new policy document, which must be held within the Policy DDS and will provide:

- a. where the proposed new Document fits within the Policy DDS, and what type of change/document is most appropriate
- b. whether the Full or Brief Development Channel is required.

### Step 2 – Identification of Stakeholders

The Unit Head or nominee will typically identify the target reference group (main stakeholders) to assist in the development of the Policy Document, to ensure that it addresses the needs of the University and that it can be implemented effectively, and without unintended consequences. The reference group should be encouraged to consider and comment on the document at all stages of drafting, before and after consultation.

For academic policies (approval authority is Academic Senate) Standing committees of the Academic Senate or working groups reporting to Senate standing committees can act as reference groups.

**Guidelines and other supporting documents to be included in Associated Information are submitted via the WesternNow form and are published on receipt of approval by the executive sponsor.**

### Step 3 – Research and Analysis

During this stage the Policy Document author or reference group will consider in more detail the logic behind the Policy Document, 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 the coverage and content of the policy/document
- identification of best practice guides and standards (e.g., Standards; benchmarking with IRU institutions)
- investigation of implications for other policies, inter-relationships and scope
- scoping the likely implementation needs - resources, training, communication, impact on other areas and associated procedural issues – e.g., record keeping
- examination of any particular policy or implementation issues that may need addressing before the Policy Document can be published

This step may be brief where only minor amendments are required.

### Step 4 – Drafting

Documents should be drafted using the current Policy Template and be written using Plain English.

A Tips and Tricks document is available on the Policy and Governance Resources website, which provides further guidance on the effective writing of drafts.

### Step 5 – Consultation

*Note: where the Policy and Governance Unit has advised that only the Brief Channel is required for your Document you need only undertake targeted consultation.*

*Consultation is an essential part of the making of policy documents and assist in making better policy by:*

- testing whether a proposed policy reflects key concerns and issues
- acting as a mechanism to flesh out all relevant requirements, obligations and matters that the policy must cover
- identifying the competing interests of different people or groups
- building consensus
- supporting transparency in the policy-making process
- creating a shared outcome that all stakeholders can buy into and support
- identifying implementation issues and challenges
- identifying any unintended consequences

*Undertake targeted consultation before going out more broadly (where required) with an approved draft.*

*All contributions can be considered but not all may be included in the final version.*

Inadequate consultation can result in poor policy that cannot be effectively implemented, or inadvertent non-compliance.

Comprehensive consultation can be a time-consuming and labour-intensive process. A decision needs to be made about what degree of consultation is appropriate, given that some problems require more consultation and engagement than others.



Deciding who to consult with is often the most difficult aspect of planning consultation. Some principles to bear in mind are:

- the Unit Head and/or Executive Sponsor must be fully engaged from the commencement of the process even where the policy document being adapted or created is a procedural document.
- anyone whose work, conditions of work or environment will be directly impacted by the proposed policy, procedure or change must be consulted. For instance, if a procedure that is being developed will impose extra steps within the workflow of a particular business unit, or change the way decisions are made, all the people who are involved in performing that workflow, or making those decisions, need to be involved.
- if the policy document contains, encompasses, or references legal requirements (including requirements under the ESOS Act), the author should consult early with the Office of General Counsel and any other business area with relevant expertise.

*The broad consultation stage acts as a final check that all relevant factors have been considered*

- if the policy or procedure affects, relates to, or intersects with the responsibility area of another part of the University, the author needs to work with them. For example, if the document will change something about how international students are managed, close collaboration with International Office would be needed.
- **students must be consulted if the document will affect them.** Policy and Governance can assist with this step by convening a Student Policy Review Panel. Other mechanisms may also be used, for example, via focus groups, surveys, open forums, that are appropriate for the scale of the change proposed. As a general rule, the bigger the change, the greater the level of consultation required.

#### Bulletin Board Consultation:

Broad all of University consultation should be undertaken via the Bulletin Board on the Policy DDS. The Executive Sponsor must be aware of the draft for university-wide consultation where this step is required. The length of time for targeted consultation will depend on the complexity of the policy, its audience, and the time of the year. As a rule of thumb, the minimum term should be 10 working days (2 standard weeks) or longer if holidays / University closure days fall within the period.

The nominated Author will receive an email from the Policy DDS with participants responses as they are received and also a collated report of all responses by clause at the conclusion of the Bulletin Board consultation period.

Feedback should be considered and discussed with the reference group and appropriate amendments made to the draft. It is recommended that each participant is provided with a reply indicating how their feedback has been used, or why it was not used.

#### **Step 6 – Endorsement and Approval**

Documents are usually endorsed and approved as below:

Document Type	Endorser	Approver
University Rules	N/A	Board of Trustees or Vice-Chancellor and President
Other Policy Documents (except Procedures and Guidelines) related to governance of the University	Relevant standing committee of the Board of Trustees	Board of Trustees

Other Policy Documents (except Procedures and Guidelines) related to the quality and assurance of academic matters affecting the University	Academic Senate Policy Committee	Academic Senate
Other Policy Documents (except Procedures and Guidelines) relating to the management and operations of the University	Executive Committee	Vice-Chancellor and President
Procedures	Unit Head	Executive Sponsor
Guidelines	N/A	Unit Head

Documents are submitted for approval via the Policy DDS. A submission (or covering memo) is completed online by the Unit Head or nominee. The covering memo explains to the endorsing and approval authorities the rationale for the Policy Document, the changes and the implementation issues associated with it. The emphasis will vary according to the subject matter, but the core matters to be covered in the approval submission are the:

- purpose of the Policy Document
- nature of the changes being made if a revised Policy Document
- consultation undertaken
- issues identified during consultation
- resource implications – training/financial/staffing/compliance
- communication strategy and implementation responsibility.

### **Step 7 – Publication, Communication, and Implementation**

Policy and Governance notify the Author and arrange standard communications on E-Update and Viva Engage when a revised or new Policy Document is published. Policy Documents that impact on students are posted on vUWS. Additional content can be requested by the Unit Head to be added to these standard communications.

All new and substantially changed Policy Documents must have an implementation plan developed as part of their publication process.

It is important to think about the timing of release of new versions of Documents. A new version of a Document relating to students that becomes effective in the middle of a teaching session can lead to confusion for students about what version applies to them. It may be appropriate to hold over the date of effect to the start of the next semester, first day of the year etc.

### **Step 8 – Review**

#### *Standard Review*

All policies are subject to a cycle of review. The standard review cycle for Policy Documents is three (3) years.

A standard review of a Policy Document should cover:

- any issues or concerns that have been identified in the operation of the Policy Document
- an evaluation of the level of compliance with the Policy Document and evidence that it is having the intended effect

- whether the content 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 Document.

The Policy DDS generates automated notices to Unit Heads when review dates arise.

New Policy Documents or where there have been significant changes should be subject to a post-implementation review twelve months (one year) after their publication.

*Good policy hygiene through regular review and updating supports compliance, good business practice and keeps the review task manageable.*

### *12 Month Post-Implementation Review*

The purpose of a post-implementation review is to assess the policy's performance and its alignment with the desired goals and objectives. This is not primarily a content and style review, but rather looks at how effective the Policy Document has been in terms of roll-out and usefulness. Key questions that are considered in such reviews include:

- Was the Policy Document successful in achieving its intended outcomes?
- What has been the impact of this Policy Document?
- Did the policy create any unintended consequences, confusion or uncertainty?
- What concerns have been raised?
- Were the implementation strategies and processes proposed in the Implementation Plan fully rolled out? Did they prove to be efficient and effective?
- Are there any gaps or areas for improvement?

The review typically involves collecting and analysing various types of data, including quantitative data (e.g., statistical indicators, performance metrics) and qualitative data (e.g., stakeholder feedback, case studies). It could include issue registers, surveys, interviews, focus groups, data analysis, and consultation with relevant stakeholders.

Based on the findings of the review, Unit Heads and Executive Sponsors can make informed decisions regarding policy adjustments, modifications, or even termination if the policy document is not achieving the intended outcomes.

## **SECTION FOUR – PROCEDURE DEVELOPMENT**

At Western, all procedures are considered mandatory and ‘belong’ to a Head Policy, from which they derive their principled basis. Procedures, therefore, should NOT contain high-level or aspirational statements; they are intended to provide readers with practical steps for implementation.

Procedures may be amended with the oversight of the relevant Executive Sponsor, which allows for greater flexibility and agility in responding to changing circumstances.

Procedures have similar style and use the same template.

Ways in which procedures may differ from a policy style are:

1. Procedures may follow a sequential, step by step structure, with expected actions ordered in a way that is concise, specific, and actionable. Where there is flexibility to make more than one decision, the procedure should clearly specify that, and the considerations that should guide the choices.
2. Procedures are typically focused on a detailed explanation of the roles and responsibilities of all the people who will have involvement in delivering the procedural content. They may include a Roles and Responsibilities table to represent this coverage.
3. Procedures may link to visual aids, such as diagrams or flowcharts, if it helps make better sense of the information.
4. Procedures may provide warnings or cautions where appropriate to highlight potential risks or hazards associated with certain steps. This helps to ensure safety and prevent accidents or mistakes.
5. While all documents should be written with clarity and audience in mind, taking a user-centric approach. Conscious consideration of the needs and capabilities of the people who will need to use the procedure is essential. Content should be tailored to the knowledge and experience levels of users. For some procedures, this might mean providing more explanation or background to help users understand the context of the procedural actions.

## SECTION FIVE – MORE INFORMATION

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

### *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 Cambridge Guide to English Usage – ed. Pam Peters, Cambridge University Press 2004
- The Plain English Campaign <http://www.plainenglish.co.uk/>
- Policy Without (Much) Pain – 2013 – Association of Tertiary Education Managers Institutional Policy Network
- Style Manual – Sixth Edition, John Wiley and Sons, 2002
- Write Mark – New Zealand’s Plain English Standard  
<http://www.writemark.co.nz/mainsite/Home.html>
- Writing at Work – Neil James, Allen & Unwin, 2007