Guidance on developing policies and procedures

Item	Detail
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Policy Officer	Head of Governance & Regulatory Affairs
Department	Directorate
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Accessibility Checked	7th October 2019

1. Introduction and Purpose

All organisations require clear, consistent, unambiguous and easily accessible policies and procedures. The purpose of this Guidance is to set clear expectations in relation to the development, implementation and management of all University of Worcester policies and procedures. This Guidance seeks to ensure that members of staff who are involved in policy development are clear on their roles and responsibilities so that all University policies and procedures are developed and maintained in a consistent and coherent manner.

2. Key Policy Development Stages

2.1 Justification of the Policy

The first stage in developing a policy is to set out the justification for having such a policy, what the policy should achieve, and who the target audience should be. Depending on the nature of the policy, this initial stage could be completed by an individual member of staff, a team or a small working group tasked with delivering the policy objectives.

At this stage, it is important to identify who the 'Policy Officer' for the document will be i.e. the individual that will oversee the day-to-day implementation and management of the policy.

2.2 Researching and Analysing the Approach

At an initial stage, it is useful to consult with key stakeholders who will use the policy, and also to research and analyse information on the actual requirement for the policy (i.e. legislation). It may also be useful to research examples of best practice from other organisations prior to putting the initial draft together.

2.3 Decide what sort of document is needed

It is important to be clear about the purpose and intent of the document you are writing. The following definitions apply:

'Code of Practice' is a set of guidelines and regulations to be followed and does not normally have the force of the force of law.

'Framework' is a set of assumptions, concepts, values and practices

'Guideline(s)' defines the recommended approach for conducting a specific activity normally providing operational detail, instructions, and advice in order to facilitate the implementation of policies and procedures.

'Policy' is a principle or set of rules approved by the University's Board of Governors, Academic Board or the Vice Chancellor's Executive Board to guide decisions and achieve rational outcomes.

'Procedures' define how a policy will be implemented. They provide the objectives, functions, and tasks to accomplish the policy, and explain the circumstances in which the policy is to be implemented. They should include areas of responsibility for policy and procedural implementation, such as who decides on policy exemptions, who holds relevant forms etc. It is recommended that they include a flowchart to explain any complex processes. Procedures may be incorporated into an overarching Policy.

2.4   Drafting the Policy

Once the nature of the document has been identified the policy should be written following the Guidance on Writing an Accessible Document (Appendix 4)

In addition, the policy needs to:

- Be clear, easy to read, and non-technical;
- Keep to the right level of information for individuals to act upon and follow successfully;
- Be clear who the policy relates to i.e. is it the whole University community; or students (undergraduate and/or postgraduate); staff (all, permanent, Associate Lecturers etc); sub-contractors; consultants.
- Be factual, with checks made for accuracy, as well as for consistent use of terminology and spelling checks;
- Avoid implying choice i.e. use 'must' instead of 'should not';
- Be succinct and avoid loopholes
- Be written in the third person, and generally in the present tense and active choice i.e. "Staff must comply with this policy";
- Spell out acronyms in the first usage, with the abbreviation following it in parentheses (). The abbreviation can be used thereafter;
- Keep to gender and politically neutral language i.e. 'they' instead of 'he or she'

2.5   Managing Version Control

All versions of a draft policy should be numbered in order to be clear as to what stage the document is at (either at draft or approval stage). A first draft of a policy ill be Draft version 0.1, Draft Version 0.2, with the zero indicating that the policy is in draft stage. When a policy is approved, the policy must be numbered as Approved Version 1.1 and so on.

2.6 Consultation

When a draft policy is at a fairly advanced stage, but prior to its final approval, it is important to ensure that appropriate consultation is undertaken both with internal and, where appropriate, external stakeholders. These would normally include relevant members of staff, the Students' Union, and staff Trade Unions.

2.7 Equality Impact Assessment

Once the consultation process has been completed the policy must be subject to an Equality Impact Assessment (see Appendix 3). Where no significant issues are highlighted, the policy can be submitted to an appropriate Group or Committee for consideration and recommendation to an Approval Body. If the assessment process highlights issues, the Policy Officer must take appropriate steps to mitigate these (including undertaken further consultation with key stakeholder groups where necessary), prior to finalising the draft for approval.

2.8 Approval Process

A policy is considered and approved by an 'Approval Body'. These are either the Board of Governors (where the document forms part of the Corporate Governance Framework); Academic Board (where the document relates to the University's academic provision); or the Vice Chancellor's Executive Board (where the document relates to the day to day operation of the University).

Where a policy is identified to be approved by either the Board of Governors or Academic Board it should be submitted to that body via the relevant sub-committees. Advice on this is available from the Head of Governance and Regulatory Affairs (for Board of Governor approval) or the Academic Registrar (for Academic Board approval).

The minutes of the Approval Body should clearly state that the policy has been considered and approved.

2.9 Post approval Actions and Implementation

Once a policy has been approved:

1. The policy should be uploaded, as a pdf, to an appropriate area on the University website. This would normally be within the pages of the department where the policy was initially created
2. Once the policy is uploaded, a link should be sent to the Head of Governance and Regulatory Affairs so that the document can be added to the central Register of Policies and Procedures.
3. It is the responsibility of the Policy Officer to upload the pdf and to make the University community aware of a new or updated policy within one month of the policy being approved and/or updated. Dissemination of the policy may

be carried out through staff training; weekly All Staff email; notification to Heads of Departments; notification on student Sole Page; in departmental meetings.

3.   Reviewing a Policy

A policy should be reviewed every three years. A note of the review date should be included in the Approval Information Box. In some instances, the Approval Body may decide that a review should be undertaken after the first year of implementation; thereafter the policy should be reviewed on a three year cycle.

4.   Updating a Policy

Minor changes may be made to a Policy without it going through the full policy development and approval process is the change is not substantive and does not modify the intent, meaning or focus of the policy. The decision as to whether those criteria are met will be jointly made by the Policy Officer and the Head of Governance and Regulatory Affairs, or in the case of academic related policies, the Academic Registrar.

Major or substantive revisions to an existing policy must be treated in the same way as new policies and will undergo the development and approval process described in Section 2 of this document.

When a policy has been reviewed the revised document should be uploaded to the department's webpage, replacing the previous version. A copy of the previous version should be kept by the department in line with the Document Retention Schedule.

When uploaded a revised version of a document to the website please ensure that the file name of the document is exactly the same as that it is replacing i.e. there are no dates, version numbers in the file name. This will ensure that any hyperlinks to the document from elsewhere on the website are not broken.

Advise the Head of Governance and Regulatory Affairs that the document has been reviewed and provide a link to the revised document.

5.   Retiring a Policy

Where a policy is no longer applicable, has been changed into guidelines or procedures, or where it would be more effective to integrate it into another policy, the Policy Officer should advise the Head of Governance and Regulatory Affairs. The policy should be removed from the department's webpage and archived. The Head of Governance and Regulatory Affairs will ensure that the policy is removed from the University's online Register of Policies and Procedures.

6.   Appendices/Related Documents

Appendix 1 - How to write a policy: structural overview

Appendix 2 - Key information about the policy (Cover Page)

Appendix 3 – Guidance on Equality Impact Assessment

Guidance on writing an accessible document

Appendix 1

Policy Template

University logo

Insert the University logo in the top left hand corner of the front page of the document. You can add the department name to the logo. Further advice on this is available in the [University's branding guidelines](#)

Policy Title

The title of the policy must use Calibri or Arial font, 16pt, Bold, Capitals only at the start of words, left aligned.

Approval Table

Information about the policy approval and review should be included at the bottom of the cover sheet of the document (see Appendix 2)

Purpose

This should provide a clear and succinct statement of the reason for the policy.

Overview

An overview of the policy, including any background information that provides a context for the document.

Definitions

If necessary, for the purposes of clarity, a list of key definitions should be included.

Scope

Clearly identify who the policy applies to. If it relates to students is this 'All Students' or a specific group of students i.e undergraduate or postgraduate, a specific course. If it relates to staff is this 'All Staff' or a specific group of staff i.e. permanent, full time, part-time, temporary, Associate Lecturers, agency staff, consultants, sub-contractors, honorary appointments.

The Policy/Policy Statement

This is the core section of the policy document. It should outline the underlying principles that constitute the policy. It should include:

- What situations are covered by the policy
- The major conditions and restrictions of the policy
- What is expected of the individuals within the scope of the policy
- Exclusions or special circumstances, areas of risk, and why these are identified as such

- responsibilities for carrying out the policy, and what happens if the policy is breached.

Related Policies or Documents

List the title and effective date of any policies referred to and include a hyperlink.

Procedures

- These can either be a separate document or be part of the policy document. When incorporated into a policy document the procedures need to be clearly identified within the document.
- The document should outline the Who, How and When.
- Realistic goals and timescales need to be included
- It is often useful to include a flowchart to help explain complex procedures

Appendix 2

Approval Table

Each document needs to include an Approval/Review Table. This should be included on the bottom of the cover sheet or on the last page of the document and should be updated each time the document is reviewed.

If the policy is new or a substantial revision of a former document add an additional line which articulates 'policy/procedures superseded by this document'

Item	Notes
Version Number	See 2.5 above
Date of Approval	Date document approved
Approved by	Title of Approval Body
Effective from	This may the same as the approval date or a later date
Policy Officer	Post holder who is responsible for the Policy (job title not an individual's name)
Department	The name of the department which administers the policy
Review date	Date of next review
Last reviewed	Include date and detail of any significant amendments
Equality Impact Assessment	Date the EIA was undertaken
Accessibility Checked	Date the Accessibility Check was undertaken

Guidance on completing an Equality and Impact Assessment (EIA)

The University is committed to promoting equality and participation in all it activities, whether this is related to the work it does with students and external stakeholders or its responsibilities as an employer. As a public authority the University is required to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations when making decisions and developing policies and procedures. To do this, it is necessary to understand the potential impacts of policies and procedures on different groups of people.

1. What is an EIA and why do we need to complete one?

An EIA is an evidence-based approach designed to help ensure that policies, practices, and decision-making processes are fair and do not present barriers to participation or disadvantage any protected groups from participation. This includes both strategic and operation activities. The term 'policy' used throughout this document covers the range of functions, activities and decisions for which the University is responsible, including learning and teaching, research and employment policies and procedures.

The EIA will help to ensure that:

- We understand the potential effects of the policy or procedure by assessing the impacts on different groups both external and internal
- Any adverse impacts are identified and actions identified to remove or mitigate them
- decisions are transparent and based on evidence with clear reasoning
- the publication of the policy or procedure meets the standards for being perceivable, operable, understandable and robust

2. When do I need to complete an EIA?

Whether an EIA is needed or not will depend on the likely impact that the policy or procedure may have and relevant of the activity to equality. The EIA should be done when the need for a new policy or procedure is identified, or when an existing one is reviewed. Depending on the type of policy or activity advice can be sought from the Head of Governance and Regulatory Affairs, the HR department or the Academic Registrar.

An EIA should form part of any new policy or procedure and be completed in as set out in the Guidance on Developing a Policy or Procedure.

3. Who is responsible for completing and signing off an EIA?

The Policy Officer responsible for the policy or procedure should undertaken the EIA and provide the Approval Body for the document with the outcomes of the EIA and any mitigating actions taken to address negative outcomes. The completion of the EIA must be noted in the Approval Box on the policy document.

4. Undertaking an EIA

4.1 Building the evidence and making a judgement

In the case of new policies or procedures there may be little evident of the potential effect on protected characteristic groups. In such cases careful consideration should be given to whether the requirements of the policy could potentially discriminate against anyone.

Discrimination is where someone is treated less favourably or put at a disadvantage because of their protected characteristic. The different groups covered by the Equality Act are referred to as protected characteristics:

- Disability;
- Gender reassignment;
- Marriage or civil partnership status;
- Pregnancy and maternity;
- Race and ethnicity;
- Religion or belief;
- Sexual orientation;
- Sex (gender);
- Age

It is good practice to include employment characteristics such as full/part time contract status and fixed term/open contracts. In the context of the University consideration should also be given to whether any group of students could be being discriminated against such as undergraduate/postgraduate, full-time/part time..

4.2 Consultation

Consultation can add evidence to the assessment. Consultation is very important and key to demonstrating that organisations are meeting the equalities duties, but it also needs to be proportionate and relevant. Considering the degree and range of consultation will safe-guard against 'groupthink' by involving a diverse range of consultees. It is important to guard against over consultation on a small policy or procedure or under consultation on a significant policy or procedure.

4.3 Assessments

It is beneficial to undertake a Provisional Assessment once the policy or procedure has been sufficiently developed. Any potential negative impacts identified as a

result of the Provisional Assessment should be considered in the further development of the policy or procedure. Once the final draft of the policy or procedure has been completed and full EIA should be undertaken and the outcome noted and provided to the Approval Body as part of the policy or procedure approval process.

4.4   Valuing Differences

EIAs are about making comparisons between groups of individuals, whether they are groups of staff or students or external stakeholders, to identify differences in their needs and/or requirements. If the difference is disproportionate, then the policy may have a detrimental impact on some and not others.

4.5   Evaluation Decision

Having undertaken the EIA (see Section 5) the following options are available to the Policy Officer.

1. Policy or procedure will be recommended for approval
2. Decision to not proceed with the policy or procedure because the evidence shows bias towards one or more groups
3. Adapt or change the policy or procedure in a way which eliminates the bias
4. Proceed with caution, providing justification for this decision.

In most cases, where disproportionate disadvantage is found by carrying out an EIA, policies are usually changed or adapted.

4.6   Recording the EIA

Once the decision has been taken to proceed with the policy or procedure it should be transmitted to the Approval Body, through the University's normal approval processes. The document should be accompanied by a summary of the EIA process and completed EIA (Appendix 1).   The date that the EIA was completed should be recorded in the Approval Box on the policy or procedure document. The Policy Officer should retain a copy of the EIA alongside their copy of the policy or procedure, there is no requirement to publish the EIA.

Equality Impact Assessment for Policies and Procedures Questionnaire

1.   Name of policy or procedure being assessed

2.   Summary of aims and objectives of policy or procedure

3.   What involvement and consultation has been done in relation to this policy or procedure?

4.   Who is affected by the policy or procedure?

Protected Characteristic Group	Is there a potential for positive or negative impact?	Please explain and give examples of any evidence/data used	Action to address negative impact (e.g. adjustment to the policy or procedure(
Age			
Disability			
Gender			
Gender re-assignment			
Marriage or civil partnership			
Pregnancy or maternity			
Race or ethnicity			
Religion or belief			
Sexual orientation			
Full or part time (staff or student)			

Protected Characteristic Group	Is there a potential for positive or negative impact?	Please explain and give examples of any evidence/data used	Action to address negative impact (e.g. adjustment to the policy or procedure(
Fixed term or open contract (staff)			
Undergraduate or postgraduate (students)			

5. What are the arrangements for monitoring and reviewing the actual impact of the policy or procedure?

6. Evaluation

Is it possible that the proposed policy or procedure could discriminate or unfairly disadvantage people?

a) No barriers identified, therefore activity will proceed

b) Stop the policy or procedure as the data shows bias towards one or more groups

c) Adapt or change the policy in a way which will eliminate the bias

d) Barriers and impacts are identified, however having considered all available options carefully, there appears to be no other proportionate way to achieve the aim of the policy or procedure. Therefore proceed with caution with the policy or procedure knowing that is may favour some people less than others, providing justification for this decision.

EIA completed by:

Date: