

POLICY DEVELOPMENT FRAMEWORK

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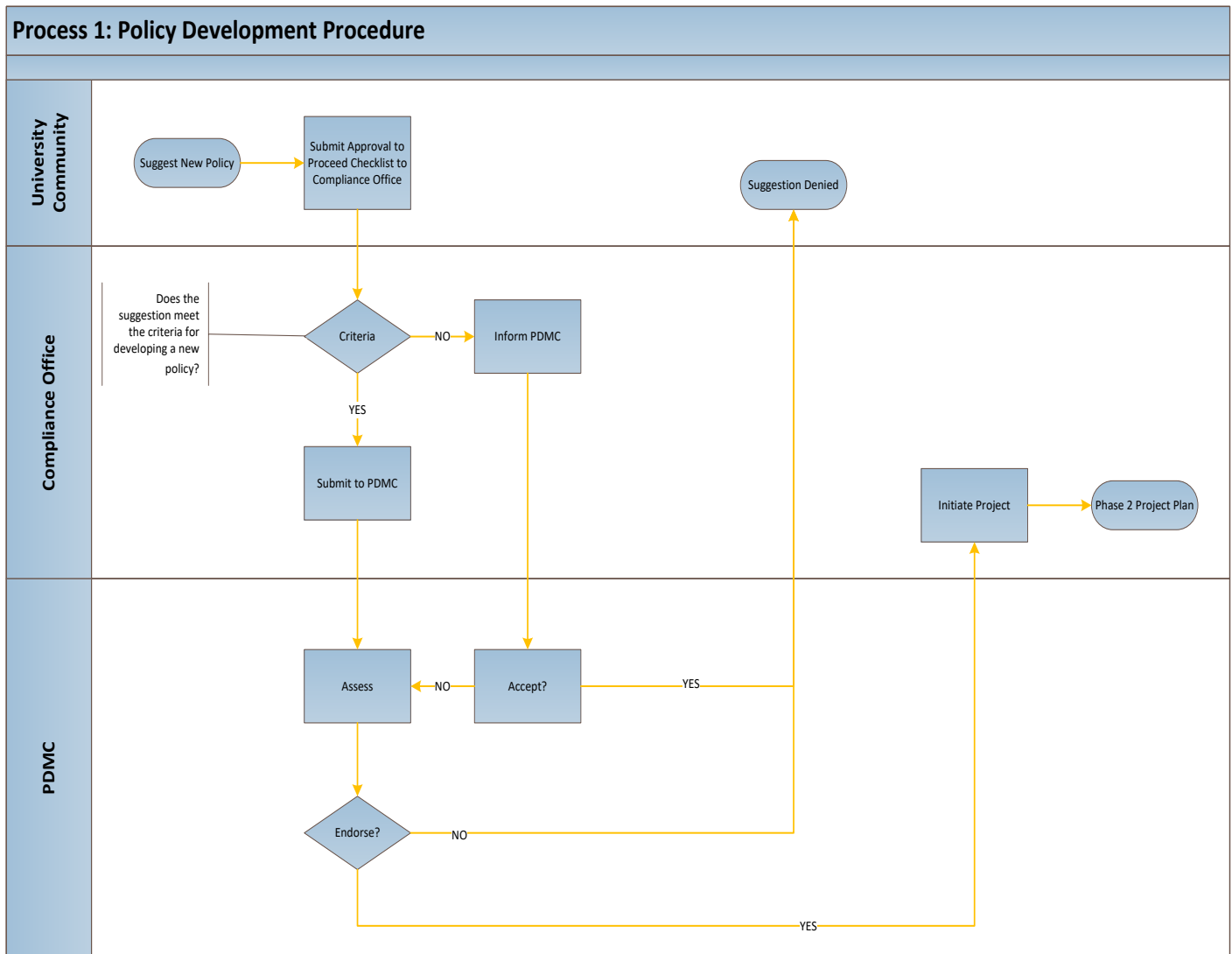
PROCEDURE

Procedure Number	Version 1.0
Date of Approval	24 June 2023
Policy Sponsor	ED: VC
Review Date	24 June 2026
Approver	Vice-Chancellor
Department/Unit	Office of the VC: Compliance Management Function

Important Information

(a). This Procedure consists of 4 processes:

- 1) Process 1 – Policy Development
- 2) Process 2 – Policy Amendment
- 3) Process 3 – Policy Project
- 4) Process 4 – Policy Fast-track



1. Process 1: Policy Development Procedure

Step 1.1: Suggest New Policy (Proposer – Member of the University Community)

- (a) A member of the University Community may propose/suggest a new Policy.
- (b) If the member believes that the University requires a new Policy, they must complete the CPUT **Approval to Proceed (Phase 1) Form** available on the Policy Library at www.cput.ac.za/policy/home and submit it to compliance@cput.ac.za.
- (c) The submission must address the criteria set out in step 1.2 below.

Step 1.2: Criteria Assessment (Compliance Office)

- (a). The Compliance Office must evaluate the submission against the following criteria:
 - 1) will the Policy fulfil the University's obligations under legislation?
 - 2) will the Policy help us achieve our strategic plan?
 - 3) will the Policy address the needs of the University Community?
 - 4) will the Policy satisfy audit recommendations?
 - 5) will the Policy correct a practice or behaviour that is performing poorly?
 - 6) will the Policy satisfy the University's risk profile ?
 - 7) will the Policy benefit the University in any other manner?
- (b). The suggested Policy should meet at least one of the above criteria questions.
- (c). The member will make a submission to the **Compliance Office** for assessment against the Approval to Proceed Checklist available from the Compliance Office and [Policy Library](#). If the submission was not made by the relevant Policy Sponsor, the member must submit an indication of support from the relevant or potentially relevant Policy Sponsor.
- (d). If the suggested Policy does not meet the criteria, the Compliance Office will inform the Policy Development and Management Committee (PDMC) about the decision.
- (e). If the suggested Policy meets the criteria, the Compliance Office will submit a recommendation to the PDMC.

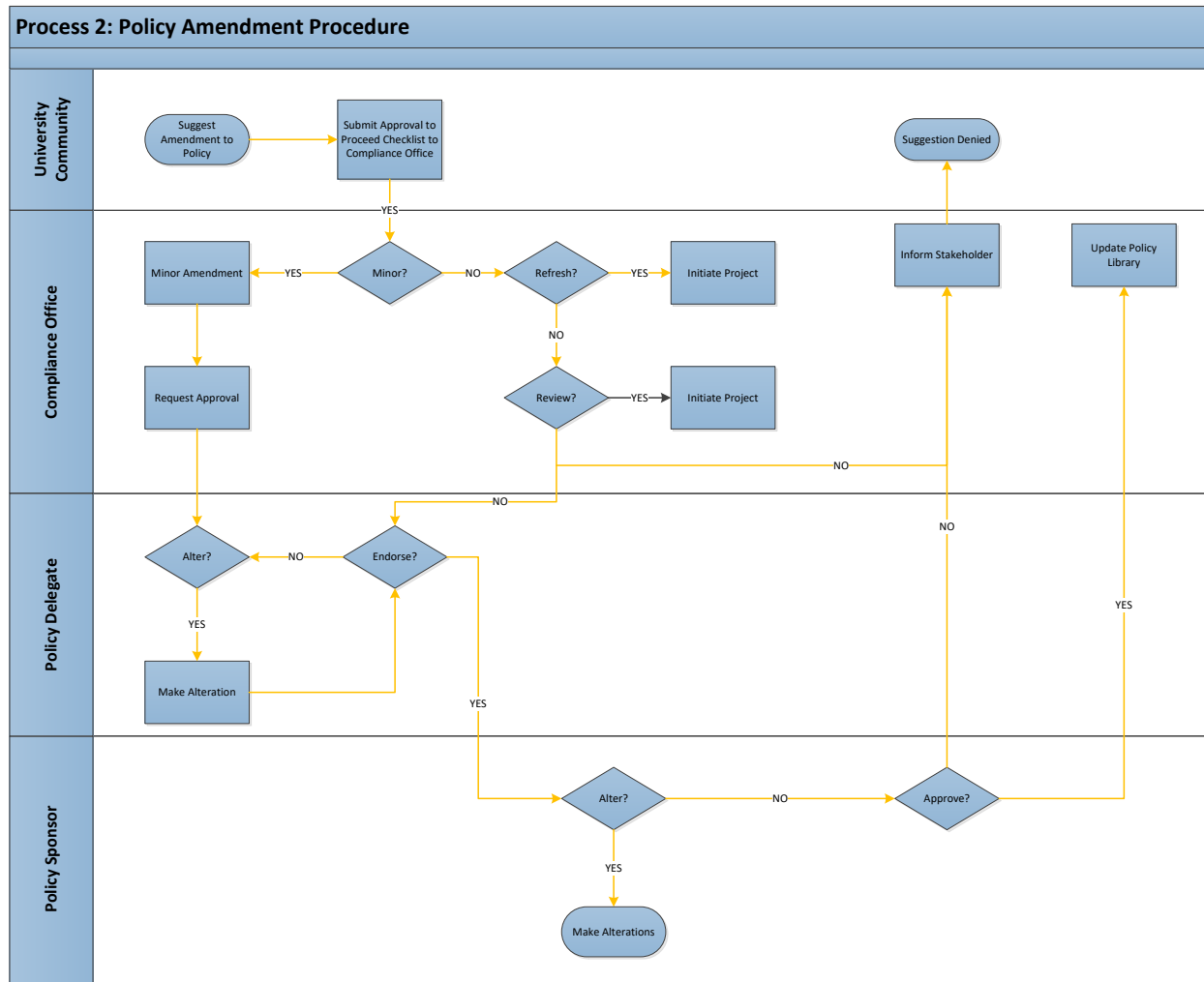
Step 1.3: Need Assessment (PDMC)

- (a). When the PDMC receives a recommendation from the Compliance Office, they must assess the recommendation and respond within five (5) working days of the request.
- (b). If a member of the PDMC disagrees with a decision made in step 1.2 (b) (about a suggested Policy not meeting the criteria), the PMDC member must provide the PDMC with satisfactory evidence or argument to support the endorsement of the suggested Policy.
- (c). After receiving evidence in support of the endorsement from a PDMC member as referred above (b), follow step 1.3 (a).

Step 1.4: Approved or Denied (Compliance Office)

- (a). With a simple majority (50% + 1), the PDMC can endorse the development of a new Policy, inform the Proposer and the relevant Policy Sponsor to initiate Phase 2 – Project Plan (see Process 3 – Policy Project).
- (b). Should the PDMC not endorse the development of a new Policy, inform the Proposer and the relevant Policy Sponsor that the suggestion has not been endorsed.

Process 2: Policy Amendment Procedure



2. Policy Amendment Procedure (Process 2)

Step 2.1: Suggest Amendment to Policy (Proposer)

(a). A Proposer who submits a suggestion to amend an existing Policy, must complete the **Approval to Proceed Form** found on the CPUT Policy Library at www.cput.ac.za/policy/home and submit it to the Compliance Office at compliance@cput.ac.za.

Step 2.2: Amendment Assessment (Compliance Office)

- (a). The Compliance Office must determine whether the suggested amendment is a Minor Amendment, a Policy Refresh or a Policy Review as defined in the Policy Development Framework Policy.
- (b). Should the suggested amendment meet the definitions as referred to above, the Policy Delegate and the relevant Policy Sponsor must be informed to initiate Phase 2 – Project Plan (see Policy Project Process).
- (c). For Minor Amendments, the Policy Delegate must make the proposed changes and send the draft, including a copy of the Policy, identifying the proposed changes to the Policy Sponsor for endorsing. If the amendment request was submitted by the relevant Policy Delegate and Policy Sponsor, proceed to step 2.4.
- (d). Should the suggested amendment not meet the definitions of either Minor Amendment, Policy Refresh or Policy Review, inform the Proposer who suggested the amendment.

Step 2.3: Endorsing a Minor Amendment (Policy Sponsor)

(a). The Policy Sponsor, after receiving changes to a policy from the Policy Delegate and Compliance Office, must evaluate and provide a response within five business days of receiving the endorsement request by either:

- 1) rejecting the amendment;
- 2) making further amendments to the Policy; or
- 3) endorsing the Policy.

(b). Note: The Policy Sponsor must respond to the Compliance Office and Policy Delegate for all options above.

Step 2.4: Approving a Minor Amendment (Policy Sponsor)

(a). The Policy Sponsor, after receiving changes to a policy from the Policy Delegate and Compliance Office, must evaluate and provide a response within five business days of receiving the endorsement request by either:

- 1) rejecting the amendment;

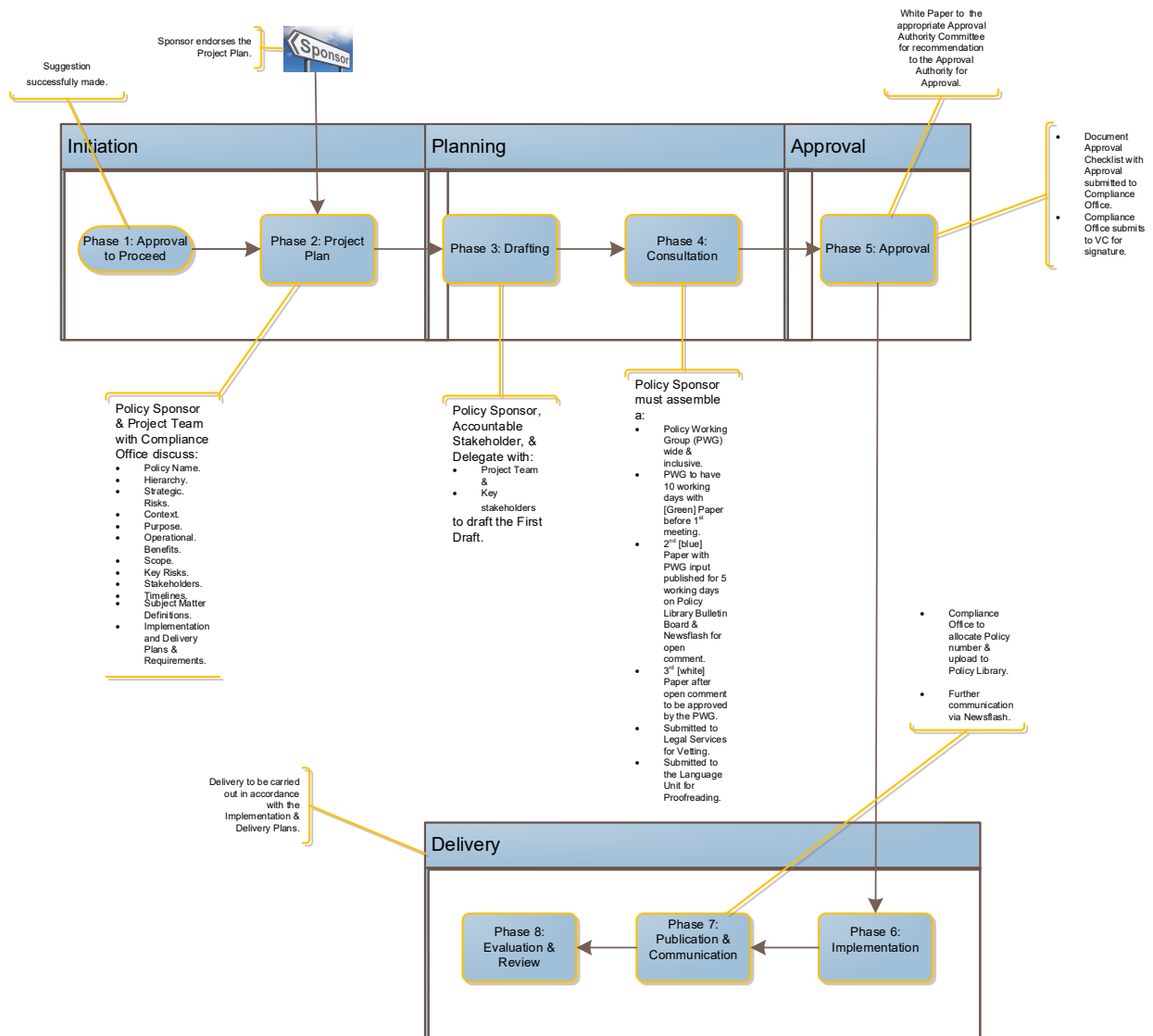
- 2) making further amendments to the Policy; or
- 3) approving the Policy.

Step 2.5: Amendment Result (Compliance Office)

(a). Should the amended Policy be approved by the relevant Policy Sponsor in line with 2.4 above, the new version must be uploaded to the CPUT Policy Library in accordance with the CPUT Policy Upload Control Document.

(b). Should the Policy Delegate or Policy Sponsor reject the suggested amendment, the Proposer must be informed and the decision that the suggestion was rejected must be added to the next agenda or correspondence to the PDMC.

Process 3: Policy Project



3. Policy Project Procedure

Step 3.1: Project Plan (Policy Delegate)

- (a). The Policy Delegate, under the instruction of the Policy Sponsor, must develop a Project Plan that captures the information listed in Phase 2 of Process 3 by using the data from either Process 1 or 2.
- (b). The Policy Delegate must submit the Project Plan to the Project Team and the Compliance Office and work with them to finalise.

(c). The Policy Delegate must perform a preliminary gap analysis when requested to do so by the Project Team or the Compliance Office. The Policy Delegate must submit the Project Plan to the Policy Sponsor for endorsement.

(d). Note: When there is a dispute between the Project Team members, the Policy Sponsor's decision is final.

3.2: Gap Analysis (Policy Delegate)

(a). The Policy Delegate must work with the stakeholders as identified in the Project Plan to identify:

- 1) Which other institutions to use as benchmarks;
- 2) What better practice, best practice or common practice to take into consideration;
- 3) What legislative requirements; and
- 4) Which internal challenges (such as audit requirements) should be addressed by the Policy.

(b). Establish the content to be factored into the Policy as well as the terms to be defined within the Policy.

3.3: Recommendation (Policy Delegate)

(a). The Policy Delegate must work with the Project Team and/or Compliance Office to develop a Recommendation Report which records an outline of the implementation, evaluation and communication requirements.

3.4: Drafting (Policy Delegate)

(a). The Flowchart, process 3.5, illustrates the drafting and approval pathway for all Policies. If Procedures were identified in the Recommendation Report, draft these first, starting with the process maps for each Procedure.

(b). If Control Documents were identified in the Recommendation Report, draft them after drafting any Procedures, and before drafting the Policy.

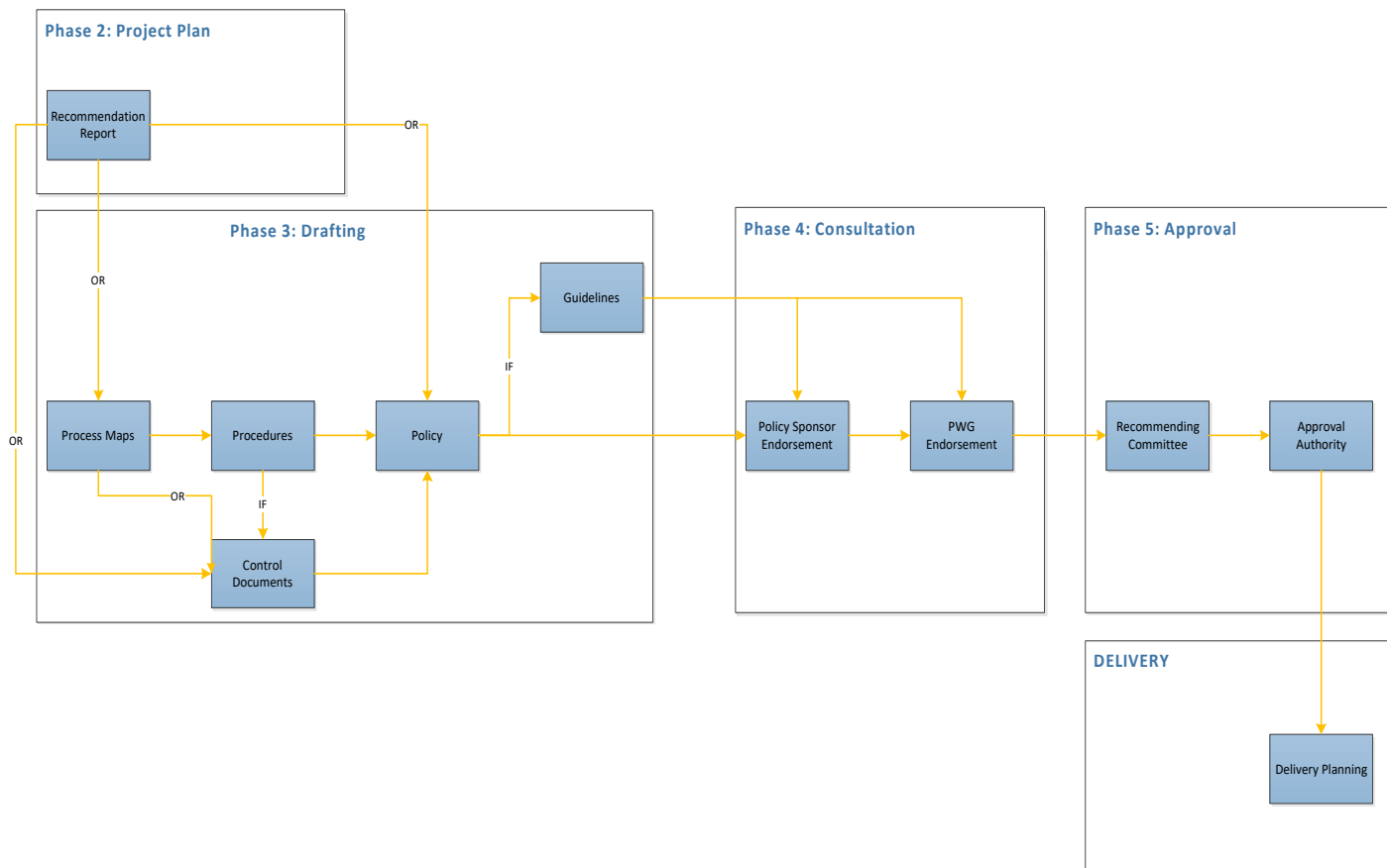
(c). If no Procedures or Control Documents were identified in the Recommendation Report, draft the Policy.

(d). Engage the Project Team and/or relevant stakeholders, as identified in the Project Plan, and test the initial draft.

(e). If Guidelines were identified in the Recommendation Report, draft these last.

(f). Note: Everything else to be implemented can be done in Phase 6 in Process 3.

Process 3.5: Drafting



3.5.1: Consultation

- The Policy Sponsor must assemble a Policy Working Group (PWG) from all relevant areas of the University and as identified in the Project Plan.
- Consultation should be wide, inclusive and provide sufficient time for the provision of feedback.
- PWG must be given 10 working days with First [Green] Draft before first (1st) meeting.
- The Second [Blue] draft with the PWG input must be published for five working days on the [Policy Library Bulletin Board](#) & Newsflash for open comment.
- The Third [White] draft should be open for comments and should be approved by the PWG on the second (2nd) meeting.
- The draft must be reworked where necessary until a final draft Policy has been endorsed by all relevant stakeholders.

(g). After the Third [White] draft has been approved by the PWG, it must be submitted to Legal Services for Vetting, and then to the Language Unit for Proofreading.

3.5.2: Approval

- (a). The Final White Draft must be submitted by the Policy Sponsor to the Appropriate Recommending Council Committee for recommendation to the Approval Authority for final Approval.
- (b). Where the Approval Authority approves the final draft, the Approval should be documented on the completed **Document Approval Checklist** and provided by the Policy Sponsor to the Compliance Office with the final approved version of the policy instrument document.
- (c). The Compliance Office will then submit all the Proof of Approval to the VC for signature.
- (d). Where the Approver approves the final draft, progress the project to Phase 6.
- (e). Where the Policy Approver does not approve the final draft, act on the advice of that Approver.

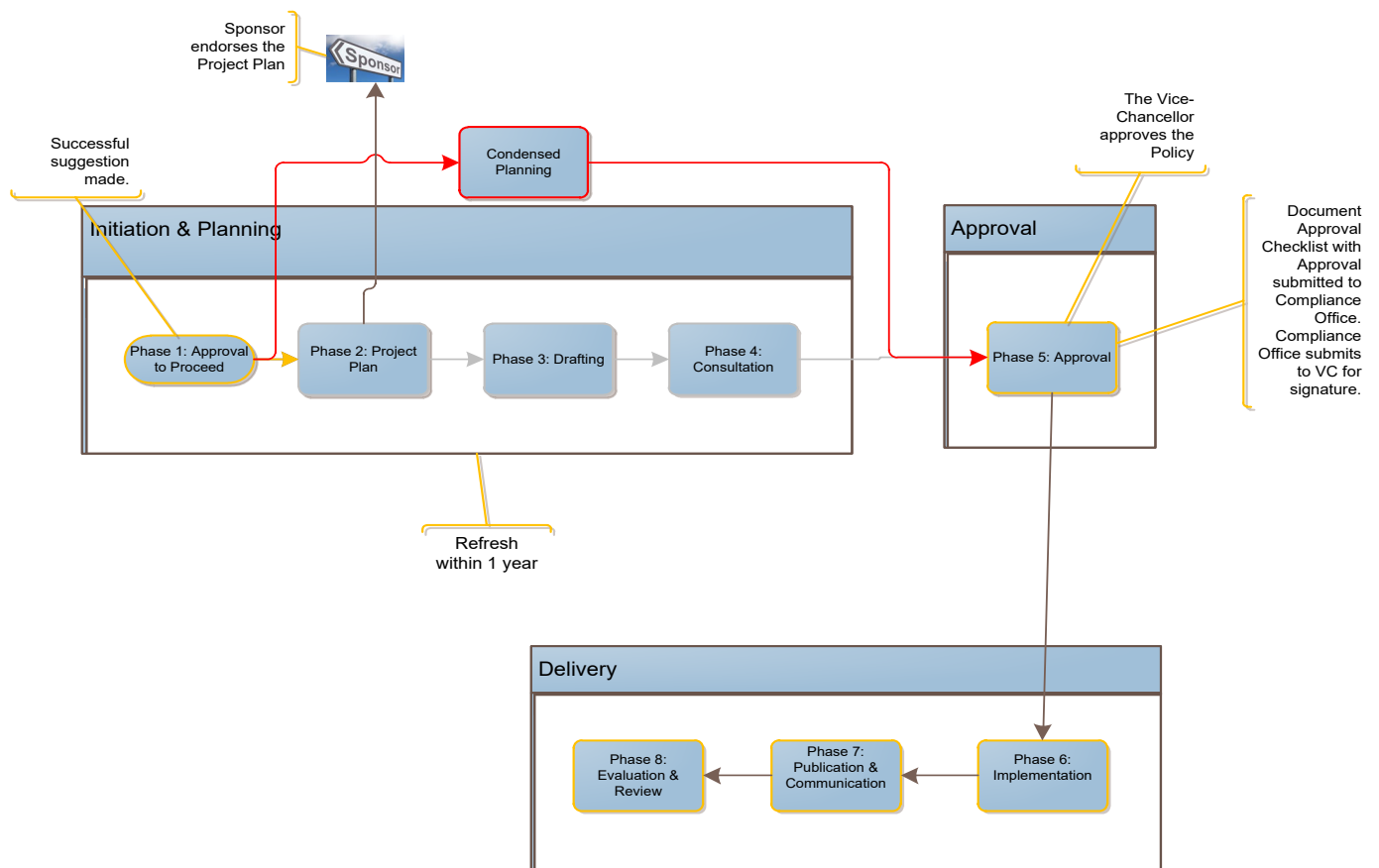
Step 3.6: Delivery Planning (Policy Delegate)

- (a). The Policy Delegate must develop the implementation plan and evaluation plan (the templates are available from the university website and the Compliance Office).
- (b). The Policy Delegate must work with **Learning & Development** and **Marketing & Communication** to develop a training, awareness and communication plan.
- (c). The Policy Delegate must submit each delivery plan to the Compliance Office to check for alignment to the Policy Framework.
- (d). The finalised delivery plans must be submitted to the Compliance Office and Policy Sponsor to be endorsed.

Step 3.7: Compliance (Policy Delegate)

- (a). The Policy Delegate must deliver the implementation, evaluation training, awareness and communications plans.
- (b). Once implementation and communication are sufficient (as identified in the respective plans), the Compliance Office will upload the approved Policy (and Procedures, Control Documents and/or Guidelines) to the CPUT Policy Library.

4. Policy Fast-track Procedure



Step 4.1: Project Plan (Policy Delegate)

(a). Follow step 3.1

Step 4.2: Condensed Planning (Policy Delegate)

(a). The Policy Delegate must work with available relevant stakeholders to identify the content to be factored into the Policy as well as the terms to be defined within the Policy.

(b). **Note:** Fast-tracks are sometimes necessary to ensure compliance with legislation and other requirements, or where documentation exists to evidence that the analyses carried out in Phase 2, Phase 3 and Phase 4 of Process 3 had already been done.

(c). When a new Policy is to be fast-tracked, follow Process 4.

Step 4.3: Drafting (Policy Delegate)

(a). Policy Delegate must draft the Policy and, where necessary, rework this directly with affected stakeholders who are available until a final draft has been endorsed by the Compliance Office and is ready for either:

- 1) provisional approval by the Sponsor; or
- 2) approval by the Approver (VC).

Step 4: Delivery (Policy Delegate)

(a). When a Policy has provisional approval, the Policy Delegate will work with available stakeholders to communicate essential information to those impacted by the new Policy and proceed to Step 3.6: Delivery Planning.

(b). When a Policy has been approved, follow Step 3.6: Delivery Planning.

5. Policy Assessment Notification

(a). Each Policy is recorded on the Policy Framework Database with the date of its next assessment.

(b). Six months before the assessment date, the Compliance Office, through an automated system, will contact the Policy Accountable Stakeholder(s) to:

- 1) alert them to the up-coming deadline; and
- 2) request an assessment of the policy for accuracy, appropriateness and accessibility.

(c). If an Evaluation Plan exists for that Policy, the assessment should take those objectives and measures into account.

(d). If the Accountable Stakeholder is unavailable, the Compliance Office will escalate the assessment notification to the Policy Sponsor.

6. Policy Assessment Result

(a). The assessment can indicate one of the following:

- 1) the Policy remains current and can be renewed on the Policy Library;
- 2) the Policy needs to be amended;
- 3) the Policy needs to be rescinded.

Policy Renewal

(a). The Compliance Office will contact the Policy Sponsor and seek agreement to renew the Policy on the CPUT Policy Library by uploading a new version with an adjusted assessment date.

Policy Amendment


(a). The Compliance Office will work with the Policy Delegates and Policy Accountable Stakeholders to identify what type of amendment is required:

- 1) Minor Amendment;
- 2) Fast-track;
- 3) Policy Refresh; or
- 4) Policy Review.

(b). The amendment will be carried out in accordance with the Policy Development Framework Procedure.

Policy Rescission

(a). The Compliance Office will contact the Policy Sponsor and seek agreement to rescind the Policy.

Certification of Due process: To be verified and signed once approved by the relevant authority	 _____ Vice Chancellor	31.07.2023 _____ Date
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End