Whitepaper

NAVEX[®]

Getting Started with Policy & Procedure Management (Part 2)

In part one of this guide, we established how to line up the people, processes and guiding principles necessary for the launch of an effective policy and procedure management program. This foundation is an essential first step in maturing an organization's real-time management of the policies that define proper conduct and business practices. In part two of the journey – implementation – we'll define how to develop and enforce the policies themselves and ensure they remain in alignment with the organization's strategic objectives.

Writing and Managing Effective Policies

The policy management lifecycle includes four stages – research and creation, review and approval, distribution and training, and tracking and updating.

Stage One: Research and Creation

The Writing Process

This first stage focuses on how to write a policy draft, including the important elements of a policy, the process, the writing style, and design and legal considerations.

Before beginning to write, the policy owner – and writers assigned to the policy – should gather relevant information from a broad range of sources both internal and external.

Internal sources include:

- Employee feedback
- Risk assessment
- Incident reports in the case management system
- Quality and compliance feedback
- Governance feedback

External sources include:

- Legislation
- Regulations
- Customer feedback
- Best practices
- Example policies from other organizations

Writing Style

Policies and procedures should be direct and without room for interpretation, but they should not come off as hostile or condescending. Use the same professional voice regardless of the target audience.

Clarity is crucial – to be certain that the policy resonates and functions as intended, it must be unambiguous, grammatically correct and error-free. Use careful phrasing, as words such as "shall," "should" and "never" can impact the interpretation of a policy.

Formatting

Standardized formatting and style is important for all policies. Policy management software is one way to ensure consistency, as it will restrict authors to preestablished parameters. Some strategies to improve layout include headings and subheadings, bullet points, tables and quotes.

All policy documents should include:

- A policy title
- A brief rationale for why the policy exists, focusing on benefits for the organization and user
- Definitions of key terms

- A scope statement explaining who the policy applies to
- Citation of, and links to, any related documents
- Key dates such as when the policy was written, implemented or altered

Stage Two: Review and Approval

With a policy draft completed, it's time to circulate the document among key stakeholders for review and feedback.

To ensure that policies align with the organization's governance principles and meta-policy – which is the "policy on policies" – a document control administrator should oversee the entire lifecycle for all policies. This includes drafting, reviewing and editing policies before final approval, distribution and training.

Rarely, if ever, does the first draft of a policy meet the criteria for approval. To develop an effective policy system that supports, advances and protects the organization, policy development should be viewed as an ongoing process worthy of sufficient time and resources.

With a draft complete, the owner submits the policy to reviewers that ensure accuracy, completeness and alignment with the meta-policy. This stage can be laborious – reviewers may have differences of opinion, miss deadlines or fail to provide feedback at all. The policy owner must work with reviewers to ensure and consolidate feedback, reconcile disagreements and make requested changes. Rounds of review can include content and readability, legality, and strategic alignment for the organization.

Once all reviewers have signed off, it's time to involve those with final review authority. Typically, only minor changes are necessary at this stage.

Once approved, the policy is official, and part of the organization's policy framework. This step also transforms the policy into a legal document in the eyes of the law.

Yet simply finalizing the policy is not enough – it's still necessary to distribute, track and update the policy as necessary.

Stage Three: Distribution and Training

The simple publication of a policy doesn't guarantee that employees will read it, understand it and refer to it as needed. Before rolling out new policies, a document control administrator must develop a distribution strategy to advise employees that policy changes are forthcoming and to prepare them to adjust to those changes.

Not every policy needs to go to every employee. Tailoring distribution of policies to relevant audiences can help prevent overwhelming users with unnecessary information.

There are three common methods of policy and procedure distribution, each with pros and cons:

Printed copies make a personal impression about the importance of a policy, and handing out the policy in person creates an opportunity to answer questions. This method is time consuming, however, involving costs of time and printing while discouraging frequent updates.

Emailed copies reach their destination quickly and at a low cost versus print media. However, audiences may struggle to find the policy document in the future, and email distribution may not be sufficient to confirm that a recipient read the policy.

Policy and procedure software allows automation of distribution, tracks completion of required reading, provides periodic testing, serves as a one-stop-shop for finding the latest policies and more. These built-for-purpose platforms come are a financial investment, though the efficiencies they facilitate generate a strong return.

Regardless of the chosen approach, distribution should inform users how to efficiently access policies through a central repository. Employees may act in good faith when they do what they think is best to access the latest version of a policy, but without proper guidance, following an outdated version of a policy can create risk.

Stage Four: Tracking and Updating

The last stage of the policy management lifecycle is to establish methods to ensure that policies remain relevant and up to date. This must be a continual process.

Policies can become quickly outdated – and a potential liability – as laws, technology, work habits and social factors evolve. It is thus important that stakeholders continue to align their behavior and decisions to relevant and updated policy guidance.

Organizations should review policies at least once a year to determine the need for possible revision. Ask yourself – is this policy still current with my industry, and does it still solve the problem it was meant to address? An update period is also an appropriate time to decide whether new policies are needed to further support existing policies, or whether reauthorization or retirement of a policy is necessary.

A review period is also a good opportunity to confirm and ensure that only the latest version of a policy is available to employees. Outdated documents should be archived for easy access in the case of an audit or for building a legal defense.

Spreadsheets offer one method for tracking the timeliness of policies. Relevant stakeholders make a list of all the policies and procedures they oversee, when the policies were written and when the next update is necessary. However, this somewhat manual approach may quickly become unwieldy and impractical for a growing organization.

In contrast to spreadsheets, a better method is to use purpose-built policy and procedure software to manage your program. A robust policy management solution will remove the manual administrative tasks of tracking the cadence of policy updates, and will notify stakeholders when it is time to review those policies. Policy and procedure software can launch a manual workflow to ensure the proper collaboration and approvals, and can seamlessly distribute the updated policies for attestation.

Getting started with a policy and procedure management program is a powerful step toward reducing risk and encouraging desired workplace behaviors. As outlined in part one of this guide, defining a specific delegation of responsible parties and decision-makers is necessary to ensure a new program will have the proper governance and scope. In this guide, we've seen how the creation and ongoing review of policies must be a methodical and ongoing process.

A high-performing policy and procedure management program has many moving parts, and there are substantial opportunities to optimize execution. Find more information on how to get started and mature a policy management program at the <u>NAVEX Resource Center</u>.

WWW.NAVEX.COM | info@navex.com | +1866 297 0224

NAVEX is the worldwide leader in integrated risk and compliance management software and services. Our solutions are trusted by thousands of customers around the globe to help them manage risk, address complex regulatory requirements, build corporate ESG programs and foster ethical workplace cultures. © 2022 NAVEX GLOBAL, INC. ALL RIGHTS RESERVED. | 05.28.22