Policy Management Framework

1. Identify the policy need
2. Identify the policy owner (e.g., the responsible College Officer)
3. Consult with key stakeholders
4. Research good practice
5. Draft policy using the approved template
6. Invite feedback from stakeholders
7. Agree on the final draft
8. Circulate policy to relevant committees
9. Incorporate Committee feedback
10. Submit to University and/or College Council Board
11. Publish on the Trinity website
12. Communicate to stakeholders
13. Implement policy
14. Review regularly
# Policy Management Framework

Guidelines on the development, implementation, monitoring and review of policies at Trinity College Dublin

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Appendix 1: Policy Template  
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Appendix 3: Guidelines for writing good policies  
Appendix 4: Policy Review Record Sheet
Policy Management Framework

Guidelines on the development, implementation, monitoring and review of policies at Trinity College Dublin

1. Context
A policy can be defined as ‘a set of principles, rules, and guidelines developed and adopted by an organisation, and published in a format that is widely accessible’. Trinity’s policies represent the official position of Trinity College Dublin, the University of Dublin (hereafter referred to as Trinity) on any aspect of the institution’s activities. They are a statement of intent that guide decisions, and are therefore a critical element of the governance of the University, enabling it to communicate and achieve its objectives, and be compliant with relevant legislation (https://www.tcd.ie/about/legislation/) and with good practice.

Policy management is the process of developing, approving, communicating, implementing and maintaining policies. Effective policy management facilitates good governance and supports Trinity by, amongst other things, demonstrating that policies align and comply with national, European and international legal and regulatory requirements.

A framework for policy management establishes a structure for and outlines the standards and principles of policy development, approval, communication, implementation and maintenance (including review). It helps to ensure a transparent and consistent process for stakeholder input and outlines an appropriate approval pathway.

![Policy development cycle](image)

*Fig 1: Policy development cycle*
2. **Purpose**  
The purpose of these guidelines is to establish and outline a framework for the management of policies at Trinity.

3. **Benefits**  
These guidelines establish a process for the development, monitoring and review of policies at Trinity in a way that ensures transparency and consistency, and is aligned with relevant legislation, regulation and strategy.

4. **Scope**  
This framework applies to the development, approval, implementation and review of all policies (academic and non-academic) including policies that support corporate functions, the student experience, and national and transnational partnerships. Local policies should be developed in alignment with this framework.

5. **Principles**  
The guiding principles for the management of Trinity Policies are that they:

5.1 Be informed by national and international best practice.

5.2 Comply with national legislation and EU legislation as appropriate.

5.3 Be developed in conjunction and align with existing Trinity policies and regulations.

5.4 Be developed according to a standard procedure to ensure consistency.

5.5 Comply with Trinity’s Accessible Information Policy.

5.6 Comply with Trinity’s Visual Identity Guidelines.

5.7 Be in keeping with our commitments to Equality, Diversity and Inclusion (EDI), and ensure that they are non-discriminatory, and are fair and inclusive in meeting the legitimate needs of the diverse groups that make up the University community.

5.8 Be assigned an Owner who has overall responsibility for the implementation of the policy or procedure.

5.9 Be easily accessible and published on the relevant section of the Trinity website which broadly are on the Trinity Teaching and Learning (TT&L) website for academic policies and procedures, on the Policies page on the Trinity website for non-academic policies, the Research website for research policies, the HR website for HR policies and the IT Services website for IT Services policies.¹

5.10 Are communicated in a timely and effective manner.

5.11 Undergo regular monitoring and review in order to ensure that they remain fit-for-purpose.

6. **Policy instruments**  
Policies exist within a hierarchy of broader regulatory instruments, which include:

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¹ There are some exceptions to this. For example, several academic policies are hosted on the Trinity homepage such as Academic Freedom, Fitness to Practise, Fitness to Study. Some Research Policies are also published on the Trinity homepage such as Good Research Practice Policy.
7. **Definitions**

7.1 **Legislation** is the set of laws and rules made by the Oireachtas. Policies must comply with all relevant national and international legislation, as outlined on Trinity’s website (https://www.tcd.ie/about/legislation).

7.2 **The 2010 Consolidated Statutes of Trinity College Dublin and of the University of Dublin** constitute the basic law of the College and the University, and are approved by the College Board, and their Chapters are assented to by the Fellows and the Visitors.²

7.3 **Policies** represent the official position of the institution on any aspect of its activities. Policies are clear, simple statements of how an organisation intends to conduct its activities that can be used to guide decisions. They are formally approved by the Council or Board and have broad application across the institution. Once approved, compliance with a policy is mandatory.

7.4 The **University Calendar** contains general **regulations** regarding studying at Trinity, in addition to specific regulations that apply to undergraduate and postgraduate programmes at Trinity.

7.5 **Procedures** provide detailed mandatory direction on how a policy should be implemented and may be approved by relevant Committees. They establish the ‘who,
what, where and when’ in relation to a policy, and establish accountability. They outline what records must be kept (if relevant).

7.6 Processes outline the specific steps or actions that must be taken in order to implement a procedure, e.g., system steps.

7.7 Guidelines provide approved and recommended approaches to implementing a policy but are not mandatory.

7.8 A policy Owner is the appropriate Officer or Head of Area whose remit or responsibility covers the subject area of the policy.

7.9 A policy Implementer is the appropriate Head of local unit/area responsible for local implementation, e.g. Head of School, Head of Unit/Division, Director of Trinity Research Institute (TRI).

8. Guidelines for policy development, approval and review

8.1 Initiation and development

8.1.1 New policies are developed in response to (i) strategic planning, (ii) changes to legislation or codes of governance, (iii) institutional restructuring or (iv) an identified risk or gap following internal or external feedback from stakeholders (students, staff, internal audit, Chief Risk Officer, external reviewers, external examiners, etc.). The relevant Chief Officer/Head of Division is responsible for initiating the process where a policy and policy owner do not currently exist on the relevant issue.

8.1.2 The appropriate Officer or Head of Area should be consulted regarding the need to develop a policy.

8.1.3 The proposed policy should be drafted on the approved Policy Template (Appendix 1). The intended purpose of the policy or procedure and the rationale for its development should be clearly outlined by the proposer. Bear in mind that a policy should be a statement of principles. Detailed procedures are generally not appropriate for policies.

8.1.4 The proposed policy should be informed by research on existing policies in Trinity and in other institutions, and by international best practice.

8.1.5 The documents ‘Checklists for Creating Policies’ (Appendix 2), and ‘Guidelines for Writing Good Policies’ (Appendix 3) should be employed and consulted during the drafting phase.

8.1.6 Relevant stakeholder groups should be consulted on the proposed policy before it is circulated for consideration to the relevant committee via the appropriate approval pathway. Those who should be consulted include, in particular, those responsible for the operationalisation of the policy and for any system changes that are required to implement or report on elements of the policy e.g. Academic Registry, IT Services, Human Resources, Research Office.

8.1.7 Revised policies that are submitted for committee approval should include a tracked change version of the policy indicating where the currently approved policy has been amended in addition to a ‘clean’ version of the revised policy,
for ease of consideration by committee members. Where significant revisions have been made to a policy it should be accompanied by a Memo\(^3\) outlining the purpose of the revisions. The Policy Review Record Sheet in Appendix 4 is intended to provide guidance for the review of a Policy. If the revised policy needs to go forward for committee approval, the record sheet may be appended to the revised policy for information purposes.

8.2 Approval Pathways

8.2.1 Approval of policies follows an agreed Approval Pathway.

Academic Policies (see Fig 3)

Academic policies are developed in consultation with the relevant Officers (Senior Lecturer/Dean of Undergraduate Studies, Dean of Graduate Studies, Dean of Research, Dean of Students etc.). Proposed academic policies are circulated to (i) the Undergraduate Studies Committee, if the policy relates to undergraduate education, (ii) to the Graduate Studies Committee, if the policy relates to postgraduate education, before being forwarded to Council for approval. The Academic Secretary and Trinity Teaching and Learning (TT&L)\(^4\) staff support some Annual Academic Officers to develop and revise academic policies, and to facilitate their submission for approval by academic and compliance committees of Council (e.g. USC, GSC, Quality). They should be contacted on initiation to help identify any dependencies with other policies, with the College Calendar, and with national and European standards for higher education. Policies that relate to quality should also be considered by the Quality Committee and policies that relate to research should be considered by the Research Committee, before being considered by Council. Other committees as appropriate may consider new policies before Council approval is obtained. Some policies (for example, those that relate to Trinity Linked Providers or education partnerships) may also require to be approved by Board.

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\(^3\) Memo formats for University Council and College Board are available from the Secretary’s Office (templates suitable for submission to University Council and College Board are also available on the Identity website). A standard meeting memo is used for Undergraduate Studies Committee (USC) and Graduate Studies Committee (GSC). Please ensure that the common logo is used as required by the Trinity Visual Identity Guidelines.

\(^4\) academic.secretary@tcd.ie (ACADSEC@tcd.ie); Academic.Affairs <acadaff@tcd.ie>; Quality.Officer@tcd.ie; Assistant Academic Secretary for Graduate Education <AASGE@tcd.ie>
Non-academic Policies (see Fig 4)

Proposed non-academic policies may be circulated by the relevant Officer or Unit to the relevant committees, before being considered by the Executive Officers Group, the relevant principal Committee of Board and finally by Board itself (see Trinity Management Structures Handbook 2018).6

5 Policies that are brought to Compliance Committees of Board and Council for approval may need to go to Council and Board, or just Board, depending on the nature of the policy.

6 This approval route applies to most non-academic policies. However there are some exceptions to this, e.g. the Misuse of Drugs policy went to Student Life Committee and to Council as well as to Board although a non-academic policy. Certain non-academic policies may need to go to Council ahead of Board, depending on the subject.
Fig 4: Approval pathway for Non-Academic Policies

8.2.2  A policy is effective from the date of Council or Board approval, as appropriate. Principal Committees play an important role in policy consideration. As provided for in the Statutes, policy matters which have already been considered by Principal Committees and Academic Committees are considered under A.2 of the Board and Council agendas respectively.

8.3  Communication

8.3.1  A stakeholder analysis should be conducted to identify who internally and externally is impacted by the policy.

8.3.2  Once approved, a policy or procedure is communicated to the relevant stakeholders and published on the relevant section of the Trinity website – see section 5.9. To facilitate easy access, the relevant sections of the Trinity website should be inter-linked and signposted.

8.3.3  A communication checklist is developed outlining the stakeholder groups that should be notified of the new policy or procedure, and this can inform a communication plan.

8.3.4  The communication plan should also facilitate provision of feedback by stakeholders to the relevant Owner on the policy.
8.3.5 In addition to the communication plan, a list of all new and revised policies is communicated to staff by email from the Secretary to the College every year. Under staff contracts, all staff are bound by approved policies.

8.4 Implementation and Review

8.4.1 The implementation of the policy should be monitored by the policy owner as denoted on the policy template. An agreed communication channel should be identified and communicated to facilitate recording of any issues identified in the initial implementation phase which may prompt an early review of the policy.

8.4.2 Many policies will need to be implemented at a local level and the policy owner, e.g. the relevant College Officer or Head of Area, is responsible for communicating the policy to the relevant local units for local implementation.

8.4.3 Heads of local units/areas, e.g. Heads of School/Unit/Division or Directors of TRIs, will be responsible for informing the policy owner about any significant issues or problems with the implementation of the policy (e.g. appeals or disputes) that may arise.

8.4.4 The policy template includes a review date. If the policy has no specified review date, the policy owner is responsible for scheduling a review of the policy no later than three years after the date of initial approval by Council or Board. Thereafter it should be reviewed every three to five years, or sooner if there is a requirement to align with new legislation, structures or changes in related policies or good practice.

8.4.5 The College Secretary’s Office will conduct an annual review of all policies for the purposes of prompting a policy owner that has not identified or acted on a need to initiate a policy review.

8.4.6 The review process should incorporate feedback from relevant stakeholder groups/users of the policy or procedure to make sure that it remains fit-for-purpose.

8.4.7 A Policy Review Record Sheet (Appendix 4) should be completed to record any changes (minor or major) made to a policy in order to ensure that the document history is captured.

8.4.8 Any changes that impact on the intended purpose or substance of the policy (minor or major) require the policy to be resubmitted to the relevant committee(s) for noting and approval. Major changes may require the policy to be considered as an Agenda A item by committees; in this case it should be accompanied by a memorandum outlining the rationale for the changes.

8.4.9 Care should be taken that the Header on the revised policy is revised to reflect the amendment. Version number if minor is 1.1, 1.2; if major or substantive changes it is Version 2.0. The Date of Issue is the date of publication on which the revised policy is uploaded on the relevant website and the link to that website should be used in communications to stakeholders to inform them that the revised policy is now effective.
8.4.10 An updated Equality Impact Assessment should be incorporated into the review process, to be aware of any changes, requirements or updates needed to respond to Equality, Diversity and Inclusion within the College community and relevant developments in the intervening period.

9. Related Documents

9.1 The University of Dublin Calendar.
9.2 The Trinity College Dublin Code of Governance.
9.3 The 2010 Consolidated Statutes of Trinity College Dublin and of the University of Dublin.
9.4 Trinity Management Structures Handbook

10. Useful links

10.1 Relevant legislation on the Trinity website https://www.tcd.ie/about/legislation
10.2 Irish Statute Book (http://www.irishstatutebook.ie/)
10.3 Policies page on the Trinity website (https://www.tcd.ie/about/policies/)
10.4 Trinity Teaching & Learning website https://www.tcd.ie/teaching-learning/academic-policies/
10.5 Dean of Research Local page https://www.tcd.ie/research/dean/research-policies/
10.6 HR website (https://www.tcd.ie/hr/)
10.7 IT Services website (https://www.tcd.ie/itservices/general/policies.php)

11. Document Control

Date policy approved: 20<sup>th</sup> April 2022
Date of next review: 2025
Title

1. Context
This section outlines the landscape in which the policy is operating, including legislative, regulatory, financial, and strategic considerations.

2. Purpose (mandatory)
This section states the reason or rationale for the policy i.e. the issue that the policy seeks to address or the legislative obligations that require the policy to be developed.

3. Benefits (optional)
This section outlines the benefits of having the policy e.g. to provide clear, transparent, and easily accessible guidelines that consider the issue that the policy seeks to address.

4. Scope (mandatory)
This section states what groups or sections of the University the policy or procedure applies to. It should also outline any groups or sections of the University to which a policy or procedure does not apply.

5. Principles (mandatory)
This section outlines the core values and beliefs that the policy articulates e.g. transparency, fairness, equity, impartiality etc.

6. Definitions (optional)
This section provides an explanation of key words or terms used in the policy and assists readers in understanding or implementing the policy.

7. Policy (mandatory)
This section outlines the details of the policy itself.

8. Responsibility and Implementation
This section outlines the roles and responsibilities of the responsible College Officer involved in monitoring the implementation of the policy. Formal titles or positions should be listed rather than an individual’s name. Responsibility should be assigned to an individual position/role rather than to an Area or a Committee. The position (e.g. Head of School/Unit/Division or Director of TRI) responsible for local implementation of the policy should also be listed.
9. Related Documents
This section outlines any documents or guidance material that relates to the policy and provides context and/or additional information to assist readers understand or implement the policy. Any related policies impacted by the policy should also be listed.

This section outlines the date on which the policy was approved and by what Committee i.e. Council or Board, and the academic year during which the policy will be next due for review (no longer than three years following approval of the policy).

Approved by:
Date policy approved:
Date of next review:
Officer responsible for review:

Document Control for Revised Policies

10.1 Date of initial approval:

10.2 Date revised policy approved:

10.3 Date policy effective from:

10.4 Date of next review: Academic Year xxxx/xxxx
Appendix 2: Policy Checklist

| Context | What is Trinity doing (or trying to do)? How is it doing it? Where and when? Optional: a sentence on how this policy supports the University’s strategic plan. Will this policy replace any existing policies? Does it build on any existing regulations or informal guidelines? Does it refer to other policies and have those other policies changed recently? (NB - These documents may need updating now.) |
| Purpose | Why do we need a policy on this topic? What does it do? |
| Benefits | What are the benefits of realising this policy? What are the drawbacks of not having the policy? |
| Scope | What activities, people, units and resources does this policy apply to? When/where does it apply? Any exclusions? What is out of scope? |
| Principles | What are Trinity’s principles in regard to this activity/service/resource/topic? What does Trinity believe? (This should be limited to 5-6 statements.) |
| Definitions (optional) | If necessary, include an explanation of terms or abbreviations used within the policy and procedure. Where there are existing definitions of the terms in other University regulations or policy, those definitions should be used. |
| Policy | What does Trinity do to act out its principles? What rules/resources does it have in place? What is Trinity committed to deliver - expected standard. |
| Responsibility and Implementation | Who is responsible for implementing this policy at a local level? Who is responsible for reviewing and monitoring it at a College Officer level? Has the most effective, efficient, manageable and sustainable manner of implementation been chosen in consultation with policy users? |
| Record Management | Is there any documentation of the system/process involved here? What happens to this documentation? Hard copies/soft copies? Where is it stored? Who can look at it? Are records managed according to the EU-GDPR and Health Research Regulations? |
| Equality Impact Assessment | Has an up-to-date Equality Impact Assessment been incorporated into the review process, so as to be aware of any changes, requirement or updates needed to respond to Equality, Diversity and Inclusion within the College community and relevant developments in the intervening period? |
| Related Documents | What internal policies, procedures and process maps are directly related to this policy? What external acts or legislation affect it? Are these properly referenced in the policy? |
| Document Control | Position/unit responsible for review (e.g., someone’s job title, not their name). Their contact details (not a personalised email address). Review date. |
There should also be information in the header and footer:

<table>
<thead>
<tr>
<th>Header</th>
<th>Policy Number; Revision; Date of Issue i.e., publication date, not approval date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Footer</td>
<td>Page number (“1 of 2” etc. format)</td>
</tr>
</tbody>
</table>

**Format conventions**

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<tr>
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<td>16</td>
<td>Yes</td>
</tr>
<tr>
<td>Subsection Headings</td>
<td>Calibri</td>
<td>12</td>
<td>Yes</td>
</tr>
</tbody>
</table>

| Page Numbering      | 1 of 5, 2 of 5 etc.                                      |
| Heading in top right corner: | Version: 1.0                                           |
|                     | Date of Issue:                                         |
| Line Spacing        | 1.15                                                  |
| Version             | The first approved version of the policy is version 1.0. Subsequent versions are 2.0, 3.0 etc. Where minor amendments to the policy are made before the next scheduled review date, they become version 1.1,2.1 etc. |

**Context**

1. The following phrase to appear in the first sentence of the policy
   ‘Trinity College Dublin, the University of Dublin, hereafter referred to as Trinity...’
2. For academic policies:
   - The last line of this section should contain the sentence,
     ‘This policy should be read in conjunction with the regulations in The University of Dublin Calendar, Parts (relevant sections)’.
   - A link to the Calendar should appear where it appears for the first time in a policy.

**Document control**

<table>
<thead>
<tr>
<th>Date policy approved:</th>
<th>By Council or Board</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date revised policy approved</td>
<td>By Council or Board</td>
</tr>
<tr>
<td>Date of next policy review:</td>
<td>In the academic year no longer than 3 years following approval of the policy</td>
</tr>
</tbody>
</table>
Appendix 3: Guidelines for writing good policies

1. Content
Policies have a lot in common with strategy documents, in that they both outline the desired state of the organisation. However, a strategy document may recognise that the desired state differs from the current state. A policy document expresses the desired state in terms of the current status quo. In other words: **it is assumed that the policy can be executed by the organisation in its current form.**

The key test of policies vs. procedures is: "Will this document only need updating when our organisational structure, goals or objectives change?" If the answer is yes, you have successfully written a policy.

2. Writing Style
Policy documents should (i) be clear and understandable to a general audience, (ii) be written in the active voice, (iii) omit unnecessary words, and use short words and sentences, (iv) avoid jargon and acronyms, (v) avoid specifying information that may be subject to change, requiring the document to be updated.

The policy title should capture the content of the policy.

Policy titles should be easy to search online and elsewhere. Do not use the word “policy” in the title, unless it comes at the end, so it is easy to find documents alphabetically.

3. Common Terms
To ensure consistency across documents, the same terms should be agreed upon and used:

- The full name “Trinity College Dublin, the University of Dublin” should be used in the first instance.
- “Trinity” (not TCD) should be used as the short-hand version every time thereafter.
- Use “the University” not “the College” in external communications.
- Use the term “programme” (not course) to describe a programme of study leading to an award.
- In the first instance, write “University Council”.
- Thereafter, it may be described as “University Council” or “Council”.

Do not capitalise general terms such as “external examiners”, or “examining system” etc., unless they are active, named systems/services/posts within Trinity, e.g., Provost, Academic Secretary, Disability Service, Trinity Access Programme or Quality Office, etc.

4. Currency and Version Control
All issuing and re-issuing of policies should be done through one designated position in a unit. In this way, amendment records can be appropriately maintained, and issuing controlled.

The standard format of policies and procedures includes an issue date and version number. The first time a policy or procedure is issued it should be numbered ‘1’, with subsequent
amendments numbered ‘2’, ‘3’, ‘4’ if substantial or ‘1.2’, ‘1.2’ if minor etc. Until the policy is issued, mark it as a draft document.

5. Visual Formatting Guidelines

Logo
Trinity Communications advise that the following version of the Trinity logo (common use) is to be used on policy and procedure documents:

![Trinity College Dublin Logo](https://www.tcd.ie/identity/)

A template document for a policy or procedure can be downloaded from the Quality Office website.

Font
Calibri font should be used. Line spacing should be 1.15. Font should not be smaller than 12. Avoid underlining, italicising or bolding text. Left align text (do not justify).

Accessibility
Finished documents should be published online in PDF format. Prior to publication, all documents should be proofed to make sure they meet the Accessibility Information Policy. Trinity's policy on Accessible Information advises that policy documents in other accessible formats may be made available upon request.

If a request is made for another accessible format, this should be forwarded to the Disability Service. To enable conversion, all documents should be stored by the responsible unit in both PDF and Word format.

6. Partners
Consider partners and collaborators:

- Who are our partners/collaborators in developing these policies and procedures?
- What do we need from them?
- At what stage will we work with them?

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7 See [https://www.tcd.ie/identity/](https://www.tcd.ie/identity/)
7. Additional Resources

Other Educational Institutions
The following may provide good practice reference points and samples of documents that we have not yet developed in Trinity. Would elements of their policy models work within Trinity?

Our comparator group of universities:
- University of St. Andrews
- University College London (UCL)
- University of Edinburgh
- University of Warwick

Other Irish universities: [https://www.iua.ie/ouruniversities/](https://www.iua.ie/ouruniversities/)
The Russell Group of universities: [https://russellgroup.ac.uk/about/our-universities/](https://russellgroup.ac.uk/about/our-universities/)
The League of European Research Universities (LERU): [https://www.leru.org/members](https://www.leru.org/members)
CHARM-EU: [https://www.charm-eu.eu/who-we-are](https://www.charm-eu.eu/who-we-are)
Appendix 4: Policy Review Record Sheet

The Policy Review Record Sheet is intended to provide guidance for the review of a Policy. If the revised policy needs to go forward for committee approval, the record sheet may be appended to the revised policy for information purposes.

<table>
<thead>
<tr>
<th>Policy Review record sheet</th>
</tr>
</thead>
<tbody>
<tr>
<td>Current Policy Title</td>
</tr>
<tr>
<td>Policy Owner</td>
</tr>
<tr>
<td>Date of first approval</td>
</tr>
</tbody>
</table>

Tick one:
- Comprehensive Review
- Major Policy Change
- Minor Policy Change

Has this Policy been reviewed or amended since it was first approved? If yes, please detail when it was last reviewed or amended, what triggered the review or amendment, and what changes were made.

Is a change or amendment to the policy being proposed now? If yes, please outline what amendment is being proposed and why (e.g. external or internal triggering events such as a change in legislation, new College regulation, addressing a new risk, issues identified with existing policy, etc.)

Are there other existing policies that overlap or are closely related to this policy? Are there any existing policies which are referenced in this policy or on which this policy is dependant? If yes, which indicate below which ones.

Are changes to these policies also required? If so, please summarise these below.

What consultation took place as part of the review of this policy? Please list the groups or individuals.
<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Please outline the impact of the revised policy, if known, on internal and external stakeholders.</td>
<td></td>
</tr>
<tr>
<td>Please outline how the revised policy will be communicated to internal and external stakeholders.</td>
<td></td>
</tr>
<tr>
<td>Please outline how the impact of the revised policy will be monitored.</td>
<td></td>
</tr>
<tr>
<td>Please outline how compliance with the revised policy will be monitored.</td>
<td></td>
</tr>
</tbody>
</table>