

City of St. John's Corporate and Operational Policy Manual

Policy Title: Policy Development Framework	Policy #: 01-01-12
Last Revision Date: N/A	Policy Section: Organization
Policy Sponsor: Theresa Walsh, City Clerk	

1. Policy Statement

Policies of the City of St. John's ("**the City**") are formal decisions approved by Council to address service needs, operational issues and strategic priorities. Policies articulate the City's position on matters not otherwise governed by legislation, bylaws, regulations or other binding instruments. Policies define required actions, prohibited practices and benchmarks for City program and service delivery.

This Policy Development Framework ("**the Framework**") establishes a consistent, transparent and accountable approach to the creation, review, approval and rescission of City Policies. The Framework ensures:

- Policies are developed in alignment with Council direction, legislative obligations and public service best practices; and
- Policies reflect the City's strategic goals and commitment to equity, innovation, sustainability and fiscal responsibility.

2. Definitions

"Corporate Policy Committee (CPC)" is a committee responsible for reviewing Policy proposals, advising on direction and approving Draft Policies for submission to Senior Leadership Team (SLT) and Council.

"Draft Policy" is a preliminary version of a Policy document developed by the Policy Working Group outlining the proposed approach and requirements. The Draft Policy reflects research findings, in alignment with the City's strategic direction. It is subject to internal review by the Office of

the City Solicitor, CPC and other relevant bodies prior to final approval and adoption.

“Designate” means any employee formally delegated responsibility for specific action.

“Forms” are standardized documents used to collect, submit or verify information in support of Policy development. Forms are used internally and externally to guide consistent data collection, reporting processes and approvals.

“Interested Parties” means individuals, groups, organizations or entities that may be affected by, have responsibilities under or have a reasonable interest in a City decision, policy, program, service or asset. Interested Parties may include City staff, residents, user groups, community organizations, third-party service providers, rights-holders and other partners whose perspectives or circumstances should be considered in the City’s decision-making process.

“Legacy Policies” are Policies that pre-date the City’s Policy Development Framework and were not formally adopted by Council under a standardized approval process. They remain in effect for operational continuity, but may require review and, where appropriate, formal adoption, revision or rescission in accordance with this Framework.

“Non-substantive Amendments” are changes to a Policy that do not alter its intent, scope or core requirements. They are limited to adjustments that improve clarity, accuracy or usability without affecting the policy’s meaning or operational impact, as outlined in the Policy Development Procedures.

“Policy” is a formal, Council-approved statement that guides decision-making and actions within the City, reflecting strategic goals, legislative requirements and organizational values.

“Policy Analyst” is the category of positions within the Office of the City Clerk responsible for overseeing, coordinating and supporting the development, review and implementation of all City Policies.

“Policy Cycle” is the structured stages guiding development, implementation and evaluation of City Policies. It provides a systematic approach to ensure Policies are evidence-based, strategically aligned and responsive to organizational and community needs.

“Policy Note” is a Form submitted to CPC outlining the need, rationale, scope and intended direction of a proposed Policy.

“Policy Owner” is the staff position responsible for initiating, implementing, monitoring and reviewing a specific Policy.

“Policy Working Group” is a team established by CPC to lead Policy development, conducting Policy-related research, drafting and engagement with Interested Parties.

“Procedures” are supporting Policy documents that provide step-by-step instructions outlining how to consistently and effectively operationalize a Policy. Procedures define roles, responsibilities, workflows, decision points and approvals necessary to carry out the Policy in practice. Procedures enable performance monitoring and ensure compliance with the parent Policy and/or strategic direction.

“Substantive Amendments” are changes to a Policy that alter its intent, scope, principles or core requirements. These amendments go beyond administrative or editorial adjustments and have a material impact on how the policy is interpreted, applied or enforced.

3. Policy Requirements

3.1. Alignment and Purpose

All Policies must support and align with the City’s strategic direction, ethics and values. Policies must reflect Council-approved priorities and contribute to effective, equitable and sustainable municipal governance.

3.2. Guiding Principles

Policies must adhere to the following overarching principles:

- **Policy Cycle Compliance:** Policies must follow a defined development cycle, as listed below and detailed in the Policy Development Procedures.
- **Evidence-Based Development:** Policies must be informed by data, research and/or input from Interested Parties, where appropriate, available and feasible.
- **Clarity of Intent:** The purpose and scope of each Policy must be clearly articulated, substantiated and defensible.
- **Defined Approval Process:** Policies must follow a clear approval process, as listed in the Policy Cycle and detailed in the Policy Development Procedures.
- **Policy Education:** Staff must be trained in Policy fundamentals, development processes and implementation strategies.
- **Accessibility:** Policies must be inventoried in a centralized, publicly accessible platform.

3.3. Corporate Policy Committee

- a) The Corporate Policy Committee shall include the following:
 - i. City Clerk
 - ii. Policy Analyst(s)
 - iii. City Internal Auditor
 - iv. Organizational Performance and Strategy Representative
 - v. Human Resources Division
 - vi. Office of the City Solicitor Representative
- b) SLT must nominate representatives best suited to meet the responsibilities of the CPC, as detailed in the Policy Development Procedures.
- c) The Corporate Policy Committee may convene in person or virtually, and may conduct business or make decisions electronically, including by email or other digital format.

3.4. Policy Working Group

- a) During Policy drafting, the CPC will strike a Policy Working Group consisting of:
 - i. Policy Analyst, who serves as Chair;
 - ii. Policy Owner(s); and

- iii. Any other relevant subject-matter experts.
- b) The Policy Working Group may convene in person or virtually, and may conduct business or make decisions electronically, including by email or other digital format.
- c) The Policy Working Group may consult with various departments, as required in the scope of its work.

3.5. Policy Development Process

The Policy Cycle includes:

1. **Initiation:** Policy development may begin at the departmental level or through direction from SLT or Council. Policy Owners proposing to create, amend or rescind a Policy must consult the Policy Analyst, who will advise on the need for Policy development, revision or rescindment.
2. **Policy Note:** Once the need for a Policy is confirmed, the Policy Owner(s) and Policy Analyst develop a Policy Note and submit it to CPC for review. CPC has two weeks to respond and strike a Policy Working Group. Upon CPC approval, the Policy Note is submitted to SLT for information purposes. SLT may provide feedback or direction at this stage, including advising on Policy Working Group membership.
3. **Research and Analysis:** The Policy Working Group researches context; reviews legislation, existing Policies, best practices and internal data; and assesses risks, resource needs and cross-departmental impacts.
4. **Drafting:** The Policy Working Group drafts a clear, actionable Policy. The completed Draft is then reviewed by the Office of the City Solicitor Representative on the CPC.
5. **Approval:** The Policy Working Group submits the Policy to CPC. Once approved, the Draft is submitted to SLT for review. Following SLT approval, the Policy is submitted to Council for formal adoption.
6. **Implementation:** After Council adoption, Policy Owners work with departments to operationalize the Policy. Implementation involves

communication, integration into workflows, training and resource allocation.

7. **Evaluation and Review:** Policies must be reviewed periodically or when significant changes occur. Initial review occurs after three years, with subsequent reviews at least every five years, unless otherwise noted in the Policy. The Policy Owner, in consultation with the Policy Analyst, submits findings to CPC for review.
8. **Amendment and Rescission:** Based on review findings, CPC determines whether a Policy requires amendment or rescission. When Substantive Amendments or rescissions are needed, CPC establishes a Policy Working Group to follow the development steps outlined in the Policy Cycle.

3.6. Policy Inventory and Naming

All Policies must be tracked in a centralized Policy Inventory. Naming conventions must be standardized to ensure clarity, consistency and ease of reference.

3.7 Non-substantive Amendments

By adopting this Framework and associated Procedures, Council delegates its authority to approve Non-substantive Amendments to Council-approved Policies to the City Clerk, who may sub-delegate to an employee in the Office of the City Clerk.

Non-substantive Amendments shall not alter the intent, scope or requirements of a Policy and shall only include the following, as detailed in the Policy Development Procedures:

- a) Language modernization;
- b) Correction of obvious errors;
- c) Minor operational updates; and
- d) Consistency adjustments.

The Office of the City Clerk shall maintain a log of all Non-substantive Amendments and shall provide an annual information note to Council listing all Non-substantive Amendments.

3.8 Legacy Policies

Legacy Policies remain in effect without having been formally adopted by Council. Under this Framework, Legacy Policies shall be reviewed and brought forward for formal Council adoption, amendment and/or rescission.

4. Application

This Framework applies to all Policies of the City of St. John's. It is intended for use by Council, SLT, departments and staff involved in Policy development and oversight. The Framework governs both Council-approved and Legacy Policies, and must be followed to ensure consistency, transparency and alignment with the City's strategic direction and values.

5. Responsibilities

5.1. Council shall be responsible for:

- a) Approving the adoption, Substantial Amendment and rescission of all City Policies developed under this Framework, unless otherwise delegated, ensuring that Policies reflect the City's strategic direction, comply with applicable legislation and serve the public interest;
- b) Delegating authority to the City Clerk or Designate to approve and enact Non-substantive Amendments to Council-approved Policies made under this Framework;
- c) Initiating Policy development, where applicable; and
- d) Requesting Policy reviews, where applicable.

5.2. The Senior Leadership Team shall be responsible for:

- a) Providing executive oversight and strategic direction throughout the Policy development process;

- b) Nominating representatives best suited to meet the responsibilities of the CPC;
- c) Advising, as needed, on appropriate departmental staff to serve on Policy Working Groups, ensuring cross-departmental representation and subject matter expertise in Policy development;
- d) Reviewing Draft Policies to ensure alignment with corporate priorities, operational feasibility and organizational capacity;
- e) Endorsing Policies prior to Council submission; and

5.3. The Corporate Policy Committee shall be responsible for:

- a) Providing cross-departmental oversight and strategic coordination in the development, review and maintenance of City Policies;
- b) Assessing and providing guidance on organizational alignment and interdepartmental impacts;
- c) Establishing Policy Working Groups;
- d) Supporting consistency in Policy quality and adherence to this Framework;
- e) Advising on the need for related Forms and Procedures; and
- f) Reviewing Draft Policies prior to SLT submission.

5.4. The Policy Working Group is responsible for:

- a) Leading Policy development following establishment of the working group;
- b) Conducting research and analysis, including legislative review, environmental and jurisdictional scans, identification of Interested Parties and data analysis;
- c) Assessing risks, resource needs and cross-departmental impacts;
- d) Drafting Policy documents that are clear, actionable and aligned with strategic goals;
- e) Identifying the need for and supporting the drafting of related Forms and Procedures;
- f) Engaging departments and Interested Parties to validate feasibility; and
- g) Submitting Draft Policies to CPC for review and final approval.

5.5. The Office of the City Solicitor is responsible for:

- a) Ensuring all Policies align with applicable municipal, provincial and federal legislation and regulations;
- b) Reviewing Draft Policies for legal sufficiency, clarity and enforceability;
- c) Advising on potential risks and liabilities associated with proposed Policy direction or language;
- d) Providing legal advice during the Policy approval process, including Council deliberations, where necessary; and
- e) Assisting departments in interpreting existing Policies and resolving ambiguities or disputes.

5.6. Finance and Corporate Services (Organizational Performance and Strategy) is responsible for:

- a) Developing and delivering training programs to support the Policy development process; and
- b) Supporting departments to tailor training to operational needs.

5.7. Corporate Communications is responsible for:

- a) Developing communication strategies to support Policy awareness and understanding; and
- b) Coordinating internal and external messaging related to Policy changes.

5.8. The Office of the City Clerk shall be responsible for:

- a) Ensuring the official record-keeping and documentation of all Council-approved Policies, including:
 - maintaining the Policy inventory,
 - assigning Policy numbers and titles in accordance with established naming conventions, and
 - ensuring that approved Policies are published and accessible to the public and staff;
- b) coordinating the inclusion of Policies on Council agendas; and
- c) ensuring proper archiving of rescinded Policies.

5.9. The City Clerk is responsible for:

- a) serving as Chair of CPC, providing leadership and oversight to ensure that Policy development processes are consistent, transparent and aligned with this Framework; and
- b) Administering Council's delegated authority for Non-substantive Amendments to Council-approved policies.

5.10. The Policy Analyst is responsible for:

- a) Advising Policy Owners on the application of this Framework and recommending whether a Policy should be developed, revised or rescinded;
- b) Leading the development of the Policy Note and coordinating its submission to CPC;
- c) Chairing and facilitating the work of the Policy Working Group, including research, analysis, drafting and engagement of Interested Parties;
- d) Ensuring Policies are developed in alignment with strategic goals, legislative requirements and the City's values;
- e) Providing guidance on the use and development of supporting documents;
- f) Coordinating reviews and evaluations of existing Policies and supporting rescission processes, where appropriate; and
- g) Ensuring consistency with the Policy Procedures and maintaining quality control throughout the Policy Cycle.

5.11. The Policy Owner is responsible for

- a) Working with the Policy Analyst, as appropriate, through the development process outlined in this Framework;
- b) Initiating Policy proposals and submitting Policy Notes to CPC for review;
- c) Providing subject matter expertise and context throughout Policy development;
- d) Participating in the Policy Working Group and contributing to research and drafting;
- e) Ensuring the Policy reflects operational realities and departmental priorities;
- f) Supporting implementation planning, including identifying required resources, processes and training;

- g) Monitoring Policy performance and leading scheduled reviews and updates; and
- h) Maintaining accountability for Policy outcomes and compliance within their area of responsibility.

6. References

Policy Development Procedures

7. Approval

- Position Title of Policy Sponsor: City Clerk
- Position Title of Policy Writer: Policy Analyst
- Date of Approval from
 - Corporate Policy Committee: July 16, 2024
 - Senior Leadership Team: February 20, 2026
 - Committee of the Whole: March 17, 2026
- Date of Approval from Council: March 25, 2026

8. Monitoring and Contravention

- a) The Office of the City Clerk shall monitor the application of the Policy and associated Procedures.
- b) Any contravention of the Policy and/or associated Procedures may be brought to the attention of the Office of the City Clerk, the Department of Finance and Corporate Services (Human Resources Division), the Office of the City Solicitor, and/or the Office of the City Manager for further investigation and appropriate action, which may include, but is not limited to, legal action and/or discipline up to and including dismissal.

9. Review Date

Initial review: Three years.
Subsequent review: Five years.