

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

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

1. Procedure Statement

These Procedures outline the steps required to operationalize the City of St. John's ("**the City**") Policy Development Framework ("**the Framework**"). It provides clear, consistent instructions for initiating, drafting, reviewing, approving, implementing, evaluating and rescinding policies. These Procedures ensure that all Policies are developed in alignment with Council direction, legislative obligations and the City's strategic goals and values, including equity, innovation, transparency, sustainability and fiscal responsibility. These Procedures support accountability, cross-departmental coordination and continuous improvement in municipal governance.

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.

"Designate" means any employee formally delegated responsibility for specific action.

"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.

“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 require review, classification 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.

“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 with 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 rationale, scope and intended direction of a proposed Policy.

“Policy Owner” is the staff member 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. Procedure Requirements

3.1. Policy Cycle

3.1.1. Initiation

Initiation may occur at the departmental level or through SLT or Council direction. Supporting documentation (i.e., Policy Note) will define timelines and standards for each phase of Policy development.

The Policy Owner(s) seeking to (i) create a new Policy, (ii) amend an existing policy or (iii) rescind an existing policy must contact the Policy Analyst, who will recommend whether a Policy Note should be developed and/or if another supporting document (e.g., Procedures or Forms) would be appropriate.

In the case of disagreement between the Policy Owner and the Policy Analyst, the Corporate Policy Committee shall make the final decision.

3.1.2. Policy Note

Once the Policy Owner(s) and Policy Analyst confirm the need for a Policy, they develop a Policy Note, which they subsequently share with CPC. CPC considers the Policy Note and confirms organizational and strategic alignment, identifies potential cross-departmental impacts and resource implications, and provides strategic guidance.

CPC has two weeks to provide comments, advise on direction and establish a Policy Working Group to lead Policy development.

Upon CPC sign-off, the Policy Note is circulated to SLT to ensure executive-level awareness and to obtain feedback or direction on Policy development, if applicable, including Policy Working Group composition.

3.1.3. Research and Analysis

The Policy Working Group conducts research to understand the policy context, assess implications and explore potential approaches. This includes reviewing legislation, existing policies, best practices, internal data and operational realities. The group also evaluates risks, resource needs and impacts across departments and Interested Parties.

Key activities include:

- Collecting and analyzing data;
- Scanning existing legislation and Policies;
- Reviewing approaches from other jurisdictions;
- Identifying Interested Parties affected by or involved in the Policy; and
- Brainstorming options exploring possible Policy directions.

Findings from this stage inform Policy drafting and help ensure an evidence-based approach aligned with the City's strategic direction.

3.1.4. Drafting

Following completion of Research and Analysis, the Policy Working Group translates their findings into a clear, concise and actionable Policy document. The Draft Policy must reflect the City's strategic goals and values, and be written in accordance with the Framework and related supporting documents.

Key activities include:

- Structuring the Draft Policy to clearly define its purpose, scope, responsibilities and requirements, including a clear review schedule;
- Suggesting Forms and/or Procedures, if necessary, to support the Draft Policy;
- Engaging relevant departments and Interested Parties, as necessary, to validate the Draft Policy and ensure operational feasibility; and
- Preparing the Draft Policy for review and approval, including formatting, naming and cataloguing in accordance with the Framework and related Procedures.

Once complete, the Policy Working Group submits the Draft Policy to the Office of the City Solicitor, who reviews the Policy for clarity, risk mitigation and alignment with the City's authority.

3.1.5. Approval

Upon completion, the Policy Working Group submits the Draft Policy to CPC, who reviews for organizational alignment. At this stage, CPC may request further analysis and revisions before final sign-off.

Upon final sign-off, CPC submits the Draft Policy to SLT for review and approval. SLT may provide feedback or direction at this stage, including

referring the Draft Policy back to CPC or the Policy Working Group for further work.

Following SLT approval, the Draft Policy is submitted to Council for formal adoption, at which point the Draft Policy becomes Policy.

3.1.6. Implementation

Following Council adoption, the Policy Owner(s), in collaboration with relevant departments, operationalizes the Policy. Implementation includes communicating the Policy to affected Interested Parties, integrating the Policy into relevant workflows and systems, and ensuring necessary training and resources are in place to support compliance.

Key activities include:

- Developing or revising supporting documents;
- Co-ordinating with departmental leads to operationalize the Policy;
- Delivering communication and training initiatives; and
- Identifying standards to support future evaluation.

Effective implementation ensures the Policy achieves its intended outcomes and contributes to the City's strategic direction.

3.1.7. Evaluation and Review

Policies must be reviewed periodically and/or in response to significant changes in legislation, operations or strategic direction. The Policy Owner, supported by the Policy Analyst, is responsible for initiating and coordinating the review process.

Key activities include:

- Assessing the Policy's effectiveness in achieving its intended outcomes;

- Evaluating application of Policy and identifying implementation challenges;
- Reviewing feedback from Interested Parties and operational impacts; and
- Identifying necessary amendments, opportunities for improvement or need for rescindment.

Policies are subject to an initial review after three years, with subsequent reviews occurring at least every five years, unless otherwise specified. Policy Owner(s), in consultation with the Policy Analyst, submit review findings to CPC via the Policy Review Form.

3.1.8. Amendment and Rescission

Based on review findings, CPC will determine if the Policy requires:

1. Amendments:
 - a) Non-Substantive Amendments (e.g., language modernization, obvious errors and minor operational updates) do not require review by the Office of the City Solicitor or Council adoption and may be approved by the City Clerk or Designate (see **Non-Substantive Amendments**); or
 - b) Substantive Amendments (e.g., those that alter the intent, scope or requirements of a policy) require Council adoption; or
2. Rescission:
 - a) Policies require Council approval for rescindment.

For requests of Substantive Amendments and rescissions, the CPC will establish a Policy Working Group to follow the process outlined in steps 3.1.2 through 3.1.6 of the Policy Cycle.

3.1.9. Non-substantive Amendments

1. Non-substantive Amendments shall not alter the intent, scope or requirements of a Policy.
2. Non-substantive Amendments shall only include:
 - a) Language modernization: Updates that improve clarity, reflect current organizational terminology or align with contemporary and inclusive language practices;
 - b) Correction of obvious errors: Routine editorial corrections that do not affect interpretation or application, including fixing typographical errors, misspellings or grammatical issues; correcting formatting, numbering, cross-references or headings; and repairing broken or outdated links;
 - c) Minor operational updates: Changes that keep the Policy current with administrative realities, such as updating job titles, position names or department names; revising references to internal systems, platforms or documents; and updating contact information, office locations or similar administrative details; and
 - d) Consistency adjustments: Updates to ensure alignment across the City's policy inventory, including harmonizing terminology with the Policy Development Framework, Procedures and associated templates; applying consistent naming, formatting or style conventions; and aligning definitions, headings or structural elements with corporate standards.
3. 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.
4. This delegation is limited to Non-substantive Amendments as defined in this Framework and does not include Substantive Amendments or rescissions.
5. Before approval, the City Clerk or Designate shall:
 - consult the Policy Owner;
 - confirm through CPC that the update is Non-substantive; and
 - obtain Office of the City Solicitor concurrence where there is any doubt.

6. The City Clerk or Designate shall maintain a change log.
7. The City Clerk or Designate shall provide an annual information note to Council listing all Non-substantive Amendments.
8. The City Clerk or Designate may refer any proposed change to Council at their discretion. Council may also direct that a specific Policy or category of Policies shall not be amended under this delegation.

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, Substantive Amendment and rescission of all City Policies, 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; and
- e) Endorsing Policies prior to Council submission.

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 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;
- 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/or 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. In carrying out this responsibility, the City Clerk shall:
 - determine, in consultation with CPC and the Policy Owner, whether a proposed change qualifies as a Non-substantive Amendment under this Framework;
 - approve and enact Non-substantive Amendments and, where appropriate, sub-delegate this authority to an employee in the Office of the City Clerk;
 - obtain concurrence from the Office of the City Solicitor where any aspect of a proposed change is borderline or may reasonably affect interpretation or legal risk;
 - provide an annual information note to Council listing all Non-substantive Amendments approved during the reporting period; and
 - refer any proposed amendment to Council where, in the City Clerk's opinion, the change is or may be Substantive, controversial, or otherwise unsuitable for delegated approval.

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;
- 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 related 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 Guidelines 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 Framework

7. Approval

- Procedure Sponsor: City Clerk
- Procedure Writer: Policy Analyst
- Date of Approval from:
 - Corporate Policy Committee: July 16, 2024
 - Senior Leadership Team: February 20, 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.