

Information Control Procedures

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Document Version Control

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1. Scope

This document sets out the internal procedures which are in place to ensure that all Relevant Communications are accurate and (where applicable) that there is compliance with: (i) relevant legislative provisions (e.g. consumer protection; data protection; our Equality, Diversity and Inclusion Policy; our Prevent duties); and (ii) our Corporate Branding Guidelines and House Style Guidelines.

Relevant Communications comprise: (i) “Tier 1 Communications”; and (ii) “other Relevant Communications”.

“Tier 1 Communications” are defined as:

- Regulatory, policy and procedural documents (see **Section 2** below)
- Corporate Plan, Strategies, and Annual Business and Improvement Plans (see **Section 3** below)
- Quality Assurance and Enhancement Manual (see **Section 4** below)
- Other documents which require formal committee approval (see **Section 5** below)

“Tier 2 Communications” are defined as:

- Publications which are to be made “widely available” to prospective students, current students, alumni and other stakeholders (see **Section 6** below)
- Press releases and other media communications (see **Section 9** below)

“Tier 1 Communications” and “Tier 2 Communications” do not include day-to-day emails and letters, presentations, and teaching and learning materials.

“Tier 1 Communications” and “Tier 2 Communications” may be published in hard copy and/or electronic format. Electronic format includes publication through our website, social media channels, the Radius Customer Relationship Management System and the Virtual Learning Environment.

There has to be a balance as to what comes within the scope of “Tier 1 Communications” and “Tier 2 Communications” and what will therefore be subject to the Information Control Procedures. The **Head of Communications** will determine whether or not a communication comes within the scope of “Tier 1 Communications” or “Tier 2 Communications”.

1.1 Relevant personnel

The relevant personnel who are involved in implementation of the Information Control Procedures include the following:

- Managing Director and Academic Principal
- Head of Communications
- Academic Registrar
- Head of Quality
- Head of Student Recruitment and Marketing
- Media and Content Manager

- CRM Executive
- Academic Lead in Teaching and Learning
 - Head of Division or Department
 - Course Leaders
 - Module Leaders

1.2 Legislative compliance

These procedures identify the person who is required to ensure that all “Tier 1 Communications” and “Tier 2 Communications” are compliant with any relevant legislation, in particular legislation relating to consumer protection, data protection and equal opportunities.

2. Relevant Communications: Regulatory, policy and procedural documents

2.1 Corporate Governance Framework: committee approval

The Corporate Governance Framework articulates our committee structure and the formal approval procedures for all regulatory, policy and procedural documents.

The **Head of Quality** is responsible for ensuring all regulatory, policy and procedural documents and any amendments thereto are approved by the relevant committee(s) in accordance with the procedures set out in the Corporate Governance Framework.

2.2 Custody, version control and publication

The **Head of Quality** retains custody of all regulatory, policy and procedural documents and ensures full version control in accordance with our **Document Control Guidelines**. Such documents will be published in hard copy format and will also be made available electronically in PDF version. The **Head of Quality** is responsible for creating the PDF version following formal committee approval.

2.3 Creation of regulatory, policy and procedural documents

A **Head of Division or Department** may identify the need for a new regulatory, policy or procedural document. A request will be submitted to the **Head of Quality** who will determine whether such document is required. If the **Head of Quality** agrees to the development of a new document, the **Head of Quality** will be responsible for coordinating the document’s development to ensure all relevant internal stakeholders can input into the process. The **Head of Quality** may establish an *ad hoc* working group for this purpose. The **Head of Quality** will also ensure that any amendments are approved by the appropriate committee(s).

2.4 Amendments to regulatory, policy and procedural documents

A **Head of Division or Department** may request amendments to be made to a regulatory, policy or procedural document. If the **Head of Quality** agrees to the document being amended, the **Head of Quality** will release the document to the **Head of Division or Department** for amendment. The **Head of Quality** will be responsible for coordinating the document’s amendment to ensure all relevant internal stakeholders can input into the process. The **Head of Quality** may establish an *ad hoc* working group for this purpose. The **Head of Quality** will also ensure that any amendments are approved by the appropriate committee(s).

2.5 Internal approval by Head of Quality and Head of Communications

Prior to a regulatory, policy or procedural document being presented to a committee for formal approval in accordance with **Section 2.1** above, the document must be approved by the Head of **Quality** to confirm that:

- the document is accurate, appropriate and relevant, and that it does not conflict with any other regulatory, policy or procedural document; and
- the document complies with relevant legislative provisions (e.g. consumer protection; data protection; equal opportunities).

The document must also be approved by the **Head of Communications** to confirm that:

- the document complies with our Corporate Branding Guidelines.

3. Relevant Communications: Corporate Plan, Strategies and Business and Improvement Plans

Our Annual Planning Cycle document sets out the procedures for the creation and approval of:

- Corporate Plan
- Divisional and Departmental Strategies
- Annual Divisional and Departmental Business and Improvement Plans

The **Head of Quality** is responsible for ensuring all such documents are approved by the relevant committee(s) in accordance with the procedures set out in the Annual Planning Cycle and the Corporate Governance Framework.

The **Head of Quality** will retain custody of all such documents and ensure full version control in accordance with our **Document Control Guidelines**. Such documents will be published in hard copy format and will also be made available electronically in PDF version. The **Head of Quality** is responsible for creating the PDF version following formal committee approval.

The **Head of Quality** will ensure that all such documents comply with relevant legislative provisions (e.g. consumer protection; data protection; equal opportunities).

The **Head of Communications** will ensure that all such documents comply with our Corporate Branding Guidelines.

4. Relevant Communications: Quality Assurance and Enhancement Manual

The Quality Assurance and Enhancement Manual (QEM) is published online through our website at:

www.lsbm.ac.uk/qem

The **Head of Quality** is the custodian of the QEM and only the **Head of Quality** has authority to make any amendments to the QEM. The **Head of Quality** is responsible for ensuring any amendments are fully compliant with any relevant legislative provisions (e.g. consumer protection; data protection; equal

opportunities). The **Head of Quality** may establish an *ad hoc* working group to undertake amendments to the QEM.

Committee approval will be required for any amendments that are made to policies and procedures in accordance with the Corporate Governance Framework.

Since the QEM is an electronic online publication, the **Media and Content Manager** is responsible for ensuring there is full compliance with our Corporate Branding Guidelines.

5. Relevant Communications: Other documents which require formal committee approval

Other than documents covered in **Sections 2 to 4** above, there are other documents which, in accordance with our Corporate Governance Framework, require formal committee approval. This is because of their importance as a “Relevant Communication”. Included within this category are the Student Guide, and Course Handbooks.

The procedures set out in **Section 2** above (including custody, version control and publication) will also apply to all such documents.

6. Other Relevant Communications

These Information Control Procedures (and our Corporate Governance Framework and Annual Planning Cycle) seek to strike a balance between those Relevant Communications which are so critically important that formal committee approval is required prior to publication (see **Sections 2 to 5** above), “Tier 2 Communications” which are important enough to warrant some internal control prior to publication, and all other communications which do not require any formal internal control measures. This is important to ensure day-to-day operational efficiency.

This Section relates to “Tier 2 Communications”.

As stated in **Section 1** above, “Tier 2 Communications” which require some internal control include publications which are to be made “widely available” to prospective students, current students, alumni and other stakeholders.

The rationale for this is to ensure accuracy of the communications and compliance with: (i) relevant legislative provisions (e.g. consumer protection; data protection; equal opportunities); and (ii) our Corporate Branding Guidelines.

Wherever there is doubt or ambiguity, the **Head of Communications** will determine whether a publication comes within the scope of “Tier 2 Communications” and therefore should comply with the Information Control Procedures.

The procedure to be complied with shall be determined according to the type of publication and the medium of publication.

The type of publication shall be classified as either a:

- Marketing communication, or a
- Non-marketing communication

The medium of publication shall be one of the following:

- Hardcopy

- Website
- Social Media
- Radius Customer Relationship Management System
- Virtual Learning Environment (VLE)

6.1 Other Relevant Communications: Custody and publication

6.1.1 Hard copy publications

Marketing communication

If the hard copy publication is a Marketing communication (e.g. prospectus) the **Media and Content Manager** retains custody.

All information in hard copy publications will be collated by the **Media and Content Manager** in conjunction with relevant staff.

The **Media and Content Manager** is responsible for ensuring compliance with the Corporate Brand Guidelines.

The final approval for any content within marketing hard copy publications is held by the **Head of Student Recruitment and Marketing**. The **Head of Student Recruitment and Marketing** is therefore responsible for the accuracy and relevance of information and for ensuing compliance with relevant legislative provisions (e.g. consumer protection; data protection; equal opportunities).

All marketing communications which come within the scope of “Tier 2 Communications” shall be subject to a periodic audit by the **Head of Communications**.

Non-marketing communication

If the hard copy publication is not a Marketing communication (e.g. Careers Advice; Student Guide; Student Charter; Module Handbooks) the relevant **Head of Division or Department** retains custody and is responsible for approving the publication’s accuracy prior to publication. The **Head of Communications** is responsible for ensuring the publication is compliant with: (i) relevant legislative provisions (e.g. consumer protection; data protection; equal opportunities); and (ii) our Corporate Branding Guidelines.

Publication

Some hard copy publications may also be published electronically in PDF version. The **Media and Content Manager** (for Marketing communications) and the relevant **Head of Division or Department** (for Non-marketing communications) are responsible for creating the PDF version following approval.

6.1.2 Electronic publications

Website

All information published on the website, with the exception of the QEM, shall come within the scope of “Tier 2 Communications” and therefore must comply with these procedures. The **Media and Content Manager** is the gatekeeper of all information published through the website and will be responsible for final approval to ensure tone of voice, web optimisation, accuracy and compliance with the Corporate Brand Guidelines and House Style Guidelines.

The **Media and Content Manager** will keep track of all website content, working with Heads of Division and Heads of Department to ensure that all content is checked and updated on a quarterly basis.

All information published on the website shall be subject to an audit on a quarterly basis by the **Head of Student Recruitment and Marketing**, and the **Head of Communications**.

Social Media

Due to social media's less formal mode of communication, only selected information published through our social media channels (e.g. Facebook, Twitter, LinkedIn) shall come within the scope of "Tier 2 Communications" (e.g. posts, "tweets", or advertisements) and will therefore be subject to these procedures.

The **CRM Executive** is responsible for posting information to students and prospective students on social media sites in accordance with our Social Media Policy. The **CRM Executive** may authorise other staff to post information.

All social media communications which come within the scope of "Tier 2 Communications" shall be subject to a periodic audit by the **Head of Student Recruitment and Marketing**, and the **Head of Communications**.

The **CRM Executive** is responsible for monitoring our social media accounts daily. In line with our Equality, Diversity and Inclusion Policy and our Prevent duties, if one of our students or external stakeholders were to post a comment on one of our social media accounts that could be deemed to be offensive or to have the potential to "radicalise" others, then the comment would be removed and the contact would be blocked. If the contact was a member of our staff, then this would be passed onto our HR Department for further investigation. If the contact was not a member of staff, then the matter would then be passed onto our Registry and Student Engagement and Success Divisions for further investigation.

Radius Customer Relationship Management System

Radius is used to communicate with leads, applicants and offer holders. Mass communications and formal communication plans shall come within the scope of "Tier 2 Communications" and shall be subject to these procedures.

All Radius communications which come within the scope of "Tier 2 Communications" shall be subject to the approval of the **Head of Student Recruitment and Marketing** or the **Media and Content Manager**.

All Radius communications which come within the scope of "Tier 2 Communications" shall also be subject to a periodic audit by the **Head of Student Recruitment and Marketing**, and the **Head of Communications**.

Virtual Learning Environment (VLE)

The VLE is used for current students for the delivery of individual modules and courses. Module and course materials are published through the VLE. Academics (and other staff) also communicate directly with students through the publication of announcements and discussion board activities. Such information shall not come within the scope of "Tier 2 Communications" and shall not be subject to these procedures. However, Course Leaders and Module Leaders will monitor discussion board activities and if any contribution is deemed to be offensive or to have the potential to "radicalise" others, then the comment would be removed and the contact would be blocked. If the contact was a member of our staff, then this would be passed onto our HR Department for further investigation. If the contact was a student, then the matter would then be passed onto our Registry and Student Engagement and Success Divisions for further investigation.

Content within the VLE shall be subject to an annual audit by the **Head of Communications** and/or the **Head of eLearning**.

7. Audit of “Tier 2 Communications”

All communications which are published electronically and which come within the scope of “Tier 2 Communications” shall be audited periodically by the **Head of Student Recruitment and Marketing**, the **Head of Communications** and/or the **Head of eLearning** as set out within **Section 6** above.

8. Information about University of Northampton courses

We deliver University of Northampton degrees. Marketing communications relating to the University of Northampton must be submitted to the Marketing Account Manager for Northampton Business School for approval. This approval must be confirmed via email or other written communication before publication.

9. Communication with the press and media

The **Media and Content Manager** is the contact for all press and media enquiries. The Manager's contact details will be easily accessible to media contacts via the website. The **Media and Content Manager** will seek the approval of the **Managing Director and Academic Principal** (or designate if absent) before entering into any communications with the press or media.