

Information Control Procedures

2019-20

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Committee Approval

Committee	Committee Action	Date
SMLT	Approved	1 May 2019
	Date in force	1 September 2019

The Information Control Procedures will be reviewed annually by our Senior Management and Leadership Team (SMLT).

1. Introduction

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:

- Relevant legislative provisions
 - For example: consumer protection to include guidance issued by the Competition and Markets Authority; data protection; equality law to include our Equality, Diversity and Inclusion Policy; the Prevent duty; and
- Our Brand Guidelines, and Tone of Voice and Style Guide

The Brand Department has published and shared with all staff a set of Document Templates that will assist in ensuring compliance with the Brand Guidelines. These templates can also be obtained from Line Managers or the Head of Brand.

1.1 Relevant personnel

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

- Managing Director
- Information Controller
- Head of Quality
- Quality Manager (Secretariat)
- Quality Manager (Regulatory and Enhancement)
- Head of Brand
- Communications Manager
- Heads of Division/Department
- Module Leaders

1.2 Relevant Communications

Relevant Communications are divided into:

- Tier 1 Communications
- Tier 2 Communications

These Information Control Procedures seek to strike a balance between those Relevant Communications which are so critically important that formal committee approval is required prior to publication (Tier 1 Communications), those which are important enough to warrant some internal control prior to publication (Tier 2 Communications), and all other communications which do not require any formal internal control measures. This is important to ensure day-to-day operational efficiency.

Tier 1 Communications consist of the following:

- Regulatory, policy and procedural documents (see **Section 2.1.1** below)

- Quality and Enhancement Manual (see **Section 2.1.2** below)

Tier 2 Communications consist of the following:

- Publications that are to be made widely available to prospective students, current students, alumni and other stakeholders (see **Section 3** 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 hardcopy and/or electronic format. Electronic format includes publication through our website, social media channels, and the Radius Customer Relationship Management System.

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 Quality Manager (Secretariat) will determine whether or not a communication comes within the scope of Tier 1 Communications or Tier 2 Communications.

2. Tier 1 Communications

Tier 1 Communications comprise the following:

- Regulatory, policy and procedural documents (see **Section 2.1** below)
- Quality and Enhancement Manual (see **Section 2.1.2** below)

2.1 Regulatory, policy and procedural documents

Our Corporate and Academic Governance Framework sets out our committee structure and the formal approval procedures for all regulatory, policy and procedural documents.

The **Quality Manager (Secretariat)** is responsible for ensuring all regulatory, policy and procedural documents are approved by the relevant committee(s) in a timely manner, in accordance with the procedures set out in the Corporate and Academic Governance Framework, and in a timely manner.

Prior to a regulatory, policy or procedural document being presented to a committee for formal approval, the document must be approved by the **Quality Manager (Regulatory and Enhancement)** 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.
 - For example: consumer protection to include guidance issued by the Competition and Markets Authority; data protection; equality law to include our Equality, Diversity and Inclusion Policy; the Prevent duty.

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

- The document complies with our Brand Guidelines, and Tone of Voice and Style Guide.

The **Quality Manager (Secretariat)** retains custody of all regulatory, policy and procedural documents and ensures full version control.

2.1.1 New document

A request for a new regulatory, policy or procedural document will be submitted to the **Quality Manager (Regulatory and Enhancement)** who will determine whether the document is required.

If the **Quality Manager (Regulatory and Enhancement)** agrees to the development of a new document, the **Quality Manager (Regulatory and Enhancement)** will be responsible for leading on the document's development to ensure all relevant internal stakeholders can input into the process.

The **Communications Manager** must approve the document, subject to compliance with our Brand Guidelines, and Tone of Voice and Style Guide.

The **Quality Manager (Secretariat)** will ensure that any new regulatory, policy or procedural document is approved by the appropriate committee(s).

2.1.2 Annual review of existing documents

The **Quality Manager (Secretariat)** is responsible for:

- Ensuring that all current regulatory, policy and procedural documents are reviewed annually in a timely manner.
- Releasing the document to the Document Lead to undertake the review and make any amendments.
- Ensuring that any amendments are approved by the appropriate committee(s).

The **Quality Manager (Regulatory and Enhancement)** must approve any regulatory, policy or procedural document prior to it being presented to a committee for formal approval.

The **Communications Manager** must approve the document, subject to compliance with our Brand Guidelines, and Tone of Voice and Style Guide.

2.2 Quality and Enhancement Manual

The Quality and Enhancement Manual (QEM) is published online through our website.

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 ultimately responsible for ensuring any amendments are fully compliant with any relevant legislative provisions.

The **Communications Manager** will ensure that the QEM complies with our Brand Guidelines, and Tone of Voice and Style Guide.

The **Quality Manager (Secretariat)** is responsible for ensuring any amendments to the QEM are approved by the relevant committee(s) in accordance with the Corporate and Academic Governance Framework.

3. Tier 2 Communications

Tier 2 Communications consist of publications that are to be made widely available to prospective students, current students, alumni and other stakeholders.

Wherever there is doubt or ambiguity, the Quality Manager (Secretariat) 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:

- Hard copy
- Website
- Social media
- Radius Customer Relationship Management System

3.1 Hard copy publications

All hard copy publications that come within the scope of Tier 2 Communications must be approved by the **Quality Manager (Regulatory and Enhancement)** to confirm that:

- The publication complies with relevant legislative provisions.
 - For example: consumer protection to include guidance issued by the Competition and Markets Authority; data protection; equality law to include our Equality, Diversity and Inclusion Policy; the Prevent duty.

They must also be approved by the **Communications Manager** to confirm that:

- The publication complies with our Brand Guidelines, and Tone of Voice and Style Guide.

If the hard copy publication is a Marketing communication (e.g. prospectus) the **Head of Brand** retains custody.

If the hard copy publication is a not a Marketing communication (e.g. Programme Handbook) the relevant **Head of Division or Department** retains custody.

3.2 Electronic publications

3.2.1 Website

All information published on the website, with the exception of the QEM (see **Section 2.2** above), shall come within the scope of Tier 2 Communications. The **Head of Brand** is the custodian of all information published through the website.

All website content must be approved by the **Quality Manager (Regulatory and Enhancement)** to confirm that:

- The content complies with relevant legislative provisions.
 - For example: consumer protection to include guidance issued by the Competition and Markets Authority; data protection; equality law to include our Equality, Diversity and Inclusion Policy; the Prevent duty.

The content must also be approved by the **Communications Manager** to confirm that:

- The content complies with our Brand Guidelines, and Tone of Voice and Style Guide.

3.2.2 Social Media

Due to social media's less formal mode of communication, content published through our social media channels (e.g. Facebook, Twitter, LinkedIn) does not require the approval of the **Quality Manager (Regulatory and Enhancement)**.

The **Communications Manager** is responsible for:

- Posting content on social media sites and may authorise other staff to post content.
- Ensuring that the content complies with relevant legislative provisions.

The **Communications Manager** is also responsible for monitoring our social media accounts daily. In line with our Equality, Diversity and Inclusion Policy and our responsibilities under the Prevent duty, if one of our staff members, 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 content was Prevent related, then this would be passed onto our Prevent Lead for further investigation. If the content was not Prevent-related, then the matter would be passed onto our **Head of Equality, Diversity and Inclusion** for further investigation.

3.2.3 Radius Customer Relationship Management System

Radius is used to communicate with potential applicants, applicants and offer holders. Mass communications, a communication sent out to all students irrespective of their course, and formal communication plans shall come within the scope of Tier 2 Communications and shall be subject to these procedures.

All Radius communications that come within the scope of Tier 2 Communications shall be subject to the following approvals:

A communication must be approved by the **Quality Manager (Regulatory and Enhancement)** to confirm that:

- The communication complies with relevant legislative provisions.
 - For example: consumer protection to include guidance issued by the Competition and Markets Authority; data protection; equality law to include our Equality, Diversity and Inclusion Policy; the Prevent duty.

The communication must also be approved by the **Communications Manager** to confirm that:

- The content complies with our Brand Guidelines, and Tone of Voice and Style Guide.

3.2.4 Communications with Current Students

A combination of the Student Self-service Portal (SSP), Canvas and emails are used to communicate with current students. Mass communications or notifications shall come within the scope of Tier 2 Communications and shall be subject to these procedures.

All communications with current students that come within the scope of Tier 2 Communications shall be subject to the following approvals:

A communication must be approved by the **Quality Manager (Regulatory and Enhancement)** to confirm that:

- The communication complies with relevant legislative provisions.
 - For example: consumer protection to include guidance issued by the Competition and Markets Authority; data protection; equality law to include our Equality, Diversity and Inclusion Policy; the Prevent duty.

The communication must also be approved by the **Communications Manager** to confirm that:

- The content complies with our Brand Guidelines, and Tone of Voice and Style Guide.

3.2.4 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 **Information Controller**.

4. 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, 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 Head of Equality, Diversity and Inclusion for further investigation.

VLE Champions undertake a periodic audit of all content on the VLE.

5. Information about University of Northampton courses

We deliver University of Northampton degrees. The **Head of Brand** is responsible for ensuring that marketing communications relating to the University of Northampton are 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.

6. Communication with the press and media

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

7. Related regulations, policies and procedures

- Brand Guidelines
- Corporate and Academic Governance Framework
- Email Acceptable Use Policy
- Equality, Diversity and Inclusion Policy
- Internet Acceptable Use Policy
- Intranet Policy

- Prevent Policy
- Social Media and Communications Policy
- Tone of Voice and Style Guide

8. Review

The Information Control Procedures will be reviewed annually by our **Senior Management and Leadership Team (SMLT)**.