

# Information Control Procedures

2023-24

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## Committee Approval

<b>Committee</b>	<b>Committee Action</b>	<b>Date</b>
SMT	Approved	1 June 2022
	<b>Date in force</b>	<b>1 June 2022</b>

The Information Control Procedures will be reviewed annually by our Senior Management Team (SMT). Any amendments require the approval of the Senior Management Team.

# 1. Introduction

This document sets out the internal procedures of approval which are in place to ensure that all relevant communications with regards to public information are accurate and (where applicable) that there is compliance with:

- Relevant legislative/regulatory provisions
  - For example: OfS Conditions of Registration; consumer protection to include guidance issued by the Competition and Markets Authority; data protection; equality law; our Equality, Diversity and Inclusion Policy; and the Prevent duty.
- Our Brand Guidelines, and Communication Principles.

All staff will receive a suite of communications and compliance training on an annual basis to ensure they are equipped to create communications that are compliant with the above and any extra measures listed below. They will also bring any changes relating to legislation, regulation and brand guidelines to the attention of staff as appropriate.

The Marketing, Communications and UK Student Recruitment (MCSR) team has published and shared with all staff a set of Document Templates and Template Training that will assist in ensuring compliance with the Brand Guidelines and Communication Principles. These can be found within the Brand Library on SharePoint.

The MCSR and Compliance teams will conduct annual audits and reviews of Tier 1 and Tier 2 Communications to ensure compliance by Document / Content Leads<sup>1</sup>.

Relevant Communications cover all communications to stakeholders within Bloomsbury Institute (including students and staff) and external third parties. Relevant external third parties may include prospective students and their parents, regulatory and statutory bodies and the designated quality body.

## 1.1 Relevant personnel

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

- Document / Content Lead<sup>1</sup>
- Strategic Leadership Team
- Head of Compliance
- Head of Quality
- Head of Marketing, Communications and UK Student Recruitment
- Deputy Head of Marketing, Communications and UK Student Recruitment (Communications Lead)
- Digital Communications and Alumni Officer
- Digital Marketing Officer
- Heads of Division/Department

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<sup>1</sup> Person responsible for reviewing / creating the document or sending the communication.

## 1.2 Relevant Communications of public information

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** below)
- Quality and Enhancement Manual (see **Section 2.3** 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. During the creation of any new communication, if the content lead is unsure whether it falls within the scope of Tier 1 or Tier 2, they should contact the Deputy Head of Marketing, Communications and UK Student Recruitment (Communications Lead).

## 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 2.3** below)

### 2.1 Regulatory, policy and procedural documents

Our [Corporate and Academic Governance Framework](#)<sup>2</sup> sets out our committee structure and the formal approval procedures for regulatory, policy and procedural documents.

The Head of Quality is responsible for:

- Ensuring that all current regulatory, policy and procedural documents are reviewed annually in a timely manner.

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<sup>2</sup> [bil.ac.uk/qem/section-1/corporate-and-academic-governance-framework/](http://bil.ac.uk/qem/section-1/corporate-and-academic-governance-framework/)

- Releasing the document to the Document Lead to undertake the review, as per the Document Review and Approval Process.
- Ensuring that any amendments are approved by the appropriate committee(s).

## 2.2 Document checklist

Prior to a regulatory, policy or procedural document being presented to a committee for formal approval, the Document Lead should ensure 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 (where applicable).
  - For example: consumer protection to include guidance issued by the Competition and Markets Authority; data protection; equality law; our Equality, Diversity and Inclusion Policy; the Prevent duty.
- The document complies with our Brand Guidelines and Communication Principles.

A request for a new regulatory, policy or procedural document must be submitted to the Quality team who will determine whether the document is required.

If the Quality team agree to the development of a new document, the person requesting the new document will be responsible for leading on the document's development to ensure all relevant internal stakeholders can input into the process. They must also confirm the document complies with the guidelines listed above.

The Head of Quality retains custody of all regulatory, policy and procedural documents and ensures full version control.

## 2.3 Quality and Enhancement Manual

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

The Quality team is the custodian of the QEM and only the Quality team have authority to authorise any amendments to the QEM. The Head of Compliance is responsible for ensuring any amendments are fully compliant with any relevant legislative provisions.

The Head of Quality is responsible for ensuring any amendments to the QEM Section 3 are approved by the relevant committee(s) in accordance with the Corporate and Academic Governance Framework.

The Digital Marketing Officer will make all approved changes and updates, and ensure that the QEM complies with our Brand Guidelines and Communication Principles.

## 3. Tier 2 Communications

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

The medium of communication shall be one of the following:

- Hard copy
- Website
- Social media

- Radius Customer Relationship Management System
- Emails
- Student Self-service Portal (SSP)
- Canvas
- Microsoft Teams
- Text messages
- Advertisements (online or print)

### 3.1 Before publication

Prior to publication of any Tier 2 communication, the Content Lead should confirm that:

- The content is accurate, appropriate and relevant.
- The content complies with our Brand Guidelines and Communication Principles.
- The Content Lead should also be aware of relevant legislative provisions and that the communication complies with these where applicable.

### 3.2 Hard copy publications

All hard copy publications come within the scope of Tier 2 Communications.

All hard copy publications must be submitted to the Deputy Head of Marketing, Communications and UK Student Recruitment (Communications Lead), after the Content Lead has ensured compliance with the checklist in **Section 3.1**, to confirm whether external design work is required.

### 3.3 Electronic publications

#### 3.3.1 Website

All information published on the website, with the exception of the QEM (see **Section 2.3** above), shall come within the scope of Tier 2 Communications. The Head of Marketing, Communications and UK Student Recruitment is the custodian of all information published through the website.

#### 3.3.2 Social media

The Digital Communications & Alumni Officers 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 Digital Communications & Alumni Officer is also responsible for monitoring our social media accounts regularly. In line with our [Equality, Diversity and Inclusion Policy](#)<sup>3</sup> 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

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<sup>3</sup> [bil.ac.uk/qem/policies/](http://bil.ac.uk/qem/policies/)

investigation. If the content was not Prevent-related, then the matter would be passed onto the Director of Student Engagement, Wellbeing and Success if the contact was a student, or our People, Talent and Culture Manager if the contact was a staff member, for further investigation.

### **3.3.3 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 should be sent using the approved templates.

For the creation of new Radius Tier 2 communications, the Content Lead must confirm that the communication does not already exist and that it meets the guidelines listed in 3.1.

### **3.3.4 Communications with current students**

A combination of the Student Self-service Portal (SSP), Canvas, emails, Teams notifications and texts 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 mass communications and notifications to students must be approved by the Deputy Head of Marketing, Communications and UK Student Recruitment (Communications Lead) to ensure the channel and time of send is relevant and suitable for the content of the communication.

The purpose of this extra level of approval is to ensure students only receive relevant information via these channels which will encourage the opening and reading of such mass communications.

Mass emails and Canvas notifications are the most frequent types of communication sent to all current students. Although they are some of the most effective and accessible ways to communicate with our student body, too many mass emails or Canvas notifications can often frustrate students. It can also result in a piece of communication becoming lost amongst others and being ultimately left unread.

If the content is deemed relevant and suitable for an email communication or Canvas notification, the Deputy Head of Marketing, Communications and UK Student Recruitment (Communications Lead) will prioritise the time of send depending on the content and that of other mass emails or Canvas notifications being sent at a similar time.

If the content is deemed not relevant or suitable for an email communication or Canvas notification, the Deputy Head of Marketing, Communications and UK Student Recruitment (Communications Lead) will suggest another communication channel to send the content, such as text message or social media.

## **8. 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 People, Talent and Culture Manager for further investigation. If the contact was a student, then the matter would then be passed onto our Director of Student Engagement, Wellbeing and Success for further investigation.

## 9. Awarding body

The Deputy Head of Marketing, Communications and UK Student Recruitment (Communications Lead) is responsible for ensuring that marketing communications relating to our awarding body are submitted to the same for approval. This approval must be confirmed via email or other written communication before publication.

## 10. Communication with the press and media

The Deputy Head of Marketing, Communications and UK Student Recruitment (Communications Lead) is the contact for all press and media enquiries. The Deputy Head's contact details will be easily accessible to media contacts via the website. The Deputy Head of Marketing, Communications and UK Student Recruitment (Communications Lead) will seek the approval of the Strategic Leadership Team (SLT) before entering into any communications with the press or media.

This procedure also applies to crisis communications. If the press or media contact us about a crisis situation, or if we need to communicate with them in response to a crisis, please refer to the Crisis Communications Protocol for more information.

## 11. Related regulations, policies and procedures

- Brand Guidelines
- Communication Principles
- Confidentiality Policy
- Corporate and Academic Governance Framework
- Crisis Communications Protocol
- Data Protection Policy
- Document Review and Approval Process
- Email Acceptable Use Policy
- Equality, Diversity and Inclusion Policy
- Internet Acceptable Use Policy
- Intranet Policy
- Prevent Policy
- Social Media and Communications Policy

## 12. Review

The Information Control Procedures will be reviewed annually by our Senior Management Team (SMT). Any amendments require the approval of the Senior Management Team.