



**Fairfield School of Business**

# Published Information Policy

Version 1.3

Approved by the Board of Governors

Last Amendment: October 2020

The following sets out how the School maintains oversight of the information it publishes about the Higher Education learning opportunities it offers.

This policy has been aligned with the following legislation and/or external quality assurance frameworks:

- i. QAA Revised Quality Code for Higher Education*
- ii. Office for Students (OfS) Regulatory Framework for Higher Education in England*
- iii. Consumer Contracts Regulations (2013)*
- iv. Consumer Protection from Unfair Trading Regulations (2008)*



## Document Information

---

Document owner(s)*:	Principal Director of Marketing and Admissions
Date of next review:	September 2021
Document Status:	IN USE
Dissemination:	For general publication

\*The document owner is responsible for maintaining and updating the content of this document and ensuring that it reflects current practice at the School.

## Contents

---

<b>PART ONE: Purpose, Scope and Principles .....</b>	<b>2</b>
1. Purpose.....	2
2. Scope of the Published Information Policy .....	2
3. Principles .....	3
4. Communication and Publicity: Guiding Principles .....	5
5. External Communication with the Media .....	5
6. Marketing and Publicity Materials.....	6
<b>PART TWO: Operational vetting and sign-off procedures to ensure consistent implementation of the Published Information Policy.....</b>	<b>8</b>
7. Operational Procedures: Introduction.....	8
8. Responsible Role Holders .....	8
9. Vetting Process for Public Information Publicity Materials .....	8
10. Bi-Annual Review and Improvement Procedure.....	11
11. Responses to Complaints or Feedback related to Published Information .....	12
<b>PART THREE: Processes to Support and Ensure the Accuracy of Public Information Related to New Programmes.....</b>	<b>13</b>
12. Introduction of New Programmes and Modules .....	13



## PART ONE: Purpose, Scope and Principles

### 1. Purpose

1.1. The purpose of this policy is to ensure that:

1.1.1. The processes for the management and vetting the information that Fairfield Business School (FSB) publishes about its learning opportunities is clearly communicated;

1.1.2. All information published by FSB (electronic or printed) is accurate, transparent, easily accessible and complete, in accordance with requirements set by:

- i. The Office for Students (OfS),
- ii. FSB Awarding Body partners,
- iii. FSB Board of Governors
- iv. Relevant regulatory requirements (to include but not limited to General Data Protection Act 2018, UK Copy write legislation and Competition Markets Authority expectations of good practice)

1.1.3. Any required amendments, as a result of stakeholder feedback or external observations, are actioned promptly

### 2. Scope of the Published Information Policy

2.1. This policy provides guidelines for all employees who are the owners of any information about the School's learning opportunities that is available to students, prospective students or the general public.

2.2. This policy applies to any information about the School and its learning opportunities that is made available to:

2.2.1. prospective students via web-based marketing materials (websites, landing pages, pay-per click (PPC) adverts and affiliate marketing channels), hard-copy marketing materials, advertorial press releases, student prospectuses and factsheets, course promotions and other similar material;

2.2.2. recruiters (Student Ambassadors and Outreach Team) via recruiter guidance, training materials on product updates, training materials for recruiters on new course and educational products, course application forms, visa guidance, admissions criteria guidance;



- 2.2.3. enrolling students via admissions and course guidance, student induction packs and similar material;
- 2.2.4. students enrolled on courses via student and programme handbooks, assessment guidance and timetables where applicable;
- 2.2.5. the general public and other stakeholders via policy documents, strategic statements and other public materials relating to each partnerships governance processes.

The publications listed above are examples of those that fall within the scope of this policy, however this does not constitute an exhaustive list.

### 3. Principles

- 3.1. In demonstrating its commitment to ensuring the maintenance of standards, FSB's Executive team has sought to ensure Marketing and Communications activity at FSB are conducted in line with the following guiding principles:
  - 3.1.1. **Principle 1:** Information that higher education providers produce about themselves and the learning opportunities they offer should be timely, current, transparent, and focused on the needs of the intended audiences;
  - 3.1.2. **Principle 2:** Higher education providers are responsible and accountable for the information they produce about the higher education learning opportunities they offer. At the same time, providers have autonomy regarding the mechanisms and media they choose to communicate this information;
  - 3.1.3. **Principle 3:** Information should be available and retrievable where intended audiences and information users can reasonably expect to find it. The format and delivery of information should take account of the access requirements of a diverse audience;
  - 3.1.4. **Principle 4:** Information produced by higher education providers should offer a fair and accurate reflection of the higher education learning opportunities they offer.

In adhering to the aforementioned guiding principles, FSB will:

- 3.2. Maintain standards by:
  - 3.2.1. Employing rigorous vetting and key stakeholder sign-off procedures for:
    - all forms of publicity,
    - all marketing materials,



- all promotions and student guidance information
- all official public documents about the School and the service it provides

3.2.2. Ensure that Terms and Conditions relating to recruitment, admissions and refunds are:

- Reviewed and updated annually
- Unambiguous and clear to students
- Available and accessible by all students at the appropriate time in the enrolment process
- Available and accessible to Awarding Body partners

3.2.3. Ensure that all publications both for students and for publicity purposes, conform to brand guidelines set by FSB Awarding Body Partners;

3.2.4. Ensure that any promotions and offers relating to courses are compliant with Competition Market Authority and OfS expectations;

3.2.5. Respect and maintain the integrity of academic freedom of individual members of academic staff.

3.3. Enable prospective students and their advisors to make informed decisions about learning opportunities on offer from FSB by publishing:

3.3.1. the institution's strategy, mission and values

3.3.2. updated and accurate programme and course detail including curriculum, learning and assessment information;

3.3.3. course teaching locations and dates;

3.3.4. course eligibility requirements, admissions criteria and process;

3.3.5. fees payable, terms and conditions and payment options;

3.3.6. Institutional policies,

3.3.7. FSB's framework for managing academic standards, quality assurance and enhancement activities

3.3.8. Data protection and privacy policies clearly communicating what data is collected and how it will be used;

3.3.9. Student support information (including guidance on disability and counselling services, safeguarding policies and employability and careers information)

3.3.10. Links to relevant awarding body partner policies and student related activities



## 4. Communication and Publicity: Guiding Principles

- 4.1. In ensuring that all communications produced are clear, accurate, comprehensive and unambiguous the FSB Published Information Policy incorporates the following:
- All internal and external communications,
  - Publications and collateral marketing materials,
  - Audio/visual materials produced, designed and/or edited by Registry, Course Managers and Administrators, the Marketing Department, the PR and Communications Team and any other department tasked with producing public information.
- 4.2. The PR Officer is responsible for coordinating all external communications. This includes:
- News or media releases,
  - Announcements,
  - Events social media updates (staff and students),
  - Media related engagements (paid and non-paid) relating to FSB's image
- 4.3. The Marketing department co-ordinate and update all website and online content, advertising, broadcasting or paid communication for consumption in the UK or abroad.
- 4.4. Associate Deans, Course Managers and Administrators within the FSB are responsible for liaising with the Publications Committee to check materials relating specifically to their provision prior to release for publication.
- 4.5. The timing of review of publications is set according to the frequency of re-publication or re-release. There is also provision for changes to be made in response to external factors, such as changes in the law or regulations.

## 5. External Communication with the Media

- 5.1. The Public Relations Officer is responsible for handling all media relations and interactions.
- 5.2. Examples of communications to be handled by the Public Relations Officer include but are not limited to:
- 5.2.1. All media liaison
  - 5.2.2. All non-paid for public relations activities
  - 5.2.3. Events (such as speeches, rolling programme of 'Expert Lectures' for students and public)
  - 5.2.4. Graduation celebration events



- 5.2.5. All social media platforms and online engagement
- 5.2.6. Internal communications and weekly staff newsletter
- 5.2.7. Reputation management
- 5.2.8. Public Affairs engagement

- 5.3. All communications with external media should be conducted via the Public Relations Officer. The FSB Staff Handbook reminds staff they are not to make any comments to the press about any matters relating to the affairs of FSB, or which might have an adverse effect on the institutions reputation.
- 5.4. All FSB generated news releases must be approved by the Public Relations Officer and Head of Marketing and where relevant, awarding body partner before being released to the media or public. The Public Relations Officer will consult with relevant members of staff to draft content on 'News' items. Any partnership announcements or joint press releases are also cleared in advance of publication by the Public Relations Officer and the relevant awarding body partner.
- 5.5. All media updates and any media engagement and non-paid for external communication, as communicated to staff members will be vetted, checked and signed-off before being released externally to the media.
- 5.6. All key external contacts are managed as far as possible by a single contact at FSB in order to avoid duplication and ensure consistency of message.

## 6. Marketing and Publicity Materials

- 6.1. The Marketing Department is responsible for managing all internal and external publications for FSB. It works closely with all key stakeholders and academics (where appropriate) and the Public Relations Officer to ensure standards are maintained.
- 6.2. The Marketing Department is responsible for a range of functions, including the production of and/or adherence to:
  - 6.2.1. Awarding body and FSB brand guidelines, ensuring brand consistency for all materials
  - 6.2.2. Online and Offline Advertising
  - 6.2.3. Printed Publications
  - 6.2.4. E-shots
  - 6.2.5. Website and landing page content and design
  - 6.2.6. Internal signage
  - 6.2.7. Corporate presentations
  - 6.2.8. Events & Open Days
  - 6.2.9. Social Media (in partnership with the Communications and Student Engagement Teams)
  - 6.2.10. Copy creation and copy writing



#### 6.2.11. All other cross-departmental marketing requirements

- 6.3. The Marketing Department is the primary 'owner' and manager of the relevant FSB branding guidelines and provides relevant graphic design, copy, PR and marketing services (both digital and online).
- 6.4. The Marketing Department is responsible for the branding aspects of faculty profiles on FSB websites. The individual owner of the profile and the relevant Academic lead are responsible for the accuracy of the information contained within that profile. Heads/Directors of individual departments/Schools are responsible for ensuring that profiles of staff are removed should they leave the Company's employment, and will provide a removal request to the Publications Committee for removal from all relevant webpages related to FSB.
- 6.5. Examples of the communications produced by the Marketing Department include:
  - 6.5.1. Printed materials for external consumption e.g. Prospectus, course information (e.g. entry requirements for potential students and course fees), as specified by the partner awarding body and confirmed internally by the FSB Principal and the Publications Committee. Public Website content e.g. FSB website and approved social media sites linked to the organisation (Facebook, LinkedIn, Twitter);
  - 6.5.2. Information about fees and terms and conditions for potential students based on information approved by the Executive Committee, reviewed by the Legal Services Department and implemented across all materials/channels online and offline by the Finance team;
  - 6.5.3. Information about scholarships for potential students, based on information provided by the Principal and implemented across all materials/channels online and offline;
  - 6.5.4. Promotional materials for public events
- 6.6. The design and content of Student Handbooks and Induction Packs relevant to each course of study offered by FSB, with content provided by the relevant stakeholder as and when an item is requested and reviewed and approved by the Publications Committee.



## **PART TWO: Operational vetting and sign-off procedures to ensure consistent implementation of the Published Information Policy**

### **7. Operational Procedures: Introduction**

- 7.1. The vetting process, to ensure FSB publicity materials provide adequate and essential information to prospective students in a clear, timely and accurate manner for all public information, is coordinated through the FSB Publications Committee.
- 7.2. The Marketing department coordinate all website content, advertising, and broadcasting or meet the key outcomes of the policy in conjunction with process owners.
- 7.3. Responsibility for the vetting of proposed public information is the responsibility of process owners before formal submission to the Publications Committee for review and approval. Information reviewed for approval by the Publications Committee is as follows:

- a. Printed material for external use/consumption e.g. prospectus, fact sheets, marketing material
- b. Public web pages e.g. FSB website, social media sites (Facebook, LinkedIn, Twitter)

Information published on the Intranet for internal use such as Human Resources Policies will be reviewed and approved by the Quality Committee, in line with governance requirements, before upload to the intranet for staff use.

- 7.4. Final approval is conveyed to the Marketing Department by the Chair of the Publications Committee – the School Principal.

### **8. Responsible Role Holders**

- 8.1. Responsibility for vetting school, campus or programme-specific information rests with the relevant Marketing contact, the academic lead for each programme (where course details, specifications are required), the Director of Admissions and Marketing and the Publications Committee.

### **9. Vetting Process for Public Information Publicity Materials**

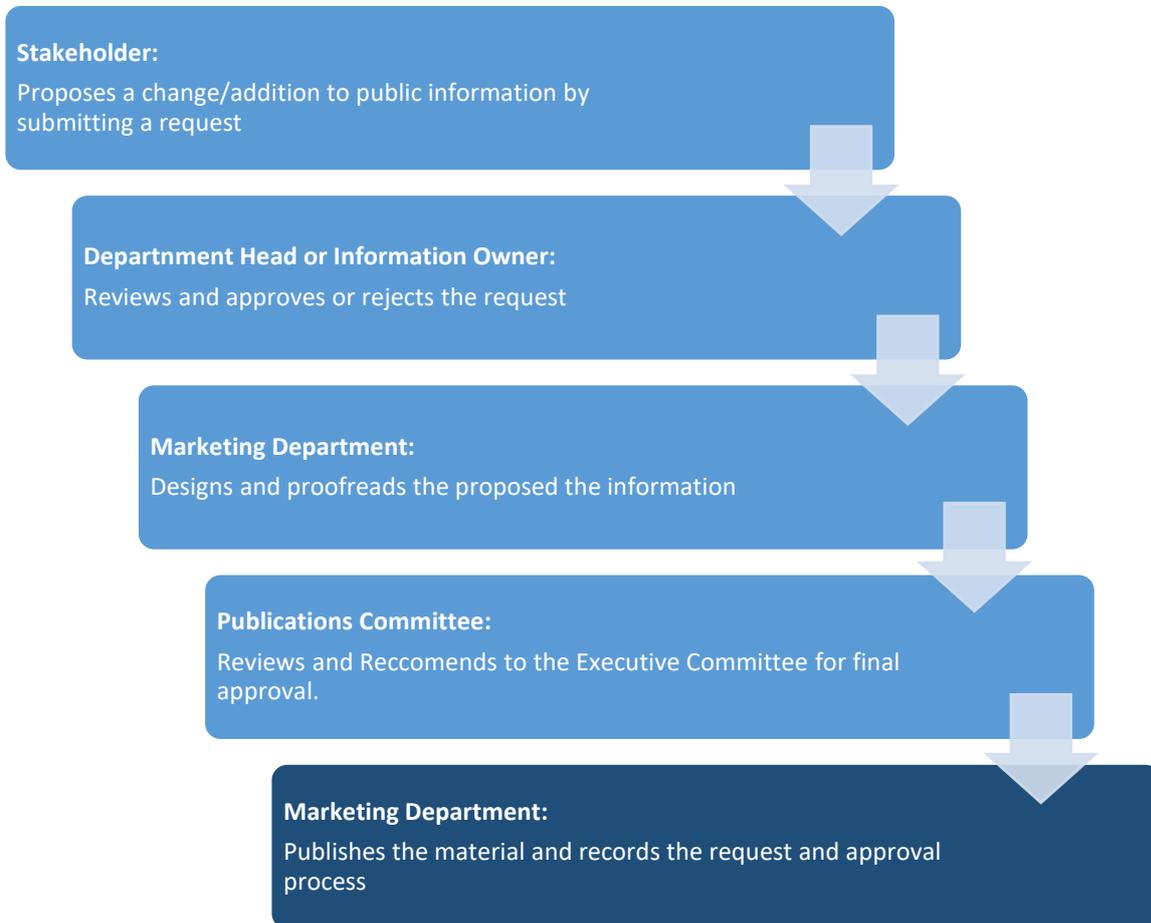
- 9.1. Stakeholders are required to allow sufficient time for the creation of any and all materials. Engagement with the vetting process, of which the Publications Committee is the final stage, is paramount to ensure accuracy.



- 9.2. Key stakeholders propose an advertisement or other promotional material (both online and offline) to the Marketing Department by completing a Marketing, Copy and Design Brief.
- 9.3. The Marketing Department creates the draft marketing communication material and forwards the proposed advertisements or promotional materials to the relevant liaison person (both Academic lead and relevant stakeholders). Each job and request is logged on the central drive in the relevant job log spreadsheet and is given a unique job number, job description and deadline date, from receipt of a brief and/or a request from within the department.
- 9.4. The designated department/individual will vet the advertisement or promotional material / news to ensure that it is complete, accurate and in compliance with any awarding body's requirements (referencing any agreed brand guidelines or instructions from the awarding body) and with the QAA's Principles and Indicators (or independent governance process). Feedback is normally expected within three working days.
- 9.5. If required in accordance with any agreements with the programme's awarding body or other external stakeholders or partners, the designated Department or a member of the Marketing team, where applicable, shall forward the draft marketing communication for approval.
- 9.6. After vetting by the relevant department (including any external approvals from key partners) the Marketing Department implements any required changes, discusses and seeks final approval to issue the publicity material from the Publications Committee.
- 9.7. In cases involving new programmes, partners or significant changes to previously approved content in the public domain, the Head of Marketing or designate will consult with the FSB Principal via the Publications Committee to seek formal sign-off.
- 9.8. Upon receiving approval, the Marketing Department team member will then log the sign-off from the Publications Committee and link a job log spreadsheet to the relevant sign-off to ensure an accurate audit trail. The Marketing Department will then advertise or disseminate the publicity material and make the same available to prospective students at the appropriate time using the intended mechanism.
- 9.9. The Marketing Department will file the final approved advertisement / promotional material / news in their archive.
- 9.10. Staff are informed of the said advertisement / promotional material. Updates are provided through the Website Log and Publications Log maintained by the Marketing Department and the Policy Log, maintained by the Quality Team, which are circulated to Executive Committee members who ensure their managers are appropriately briefed.

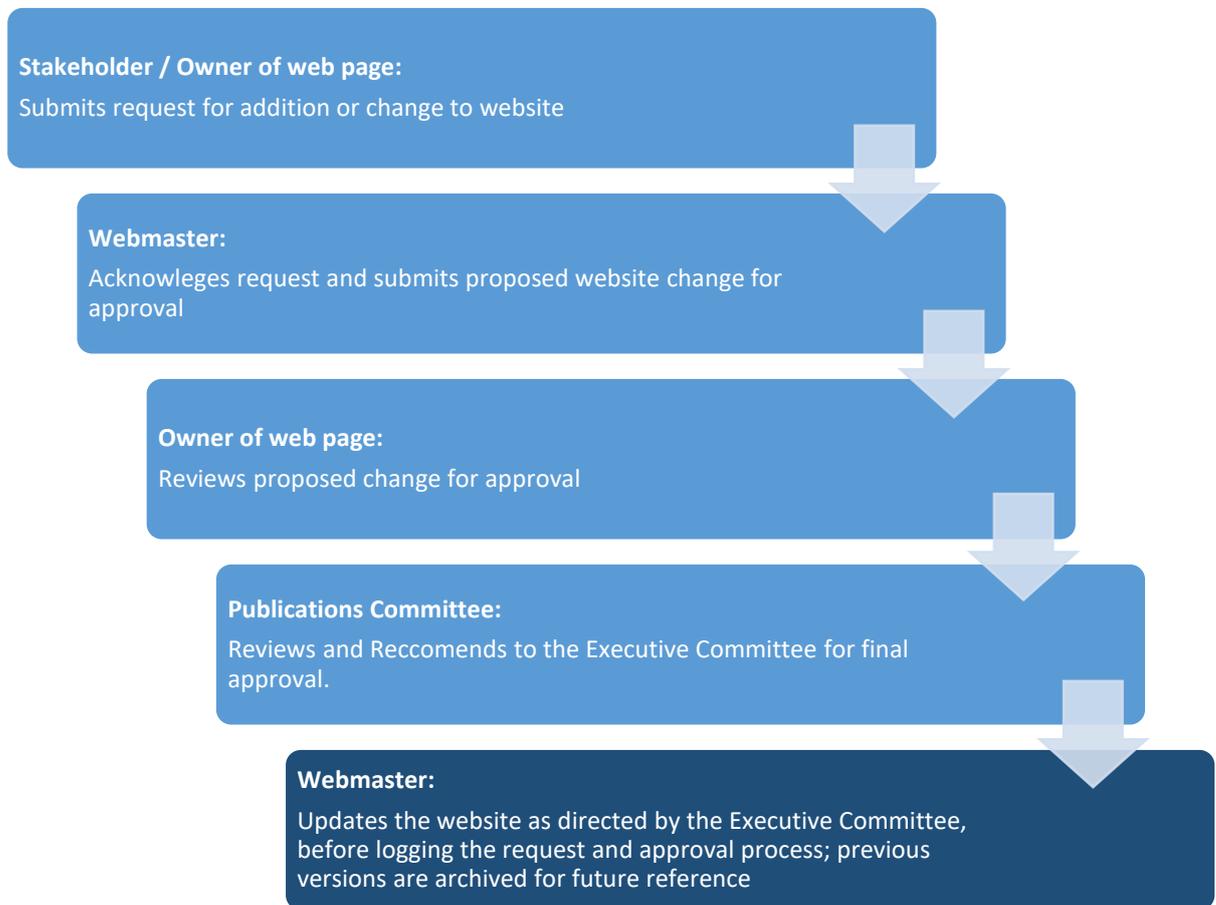


### 9.11. Vetting Process for Publicity Materials: Visual Flowchart





## 9.12. Process for Vetting Website Changes



## 10. Bi-Annual Review and Improvement Procedure

10.1. The Marketing Department annually reviews all marketing related design and copy to ensure it is accurate, comprehensive and aligned with FSB values and confirmed Brand Guidelines. This review covers:

- i. Conformity to the set Brand Guidelines;
- ii. Accuracy of information;
- iii. The operation of any promotions and the related terms and conditions.
- iv. Choice of words, accuracy and ability to substantiate any claims made in promotional materials (*e.g. "best tutors" etc.*)

10.2. Any minor, regular changes (*e.g. amendments to wording, stylistic changes, etc.*) are executed by the responsible marketing manager/team leader/brand team and are recorded in the log, noting the affected marketing material, the changes made and the effective date.



- 10.3. When a need for a significant revision is identified, it is executed in accordance with expectations outlined by the Publications Committee
- 10.4. The Marketing Department archives all promotional and recruitment material in the central creative drive for future reference.
- 10.5. As part of the bi-annual Internal Review process, FSB Publications Committee will regularly review the processes and procedures in respect of course advertisement and promotion for continual improvement.

## **11. Responses to Complaints or Feedback related to Published Information**

- 11.1. Whilst FSB proactively seeks to avoid any instance of misleading or erroneous published information through adherence to this policy, it is acknowledged that corrective action may be necessary in response to complaints or feedback.
- 11.2. Complaints or feedback relating to published information is likely to be generated via the following sources:
  - 11.2.1. Student comments and complaints;
  - 11.2.2. Comments or complaints from partner awarding bodies or universities and/or accreditation and regulation bodies;
  - 11.2.3. Comments or complaints from third party stakeholders, *e.g.* Competition Markets Authority (CMA), Office for Students (OfS) or members of the public.
- 11.3. In the case of student feedback and complaints relating to published information, these are passed onto the Student Support Officer or Complaints Officer at FSB via the relevant published complaints procedure. The complaint is then investigated with the involvement of the Publications Committee and/or any other persons directly involved in the issue. Where necessary remedial action is carried out as per the complaints procedure.
- 11.4. Where complaints or comments are received from a programme's Awarding Body, these are delivered to the Contact Person for that Awarding Body via the FSB Quality team. The issues are investigated and addressed as above and a formal response is conveyed to the awarding body with revised text, as required.
- 11.5. Whenever a complaint is received, the vetting processes will be reviewed and evaluated to assess and mitigate the risks of reoccurrence.



## PART THREE: Processes to Support and Ensure the Accuracy of Public Information Related to New Programmes

### 12. Introduction of New Programmes and Modules

- 12.1. FSB offers higher education academic award bearing courses through collaboration with a partner with degree awarding powers. Therefore, the programme's admission requirements, content and assessment will be prescribed by the awarding institution, which will also have its own quality assurance processes with which the School will be required to comply.
- 12.2. An exception to this is partnerships with Awarding Bodies such as Edexcel or other Ofsted approved awarding bodies. When working with an Awarding Body which allows flexibility and autonomy in terms of entry criteria, such criteria are agreed based on advice from the awarding body.
- 12.3. When considering new programmes and modules, FSB Academic team seeks to ensure that:
  - a. The new programme or module is consistent with the Mission Statement
  - b. There are, or will be, sufficient resources available to ensure that potential students are able to satisfy the outcomes of the programme;
  - c. The application form and any supporting documentation presented to the partner institution is prepared and presented in a way that ensures confidence on the part of that institution and complies with the requirements of the partner awarding body or university partner;
  - d. That no marketing collateral or marketing activity takes place without the permission of the partnering awarding body.
- 12.4. FSB recognises there is a need to illustrate clearly the institution is aware of the necessity to have a PIP in terms of new product development and product launch or going towards product launch, in advance of the appointment of a Course Leader (CL). This Process acknowledges that:
  - a. The CL is the authorised person for each course.
  - b. At development stage of new products an appointed Associate Dean will conduct a handover to the appointed Course Leader. The Course Leader and Principal will ensure that relevant training and content is provided to the marketing, admissions, work placement and student support teams.
  - c. There will be a formal signoff and handover between stages between the Associate Dean and the Course Leader with specific dates.



## Version History

**Version** 1.0  
Original author(s): Quality Manager  
Head of Admissions and Marketing  
Approved by: Executive Committee January 2019

---

**Version** 1.1. - 1.2  
Revised by: Quality Audit Manager  
Revision summary: *Formatting and version control applied. Reviewed by Publications Committee; Executive Committee recommends ratification of revisions by the Board of Governors.*

Approved by: Board of Governors September 2019

---

**Version** 1.3  
Revised by: Quality Audit Manager  
Dir. Admissions and Marketing  
Revision summary: *Annual review and update – minor factual amendments relating to changes of responsibility.*

Approved by: Board of Governors October 2020

---

**Version**  
Revised by: Name; Title  
Revision summary:

Approved by: Date

---

**Version**  
Revised by: Name; Title  
Revision summary:

Approved by: Date

---

**Version**  
Revised by: Name; Title  
Revision summary:

Approved by: Date

---