

J2. APPROVAL OF INFORMATION PUBLISHED BY THE COLLEGE

This section of the CAPR has been agreed by the Plymouth University (as the awarding body) as meeting its requirements for the approval of information published by the College in relation to University programmes delivered by GSM London. The shaded sections below form GSM London regulatory and policy framework as applied to Plymouth University and GSM awards.

Related guidance and codes of practice can also be found at the QAA Quality Code for Higher Education [Part C: Information about Higher Education Provision](#), The Consumer Rights Act 2015 and the Competition and Markets Authority's "Higher education: consumer law advice for providers".

Purpose and scope

2.1 This section of the Consolidated Academic Policies and Regulations (CAPR) explains how the College will ensure that any information it publishes or puts in the public domain is clear, accurate, fit for purpose, accessible and trustworthy.

2.2 This policy applies to all information published in electronic or printed form on or after 01/07/17 regardless of the date the information in the publication was written, posted or gathered, and includes information about programmes, courses, services, strategy, regulations and policies.

2.3 This policy does not apply to letters, verbal communication, presentations, teaching and learning materials, staff recruitment advertisements, the outputs of research and scholarly activity, or the content of creative work.

Definitions

2.4 'Prospectus' means a substantive printed document describing programmes and related information.

2.5 'Publications' means documents and other items put into the public domain by the College, whether digital or printed. It includes prospectuses, brochures, leaflets, display stands and webpages.

2.6 'Advertisement' means text and images in digital or printed external publications whose appearance the College pays for directly or through 'earned' search (for example, search results on paid advertisement).

2.7 'Directory entry' means information published externally without charge to the College.

2.8 'Posting' means text and images published on any social media platform such as Facebook and Twitter.

2.9 'Editorial content' means information published by third parties or the College that is non-promotional and is not paid for by the College.

Introduction

Overview

2.10 The College publishes information that is accurate, fair, reasonable and timely. The College aims to enable external audiences to form an accurate impression of the College and to make informed decisions.

2.11 In all that the College publishes, staff must bear in mind best-practice guidelines and requirements from validating bodies, funding organisations, internal policies and procedures, and all relevant UK legislation including that on data protection.

Principles

2.12 The College makes all reasonable efforts to ensure the accuracy of its published information, mainly by having it approved by defined individuals, Departments and committees and where relevant awarding bodies (see paragraphs 2.18 - 2.21).

2.13 The College will present information to high professional standards, and aims to follow the guidelines given in the relevant codes of practice. It uses Education Committee minutes of approval as a guide to programmes that may be publicised.

2.14 All College staff members have authority to use their own judgment when publishing information or communicating through a range of media. However, publication is generally authorised within Departments by line managers.

2.15 They do so if there is an 'honest belief' that the information they publish or communicate:

- (a) is necessary;
- (b) is in the College's best interests;
- (c) is in line with the nature and level of their role;
- (d) is limited to their area of expertise; and
- (e) does not damage the College's reputation in any way.

2.16 Local procedures and record-keeping for the publication or communication of public information are authorised by the relevant Senior Officer and depend on its importance. The Senior Officer will follow the College Retention Schedule for archiving publicity material.

2.17 However, some specific types of public information and communication have specific approval mechanisms under this policy. These are:

- (a) all marketing communication including prospectuses;
- (b) all publications of definitive programme information including programme specifications, programme handbooks, websites, virtual learning environments;
- (c) all student contract information;
- (d) website and online media; and
- (e) communication with the press and other mass media.

Procedures

Approval of marketing communication including prospectuses

2.18 Marketing communications and prospectuses are substantial reference documents, so the College makes sequential checks to ensure they are accurate. The College follows CMA and QAA guidelines on public information.

2.19 The following table outlines responsibility for Stage 1 approval of all marketing communications including prospectuses and the checking/approval procedure:

Element	Approval
All definitive programme information and descriptions of academic programmes, including: description of the programme, modules, facilities, staff expertise; programme and module approval status; accurate use of terms including programme, award and module titles.	Head of Quality and Governance
Reasonable information about learning and career outcomes that can be supported by evidence. Correct and appropriate use of external endorsements, quality ratings, and information about professional accreditation. Correct contact details.	Deans of Faculty
Accurate descriptions of services, facilities and associated procedures. Information about services provided, prices, availability of services, administrative procedures.	Senior Officer responsible for the relevant service
Information for international students	Senior Officer responsible for International Students
References to fees, bursaries, loans, training salaries and other financial awards	Senior Officer responsible for Student Finance
Entry requirements, application codes and admissions procedures	Head of Admissions
Promotional copy about the College	Director of Marketing and Recruitment

2.20 Following this approval, the Senior Officer responsible for marketing and recruitment will approve the publication's overall quality. The Provost and Academic Registrar are responsible for final overview approval of the publication, based on confirmation of previous stages. Where specified by the Academic Cooperation Agreement with Plymouth University published material will require approval from External Relations in Plymouth University.

2.21 Only after all relevant parties have given their final overview approval will the College publish marketing materials in any form.

Republishing approved material

2.23 Where practical, the College will seek approval from senior post-holders for the text of publications and advertisements. Marketing & Recruitment staff will act in good faith on information provided by staff responsible for the areas described in the advertisement/publication. In all cases, where specific approval by other senior managers or directors is not possible, responsibility rests with the Senior Officer responsible for Marketing and Recruitment.

2.24 The Quality and Governance Office is responsible for informing Marketing & Recruitment in good time of changes to provision (e.g., because of reapproval) that require changes to publications.

2.25 Information from current programme specifications and definitive course documents can be used as the basis for promotional publications without further checking.

2.26 Approved information (e.g. from the prospectus) can be republished without further checks if Marketing & Recruitment has not received any updated information.

2.27 Information that the College gives to external organisations is subject to checking as above. However, the College is not responsible for the accuracy of information reproduced by other agencies once it has left its control.

Website and online media

2.28 The College produces its online prospectuses using the process described above. Ongoing updates may be made throughout the year. Substantial changes such as the addition of new courses should be verified with the Head of Quality and Governance Office.

2.29 The people identified in the table below are responsible for the accuracy of all other forms of online College information in their area, in line with the principles above.

Type of online information	Oversight
Information about academic staff, programmes, facilities, achievements, benchmarks and links.	Deans of Faculty
Information about Departments, including staff, research outputs, estates or facilities, and industry links	Head of relevant Department
Department web pages and pages about the service delivered by the Department.	Head of relevant Department
References to fees and scholarships, bursaries and other forms of student support.	Senior Officer responsible for Student Finance
References to external forms of student funding, accommodation and related services.	Senior Officer responsible for Student Finance or Student Advisory
News stories, home-page content, marketing promotion copy.	Director of Marketing and Recruitment

2.30 These individuals must ensure, through a locally arranged process of regular review, that information is accurate and appropriate including the following:

(a) Information such as third-party endorsements, ratings, rankings or comparators (eg 'the Faculty is the largest provider of X in the UK') must be supported with reference to the source and date. Where possible a hyperlink to the source should be added.

(b) Any images, video or music must be the copyright of the College or (if not) used with permission that should be stated on the web page.

(c) Links to external material must be current.

(d) Potentially offensive material is justified, e.g. on the basis of creative or scholarly merit.

2.31 Social networking sites badged as belonging to College teams, departments or functions must be managed appropriately. Processes must be in place to deal with user-created content and the behaviour of participants who may not be formally part of the College. The processes must be aligned to the College's Social Media policy.

Communication with the press and other mass media

2.32 Individual staff may contact the media and respond to editorial content requests about their area of expertise. They must ensure that what they write and say is in good faith, offers clear and fit-for-purpose information, and is in the College's best interests. They need not consult any central team unless the information may contravene the College's Public Relations Plan.

2.33 Support and advice is available when required from a Senior Officer. Press releases may only be issued by the Strategic Communications Department. The press release's approval level will depend on the nature of the story but may include a Senior Officer.

Advice

2.34 Advice for students on publication of information, and the associated lower-level College rules is available from the Student Hub or the GSM London Students' Union (gsmadvicecentre@gsmlondon.ac.uk).

2.35 Advice for staff on publication of information is available from their nominated Academic Policy Partner or Head of Department.

2.36 If any staff development needs are identified, these may be discussed with members of the Staff and Educational Development Team.

Fees

2.37 No additional fees or charges are associated with this policy.

2.38 The College is not liable for financial or other consequences arising from action under this policy.

Legal and regulatory context

2.39 This policy has been informed by the UK Quality Code for Higher Education (UKQC), "Part A: Setting and Maintaining Academic Standards". The UKQC is the definitive reference point for all UK

Higher Education institutions and sets out how academic standards are established and maintained and how the quality of learning opportunities is assured and enhanced.

2.40 The College has developed this policy with regard to the requirement and principles outlined in the Consumer Rights Act 2015 and the Competition and Markets Authority's "Higher education: consumer law advice for providers".

2.41 The College may not be bound by all the principles in paragraph 2.40 and this policy alone may not provide the procedure to meet all of these principles, some of which may be met by other College policies and procedures. It uses the principles as guidance only, to help it deal soundly with these matters.

Enforcement, monitoring and review

2.42 If any person or body in the College refuses to comply with a request or decision made to enforce these regulations, their refusal must be reported to the Academic Registrar, who will take such action to enforce this policy as they think necessary.

2.43 Each year, the College must receive a report that enables it to monitor, identify and act on any shortfalls in how these regulations are interpreted and applied.

2.44 Every three (3) years, the College must review these regulations to ensure that:

- (a) they remain up to date and continue to meet the expectations of the UK Quality Code, applicable legislation or guidance;
- (b) areas of improvement, or any concerns, raised by students, external examiners, or professional bodies have been addressed; and
- (c) opportunities to reduce unnecessary bureaucracy have been taken.

Schedule (not part of the policies and regulations):

Responsible Officer: Director of Marketing and Recruitment

Approved by: College Executive Group

Version: 2.0

Date: June 2017

Monitoring and Review Body: Faculty Board

Effective From: July 2017

Next Scheduled Review: June 2020

Approval of Information published by the College

Purpose and scope

This section of the Consolidated Academic Policies and Regulations (CAPR) explains how the College will ensure that any information it publishes or puts in the public domain is clear, accurate, fit for purpose, accessible and trustworthy.

This policy applies to all information published in electronic or printed form on or after 1 October 2015 regardless of the date the information in the publication was written or gathered, and includes information about programmes, courses, services, strategy, regulations and policies.

This policy does not apply to letters, verbal communication, presentations, teaching and learning materials, staff recruitment advertisements, the outputs of research and scholarly activity, or the content of creative work.

Definitions

‘Prospectus’ means a substantive printed document describing programmes and related information.

‘Publications’ means documents and other items put into the public domain by the College, whether digital or printed. It includes prospectuses, brochures, leaflets, display stands and webpages.

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The College publishes information that is accurate, fair, reasonable and timely. The College aims to enable external audiences to form an accurate impression of the College and to make informed decisions.

In all that the College publishes, staff must bear in mind best-practice guidelines and requirements from funding organisations, internal policies and procedures, and all relevant UK legislation including that on data protection.

Principles

The College makes all reasonable efforts to ensure the accuracy of its published information, mainly by having it approved by defined individuals, Departments and committees (see paragraphs 21 and 26).

The College will present information to high professional standards, and aims to follow the guidelines given in the relevant codes of practice. It uses Education Committee minutes of approval as a guide to programmes that may be publicised.

All College staff members have authority to use their own judgment when publishing information or communicating through a range of media. However, publication is generally authorised within Departments by line managers.

They do so if there is an 'honest belief' that the information they publish or communicate:

is necessary;

is in the College's best interests;

is in line with the nature and level of their role;

is limited to their area of expertise; and

does not damage the College's reputation in any way.

Local procedures and record-keeping for the publication or communication of public information are authorised by the relevant Senior Officer and depend on its importance.

However, some specific types of public information and communication have specific approval mechanisms under this policy. These are:

all marketing communication including prospectuses;

all publications of definitive programme information including programme handbooks, websites, virtual learning environments;

all student contract information;

website and online media; and

communication with the press and other mass media.

Procedures

Approval of marketing communication including prospectuses

Marketing communications and prospectuses are substantial reference documents, so the College makes sequential checks to ensure they are accurate.

However, to ensure that prospectuses are published in good time, the production process may need to skip the sequence of checking for some information, except for programme titles and content information. In these cases the College relies on the best judgment of senior managers to decide on the final text.

The following table outlines responsibility for Stage 1 approval of all marketing communications including prospectuses and the checking/approval procedure:

Element	Approval
All definitive programme information and descriptions of academic programmes, including: description of the programme, modules, facilities, staff expertise; programme and module approval status; accurate use of terms including programme, award and module titles.	Head of Quality
Reasonable information about learning and career outcomes that can be supported by evidence. Correct and appropriate use of external endorsements, quality ratings, and information about professional accreditation. Correct contact details.	Deans of Faculty
Accurate descriptions of services, facilities and associated procedures. Information about services provided, prices, availability of services, administrative procedures.	Senior Officer responsible for the relevant service
Information for international students.	Senior Officer responsible for International Students
References to fees, bursaries, loans, training salaries and other financial awards.	Senior Officer responsible for Student Finance
Entry requirements, application codes and admissions procedures.	Head of Registry and Administration
Promotional copy about the College.	Head of Marketing

Following this approval, the Senior Officer responsible for marketing and recruitment will approve the publication's overall quality. The Provost and Academic Registrar are responsible for final overview approval of the publication, based on confirmation of previous stages.

Only after both people have given their final overview approval will the College publish marketing materials in any form.

Republishing approved material

Where practical, the College will seek approval from senior post-holders for the text of publications and advertisements. Marketing & Student Recruitment staff will act in good faith on information provided by staff responsible for the areas described in the advertisement/publication. In all cases, where specific approval by other senior managers or directors is not possible, responsibility rests with the Senior Officer responsible for marketing and recruitment.

The Quality Office is responsible for informing Marketing & Student Recruitment in good time of changes to provision (e.g., because of reapproval) that require changes to publications.

Information from current programme specifications and definitive course documents can be used as the basis for promotional publications without further checking.

Approved information (e.g. from the prospectus) can be republished without further checks if Marketing & Student Recruitment has not received any updated information. (Marketing & Student Recruitment may republish approved information (e.g. from the prospectus) without further checks if it has not received any updated information.)

Information that the College gives to external organisations is subject to checking as above. However, the College is not responsible for the accuracy of information reproduced by other agencies once it has left its control.

Website and online media

The College produces its online prospectuses using the process described above. Ongoing updates may be made throughout the year. Substantial changes such as the addition of new courses should be verified with the Quality Office.

The people identified in the table below are responsible for the accuracy of all other forms of online College information in their area, in line with the principles above.

Type of online information	Oversight
Information about academic staff, programmes, facilities, achievements, benchmarks and links.	Deans of Faculty
Information about Departments, including staff, research outputs, estates or facilities, and industry links.	Head of relevant Department

Department web pages and pages about the service delivered by the Department.	Head of relevant Department
References to fees and scholarships, bursaries and other forms of student support.	Senior Officer responsible for Student Finance
References to external forms of student funding, accommodation and related services.	Senior Officer responsible for Student Finance or Student Advisory
News stories, home-page content, marketing promotion copy.	Head of Department of Marketing

These individuals must ensure, through a locally arranged process of regular review, that information is accurate and appropriate including the following:

Information such as third-party endorsements, ratings, rankings or comparators (eg ‘the Faculty is the largest provider of X in the UK’) must be supported with reference to the source and date. Where possible a hyperlink to the source should be added.

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Support and advice is available when required from a Senior Officer. Press releases may only be issued by the Directorate of Marketing and Recruitment. The press release’s approval level will depend on the nature of the story but may include a Senior Officer.

Advice

Advice for students on publication of information, and the associated lower-level College rules is available from the Student Hub or the GSM London Students' Union (gsmadvicentre@gsm.ac.uk).

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The College has developed this policy with regard to the requirement and principles outlined in the *Consumer Rights Act 2015* and the Competition and Markets Authority's "Higher education: consumer law advice for providers".

The College may not be bound by all the principles in paragraph 2.40 and this policy alone may not provide the procedure to meet all of these principles, some of which may be met by other College policies and procedures.. It uses the principles as guidance only, to help it deal soundly with these matters.

Enforcement, monitoring and review

If any person or body in the College refuses to comply with a request or decision made to enforce these regulations, their refusal must be reported to the Academic Registrar, who will take such action to enforce this policy as they think necessary.

Each year, the College must receive a report that enables it to monitor, identify and act on any shortfalls in how these regulations are interpreted and applied.

Every three (3) years, the College must review these regulations to ensure that:

they remain up to date and continue to meet the expectations of the UK Quality Code, applicable legislation or guidance;

areas of improvement, or any concerns, raised by students, external examiners, or professional bodies have been addressed; and

opportunities to reduce unnecessary bureaucracy have been taken.

Schedule (not part of the policies and regulations):

Responsible Officer: Head of Marketing

Approved by: College Executive Group

Version: 1.0

Date: 24 June 2017

Monitoring and Review Body: Faculty Board

Effective From: July 2017

Next Scheduled Review: June 2019