



Accountable Information Provider Policy

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Section / Dept:	Marketing
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Related policies:	CMA Policy
Policy history:	New

Version History

Version	Author	Revisions Made	Date
1	Claire Gammell	First Draft	30 th October 2015

Approval History

Equality Analysis

Version	Reviewed by	Comments	Date
1	Jo McCarthy-Holland	Assessed and considered to have positive impact on equality	4 th February 2016

Committee Sign Off

Version	Committee Name	Date of Sign Off
1	Executive Board Committee (or other)	

1	Introduction
	The Accountable Information Provider Policy is required as a direct outcome of the Consumer Protection Authority audit and action plan conducted by the Government. This highlighted the need for the marketing channels our material information (the pre contract information an enquirer needs to make an informed decision) is published on to be proactively governed in order to ensure full compliance with CMA Guidelines. Specifically focused on providing accurate, clear, unambiguous and timely information that may be used by a prospective student as to their decision about what institution they wish to attend. This information must be easy to access e.g. via website, prospectuses, and at open days.
1.1	Purpose
1.1.1	The overall purpose for this policy is to ensure that there is a 'single source of truth' for pre-applicant information. By identifying the approvers/providers of the information and then involving them more closely in the Marketing process, the University will ensure it provides consistent and accurate information.
1.2	Scope
1.2.1	This policy provides the relevant University of Surrey staff members known as Accountable Information Provider with a clear expectation of their duties.
1.3	Equality Analysis
1.3.1	This policy has been reviewed in line with the University's equality strategy and is considered to have a positive impact on equality.
1.4	Definitions
1.4.1	The term Accountable Information Provider (AIP) is the person responsible for signing off contractual information for marketing channels. The AIP is typically the head of department originating the information. In certain circumstances this maybe different e.g. Where a head of department advises that someone's specified job role identifies them as responsible for the information.
1.5	Legislative context
1.5.1	This policy is governed by the Consumer Rights Act 2015, Consumer Protection 2008 and Consumer Contracts Regulations 2013
1.6	Health & Safety Implications
1.6.1	
2	Policy
2.1	Principles
2.1.1	CMA Regulations and Requirements
2.1.1.1	The CMA regulations apply to four stages of information provision to Students: <ol style="list-style-type: none"> 1. Student research and application 2. Offer stage 3. Acceptance stage 4. Student enrolment stage
2.1.1.2	1. Student Research and Application Stage

	<p>When providing or approving material information at the student research and application stage, the University must</p> <ol style="list-style-type: none"> 1. Ensure that all information provided is accurate, clear, unambiguous and timely. 2. Inform the prospective student as to their decision about what institution they wish to attend. 3. Ensure that information is easy to access for all, inclusive for all and in appropriate formats e.g. via website, prospectuses, and at open days. 4. Draw the prospective student's attention to important and surprising terms
2.1.1.3	<p>2. Offer Stage</p> <p>The CMA is of the view that at the offer stage a contract is being formed between the University and the student. Therefore there are a number of obligations at this stage: -</p> <ol style="list-style-type: none"> 1. The University continues to provide important information that informs the student of whether or not they wish to accept an offer of a place at the University. 2. That the prospective student is provided with the necessary pre-contract information such as course details, length of course, fees and other costs, before they decide whether they wish to accept the offer of a place. 3. Ensuring that the pre-contract information is kept up to date. 4. That the University flags up any terms and conditions that is particularly surprising or important.
2.1.1.4	<p>3 & 4 Acceptance and Enrolment stage</p> <p>The CMA is also of the view that a further contract is formed between the University and the Student when the student actually takes up their place at the University and formally registers/enrols. The obligations at this stage are effectively the same as at the offer stage.</p>
2.1.2	<p>What is an 'Accountable Information Provider'?</p>
2.1.2.1	<p>The Accountable Information Provider (AIP) is responsible for signing off contractual information for marketing channels. The AIP is typically the head of the department originating the information.</p> <p>As well as approving information for key projects (e.g. prospectus) they are responsible for alerting Marketing to any changes to information outside of recruitment cycles or specific projects.</p> <p>The remit of Accountable Information Provider is attributed to their job role not the individual person.</p> <p>It should be noted that the University covers any personal liability should the CMA take action</p>
2.1.3	<p>What is the role of the Accountable Information Provider?</p>
2.1.3.1	<p>The AIP is responsible for ensuring the accuracy of their content for Marketing channels, which include (but are not limited to):</p> <ol style="list-style-type: none"> 1. Web content: Content appearing surrey.ac.uk, including within uploaded documents, whether produced or maintained with their department or via Marketing. 2. Prospectus and brochures: Any pre-contract information provided to Marketing. 3. Information given in person: Presentations given at Open Day, applicant days, campus

	<p>tours, by the phone or in a one-to-one meeting.</p> <p>4. Briefings of colleagues and/or staff: Training and induction of new staff, student ambassadors, agents, or student/alumni representatives.</p>
2.2	Procedures
2.2.1	Essential Steps
	<p>This policy outlines the requirements of AIPs throughout the pre-enrolment journey. The AIP is expected to:</p> <ol style="list-style-type: none"> 1. Meet Marketing's timelines for information updates and approval 2. Provide proactive updates to Marketing should any material information change 3. Drive awareness of CMA requirements within their Departments <p>Ensure that they information they approve and provide is compliant as outlined above</p>
2.2.1.1	The AIP's will be contacted by Marketing and given key deadline dates to supply the required information to the department. They will be given prior notice and expected to prioritise supplying the required information by the stated deadline. The AIP's should familiarise themselves with the Inclusive Language Policy which is incorporated into the brand guidelines available on Asset Bank.
2.2.1.2	If the AIP does not supply the required information to the Department within the specified deadline this will be escalated to the relevant line manager.
2.2.2	Legal Liability
2.2.2.1	The liability for any legal action taken as a result of the supply of incorrect information would rest with the University and not the individual AIP, as they would be deemed to be acting on behalf of the University.
3	Governance Requirements
3.1	Responsibility
3.1.1	<p>This policy is owned by the University's Marketing Department. It will be the responsibility of the Production Manager to ensure that the policy is implemented, communicated and reviewed on an annual basis.</p> <p>The Production Manager will regularly review the impact of the policy and ensure that any subsequent issues relating to the supply of information for marketing channels are dealt with through the most appropriate channels.</p>
3.2	Implementation / Communication Plan
3.2.1	<p>Once approved, this policy will be posted, along with supporting documentation, on to the University's website and communicated via internal communications channels including:</p> <ul style="list-style-type: none"> • Leaders' Alert, SurreyNet, SurreyLife and NetNews. • HR will be asked to include the policy in their briefing to the appropriate new staff during the induction process. • The role of AIP is covered under any other applicable duties in job purposes and role profiles • Updates to this Policy and on-going guidance relating to best practice will be distributed to AIP's accordingly.
3.3	Exceptions to this Policy
3.3.1	In all cases where it is believed that this policy has been breached, considerable judgement will be exercised to consider the context behind the issue and the impact of the action.

3.4	Supporting documentation
3.4.1	CMA Marketing Process Flow
	Accountable Information Provider Information required spreadsheet Brand Guidelines Inclusive Language Policy

Identified AIP Job Roles

FASS

Faculty Manager
Associate Dean (Learning and Teaching)
Head of the School of English and Languages
Head of the School of Economics
Head of the School of Law
Head of the School of Hospitality and Tourism Management
Head of UG Studies - SBS
Deputy Head of Surrey Business School
Head of Department - Politics
Head of Department - Sociology
Head of Guildford School of Acting
Head of Department of Music and Media

FEPS

Associate Dean (Learning and Teaching)
Head of Department – Chemistry
Head of Department - Chemical and Process Engineering
Head of Department - Civil and Environmental Engineering
Head of Department - Computer Science
Head of Department - Electrical and Electronic Engineering
Head of Department - Mathematics
Head of Department - Mechanical Engineering Sciences
Head of Department – Physics
Director of the Centre for Environmental Strategy

PGR ONLY

Associate Dean (Research & Enterprise)
Faculty PGR Director

FHMS

Associate Dean (Learning and Teaching)
Faculty Manager
Head of School of Biosciences and Medicine
Head of School of Health Sciences
Head of School of Veterinary Medicine
School of Psychology Director of Teaching and Learning

CENTRAL SERVICES

Director of Recruitment and Admissions
Head of Accommodation
Director of Alumni and Development
Director of QES
Head of Student Administration
Head of Marketing
Fees and Funding Manager
Head of Equality and Diversity
Head of Europe and International Mobility
Marketing Manager - Students Union
Director of Careers and Employability
Head of Marketing – Surrey Sports Park
University of Surrey Solicitor