

## **General Policy G02 Public Information Policy and Approval Procedures**

### **1. Policy Statement**

This policy supports SAE Institute's Strategic Directions, and provides for oversight, control and review over all public domain information about the Institute which is produced and distributed by the Institute.

### **2. Purpose**

This policy aims to ensure that the provision of public information about SAE Institute is accurate, fair, reasonable and timely, and is intended a) to enable external audiences to form an accurate impression of SAE Institute; b) to allow students and other stakeholders to make appropriately informed decisions; c) to enable clear and effective communication about and within the organisation; and d) to meet any applicable legal obligations eg in relation to copyright.

### **3. Scope**

This policy applies to all SAE Institute operations in Europe, in any Licenced territory operations, and all campuses offering programmes validated by Middlesex University, and covers information in printed, electronic or broadcast form which is intended to be made public and which refers to academic programmes, services, corporate strategies, and policies of SAE Institute or any aspect of its operations.

### **4. Associated Policies and Procedures**

This policy should be read in conjunction with the following policies and procedures:

- G01 Code of Conduct
- G04 Student Engagement
- A01 Academic Standards and Quality Assurance
- A04 Intellectual Property Policy
- A05 Admissions and Selection Policy
- G06 Information Privacy Policy
- G07 Information Technology, Network Usage and E-mail Policy.

### **5. Associated Documents**

This policy should be read in conjunction with the following documentation:

- Student Handbook
- Staff Handbook
- Social Media Guidelines (Attachment 1)

## **6. Policy**

### **6.1. Prospective Students**

#### **6.1.1. Printed Material**

The Institute's Prospectus ("Course Details") and relevant brochures for public distribution are produced under the editorial control of the Chief Executive Officer (CEO), who has ultimate responsibility to ensure that contents of published materials meet the required standards of accuracy and clarity, and comply with all legal requirements.

The accuracy of academic content is verified as required on an ongoing basis, and at least twice yearly, by the Group Academic Coordinators and the Senior Academic Coordinator in consultation with Campus Academic Coordinators, and Academic Programme Leaders.

The accuracy of corporate and administrative content is verified as required on an ongoing basis, and at least twice yearly, by the Senior Management Group, including the Campus Managers and the relevant delegated officers of the Institute eg the Registry Administrator and the Marketing Manager, Europe.

All advertising materials are prepared by the Marketing Officer and reviewed by the Media and Public Relations Officer on an ongoing basis before publication, with academic materials verified by the Group Academic Coordinators and corporate materials verified by the CEO.

Information pertaining to programmes validated by Middlesex University should have the approval of the European marketing manager and Senior Academic Coordinator or delegated Group Academic Coordinator at the design draft stage and before any publication or transmission.

#### **6.1.2. SAE Institute websites**

Each campus of SAE Institute maintains a dedicated website which provides external audiences with information regarding the Institute's courses, campuses, facilities, news and special events. It is the responsibility of the CEO to ensure that the website is accurate, informative and reflects current Institute offerings and operations.

The accuracy of academic content is verified as required on an ongoing basis, and at least twice yearly, by the Marketing Manager, Europe and the Senior Academic Coordinator or delegated Group Academic Coordinator in consultation with Campus Academic Coordinators and Academic Programme Leaders.

The accuracy of corporate and administrative content is verified as required on an ongoing basis, and at least twice yearly, by the Senior Management Group, including the Campus Managers and the relevant delegated officers of the Institute eg the Registry Officer and the Marketing Officer.

The usability and usefulness of the website are also regularly reviewed by the Senior Management Group including through feedback from students, staff and external stakeholders.

### **6.1.3. Social Media**

SAE Institute utilises various social media channels such as Facebook and Twitter to provide external audiences with direct engagement as well as information regarding the Institute's courses, campuses, facilities, news and special events. It is the responsibility of the Media and Public Relations Officer to ensure that the use of social media accords with the SAE Institute Social Media Guidelines (attached) and that the information relayed is accurate and reflects current Institute offerings and operations.

All information relating to the admissions process should be clearly signposted and meet the provisions of A05 Student Admissions and Selection Policy.

SAE Institute shall provide and make widely accessible, all information intended to help prospective students select their programme with an understanding of the academic environment in which they will be studying and the support that will be made available to them.

The Institute and its officers shall make every effort to ensure that the processes of application and admission are accurately described and presented for all prospective applicants, and that prospective students are provided with all necessary or requested information to ensure they make an informed choice in the selection of their programmes of study.

Information on all available courses will be provided on the website, and personal invitations will be issued to all prospective applicants to visit the Institute, meet the staff, inspect the facilities, and form an accurate view of the learning environment and the support that will be provided to them.

## **6.2. Current Students**

### **6.2.1. Printed Materials**

The Institute produces various materials for internal circulation in particular the Staff and Student Handbooks, for which ultimate responsibility rests with the CEO.

The accuracy of academic content is verified as required on an ongoing basis, and at least twice yearly, by the Group Academic Coordinator and the Senior Academic Coordinator in consultation with Campus Academic Coordinators and Academic Programme Leaders.

The accuracy of corporate and administrative content is verified as required on an ongoing basis, and at least twice yearly, by the Senior Management Group, including the Campus Managers.

### **6.2.2. Electronic Materials**

The Institute maintains a Student Portal for the provision of ongoing information intended to assist the work of students, and a Staff Portal for the ongoing provision of information to assist the work of Institute staff.

Both the Student Portal and the Staff Portal are maintained on an ongoing basis by the Portal Officer and the Information Technology Officer, although ultimate responsibility rests with the CEO.

Academic content is verified by the Group Academic Coordinator and the Senior Academic Coordinator, in consultation with the Campus Academic Coordinators, and Academic Programme Leaders.

Corporate and administrative content is verified as required by the Senior Management Group or the relevant Campus Manager.

Details of the framework used for managing academic standards and quality assurance and enhancement together with the description of information used to support its implementation will be accessible for all staff and students of the Institute by the Group or Campus Academic Coordinators, together with all associated relevant policies.

The Institute makes daily and extensive use of e-mail for internal communications purposes, and such usage is governed by G09: Information Technology, Network Usage, and E-mail Policy.

It is the responsibility of the campus or regional manager to maintain records (by type and category) of all activity relating to professional, statutory or collaborative bodies that are subject to formal agreements.

### **6.3. Information for Students**

On enrolment and commencement of studies, students shall be provided with the Student Handbook, Programme Handbook and access to the appropriate electronic information sites for current and ongoing information in relation to their programmes of study as part of an induction programme. They shall also be provided with information about the support that will be provided, what they can expect from the Institute, and the expectations of them and their responsibilities as students, including the Code of Conduct and the rules, regulations, policies and procedures that apply to them.

Students shall also be provided with information about how any information about them is maintained and stored, and how communications about progress in their studies will be maintained and updated. At the start of each module of studies students shall be provided with details of that module of studies and expectations of them in relation to performance and assessment. Appendices 1 and 2 of G04 the Student Engagement Policy also apply and should be consulted.

### **6.4. Graduates**

On completion of their studies students shall be provided with a detailed and formal record of their studies in accord with Middlesex University policies on the provision of Diploma Supplements and records, and shall be provided with timely and sufficient information to allow them to participate in Middlesex University graduation ceremonies.

Students will also be provided with information on future access to their academic records and record retention.

## **6.5. Communications with the Press and Media**

All official communications with the press and media are handled by the Media and Public Relations Officer, and remain the responsibility of the CEO. Press releases may only be issued on the authority of the CEO, and section 5.20 of the Code of Conduct provides directions and guidance to staff on media statements. Attachment A immediately following this policy provides social media guidelines.

Individual staff however may respond to legitimate external information requests relating to their areas of academic or professional expertise, but they are strongly advised to seek guidance from senior Institute staff and the Media and Public Relations Officer before doing so to ensure that their commentary is academic discipline specific and in no way reflects on the operations of SAE Institute. Section 5.20 of the Code of Conduct also applies.

## **6.6. Copyright Responsibilities**

All members of SAE Institute should ensure that any published material conforms to the requirements of the Copyright Laws which apply in the relevant country of operation. For example, in the UK the Copyright, Designs and Patents Act of 1988 applies, and any subsequent legislative amendments to it. General guidance can be found from the UK Copyright Service at:

[http://www.copyrightservice.co.uk/copyright/p01\\_uk\\_copyright\\_law](http://www.copyrightservice.co.uk/copyright/p01_uk_copyright_law)

An informative guide to copyright issues in the Higher Education sector is available at:

<http://www2.warwick.ac.uk/services/gov/legalservices/whentouse/copyright/>, and copyright issues for creative works in the digital age are a matter of importance for both staff and students at SAE Institute.

Responsibility for observation and compliance of copyright provisions in all academic materials rests with the academic member of staff responsible for the modular material produced, under the guidance of the Group Academic Coordinators and where necessary the Senior Academic Coordinator, whose decision in relation to such matters shall be final.

Responsibility for observation and compliance of copyright provisions in all non-academic materials produced at Campus level rests with the Campus Managers, and responsibility for observation and compliance of copyright provisions at regional level rests with Media and Regional Marketing Manager, with ultimate responsibility at the CEO level.

Information about the need for copyright compliance and access to further information shall be provided to both staff and students as part of their induction, and shall be available on the Staff and Student Portals.

### **6.7. References to Middlesex University**

The relevant officers of Middlesex University eg the Accreditation Tutor, the Subject Specialist Tutor) and the Collaborative Programmes Manager, are consulted on a regular and as needs basis in relation to any references to Middlesex University in SAE Institute publications whether printed or electronic. All references to degree programmes in SAE Institute publications are carefully scrutinised at time of preparation by the relevant delegated SAE officers to ensure accuracy in relation to the programmes of study and correct description as Middlesex University degrees and recognised programmes. Ultimate responsibility rests with the CEO.

### **7. Policy History**

Last Review: December 2015

Policy Review Date: 1 December 2017

## **Policy G02: Appendix: Social Media Guidelines SAE Institute, United Kingdom**

1. These guidelines are designed to inform and guide all staff of SAE Institute in their contribution to and use of social networks as employees of SAE Institute, or in any context where their individual views and opinions may be interpreted as being linked to the operations and reputation of SAE Institute by virtue of their employment, whether intended or not.
2. While individuals always retain the right to freedom of opinion and public participation, any public statement made by an individual which refers to or draws upon the link to their employment brings with it the responsibilities to recognise the legal and reputational rights of the employer.
3. Staff should always refer to the provisions of the Code of Conduct, and especially section 5.20, in any situation relating to the use of social media or public statements.
4. Staff should always refer to the provisions of the Code of Conduct, and especially section 5.20, in any situation relating to the use of social media or public statements.
5. *What are Social Media?*  
Social Media are social networks, internet communities and electronically accessed sites that offer a platform for the exchange of opinions, views, impressions and experiences. Among the better known are: Facebook, Twitter, mySpace, YouTube, XING, LinkedIn, etc.
6. *Why does SAE Institute need Social Media Guidelines?*  
Having a private opinion is everyone's right, and a private matter. But when you make it public, you may be impinging on the rights of others, whether persons or organisations, and they, like you, have legal protections to ensure that their good name, their reputation and their business should be protected from unsubstantiated assertions, gossip, or uninformed comments.

In an increasingly digitally connected world, social networking sites are gaining more currency and daily usage, and many students and staff of SAE Institute are members in different online communities, and new opportunities for interaction occur daily.

As the number of social network users continues to go up rapidly, companies may be using social networks for brand promotion and individuals may be using social networks for individual expression of views. However, the rights of all entities need to be protected, and staff should be aware of the ways that personal views expressed publicly may intentionally or inadvertently enhance or damage the good name and reputation of individuals or companies or organisations.

Users often share their experiences, discuss their opinions and preferences, and in the best case scenario may refer to or promote their favourite brands or products. Due to the high multiplier effect that occurs within social networks, the image of any company or organisation such as SAE Institute can be often rapidly promoted, advocated, harmed or maligned.

In that context, every employee who participates in social networks can willingly or inadvertently become an ambassador for the organisational “brand” and good name, sometimes independently of whether they actively publish information in the name of the company or by association.

Brand recognition and brand promotion may therefore no longer be limited to official company websites but may happen through many different channels and may be executed by many different people, both staff and students, with different motivations and in many different conscious and unconscious ways.

These guidelines offer advice and guidance from SAE Institute for constructive and legally acceptable behaviour in social media networks, in order to promote fairness and to avoid mistakes which may not only damage the reputation of the SAE Institute but in the worst case scenario could also lead to financial consequences for the organisation or for individuals.

## 7. Basic Principles for the Use of Social Media

### 7.1. *Engage constructively.*

Only someone who actively looks to engage, participates in discussions and answers questions purposefully is taken seriously in the world of Web 2.0.

### 7.2. *Create additional value.*

The SAE goal is not to spread short-term advertisement but to build a long-term, professionally based conversation about what we do and the services that we provide for our students. This can only be achieved with quality content.

If you have nothing constructive to offer, it may be better not to say anything.

### 7.3. *Stop and think before you send.*

Whatever you may feel, think first, write second, and think again about the effect of what you have written, before you send it.

Each of us is responsible for our own comments. Do not write anything that you might later regret. Do not answer in the heat of the moment or too emotionally without thinking it over first. If you have to let your feelings out, then talk about it with someone you respect, or write and leave it. When in doubt, get a second opinion before you post a comment. Remember: “The internet never forgets. Once it is online, it stays online, it is published forever”.

### 7.4. *Be honest, truthful, polite and fair.*

False statements are harmful, may be subject to legal retribution, and once made publicly may be spread by others, causing consequences you had not intended, but for which you may be liable. Learn and follow internet netiquette: you are part of a community, so learn its rules of behaviour. Insults, hurtful or malicious or slanderous statements, derogatory, discriminatory or racist comments are not only unwelcome but are strictly prohibited and can be legally actionable. Stop any conversation if there is the danger that it may escalate unacceptably.

7.5. *Obey current laws.*

Only publish material that is free of third-party rights or under a public domain license. Otherwise make sure that you are in possession of a written release certificate. Publish only pictures of people that have granted you permission to do so. **DO NOT** publish anything about the company or its courses or employees that you have not been given specific permission to publish. When in doubt ask your supervisor before you publish, and preferably always ask for advice in advance. Any information about SAE Institute should be accurate and helpful.

7.6. *Handling of error.*

We all make mistakes, it is an essential part of learning. So learn from your error: do not attempt to cover up or pretend it did not happen or deny what has happened: seek advice, and try to correct.

7.7. *Keep your private life and work separate.*

During work hours the use of social media platforms is acceptable and permitted if it is helpful to the organisation and addresses its strategic objectives. The private use of social media however is not allowed during work hours. Generally, private life and work should not be combined on the same page, blog or profile. Private pages have to be clearly specified and recognisable as such. Furthermore, nothing that might harm the reputation of SAE Institute and which might be embarrassing or unprofessional in any public context should be posted.

7.8. *Handling of confidential information.*

Complete silence and confidentiality must be maintained about students, clients, colleagues, information about the company or any information which you have accessed through your work. Suggestive hinting, ironic remarks, aspersions or innuendo are not acceptable. Please refer to the Code of Conduct, especially sections 5.11 and 5.12.

7.9. *Distinguish between facts and opinions.*

In order to avoid misunderstandings it is advisable to make clear what parts of your statement are provable facts and which ones are opinions. Furthermore it should be clear whether something is your own personal view or a stated company position. Anything published on private pages and private profiles should reflect personal opinion only, and should be clearly stated to be so.

7.10. *Be open, transparent and authentic.*

Our goal is open communication characterised by trust, credibility and an enduring concern for our students. Part of this is that you stand behind your position within the company and represent and communicate its values and priorities to external audiences, especially if you are engaging online in the name of SAE Institute.