

The Development and Maintenance Initiative (DMI)

Higher Education Circular



Information Commissioner's Office
Promoting public access to official information
and protecting your personal information

Circular 2

Education

(Manchester 24_04_07)

Welcome to the second higher education circular. This edition outlines the matters discussed at the second DMI workshop held in Manchester.

1.1 Issues affecting the higher education sector

The target audience of schemes was discussed. The broad user groups can be described as:

- Staff
- Students (both prospective, postgraduate and undergraduate)
- Journalists
- Other Universities

Many universities have distinct access routes to information for certain user groups, such as student portals. This will need to be taken into account when constructing the model schemes. The importance of alumni information was also recognised, alongside information designed to assist potential students. User journeys and routes of access are key to determining what type of information is already routinely published and why.

If too much emphasis is placed upon the views of authorities, model schemes may 'short-change' the public for whom they are designed. It was suggested that an organisation such as the [National Union of Students](#) could act as a consultee in this regard.

The concept of an audit process to formalise the commitment to routinely publish information was welcomed.

Many universities are moving towards e-tendering processes. This may assist with the inclusion of tendering information within schemes. As with workshops held for other sectors, the requirements of the EC and in particular the [Official Journal of the European Union](#) has been suggested as a starting point for

determining what contractual information should be included within schemes. Any class alluding to financial information must be constructed in such a way as to avoid impinging upon contractual obligations.

Publicly-owned companies are a significant feature of this sector. It has been suggested that a standard paragraph explaining the relationship of these companies to the authority itself would be useful.

Greater use of model schemes would help to ensure consistency across the sector, particularly if they were able to amalgamate examples of best practice.

In respect of information held by other regulatory bodies (which alludes to universities) it was suggested that a standard paragraph detailing contact information be included within schemes. For example, links to monitoring bodies could be included within schemes. The [Teaching Quality Information](#) site and the [Quality Assurance Agency](#) for higher education were suggested as examples in this regard.

Other suggested stakeholders with regard to universities include [Universities UK](#) and [Guild HE](#).

1.2 Classification of information

It was suggested that areas of topical or popular interest (perhaps defined by patterns of requests) should be included as a class of information. Some discussion followed as to whether areas of topical interest would be akin to controversial issues. Conversely, it was suggested that a topical class could be construed as a way of spinning positive news. It was recognised that a topical class would require close management.

It was also noted that the public want access to information which is not necessarily suitable for proactive disclosure. The expectations of the public in relation to information unsuitable for publication should be approached carefully.

There was some discussion around the merits of disclosure logs. It was suggested that many requests are too specific to the interests of the individual requestor to truly encompass issues of public concern.

It was accepted that high level classes would accommodate change much more easily in comparison to classes which are too narrowly defined. Any new model scheme must be careful to avoid classes of information which are actually pieces of information for this reason.

In earlier workshops for other sectors, the possibility of including a class of information titled 'Organisational Structure' was discussed. There is general

recognition that this title may not assist the public in understanding the type of information it alludes to. 'About us' or 'organisational information' was suggested as an alternative. Such an approach would avoid the misconception that this class would be limited to organisational charts and diagrams of the structure of departments. In respect of terms for classes in general it was recognised that the informality of web language may provide a useful steer on public facing terminology.

At present, classes of information linked to 'Finance' are often construed as policies and procedures relating to financial administration, such as the process for submitting subsistence claims. 'Finance' needs to reflect the public's expectation of information of this type e.g. how much money the university procures and how it is spent.

In many authorities, information on generic grade structure is published. The [Times Education Supplement](#) publishes some information such as salary details of senior staff and this may be a useful tool in establishing a benchmark. The information on salaries published as part of the audited accounts may also be helpful in this regard.

When publishing information related to expenses it may be necessary to provide some contextual details. For example, senior staff members may be researchers or academics who receive funding via many different channels.

There was some discussion as to whether a class of information entitled 'working for us' should be included in the new model schemes. This would provide scope for information on staff policies, recruitment procedures and development opportunities to be included.

1.3 Charging

A standard paragraph on charges would be welcomed. Clarity on what can be included within a charge would be helpful, for example is it the cost of paper or should it also include the subsidiary costs such as electric, equipment, ink etc?

An approach which allows an authority to reserve the right to charge would be the most practical way of dealing with the issue of charging.

Many authorities are keen to preserve costs for information such as teaching materials and tendering packs.

1.4 Archived Material

Aside from information held in archives and libraries, the HE sector do not regularly provide information to view in situ only.

It would be helpful if the ICO could provide a standard paragraph/guidance on how to approach special collections held in archives.

When queried about the accessibility of information held in libraries, it became clear that this is nearly always dealt with as information reasonably accessible by other means should a request for the material contained with them be received. Reasonably accessible is often approached as customer service matter. Accessibility legislation will also impact upon this.

If too much information is placed on an authorities website it would become unwieldy and difficult to manage. There needs to be consideration as to the appropriateness of the delivery of information. The public can be informed that information is available on request where it is impractical to include it on the website.

1.5 Draft Classes

Below the initial draft class headings are detailed, alongside the possible equivalents within the HE Institute Business Classification Scheme. It is accepted that many of the HE Institute Business Classification Scheme headings could fit into one or more of the current draft headings.

At present the classes are very much initial thoughts and have a limited number of examples as to the type of information they may contain to provide context. They are designed to encourage discussion as to what should be included, and the ICO would welcome feedback on their suitability.

Draft Headings	HE Institute Business Classification Scheme
About Us/Organisational Information This section would contain information on the authority's role and responsibilities. This class may include (but is not limited to): <ul style="list-style-type: none">- University Charter- University Statutes	Business Units Related Companies Corporate Management

<ul style="list-style-type: none"> - University Regulations - Mission Statement - Overview of legislation relevant to the authority/legal framework - Our publicly owned companies - Student charter - How to complain - Committee attendance/ minutes/agendas - Senate/academic board information - University calendar of events - Vacancies - Staff handbook - Grievance/disciplinary procedures - Health and safety policies - Estates and resources - Location and site maps 	
<p>What we do</p> <p>It has been suggested that this class be split further into service areas e.g. Teaching/learning; research; business community engagement and student services. This class may include (but is not limited to):</p> <ul style="list-style-type: none"> - Our services - Selection criteria for students - Registration procedures - Course information - Prospectus - Alumni - Undergraduate and Postgraduate information - Hire of rooms/facilities - Current research activities - Links with external enterprises - University accommodation for students - Information for landlords - Special collections 	<p>Teaching and learning Research Knowledge Transfer and Enterprise Corporate Services Student Services Commercial Services</p>

<p>Strategy and Performance</p> <p>This class may include (but is not limited to):</p> <ul style="list-style-type: none"> - Teaching and learning strategies - HR Strategies - Service level agreements - Reports/feedback from monitoring bodies - Performance indicators - Procurement strategy - Research strategy - Stakeholder management information 	<p>Academic Administration Corporate Relations</p>
<p>Financial Information/How we spend public money</p> <p>This class may include (but is not limited to):</p> <ul style="list-style-type: none"> - Annual budget - General procurement conditions - How we are funded/income - Grant information (research) - Published accounts - General salary/expense details on senior staff - Grade structure for staff - Rules for claiming expenses 	<p>Corporate Resources</p>

1.8 Further Input

If you have any comments on this circular or anything you would like to contribute to the initiative, please contact Paul Damerill at paul.damerill@ico.gsi.gov.uk

The next education workshop will be held as follows:

- Manchester : 6th June 2007