



BUCKINGHAMSHIRE  
NEW UNIVERSITY

EST. 1891



# Freedom of Speech Policy and Procedures

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## Forms

- Document control form (available from the Academic Registry)
- Equality analysis form (available from Human Resources Directorate)
- Formal document template (available from the Academic Registry)

Approved by: **Operations Board**  
Version No. **1.0**  
Owner: **Academic Quality Directorate**

Date first published: **Oct-2016**  
Date updated: **Oct-2016**  
Review Date: **Sep-2021**

This document has been designed to be accessible for readers. However, should you require the document in an alternative format please contact the Academic Quality Directorate.

## Quick guide to developing a document

- Identify the **type** of document you require
- Check whether your document is **needed** and not covered by another document
- Prepare a **document control form** to track development
- Complete an **equality impact assessment** to identify any groups that might be affected
- Prepare a **draft** using the formal document template provided.
- Circulate your draft for **consultation** and incorporate feedback
- Check your document meets **accessibility** requirements
- Ensure that the language used in your document is **gender neutral**
- Forward your document to Governance for formal **approval**
- **Publicise** your approved document so that staff are aware of its implications

## Purpose and scope

- 1 The purpose of this policy is to ensure that all Buckinghamshire New University strategies, regulations, policies, procedures and guidelines – the ‘document framework’ – are necessary, current and fit for purpose by providing a framework for their development, approval, implementation and review.
- 2 Other documents, such as agreements or codes of practice lie outside the scope of this policy but may adopt some of its principles such as arrangements for publication.

## Responsibilities

- 3 All University staff are responsible for ensuring that documents are prepared in accordance with this policy.
- 4 Responsibility for the document framework lies with the Governance Team in the Academic Quality Directorate (AQD), to whom any inquiries should be directed.

## Document types

- 5 A **statute** is a written law, the act of a corporation or its founder, intended as a permanent rule or law. Many of the University’s governance documents are statutes. Changes to statutes often require Privy Council approval and so sit outside the document framework.
- 6 A **strategy**, or strategic plan, is a high-level plan to achieve long-term or overall aims. It represents a substantial statement of the direction to be pursued in a given academic or operational area of work. All strategies must be formally approved.
- 7 **Regulations** are rules to be followed (normally in the context of university awards and / or student achievement). All regulations must be formally approved.
- 8 A **policy** is a concise, formal statement of the principles designed to reach certain goals or objectives. All policies must be formally approved.
- 9 A **procedure** is a document written to support a policy or strategy. It details the process or steps required for implementation and establishes those responsible. Procedures should be specific, factual and succinct and must be formally approved. Some procedures are incorporated within policy documents for simplicity.
- 10 **Guidelines** provide detailed advice or guidance to staff for conducting a specific activity. Typically, such documents provide operational detail, instructions, advice and recommendations on good practice that facilitate the implementation of that activity. Guidelines are not binding, not enforced and do not need formal approval.
- 11 Documents may be supported by **forms**. These do not require approval, although they may be published, and may be updated at any time to maintain functionality.

## Principles

- 12 Approval of documents will be undertaken in accordance with the University's *Scheme of Delegation*, drawn up under its *Instruments and Articles of Government*.
- 13 All parts of the University's document framework **must**:
- comply with relevant legislation, the University's *Articles and Instruments of Government* and related documentation
  - consider all strategic and risk implications
  - consider the impact on staff, students and other stakeholders of the University
  - be feasible to implement and comply with other parts of the framework
  - be equality assessed during document development
  - be prepared using the standard University template to ensure consistency and promote understanding
- 14 **Strategies, regulations, policies and procedures** will be approved for a maximum period of five years. Where a shorter period is required this will be indicated during document approval.
- **statutes** will not have a formal approval period as these generally relate to an event in the history of the University, e.g. the award of University Title, and will be retained in perpetuity.
  - **guidelines** will not have a formal review schedule. As these relate to operational detail, they are expected to be kept under constant review.
  - documents may be amended prior to the formal review date, e.g. to maintain alignment with external requirements or an internal needs assessment
  - outdated documents should be formally rescinded by the relevant committee or other designated body to ensure that they removed from the framework
- 15 The University will make as much information as possible available, taking into account confidentiality and privacy requirements. Documents will be identified as either externally or internally facing which will determine the manner of publication:
- **externally facing** documents will be published on the University website and be publicly available
  - **internally facing** documents will be published via the intranet for internal use only. Documents will be restricted where they are deemed to be of a sensitive nature or relate to internal operational processes, e.g. guideline documents.<sup>1</sup>
- 16 The University will seek to ensure that documents are accessible to readers. The default format for all documents will be Portable Document Format (PDF). Where necessary documents will also be made available in alternate formats.
- 17 The online version of any document, whether published on the University website or via the intranet, will be considered as the sole definitive and current version.

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<sup>1</sup> Documents will be deemed to be of a sensitive nature where they cover areas that correspond to one or more [Freedom of Information Act \(FOI\)](#) exemptions, e.g. where they refer to commercial interest (section 43 of the Act).

## Document life cycle

- 18 There are four main stages in a document life cycle:
- a identification of a new document
  - b development of a new document
  - c approval of a new document
  - d amendment, review and rescinding of an existing document

### Identification of a new document

- 19 This is the initial phase of any document where the need for a new document is first identified. Typically, this will arise from the identification of a gap in the document framework. When any new document is proposed, it must be established why it is needed and what it aims to achieve.
- 20 A review should be undertaken of existing documentation to establish whether a current document already covers the need that has been identified or whether it could be updated accordingly. This avoids adding to the overall document framework unnecessarily.
- 21 If a new document is required a **document control form** must be completed and used to track development. The following information will be identified:
- the type of document (Strategy, policy, procedure etc.)
  - the name of the document
  - the document owner
  - whether the document will be internally or externally facing
  - key stakeholders
  - themes associated with the document

### Development of a new document

- 22 The document owner is responsible for preparing the initial draft of the document and circulating it for consultation.
- 23 It is essential that document owners use the **formal document template** provided and prepare the document in accordance with the recommended format and style. See Appendix 2: Format and style.
- 24 It may be useful to establish a task and finish group to help draft the document, especially where expert advice and guidance are required from across the University.
- 25 Documents must be drafted with accessibility and the reader in mind. See Appendix 3: Other guidance.

### Equality analysis

- 26 The document owner must undertake equality analysis of the proposed document considering the effect on equality of its likely implementation and taking the appropriate steps to minimise its impact on protected groups.
- 27 The *Equality Analysis Guide* has been designed to provide practical support for this stage of document development. The Guide is supported by the University's [Equality](#).

[Diversity and Inclusion webpages](#) where document owners can access student and employee statistics to inform equality analysis.

- 28 An **equality analysis form** should be completed and used to track the amendments made to the document in response to any equality considerations identified.
- 29 The completed form should be forwarded to the Equality, Diversity and Inclusion Manager and a copy of the signed form retained to be submitted alongside the final document.

### **Consultation**

- 30 Document owners are responsible for ensuring all stakeholders who will be impacted by a new document are aware of the changes to work practice it may require. They will also be responsible for responding to any queries.
- 31 When ready, the document owner should circulate a draft for comment; this should be clearly marked as “Draft”. The process for numbering drafts is provided below.
- 32 The extent of consultation will depend on the document type. Policy and strategy documents should be circulated widely as these potentially affect all staff at the University. By contrast, draft guidelines are unlikely to have such a wide impact and the consultation will be correspondingly smaller.
- 33 Consultation documents should be accompanied with a covering note explaining the background to the document, why it is needed and the date for comments to be received. The note should also indicate who has been involved in preparing the draft.
- 34 Once comments have been received, the draft should be finalised. The **document control form** should be updated with a review of the consultation and changes made.
- 35 Depending on the nature of the document, drafts may need to be considered by one or other of the University’s sub-committees. For example, it is expected that documents for approval by Senate will have been earlier considered and recommended by one of Senate’s five sub-committees. Document owners should liaise with the Officer or Secretary of the relevant sub-committee to ensure that sufficient time is allowed for the document to be scrutinised and amendments made before submitting to Governance for consideration by the approving committee (see below).

### **Approval of a new document**

- 36 As soon as a document is ready for approval, the document owner will forward it to Governance, together with the document control form, a covering note for the relevant approving committee, as well as other supporting documentation.
- 37 The document will be checked to ensure that it is of an appropriate standard for publication. It will then be submitted to the Secretary of the relevant approving body to be considered and formally approved. Documents not needing formal approval will be published immediately.
- 38 Following formal approval, the document control form will be updated and all documentation will be forwarded to Governance for publication. Governance will inform the document owner accordingly.
- 39 Each document will be identified against a number of keywords or key phrases to enable searching for the document.

- 40 Following approval of a new document a note will be placed on the Digest all-staff email list, notifying staff of the new document and summarising its key features.
- 41 University partners will be advised of approval of a new or amended document by email by the partnerships team and via twice-yearly network events.

## **Amendment, review and rescinding of an existing document**

### **Amendment**

- 42 There are two types of amendment to a document:
- **major amendment** – a substantial revision comprising major changes in content and / or policy which will require approval by the responsible body or committee. A revised equality analysis form will be required.
  - **minor amendment** – minor revisions to a document, including updating of references, nomenclature, minor changes to process, or adaptation to a new document template. Minor amendments can be taken by Chair's Action and reported to a subsequent meeting.
- 43 Discretion as to what constitutes a major or minor amendment will lie with the Director of Academic Quality and Clerk to Council or nominee.
- 44 Following approval of major amendments to a document a note will be placed on Digest summarising the key changes. Where minor amendments have been approved, the document owner should consider the overall impact of the change and circulate notification of the change as applicable.
- 45 **Forms** may be updated at any time to ensure currency and do not require formal approval, but document owners should ensure that it is clear which version staff should use and should take care not to update forms unnecessarily. Forms should be submitted to Governance who will upload these immediately.

### **Review**

- 46 Review of all strategies, policies, procedures and regulations must be undertaken in accordance with the schedule outlined above.
- 47 Responsibility for initiating and undertaking document review lies with the document owner. Governance will, however, send reminders to document owners at the beginning of the academic year for reviews scheduled that year and these will be reported to Senate and/or Operations Board for scheduling into committee business for that year.

### **Rescinding**

- 48 A document will be rescinded when it is no longer considered fit for purpose. A document should be rescinded when:
- it reaches its review date and is no longer considered necessary
  - it has been superseded by another document
  - changes to the sector or internal processes require its removal
- 49 A document may be rescinded at any time by the approving committee or body. The date when a document is no longer in force should be specified clearly. A note will be

placed on Digest notifying staff of the change, and will similarly be communicated to partners.

- 50 Rescinding of a document will trigger the start of the appropriate retention cycle.

## **Version control and numbering**

- 51 All documents will be assigned a version number to assist with version control. Numbering will consist of a number followed by a point and another number (e.g. Version 1.1):
- the first number refers to the original version and any subsequent major amendments or reviews as identified above
  - the second number refers to minor amendments from either the original version or subsequent major amendments
- 52 Draft versions (i.e. numbers used when preparing a new formal document from scratch) will follow the convention 0.1, 0.2 etc. On first approval, the document will become version 1.0 with subsequent minor amendments as 1.1, 1.2 etc. The first major amendment to the document will be version 2.0.
- 53 Should a document be rescinded in its entirety and replaced by a new version, then the numbering will recommence at 1.0.

## Appendix 1: Definitions

Term	Meaning
Accessibility	Refers to technical criteria required to be met to ensure a document can be read by people with disabilities.
AQD	Academic Quality Directorate
Document control form	A document used to support the process of approving or reviewing part of the document framework.
Document lifecycle	The stages in the development of a formal document from identification to publication and subsequent review.
Document owner	The individual responsible for developing and / or reviewing a particular part of the document framework
Document framework	A collective term used to refer to the University's strategies, policies, procedures, regulations and guidelines.
Equality analysis or assessment	A means of considering the effect of a process or document on groups protected from discrimination by the Equality Act 2010.
Governance	The Governance Team in AQD who have responsibility for managing and supporting the University's document framework.
Guidelines	Part of the University's document framework. Guidelines provide detailed advice or guidance to staff and define the recommended approach for conducting a specific activity.
Policy	Part of the University's document framework. A policy is a concise formal statement of the principles designed to achieve certain goals or objectives. A policy is often supported by a <b>procedure</b> .
Procedure	Part of the University's document framework. A procedure is a document written to support a <b>policy</b> or <b>strategy</b> . It records the process or steps to implement the policy.
Protected characteristic or group	Refers to one of the nine protected characteristics defined by the Equality Act 2010.
Records Retention Schedule	A Records Retention Schedule is a document which sets out the periods of time for which an organisation's business records are to be retained.
Regulations	Part of the University's document framework. Regulations contain rules to be followed (normally in the context of university awards and / or student achievement).
Scheme of delegation	A document approved by University Council intended to assist in effective decision-making and to help committees and individuals understand their roles and the limits of their powers.

Term	Meaning
Statute	A <b>statute</b> is a written law, the act of a corporation or its founder, intended as a permanent rule or law. Statutes are part of the University's document framework but due to their nature lie outside many aspects of it.
Strategy	Part of the University's document framework. A strategy is a high-level plan to achieve a long-term or overall aim.

## Appendix 2: Format, style and use of gender language in documents

### Format

The **formal document template** must be used by document owners to prepare formal documents.

All documents should use the following format:

- Left justification for paragraphs and headings
- headings not numbered
- headings written in sentence case – i.e. without capitals
- paragraphs numbered sequentially from the beginning of the document
- two levels of bullets only; if you find yourself needing a third level of bullets, considering presenting the information in a different way, e.g. a table.
- short bulleted text written without a capital at the beginning or a punctuation mark at the end. Full paragraphs can be written with a capital at the beginning and a full stop at the end.
- the template has a lettered paragraph style, this should only be used where absolutely necessary for understanding / reference
- **bold** should be used sparingly
- *italics* should only be used for titles of publications

There is no set format for forms; however, if a form is provided as a Microsoft Office format it should be saved in the latest file type only (i.e. \*.docx, rather than in earlier 'legacy' file types which are more susceptible to computer viruses).

### Style

The template uses the following pre-defined styles:<sup>2</sup>

- Title
- Subtitle
- Normal
- Paragraph – numbered
- Paragraph – lettered
- Bullets – level 1
- Bullets – level 2
- Heading 1
- Heading 2
- Heading 3
- Bold
- Quote

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<sup>2</sup> An introduction to styles is available on the [Microsoft website](#)

## **Gendered language in documents**

The University has adopted recommendations from Stonewall and other sector guidance that explicitly gendered language should be removed from documents where it is not needed. Gender neutral language should be used instead.

The Stonewall example is:

If an employee wishes to discuss their salary *he/she* should contact *his/her* manager

*This should become:*

If an employee wishes to discuss their salary, *they* should contact *their* manager

## Appendix 3: Other guidance including tips for preparation and document accessibility

### Tips for preparing a document

The following tips may help to develop a well-written document:

- documents should be written in plain English using the third person
- as documents may be written for a variety of audiences, they must be complete, yet easy to read
- care should be taken with acronyms. A list of definitions should be provided
- documents should be written using as few words as possible
- care should be taken to avoid redundant words; these can unintentionally alter the meaning of a statement
- the use of diagrams and process flow charts is encouraged where possible to aid understanding
- the best written documents are prepared with the reader in mind

### Accessibility

Documents should be prepared with accessibility issues in mind.

A document or application is considered accessible if it meets certain technical criteria and can be used by people with disabilities. This includes people who are mobility impaired, blind, low vision, deaf, hard of hearing, or who have cognitive impairments. Accessibility features in Adobe Acrobat, Adobe Reader and in the Portable Document Format (PDF) make it easier for people with disabilities to use PDF documents and forms, with and without the use of assistive technology software and devices such as screen readers, screen magnifiers, text-to-speech software, speech recognition software, alternative input devices, Braille embossers, and refreshable Braille displays. (*PDF Accessibility Overview*. Adobe Systems Incorporated. [Source: Adobe website](#))

Document owners should also consider adding alternative text for: images, tables or other insertions; lists and data tables, and; setting document properties such as titles.

Before finalising a draft, document owners should check the document using the Accessibility Checker in Microsoft Word (**File > Info > Check for Issues > Check Accessibility**).

This feature will identify any potential issues and advise you why and how to fix the issue. Further assistance on building accessibility into documents is available via the [Adobe Accessibility](#) and [Microsoft Enable](#) websites.

## Appendix 4: Process flowchart for document development

