

# Competition and Markets Authority Guidelines for University staff involved in student recruitment marketing.

May 2017

## Introduction

The Competition and Markets Authority (CMA) works to promote competition for the benefit of consumers, both within and outside the UK. Their stated aim is to make markets work well for consumers, businesses and the economy.

The CMA is a Government department with powers and responsibilities that include enforcing consumer protection legislation to tackle practices and market conditions that make it difficult for consumers to exercise choice.

Students have consumer rights and the University must meet its obligations to undergraduate students or it risks being in breach of consumer protection law.

The following advice sets out how to best produce CMA compliant marketing and communication information for prospective and current undergraduate students.

## What does this mean?

In simple terms it means that we must deal with prospective and current students fairly. We must be transparent in our communications about things such as course content, additional costs or anything essential for making a decision about where to study for an undergraduate degree.

We must provide everything required for someone to make informed choices.

The CMA realises that some of these “essential” things previously communicated might need to change during the course of study; allowing for this we must provide clear and upfront information about changes that might occur and when changes do occur communicate this promptly. (For example, the circumstances in which an advertised module might not be available to them during their studies.)

We cannot rely on disclaimer copy to cover changes to courses, fees, locations or other information relating to studying at Warwick.

Finally the key things to be aware of are that this essential information must be **accurate** and **honest, timely** and **consistent** across all communication channels.

## General Guidelines

### Evidence of claims must be provided

Wherever marketing content is used it must be CMA compliant (and in line with the Warwick brand). The first important thing to note is that all claims made about the University, courses, Departments, Staff, etc must be evidenced. As per the Writing at Warwick guidelines, when creating content statements such as 'world-leading teaching' or 'cutting-edge facilities' need to be evidenced with real examples, such as league table positions, expert opinions and evidence. For example, if content is about employability the content could include quotes from employers, examples of real Warwick graduate destinations etc. Therefore content should be either **committed** (confirmed that this is the actual experience students would receive during their degree) or **illustrative** (examples of current activity with links to where accurate content will be available (and when)).

### Be consistent, don't contradict

We must ensure that wherever we provide information for prospective students, it must be consistent across all channels and must not contradict anything which is available elsewhere.

### Be timely

It is very important with all our communications that we consider both the point in the recruitment cycle and the application status of the prospect(s) receiving it. We need to ensure that we are providing any guidance or facts in a timely manner so that the prospect has the information they need before any decision needs to be made (e.g. before UCAS or our own deadlines).

## Implications for Different Communication Channels

The following pages outline the implications of CMA for the various communications channels that are aimed at prospective students. They include best practice guidance along with information that details the changes that have been made to the main University channels to ensure compliance – this may be helpful when thinking about your own communications.

### Customer Relationship Marketing (CRM) emails

CRM emails are sent to prospective students via the Marketing and Communication's CRM team. These guidelines provide a description of how these are CMA compliant.

Use of the central CRM system means that your email communications to prospective students are CMA compliant.

CRM emails form part of an effective communications plan to prospective students but do not replace the provision of official admissions instruction. Emails should be clear and straightforward in their intention and clearly identify any calls to action.

CRM emails are designed to provide information to prospective students that encourages them to consider and/or select Warwick as their primary university of choice.

A link to the 'Quick Links' section of UG study pages is included in the footer of all emails, where the 'Essential Information' that the CMA requires the University to provide is included. It is good practice to include other appropriate links in the footer of the email as well to ensure that the communication is compliant in its transparency and thus provides everything required for a prospective student to make an informed choice (links could include: academic department(s), Library, Students' Union, Sports facilities, Postgraduate study, Professional development, International students and Terms & Conditions).

It is essential that the University stores archived versions of all emails sent to prospective students who are made an offer, from the initial offer email onwards, ensuring we balance requirements for both the CMA and Data Protection Act (DPA). CRM communications managed by the central Marketing and Communications team uses a system that enables the archiving of static snapshots of all individual CRM emails – these will be retained for five years following graduation.

For enrolled students this information will be accompanied by all personal data obtained about the student, all other CRM communications (to non-enrolled students) will be retained but anonymised.

Any records pertaining to enrolled students at Warwick will be retained within Azorus including all demographic and personal data. Records pertaining to prospects that never enrolled at Warwick will be retained but all personally identifying data will be removed thus anonymising the records. This will allow us to use the data for analytical purposes but adhere to the DPA.

More information about CRM is available within the External Affairs webpages:

<https://www2.warwick.ac.uk/services/externalaffairs/marketing/digital/crm/>

## UG Prospectus

### OVERVIEW

The undergraduate prospectus provides general information about the University, lists the courses we offer and provides a summary of the content for each course. It is often one of the first information sources that students see when they are in the early stages of enquiry and considering whether to apply to Warwick.

Information about the University as a whole is the responsibility of the Marketing and Communications team. Academic departments are responsible for providing raw information for each of their courses, from which Marketing and Communications write course descriptions. The course information requested covers facts needed to satisfy CMA (see requirements below) and richer detail about the course.

### GENERAL UNIVERSITY INFORMATION AND CMA

- Information about the University must be accurate and any claims evidenced.  
e.g. Our graduates are highly sought after by employers. We were ranked the number one most targeted university by the top 100 UK employers (*The Graduate Market in 2017*, High Fliers Research Ltd.)
- The University must provide fee levels for the audience's year of enrolment. If there are circumstances under which these may change due to factors beyond our control, this should be made clear. Links to information online about additional costs must be provided.
- For accessibility, a contact must be included through which alternative formats of the prospectus can be requested.

### COURSE INFORMATION AND CMA

#### Existing courses

Course details in print need to provide certain pieces of 'material information' that students must have before they make their application. It is not possible to provide all material information in the printed prospectus, so further details are housed online (see guidance below). All information provided about by academic departments about both the department and courses must be accurate. Claims should be evidenced.

For the print document, academic departments will need to supply the following information for *existing* courses in the Autumn term two years ahead of enrolment (i.e. for 2018 entry courses, information is needed by October 2016):

- **Name of course**
- **Qualification awarded** e.g. BSc/BA/MMath etc.
- **Location of study** – Unless time at another institution/location is required as part of the course, this is University of Warwick, Coventry
- **Entry requirements** – these must be confirmed by UG Admissions, particularly if there are any changes to requirements

### MODULE INFORMATION

- **Core modules** – If names of modules are not included in print (it's preferable that they are), the course description should list what areas of knowledge are covered by core content in each year. *See below for details of the University's responsibilities if core modules change once they have been communicated to enquirers.*
- **Illustrative examples of options** studied by current students N.B. this information is not binding and is intended to give students an idea of what they *may* study, not a guarantee of what they *will* study. It is important that this distinction is made clear in the language used.

**Example of good module content information within a course description for print:**

In your first and second years, you'll study core modules in X, Y and Z. You can also select two module options in each year, one of which may be from another department, for example learning a language. For current students, options within the Department of xxxxxxx include X, Y and Z. Your final year comprises a core module in X, one further option and a dissertation on an area of particular academic interest within your subject, which you will complete with supervision from a member of academic staff.

When requesting information for the prospectus, we will also require a web link to further module details on academic departments' own websites.

**New courses**

For any new courses planned that departments want to include in the prospectus, we will still need to gather the information outlined above.

In addition, to guarantee inclusion in print:

- New courses must have been through all approvals boards. *Please note that the approvals process may require additional CMA material information before a course can be approved. Please go to <http://www2.warwick.ac.uk/services/aro/dar/quality/categories/courseapproval/> for more information.*
- Undergraduate Admissions must have received all approvals paperwork in order to confirm entry requirements and request a course code.

**Important note on timing of course approvals and the print prospectus**

If UG Admissions have not received approvals paperwork by early December, 22 months ahead of courses opening, we will be unable to include a full course information in the print prospectus (e.g. if a course is starting in 2018, the approvals must be confirmed by December 2016).

However, we can include a statement in print explaining that a new course is in development. As soon as the course is approved, the online team can create a new course page on our online UG Study pages.

**Course information disclaimer**

We include a disclaimer in the print document, stating clearly the need to check course details online for the most up-to-date information before application. The disclaimer also makes clear that web content takes precedence over print and provides links to further legal information at [www.warwick.ac.uk/ugcourseinfornotice](http://www.warwick.ac.uk/ugcourseinfornotice)

This webpage details specific circumstances under which course content may change, outlines the University's responsibility to notify applicants of any significant changes to their course and of their rights to withdraw their application if they are not satisfied with the changes.

#### BEST PRACTICE SUMMARY

- Claims about the University and departments should be evidenced.
- Material information as outlined above must be included for each course.
- Links should be given in the print document to the central UG Study webpages [www.warwick.ac.uk/ug](http://www.warwick.ac.uk/ug) and other online sources for more in-depth and up-to-date information.
- Resource accounts should be used for contact details where possible, rather than individual contacts, to ensure a swift response to queries.
- If there is doubt about future information changing, e.g. module options, we must ensure we make it clear whether the information we provide is illustrative or committed. For illustrative content, information based on current knowledge should be used.

A disclaimer should be included in the print document with links to more detailed legal information online. *N.B. This disclaimer does not entitle the University to significantly change course content without consultation with applicants.*

## Websites

### Overview

It is important that information on the website is accurate and up-to-date as printed formats will reference webpages for the most up-to-date and expansive information.

- Claims should be evidenced (see Writing at Warwick guidelines)
- Clear links should be made to more detailed information. This is particularly relevant when the department is not responsible for the origination of the content – i.e. if a departmental site mentions campus accommodation or student finance, a link should be made to that department's information for consistency and accuracy.
- Content should be accessible to the relevant audiences; areas of websites may need to be protected or access limited for a number of reasons but if the information is relevant to prospective students, please ensure there are no view restrictions to these pages so the content is open and visible.
- Information should be updated whenever changes may significantly affect the overall content. Departments should have their own processes in place to update and make changes to their website.

### Study Webpages – What we do within Marketing and Communications

The digital team within Marketing and Communications will update each course page (under [warwick.ac.uk/study](http://warwick.ac.uk/study)) once the printed UG prospectus content is approved to detail the following information:

- Entry requirements (academic)
- List of some modules (this content will be taken from departmental websites. Under CMA obligations, this content cannot be covered by a generic disclaimer. Departments retain responsibility for the accuracy of this information)
- How students will learn/be assessed
- Employability information

### Key changes to study pages to ensure CMA compliance

- An 'Essential Information' table has been added to the right hand side of all UG course pages that contains material information.
- Images and videos have been removed from pages if the academic featured no longer teaches or if a student has left unless the content makes the timeframe very clear as a short-term solution until new assets can be found.
- Offer letters reference the study website. Because two recruitment cycles run concurrently there is now two versions of course information on the main study website – one for each year of entry. Previous years will be archived and accessible via direct links rather than publicly available.

### Information for departments' own webpages

Content on all webpages should be clear, timely and relevant:

- Claims should be evidenced (see Writing at Warwick guidelines)
- Clear links should be made to more detailed information. This is particularly relevant when the department is not responsible for the origination of the content i.e. if a department site mentions campus accommodation or student finance, a link should be

made to that department's information for consistency and accuracy.

- Content should be accessible to the relevant audiences; areas of websites may need to be protected or access limited for a number of reasons but if the information is relevant to prospective students, please ensure there are no view restrictions to these pages so the content is open and visible.
- Information should be updated whenever changes may significantly affect the overall content. Departments should have their own processes in place to update and make changes to their website.
- If information changes annually (e.g. course information) – archive versions of each year's course information should be kept and publicly accessible

#### Best practice summary

- Ensure all information is up to date and, where linking off to other websites, links are to open areas not locked down spaces
- Audio-visual content ie video, should focus on those who have a current involvement with teaching/study – out-of-date content should be removed or clearly labelled
- Course pages often hold a lot of information – ensure that factual essential information is easy to find and navigate to on the page.

Links to more information for the [digital and online communications team](#) can be found under the [External Affairs](#) webpages.

## Social Media

There is extensive information on using social media in an official University capacity including the current framework and policy information at the links below:

[Monitoring and responding to incoming messages](#)

[Social media guidelines](#)

[Social media policy](#)

The general advice on giving prospective and current students consistent, full and relevant information should be followed, using links to information to provide more details to students and answering queries within the social media channels.

### Best practice summary

- If you get asked a question you don't know the answer to, ask someone more knowledgeable if you can, and refer enquirers to specific services where you know specialist knowledge or expertise resides.
- Talk about current conditions affecting courses of study, rather than speculating about the future.
- Be careful to describe provision, services, experiences, in a tone and using vocabulary which is clearly rooted in evidence that is available for applicants to look at e.g. linking through to relevant webpages. You should try to answer questions in a factual way.
- Don't risk misleading people by omission. Don't leave things out, such as hidden course costs.
- Be clear about whether your social media account is administered by the institution or by students. Any student-run accounts should be referred to as providing a personal account of current students' experiences.

Anyone managing official University social media accounts should be following the [social media good practice guide](#), this has been updated to reflect key changes and to be compliant with Competition and Markets Authority guidance.

### Student Blogs

The Digital and Online Communications team is responsible for publishing student blogs. Our Student Blogs are all written by current students, studying and often living on campus. We don't edit the posts or tell our bloggers what to say. These are their thoughts, opinions and insights and hopefully that comes across in their own words – this is made very clear to anyone reading the blogs.

#### *Key changes made for CMA compliance*

- Each of the bloggers are asked to read supplied information on CMA and this is referenced in the terms and conditions that they sign before starting to write blogs.
- Bloggers receive a terms and conditions document when they sign up to write a blog. This has been updated to incorporate information about CMA and emphasises that they should focus on their experiences and not generalise.
- It has been suggested to all current bloggers that they complete the CMA Moodle module – all new bloggers will also be asked to complete this.
- A disclaimer makes clear that our bloggers are paid, and that the information they provide reflects only their personal experiences of studying and living at the University.

## Video

### *Advice and Guidance*

- Review existing videos on an annual basis to ensure that staff included in recruitment-focused videos are either still at the University and are still involved in study experience or the video is clearly labelled.
- Check all recruitment video content going forwards on an annual basis to ensure relevance and accuracy.
- The briefing process for video requests to the External Affairs team will now reference CMA obligations – this includes ensuring that the contributors to any videos are briefed on CMA and do not make claims that cannot be evidenced.

## Helpful Links

The University of Warwick's Consumer Protection Law website (username and password required)

<http://www2.warwick.ac.uk/services/aro/cpl/>

The CMA's UK higher education providers – advice on consumer protection law (pdf)

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/428549/HE\\_providers\\_-\\_advice\\_on\\_consumer\\_protection\\_law.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/428549/HE_providers_-_advice_on_consumer_protection_law.pdf)