



“Enabling Students to Accomplish their Academic Goal”

Information Governance, Public Information and Transparency Policy

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1. Introduction

Bellmont College is committed to managing information in a lawful, secure, accurate, transparent and accountable way. Information governance is the framework through which Belmont College makes sure that information is created, used, shared, stored, retained, disclosed and disposed of properly. It supports student protection, academic quality, fair treatment, regulatory compliance, business continuity and public trust.

Information governance is broader than information security or data protection alone. It includes the quality and reliability of student records, academic records, committee papers, public information, staff records, safeguarding records, finance records, complaints and appeals records, learning materials, digital records, email communications, paper files and evidence used for governance and regulatory assurance.

This policy also incorporates Belmont College's public information and transparency requirements. Public information is treated as a key information asset because students, applicants, staff, partners, regulators and the public rely on it when making decisions. Bringing public information and transparency into this policy means that approval, version control, publication, correction and review are managed through the same governance and evidence framework as other important College records.

Bellmont College currently works with Liverpool Hope University as an awarding and academic partner for relevant higher education provision. Under this arrangement, students may receive teaching, support and local services from Belmont College while the award, academic regulations, University systems and some academic oversight arrangements are governed through Liverpool Hope University processes, depending on the programme and partnership framework. Belmont College is also seeking Office for Students approval for its own funding arrangements. Future approval, regulatory development or changes to partnership delivery may affect operational processes, student information routes, data reporting responsibilities and governance evidence requirements, but Belmont College continues to protect student interests, maintain continuity of study and manage information governance transparently throughout any transition.

The policy has therefore been written to operate within the current Liverpool Hope University partnership and to remain suitable for future independent or revised regulatory arrangements. Where Liverpool Hope University policies, systems, terms, regulations or student records requirements apply, Belmont College signposts students and staff clearly and works with Liverpool Hope University to ensure that information is handled lawfully, securely and accurately. Where Belmont College assumes additional direct responsibilities in the future, this policy and related procedures are reviewed and updated promptly.

This policy is read alongside the related Belmont College policies named in brackets throughout the document and listed in the Document Context table at the end of this policy. It is intended to be practical as well as regulatory: it explains what good

information governance means in day-to-day teaching, support, administration, decision-making, committee reporting and partnership work.

2. Purpose of the Policy

The purpose of this policy is to establish a clear, institution-wide framework for managing information as a College asset. Good information governance ensures that the right people have the right information, at the right time, for the right purpose, while protecting confidentiality, accuracy, security and student interests.

This policy brings together information ownership, records management, student data quality, public information and transparency, data protection, information security, retention, disclosure, partnership data sharing, committee evidence, audit and review into one readable framework. It supports Belmont College in demonstrating that information governance is implemented through daily practice and committee oversight rather than being treated as a separate compliance exercise.

The policy supports Belmont College in ensuring that:

- student, academic, admissions, attendance, assessment, support and finance records are accurate, complete, current and auditable;
- confidential and restricted information is accessed only by authorised people for legitimate purposes;
- information shared with Liverpool Hope University, regulators, awarding bodies, suppliers and public bodies is lawful, accurate and appropriately controlled;
- published information is approved, version controlled, accessible, transparent and not misleading;
- records are retained for appropriate periods and securely disposed of when no longer required;
- information risks, incidents, data breaches and inaccuracies are escalated and resolved promptly;
- committees receive reliable evidence so that they can monitor quality, risk, student protection and regulatory compliance.

Staff and committees use this policy when creating records, handling student or staff data, preparing committee papers, publishing information, sharing data with partners, responding to incidents, managing complaints or appeals, or making decisions that rely on information evidence.

3. Scope of the Policy

This policy applies to all information created, received, used, accessed, stored, transmitted, shared, published, archived or disposed of by Belmont College, regardless of format. It applies to paper records, electronic records, databases, spreadsheets, emails, learning platforms, cloud storage, digital learning materials, images, audio recordings, meeting notes, reports, registers, student files, staff files and system logs.

The policy applies to:

- current students, applicants, prospective students and former students whose records are held by Belmont College;
- staff, directors, committee members, contractors, consultants, temporary staff, volunteers, visiting lecturers and authorised third parties;
- records and information connected with Liverpool Hope University partnership provision;
- academic, admissions, registry, attendance, engagement, assessment, student support, finance, safeguarding, complaints, appeals, quality assurance, governance and public information records;
- information held in Belmont College systems, Liverpool Hope University systems used by Belmont College staff or students, supplier systems, approved cloud services, physical files and archived records.

The policy applies across the full student and institutional journey, from enquiry, recruitment and admissions through to enrolment, teaching, assessment, student support, progression, completion, alumni records, complaints, appeals, regulatory reporting, audit and archive management.

This policy does not replace specialist requirements contained in the *(BCP7 Belmont College General Data Protection & Regulation (GDPR) Policy)*, the *(BCP6 Belmont College Information Security and Cybersecurity Policy)*, the *(BCP8 Belmont College IT Acceptable Use Policy)* or the *(QGP1 Belmont College Quality Handbook)*. Public information and transparency requirements are included within this policy rather than being managed through a separate policy title. This policy connects those requirements so that information is governed consistently across Belmont College.

4. Definitions

Term	Meaning for this policy
Information governance	The framework of policies, roles, controls and evidence that ensures information is managed lawfully, accurately, securely, transparently and accountably throughout its lifecycle.
Information asset	A collection of information that has value to Belmont College or its students, such as student records, assessment data, finance records, safeguarding files, committee papers, public information or system logs.
Information asset owner	The role or person responsible for ensuring that an information asset is accurate, protected, retained, reviewed and used appropriately.
Record	Information created, received or maintained as evidence of an activity, decision, transaction, communication, student status, assessment, complaint, appeal, support intervention or governance process.
Public information	Information published or provided to applicants, students, staff, partners, regulators, awarding bodies, third parties or the public, including website pages, course information, policies, forms,

	handbooks, fees information, marketing content and formal communications.
Transparency	The principle that information is clear, accessible, accurate, timely and capable of being relied upon by students and other stakeholders when making decisions.
Personal data	Information relating to an identified or identifiable living person. This includes student, applicant, staff, governor, contractor and third-party data.
Special category data	More sensitive personal data, including health, disability, ethnicity, religious belief and other protected information that requires additional protection under data protection law.
Confidential information	Information that is protected from unauthorised access or disclosure because of legal, regulatory, contractual, student, staff, commercial or reputational sensitivity.
Data breach or information incident	A security or governance incident leading to accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, information.
Retention	The period for which information is required to be kept for legal, regulatory, operational, academic, audit or student protection reasons before it is archived or securely disposed of.

5. Regulatory, Legal and Quality Assurance Framework

Bellmont College applies the following regulatory, legal and quality assurance framework to information governance, public information and transparency.

Framework / requirement	Bellmont College application
Office for Students Conditions C1-C4	Consumer protection information, complaints routes, student protection information and student communications are controlled and auditable.
Office for Students Conditions B1-B5	Academic experience, student support, engagement records, assessment evidence and standards information are accurate and retained.
Office for Students Conditions D, E1, E2, E3 and F3	Governance, public interest, accountability, risk, sustainability and reportable-event information is accurate and available for assurance.
Higher Education and Research Act 2017	Bellmont College uses information governance to support higher education regulatory duties.

UK Quality Code for Higher Education	Quality, standards, partnerships, student engagement, assessment, complaints and appeals records are maintained consistently.
Competition and Markets Authority expectations and consumer law	Student-facing information, course information, fees, terms and complaints communications are clear, accurate and fair.
UK GDPR and Data Protection Act 2018	Personal data is processed lawfully, fairly, securely and transparently with appropriate retention and individual-rights controls.
Freedom of Information Act 2000 and Environmental Information Regulations 2004	Information access and public accountability requests are routed and recorded where applicable.
Equality Act 2010	Information, forms, communications and records support accessibility, reasonable adjustments and non-discrimination.
Copyright, Designs and Patents Act 1988 and Computer Misuse Act 1990	Digital materials, systems access, copyright and system use are controlled.
Counter-Terrorism and Security Act 2015 and Prevent duty	Safeguarding and Prevent-related information sharing is handled carefully and proportionately.
Health and Safety at Work etc. Act 1974	Safety records, incidents and premises information are maintained where relevant to students, staff and visitors.
Office of the Independent Adjudicator Good Practice Framework	Complaints and appeals records support fair process, evidence handling and multi-provider case management.
Liverpool Hope University partnership requirements	Partnership data, student records, academic regulations, privacy, complaints, appeals and quality assurance requirements are followed where applicable.

6. Core Information Governance, Public Information and Transparency Principles

Bellmont College applies the principle that Information supports fair, accurate, accountable and student-centred decision-making. Information is maintained so it is good enough to be relied upon by students, staff, committees, partners, regulators and external reviewers.

Bellmont College's information governance approach is based on the following principles:

- lawfulness, fairness and transparency: information is collected, used, shared and disclosed only where there is a proper reason and where individuals are told clearly how their information is used;
- accuracy and reliability: records are complete, current and corrected promptly where errors are identified;
- accountability: decisions, approvals, data quality checks, incidents and information sharing are recorded and capable of being evidenced;
- confidentiality and need-to-know access: personal, confidential and restricted information is accessed only by authorised people for legitimate purposes;
- integrity and authenticity: records are not improperly altered, backdated, deleted, fabricated or manipulated;
- availability and continuity: essential information is accessible to authorised users when needed for teaching, assessment, support, governance and continuity planning;
- data minimisation and purpose limitation: Belmont College collects and keeps only the information it needs for defined academic, operational, legal, regulatory or support purposes;
- retention and secure disposal: records are retained for appropriate periods and disposed of securely when no longer required;
- accessibility and inclusion: information is understandable, accessible and available in alternative formats where reasonable and appropriate;
- partnership clarity: where information is shared with or governed by Liverpool Hope University or another partner, responsibilities is required to be clear and Students do not be disadvantaged by uncertainty.

7. Information Governance, Public Information and Transparency Across the Student and Operational Journey

Information governance is easiest to understand when it is viewed through the student and operational journey. Each stage creates different information risks and therefore requires different controls.

Stage	What good information governance means	Implementation route
Enquiry and marketing	Students receive accurate, accessible and current information about courses,	Public information checks; approval records; website audit;

	awards, delivery, fees, entry requirements and support.	course information review; student-facing content approval.
Application and offer	Admissions records, entry decisions, offer letters and applicant communications is accurate, fair and evidence-based.	Admissions checks; records review; (<i>RAP1 Belmont College Recruitment, Selection and Admission Policy</i>); registry audit.
Enrolment and induction	Students is expected to understand what information Belmont College holds, how it is used, key policies, systems, attendance expectations and support routes.	Induction records; student handbook signposting; privacy notices; (<i>RAP3 Belmont College Information and Schedule of Student Induction</i>).
Teaching, assessment and support	Attendance, engagement, assessment submissions, feedback, reasonable adjustments and student support records is reliable and secure.	Programme monitoring; student support records; assessment boards; (<i>QGP1 Belmont College Quality Handbook</i>).
Student voice, complaints and appeals	Feedback, complaints and appeals records is handled confidentially, fairly and with a clear evidence trail.	Complaint logs; appeal records; OIA signposting; Quality Committee trend analysis; (<i>CAP3 Belmont College Complaint and Appeal Policy and Procedure</i>).
Partnership and LHU provision	Information shared with Liverpool Hope University is lawful, accurate, consistent with partnership requirements and clear to students.	Partnership liaison; LHU reporting; programme and student records checks; data sharing arrangements.
Completion, archive and future reference	Records is expected to support awards, transcripts, regulatory evidence, alumni enquiries, complaints, appeals and audit, while respecting retention limits.	Retention schedule; secure archive; disposal records; data quality checks; (<i>BCP7 Belmont College General Data Protection & Regulation (GDPR) Policy</i>).

8. Information Assets, Ownership and Classification

Bellmont College identifies and manages significant information assets that support teaching, learning, student support, admissions, finance, governance, compliance, quality assurance, safeguarding, IT, partnership delivery and institutional decision-making. Each significant information asset has an owner or responsible role who understands its value, risks and required controls.

Information asset owners are responsible for ensuring that information is accurate, classified, accessible only to authorised users, retained appropriately and included in

risk or incident reporting where relevant. Where information is hosted or controlled by Liverpool Hope University, a supplier or another partner, Bellmont College ensures that responsibilities are clear through the relevant partnership, contract, data sharing or operational arrangements.

Classification	Meaning	Examples
Public	Approved for public release.	Website pages, published policies, approved prospectus information, approved marketing materials.
Internal	For routine College use and not normally intended for public release.	Internal procedures, draft plans, routine staff communications, non-sensitive committee planning notes.
Confidential	Sensitive information requiring limited access based on role and business need.	Student records, assessment records, HR records, financial records, complaints, appeals, partner correspondence.
Restricted	Highly sensitive information requiring strict need-to-know access and enhanced protection.	Safeguarding records, special category data, legal advice, serious incident reports, cybersecurity investigation records, passwords or authentication material.

Information is labelled, stored, transmitted, retained and disposed of according to its classification. Confidential and Restricted information is not stored on unapproved personal devices, personal email accounts, consumer file-sharing services or public artificial intelligence tools. Staff use approved College or partner systems and is required to seek advice from the Data Protection Officer, Head of IT / Information Security Lead or Head of Quality and Operations if they are unsure how information is handled.

9. Records Creation, Accuracy, Retention and Disposal

Records are created and maintained so that they provide a reliable account of what happened, when it happened, who was involved, what decision was made, what evidence was considered and what follow-up action was agreed. This applies to academic, administrative, governance, finance, student support, safeguarding, admissions, attendance, assessment, complaint and appeal records.

Staff ensure that records are factual, professional, proportionate and timely. Records do not include unnecessary opinions, irrelevant personal information, discriminatory wording or unsupported assumptions. Where a professional judgement is recorded, the basis for that judgement is clear.

Bellmont College applies retention requirements through the *(BCP7 Bellmont College General Data Protection & Regulation (GDPR) Policy)* and relevant retention schedule. Retention decisions consider legal, regulatory, academic, student

protection, audit, safeguarding, finance, partnership and operational requirements. Records are not deleted or destroyed because they are inconvenient, because a complaint or appeal has been raised, or because an error has been identified.

Secure disposal is required to be proportionate to the sensitivity of the information. Paper records containing Confidential or Restricted information are shredded or disposed of through an approved confidential waste process. Digital records are deleted securely in accordance with IT and retention controls, taking account of backups, system logs and legal hold requirements where relevant.

10. Student Records, Academic Data and Assessment Evidence

Student records, academic data and assessment evidence are central to student protection, academic quality and fair decision-making. Belmont College maintains records that support admissions decisions, enrolment, attendance, engagement, progression, assessment, feedback, reasonable adjustments, complaints, appeals, academic misconduct, student support and completion.

Academic records are sufficiently accurate to support module review, assessment boards, external examiner activity, Liverpool Hope University partnership oversight, quality assurance, regulatory evidence and student enquiries. Staff do not alter attendance, engagement, assessment or support records unless there is a legitimate correction with an evidence trail.

Where Liverpool Hope University academic regulations, systems, boards or records requirements apply, Belmont College follows the relevant partnership procedures and maintain local records that are consistent with the authoritative academic record. Students is required to be told clearly which records or decisions are managed locally by Belmont College and which are governed through Liverpool Hope University arrangements.

The Head of Academic Programmes, Programme Coordinators and Module Tutors is required to ensure that academic information is timely, accurate and escalated where errors or gaps could affect student outcomes, academic standards, progression, complaints, appeals or funding integrity. This is read alongside the (*QGP1 Belmont College Quality Handbook*), the (*CAP5 Belmont College Academic Appeals Policy*) and the (*LTP6 Belmont College Academic Integrity and Misconduct Policy*).

11. Data Protection, Confidentiality and Sensitive Information

Information governance is required to protect personal data and confidential information. Belmont College processes personal data lawfully, fairly, securely and transparently in accordance with the (*BCP7 Belmont College General Data Protection & Regulation (GDPR) Policy*).

Special care is required to be taken with information relating to disability, health, safeguarding, wellbeing, reasonable adjustments, special considerations, allegations, complaints, appeals, disciplinary matters, financial hardship, ethnicity, religious belief or other protected characteristics. Such information is shared only where there is a

lawful basis, a legitimate need-to-know, a student support purpose, a safeguarding reason, a regulatory requirement or another justified basis.

Confidentiality does not mean that information can never be shared. It means that information is shared appropriately, securely and only with people or organisations that have a legitimate reason to receive it. Where staff are uncertain, they seek advice from the Data Protection Officer, Designated Safeguarding Lead, Head of Quality and Operations or Senior Management Team before sharing information.

Students receive clear privacy information explaining how their personal data is used, who it may be shared with, how long it may be retained and how they can exercise their rights. Where Liverpool Hope University is the awarding body or controls relevant systems, students are also signposted to the relevant Liverpool Hope University privacy and data protection information.

12. Information Sharing, Liverpool Hope University Partnership and Third Parties

Bellmont College shares information with Liverpool Hope University, regulators, awarding bodies, professional bodies, public authorities, suppliers and other third parties only where there is a lawful, necessary and proportionate reason to do so. Information sharing is accurate, secure, documented and consistent with the relevant contractual, partnership, data protection and regulatory requirements.

Under current Liverpool Hope University partnership arrangements, information sharing may be required for admissions, enrolment, attendance, engagement, assessment, academic quality, complaints, appeals, student support, progression, award, audit, regulatory reporting and partnership monitoring. Belmont College ensures that staff understand the difference between local College records and records required for Liverpool Hope University academic or regulatory purposes.

Where information is shared with suppliers or contractors, Belmont College ensures that appropriate due diligence, contractual terms, confidentiality requirements, data protection provisions and security expectations are in place. Third parties is required to not use Belmont College information for unauthorised purposes and is required to report incidents promptly.

Information is transferred using approved secure methods. Staff do not share Confidential or Restricted information through personal email accounts, social media, public messaging applications or unapproved file-sharing services. Information sharing and system use is read alongside the *(BCP6 Belmont College Information Security and Cybersecurity Policy)* and the *(BCP8 Belmont College IT Acceptable Use Policy)*.

13. Public Information and Transparency Framework: Publication, Version Control and Corrections

Public information and transparency are included within this policy because public-facing information is one of the most important information assets held by Belmont College. Applicants, students, staff, Liverpool Hope University, regulators

and the wider public is required to be able to rely on information that is accurate, approved, accessible, current, transparent and not misleading.

This section acts as the internal public information and transparency framework. It applies to website pages, course pages, prospectus material, admissions communications, offer information, fees and additional costs, policy documents, student handbooks, programme information, forms, guidance notes, newsletters, social media posts, public statements and information provided to partners, regulators, applicants or students.

Bellmont College recognises that applicants and students rely on public information when making important academic, financial and personal decisions. Information about programme titles, awards, awarding bodies, Liverpool Hope University partnership responsibilities, delivery locations, modes of study, fees, additional costs, entry requirements, assessment methods, student support, complaints, appeals, student protection, data protection and accessibility is required to therefore be checked before publication and reviewed regularly.

Public information is managed through clear ownership and approval. Each published document, webpage or student-facing information source has a responsible owner, approval route, version or review date where appropriate, publication record and method for correction. Outdated information is required to be removed, archived or clearly marked as superseded. Staff do not publish or circulate student-facing information where they are unsure whether it reflects approved academic, financial, regulatory, partnership or operational arrangements.

The following controls apply to public information and transparency:

- course and programme information is required to be consistent with approved programme documentation, Liverpool Hope University partnership arrangements and current delivery arrangements;
- fees, additional costs, payment routes and refund information is required to be clear, current and consistent with approved finance communications;
- policy documents is required to use approved titles, version control, ownership details, review dates and accessible language;
- material changes affecting applicants or students is communicated promptly, accurately and in a way that explains impact, options and support;
- public statements, marketing content and website updates does not exaggerate facilities, outcomes, support arrangements, partnerships or regulatory status;
- public information is accessible, inclusive and capable of being understood by its intended audience;
- corrections is recorded where the original information may have affected student or applicant decisions.

Where incorrect, incomplete or misleading information has been published, Belmont College corrects it promptly and consider whether applicants, students, Liverpool Hope University, regulators or other stakeholders need to be informed directly. Belmont College does also consider whether mitigation, alternative options, apology,

complaint handling, refund, compensation or other redress may be appropriate where a student or applicant has relied on incorrect information.

Public information and transparency is monitored through the Quality Committee, Recruitment, Admissions and Registry Committee, Senior Management Team and Board of Directors where matters are material. Evidence may include website audits, policy review logs, course information checks, student feedback, applicant queries, complaints themes, approval records, change logs and committee action plans. This ensures that public information is not treated as a purely administrative matter, but as part of Belmont College's wider information governance, consumer protection, student protection and quality assurance framework.

14. Digital Systems, Email, Artificial Intelligence and Information Security

Digital systems are central to learning, assessment, student support, governance and administration. Belmont College manages digital information through approved systems, secure access controls, appropriate monitoring, audit logs, system backup, incident management and business continuity arrangements.

Email is used carefully because it can create formal records, share personal data, disclose confidential information or lead to accidental misdirection. Staff check recipients, use professional wording, avoid unnecessary personal data, use secure methods for sensitive information and file important decisions or evidence in the appropriate system rather than leaving them only in personal inboxes.

Artificial intelligence tools are not be used to upload or process personal data, Confidential information, Restricted information, unpublished assessment material, safeguarding records, complaints, appeals, legal advice, internal committee papers or Liverpool Hope University information unless the tool has been approved for that purpose and the data protection and security implications have been assessed. Staff and students follow the *(BCP8 Belmont College IT Acceptable Use Policy)* and the *(LTP12 Belmont College Intellectual Property Copyright and Use of Learning Materials Policy)*.

System access is required to be based on role and need-to-know. Access is reviewed when staff change role, leave Belmont College, complete temporary work, or no longer require access. System and cybersecurity risks are managed through the *(BCP6 Belmont College Information Security and Cybersecurity Policy)* and the *(BCP6 Belmont College Information Security and Cybersecurity Policy)*.

15. Paper Records, Physical Security and Secure Disposal

Although much information is digital, paper records may still be used for forms, meeting notes, attendance evidence, assessment documentation, student support notes, finance records or signed documents. Paper records are handled with the same care as digital records.

Paper files containing personal, confidential or restricted information are stored securely, kept away from public areas, locked when not in use, transported safely

and returned to the correct storage location promptly. Staff avoid printing personal or confidential information unless there is a legitimate operational need.

Working notes are filed, digitised or destroyed in accordance with retention and confidentiality requirements. Staff do not leave student records, assessment papers, safeguarding notes, complaints information or committee papers unattended in classrooms, reception areas, shared offices, vehicles or home working environments.

Secure disposal is used for paper records containing personal, confidential or restricted information. Disposal records are retained where required for audit or governance assurance.

16. Information Rights, Subject Access, Freedom of Information Awareness and Disclosure

Students, staff and other individuals may have rights in relation to personal data held by Bellmont College, including access, correction, erasure, restriction, objection and other rights depending on the circumstances. Requests relating to personal data are referred promptly to the Data Protection Officer or the designated data protection route so that deadlines and legal requirements can be managed correctly.

Staff do not respond informally to subject access requests, disclosure requests, legal requests or requests from external organisations without checking the correct route. Requests may appear in everyday language, such as a student asking for all information held about them, a copy of their support record, records used in a complaint, or emails about an academic decision.

Where Freedom of Information or Environmental Information obligations apply directly or through partnership, regulatory or public accountability arrangements, Bellmont College cooperates appropriately and ensure that information is handled consistently with legal and contractual requirements. Bellmont College also manages information provided to regulators, Liverpool Hope University, the Office for Students, the Office of the Independent Adjudicator and other bodies accurately and transparently.

Disclosure decisions balance transparency with confidentiality, data protection, safeguarding, legal privilege, commercial sensitivity, examination integrity and student protection considerations. Advice is sought where a request is complex, sensitive or time-critical.

Freedom of Information, Environmental Information and Publication Scheme Requests

Bellmont College recognises the importance of openness, accountability and transparency in the management of institutional information. Written requests for recorded information may fall within Freedom of Information or Environmental Information principles, even where the requester does not use those terms. Bellmont College therefore ensures that staff understand how to recognise, record and escalate information requests so that they are handled fairly, consistently and within the

appropriate information governance route. This section builds on the existing content in Section 16: Information Rights, Subject Access, Freedom of Information Awareness and Disclosure.

Where information is held by Belmont College, the request is reviewed by the appropriate officer, normally with advice from the Data Protection Officer and Head of Quality and Operations where required. Decisions about disclosure balance transparency with legal and regulatory duties, including data protection, confidentiality, safeguarding, commercial sensitivity, legal privilege, assessment integrity, student protection and partnership obligations. Requests involving personal data are considered carefully so that Freedom of Information handling is not confused with subject access rights under UK GDPR.

Where a request relates to information held by Liverpool Hope University or to records controlled under partnership arrangements, Belmont College signposts or liaise appropriately in line with the relevant partnership responsibilities. Belmont College maintains clear public information where appropriate, including key policies, student-facing procedures, governance information, fees, complaints routes and regulatory information. Freedom of Information and publication scheme activity is monitored through information governance, quality, risk and senior management reporting so that recurring issues, delays or disclosure risks lead to improvement.

17. Information Incidents, Data Breaches, Inaccurate Records and Corrective Action

An information incident may include loss of a device, misdirected email, unauthorised access, accidental disclosure, inaccurate student records, lost paper files, cyberattack, deletion of records, improper alteration of data, unauthorised publication, failure to retain evidence, or sharing information with the wrong person or organisation.

Staff report incidents promptly through the correct route. Delayed reporting can increase harm to students, staff, partners and Belmont College. Reports explain what happened, what information is affected, who is involved, whether the information includes personal or sensitive data, what immediate steps have been taken and whether students or partner systems may be affected.

Belmont College does assess incidents proportionately, taking account of legal reporting duties, safeguarding, student protection, partnership responsibilities, reputational impact and operational continuity. Where Liverpool Hope University systems, students or records are involved, Belmont College liaises with Liverpool Hope University through the appropriate partnership or incident route.

Where inaccurate records are identified, Belmont College corrects the error promptly and record the correction where an audit trail is needed. If an inaccurate record has affected a student decision, complaint, appeal, funding claim, assessment outcome,

support arrangement or public information, Belmont College considers whether further action, communication or redress is required.

18. Equality, Accessibility, Safeguarding, Wellbeing and Vulnerability

Information governance is required to support equality, accessibility, safeguarding and wellbeing. Records and communications are clear, respectful, accurate and accessible. Students are not disadvantaged because information is unclear, inaccessible, inaccurate, withheld inappropriately or shared without proper consideration of confidentiality and support needs.

Where information relates to disabled students, reasonable adjustments, mental health, safeguarding, financial hardship, coercion, vulnerability or protected characteristics, staff is required to handle it carefully and only share it with those who need it to provide support, manage risk, comply with law or protect the student or others.

Bellmont College considers equality impacts when designing forms, student records processes, digital systems, public information, complaints routes and disclosure arrangements. Students requiring alternative formats, support with forms, reasonable adjustments or accessible communication are supported in line with the *(SWP2 Belmont College Equality, Diversity and Inclusion Policy)* and the *(SWP1 Belmont College Reasonable Adjustment and Special Considerations Policy)*.

Safeguarding and Prevent information is handled in accordance with the *(HSP1 Belmont College Safeguarding and PREVENT Policy)*. Confidentiality does not prevent appropriate safeguarding information sharing where there is a lawful and proportionate reason to protect a student, staff member or the wider College community.

19. Training, Culture and Staff Awareness

Good information governance depends on staff understanding what is expected in their role. Belmont College provides proportionate training and awareness so that staff understand data protection, confidentiality, accurate record keeping, secure sharing, retention, public information approval, student records, incident reporting and partnership responsibilities.

Training may be delivered through induction, role-specific briefings, policy updates, committee reports, line management, IT and data protection awareness, safeguarding training, quality assurance briefings and lessons learned from incidents or audits.

Managers are responsible for ensuring that staff who handle student records, academic records, public information, complaints, appeals, safeguarding information, finance records or partner data receive appropriate guidance. Staff ask for advice when unsure. A culture of early reporting and learning is expected; errors are not concealed or ignored.

20. Governance and Committee Implementation Framework

Bellmont College embeds information governance through the governance and committee routes set out in the Quality Handbook. The implementation route is: identify the issue; assess student, legal, academic, operational and partnership impact; assign ownership; take corrective or preventive action; report to the relevant committee; escalate material risks; monitor completion; and retain the record. (QGP1 Belmont College Quality Handbook; QGP2 Belmont College Management, Committee Structure, Organogram and Terms of Reference; BCP2 Belmont College Risk Management Policy)

Committee / Body	How it implements this policy
Board of Directors	Holds ultimate oversight of information governance, institutional accountability, student protection, regulatory assurance, risk appetite and material partnership or funding changes.
Audit & Risk Committee	Advises the Board of Directors on audit arrangements, internal control, risk management, financial sustainability, regulatory compliance and information-governance assurance.
Academic Committee	Acts as the mandatory Board committee and academic authority for academic standards, quality, assessment assurance, student outcomes and academic governance information.
Senior Management Committee	Coordinates operational implementation, resources, incident response, data quality improvement, partnership liaison and cross-departmental action.
Quality Committee	Provides central assurance on quality information, public information, transparency, student outcomes data, complaints and appeals themes, policy implementation and evidence trails.
Learning and Teaching Committee	Reviews teaching, assessment, feedback, learning resources, student engagement records, module information and academic support records.
Recruitment, Admissions and Registry Committee	Monitors applicant information, offer records, course information accuracy, enrolment, attendance, engagement, registry data quality and student record controls.

Student Staff Committee	Provides an early warning and consultation route for students to raise issues about information, communication, systems, support records and accessibility.
Safeguarding Team	Reviews safeguarding, Prevent, wellbeing and vulnerability information handling, confidentiality and information-sharing risks.
Equality, Diversity and Inclusion oversight	Reviews accessibility, equality impacts and inclusion issues in information, records, forms, communication and student-facing processes.

21. Roles and Responsibilities

Information governance is a shared responsibility. The following roles and responsibilities are aligned with the Quality Handbook and with the operational requirements of this policy. These responsibilities are read alongside role descriptions, committee terms of reference and related policies.

Role	Responsibility
Board of Directors	Governing body with overall authority for the management of the Company’s business. Approves the Governance Framework, scheme of delegation and committee terms of reference, and retains ultimate oversight of academic quality, standards, student outcomes, regulatory compliance, risk, financial sustainability and institutional performance. Ensures compliance with relevant OfS conditions, including B1, B2, B3, B4, B5, C1–C4, D, E1, E2 and E3.
Audit & Risk Committee	Mandatory Board committee advising the Board on audit arrangements, internal control, risk management, financial sustainability, regulatory compliance and assurance over OfS requirements. Provides oversight of risks relating to OfS C1–C4, D, E2, E3 and relevant B conditions.
Academic Committee	Mandatory Board committee and academic authority. Promotes academic and professional work, safeguards academic standards and quality, oversees academic assurance from the Quality Committee and reports to the Board on delegated authority. Responsible for oversight of OfS B1, B2, B3, B4 and B5, with relevant links to C1, C2 and E2.

Senior Management Committee	Operational management forum responsible for planning, resourcing, delivery, implementation and management reporting. Provides operational oversight of academic quality, student outcomes, compliance, risk, finance and regulatory delivery. Supports compliance with OfS B1–B5, C1–C4, D and E2.
Quality Committee	Subcommittee of the Academic Committee responsible for academic quality assurance, quality enhancement, student outcomes, assessment standards and academic quality risk monitoring. Escalates operational actions to the Senior Management Committee as required. Supports compliance with OfS B1, B2, B3, B4 and B5, and relevant C1, C2 and E2 conditions.
CEO	Holds executive accountability for implementing the Board-approved strategy and ensuring institutional leadership, regulatory compliance, financial sustainability, quality assurance and successful student outcomes. Accountable to the Board of Directors for delivery of OfS B1–B5, C1–C4, D, E2 and E3.
Head of Quality & Operations	Leads and oversees the quality assurance framework, ensuring compliance with OfS conditions, awarding partner requirements, and the effective monitoring of academic standards, student outcomes, marketing, accountancy and finance functions. Coordinates reporting through the Senior Management Committee, Quality Committee and Academic Committee routes (OfS B1, B2, B3, B4 and relevant C conditions).
Head of Academic Programmes	Provides academic leadership for programme quality and standards, ensuring high-quality learning opportunities and the delivery of positive student outcomes, including continuation, completion and progression (OfS B1, B2, B3).
Head of Professional Services	Oversees professional services that support student success across the student lifecycle, including recruitment, admissions, student support and outcomes monitoring. Ensures effective support provision, fair applicant selection, regulatory compliance, and data-informed improvement of continuation, completion and progression outcomes. It is noted that admissions operate within Liverpool Hope University's framework, with Liverpool Hope University retaining overall accountability for admissions decisions. Ensures admissions decisions, particularly for Foundation Year and non-standard

	applicants, evidence an overall judgement of potential to succeed. (OfS B2, B3, C1/C5, C3, E2 and F1).
Head of IT & Human Resources	Ensures robust staff recruitment, staff development, and fair employment practices alongside secure, reliable digital systems that support teaching, data management, and regulatory reporting, maintaining alignment with quality and compliance expectations (OfS B1–B4, C1–C3).
Programme Coordinator	Ensures the effective delivery of teaching, learning and assessment at module/block level, maintaining alignment with learning outcomes and the integrity of assessment practices (OfS B2, B4).
Data Protection Officer	Advises on lawful, fair and secure processing of personal data, including privacy information, subject access requests, data breaches, data sharing, DPIAs, retention and external notifications.
IT Staff / Marketing	Ensure that public-facing information, website content, marketing material, course information, social media content and applicant communications are approved, accurate, accessible, current, not misleading and corrected promptly where issues are identified.
Finance Lead or designated finance personnel	Maintain day-to-day financial records, payment evidence, procurement documentation, budget monitoring, supplier records, financial reporting and escalation of irregularities or inaccurate information.
Module Tutors and Academic Support Tutors	Maintain accurate teaching, attendance, engagement and assessment records, identify unusual patterns or concerns, support students appropriately and escalate issues that may affect academic standards, student interests or data integrity.
Student Support staff	Maintain confidential and proportionate support records, handle wellbeing, safeguarding, accessibility and vulnerability information carefully, and signpost students to official routes.
Information asset owners	Ensure that assigned information assets are accurate, classified, access-controlled, retained, reviewed and included in risk or incident reporting where required.

All staff	Act honestly, keep accurate records, protect information, follow approved systems and controls, report concerns promptly and cooperate with audits or investigations. Staff do not ignore irregularities, conceal errors, pressure others to change records or bypass procedures.
Students and student representatives	Contribute by providing truthful information, protecting their accounts and personal data, using official communication routes, raising concerns early and participating constructively in student voice and quality assurance processes.
Contractors, consultants, suppliers and partners	Act honestly, comply with contractual and data protection requirements, protect information, cooperate with audit and investigation requirements, declare conflicts and report concerns relating to Bellmont College information or students.

23. Policy Exceptions and Non-Compliance

There may be exceptional circumstances where a requirement in this policy cannot be met immediately or where an alternative control is necessary. Any exception is justified, risk-assessed, time-bound and approved by an appropriate senior manager. Exceptions involving personal data, student impact, Liverpool Hope University systems, safeguarding information or significant risk are escalated to the Data Protection Officer, Senior Management Team or relevant committee as appropriate.

Non-compliance may include unauthorised disclosure, inaccurate records, improper deletion, failure to report incidents, misuse of systems, failure to follow retention requirements, publication of misleading information, sharing information with unauthorised parties, or bypassing approved processes.

Bellmont College responds proportionately to non-compliance, taking account of seriousness, intent, impact, risk to students, legal duties, partnership obligations and previous history. Actions may include advice, training, corrective action, access restriction, disciplinary action, contractual action, reporting to external bodies, or referral to law enforcement where appropriate.

24. Conclusion

Bellmont College recognises that information governance is fundamental to student protection, academic quality, lawful data processing, operational resilience, transparency and public trust. Good information governance ensures that decisions are based on accurate evidence, students are treated fairly, confidential information is protected, public information is reliable and committees can provide meaningful oversight.

Through this policy, Bellmont College commits to managing information through clear ownership, proportionate controls, accurate records, secure systems, effective partnership working, committee oversight and continuous improvement. Bellmont

College does continue to work with Liverpool Hope University under current partnership arrangements and does manage any future OfS funding or regulatory changes carefully, transparently and in the interests of students.

Bellmont College Information Governance, Public Information and Transparency Policy					
Version	Date	Author(s)	Amendments	Approved by	Next review
1	March 2026	Head of Quality and Operations	New Document	Board of Directors	March 2027