

ORDINANCE 27

REPORTABLE EVENTS

- 1 The Office for Students (OfS) requires all higher education institutions to report to it the occurrence, or suspected occurrence, of a 'reportable event', which the OfS defines as follows:

“A reportable event is any event or circumstance that, in the judgement of OfS, materially affects or could materially affect the provider's legal form or business model, and/or its willingness or ability to comply with its conditions of registration.”
- 2 In line with this requirement, the University will report to the OfS the reportable events that the OfS specifies within its publication 'Regulation up to 31 July 2019 of providers that were previously funded by HEFCE (Annex E Reportable Events)' as follows:
 - 2.1 A change in the provider's circumstances
 - 2.2 A change in ownership
 - 2.3 A change of control
 - 2.4 The provider becoming aware of suspected or actual fraud or financial irregularity
 - 2.5 The provider becoming aware of court or legal action
 - 2.6 The provider resolving to cease to provide higher education
 - 2.7 Regularity investigation and/or sanction by other regulators, e.g. Charity Commission, Home Office.
 - 2.8 Loss of accreditation by a Professional, Statutory or Regulatory Body.
 - 2.9 Any new partnerships, including validation or sub-contractual arrangements.
 - 2.10 Opening a new campus.
 - 2.11 Intended campus, department, subject or provider closure.
 - 2.12 Any other material events with possible financial viability or sustainability implications
- 3 Any reportable event as defined above, shall be reported immediately to the Pro Vice-Chancellor (Operations) who will liaise with the Vice-Chancellor, as the University's 'accountable officer', to determine whether wider notification is required. If there is any doubt as to whether a matter constitutes a reportable event, advice should be sought from the University Secretary.
- 4 If fraud or financial irregularity is suspected, the Vice-Chancellor will make an immediate interim report to the OfS, together with an indication of when the University should be able to make a full report on the incident.

- 5 The Vice-Chancellor will also notify the following persons of the suspected incident and the action being taken:
 - 5.1 The Chair of the Board of Trustees;
 - 5.2 The Chair of the Audit and Risk Assurance Committee;
 - 5.3 The Head of the University's internal audit providers; and
 - 5.4 The University's external auditor providers.

The Board of Trustees will also be informed as and when appropriate of any notification or report to OfS.
- 6 Where applicable, depending on the nature of the reportable event, the full report to the OfS will provide as much information as possible to demonstrate that the University has responded to the incident in an appropriate manner, including how it has reviewed systems and controls to minimise the risk of reoccurrence; the information provided will include the following:
 - 6.1 whether the incident has happened or is still suspected;
 - 6.2 when the incident occurred and who was involved;
 - 6.3 the impact of the incident on the University, any beneficiary involved, or both;
 - 6.4 what inquiries have been made and/or actions taken, including any reports to other regulators or the Police;
 - 6.5 what policies and procedures were in place that apply to the incident, whether they were followed and, if not, why;
 - 6.6 whether the Board of Trustees has determined that, as a result of the incident, policies and procedures need to be introduced or revised – and if so, how and by when.
- 7 Where there is significant doubt as to whether a potential incident should be reported, the Vice-Chancellor will seek advice from the OfS.

20 April 2018