Plymouth Marjon University

Office for Students (OfS) Reportable Events Policy

Contents

Plymouth Marjon University 1
Reportable Events Policy 1
Introduction 2
What is a Reportable Event? 3
Determining Whether an Event is Reportable 3
Reporting Timelines 4
Responsibilities 5
Making a Report 6
Confidentiality 7

Introduction

The Office for Students (OfS) adopts a proportionate, risk-based approach to regulation. This entails directing regulatory focus towards providers deemed to be at the highest risk of breaching their conditions of registration.

In alignment with this approach, the University has a regulatory obligation to report particular incidents or circumstances (Reportable Events) to the OfS, in accordance with the provisions outlined in the Regulatory Framework. These include:

- Reportable events as defined in Condition F3 (paragraph 494) of the OfS Regulatory Framework.
- Events, excluding for the closure of an individual course, that require the implementation of the University's Student Protection Plan as required by Condition C3 of the OfS Regulatory Framework.
- Amendments or inaccuracies in information presented about the provider on the OfS Register, as required by Condition E4 of the OfS Regulatory Framework.
- The provisions of the OfS terms and conditions of funding for Higher Education Institutions.
- Matters relating to the University's compliance with the Prevent Duty.
- Any specific reporting obligations communicated directly to the University by the OfS, whether as an F3 notice or a specific condition of registration

Additionally, the University is subject to reporting obligations to various other regulatory bodies beyond the OfS. These include, but are not limited to, the Home Office's UK Visas and Immigration division (UKVI), the Health and Safety Executive (HSE), the Information Commissioner's Office (ICO), Research England, and a range of Professional, Statutory, and Regulatory Bodies (PSRBs) that accredit programme delivery. Certain events reported to these bodies may also require notification to the OfS, depending on their impact on the University's business. Where an OfS reportable event relates to, or impacts, a key stakeholder of the University, the Governance Services Manager will ensure via the Executive Leadership Team that the stakeholder is informed of the event or matter.

What is a Reportable Event?

The OfS Regulatory Framework defines a reportable event as 'any event or matter that, in its reasonable judgement, negatively affects or could negatively affect:

- The provider's eligibility for registration with the OfS.
- The provider's ability to comply with its conditions of registration.
- The provider's eligibility for degree awarding powers, or its ability to comply with the criteria for degree awarding powers.
- The provider's eligibility for university title.'

In interpreting 'the reasonable judgement of the OfS', the OfS will, as a matter of policy, consider 'whether a reasonable provider intent on complying with all of its conditions of registration and acting in the interests of students and taxpayers (rather than its own commercial, reputational or other interests) would consider the event or matter to be material'.

The OfS provide a non-exhaustive illustrative list, under seven broad categories (see below), of events or matters that may be reportable. Some of these will always be reportable whilst others will be reportable under certain circumstances/contexts:

- Matters relating to a provider's ownership, legal form or corporate structure
- Matters relating to the delivery of higher education in England
- Matters relating to the quality and standards of a provider's higher education courses
- Matters relating to student and consumer protection
- Matters relating to a provider's financial viability or sustainability
- Matters relating to management and governance
- Matters relating to information provision

The OfS may also identify additional matters requiring notification, which will be communicated to the University via an F3 notice. Further advice and guidance, including the list of non-exhaustive reportable events are available in OfS Regulatory Advice 16: Regulatory Events.

Determining Whether an Event is Reportable

The responsibility for determining whether a particular event or matter constitutes a reportable event rests with the University. This is because the materiality of an event may vary significantly between providers. For example, the threshold at which a decline in student recruitment becomes material to financial viability will depend on factors such as institutional size, business model, and cash flow.

The decision to report should be informed by the specific circumstances and operational context of the University. While the OfS provides guidance, a range of factors must be considered in making this determination. The University is also required to document its decision-making process in relation to reportable events.

Although the likelihood of encountering reportable events is expected to be low, it is essential that any potential event is carefully assessed prior to submission to the OfS. The University relies on its staff, students, partners and stakeholders to identify and bring any potential reportable events to its attention.

Reporting a reportable event will not in itself result in regulatory action, however this may trigger a request for further information from the OfS. However, for events or matters that are not always considered reportable the University should make a judgement about whether a report is required and whether the event or matter negatively affects or could negatively affect our:

- Eligibility for registration
- Compliance with the conditions of registration
- Compliance for degree awarding powers
- Eligibility for university title

This judgement is referred to as the materiality test. The materiality test is context-dependent and influenced by factors such as the size and complexity of the institution and the nature of the event. Contextual considerations must always be taken into account when determining whether an event meets the definition of a reportable event. The OfS will determine whether the event is in fact reportable.

Reporting Timelines

The University is required to report an event within **five working days** of the date that the event is identified, or where not possible due to exceptional circumstances beyond the control of the University, as soon as reasonably practicable and without undue delay as noted in paragraph 30, Regulatory Advice 16. Timescales for reporting are strict, and it is therefore essential that reports are made promptly, including events that are foreseen but have not yet happened.

Reportable events may include events that have yet to happen or events that have already happened. There may be occasions where an event or reportable event may relate to the University's future plans for example a new campus, the closure of a subject area or an event that impacts on our financial forecast. The University should consider the following factors when determining the timing of a report in these circumstances:

- Where the University can foresee an event or matter that is relevant to our eligibility for registration with the OfS, the event should be reported **within five working days of the matter being first contemplated by the University** (when plans are discussed formally with the Board of Governors), or as soon as reasonably practicable and without delay.
- Where the University can foresee an event or matter that is relevant to the University's compliance with our conditions of registration or our authorisation for degree awarding powers or university title, the event should be reported **within five working days of the University becoming aware of the matter or event**, for example the closure of a campus or a likely breach of banking covenants.

The University may become aware of an event or matter that is likely to be a reportable event after it has already happened, for example discovery of possible fraud. In these circumstances the University must report the event or matter to the OfS within **five working days of the date that the event was identified by the University**. Where this is not possible the event must be reported as soon as reasonably practicable and without undue delay.

As soon as you are aware of, or anticipate, a reportable event please contact reportableevent@marjon.ac.uk

Strict adherence to these reporting timelines is essential. Prompt reporting ensures regulatory compliance and supports the University's commitment to transparency and accountability.

Responsibilities

The University's Board of Governors (BoG) are responsible for interactions between the University and the OfS including responsibility for reportable events. The Vice-Chancellor as Accountable Officer has delegated day to day oversight of reportable events and in conjunction with the Executive Leadership Team (ELT) and the Governance Services Manager responsibility for the operation of an effective process for reporting events to the OfS.

Where a potential reportable event relates to the Vice-Chancellor, the Chair of the Board of Governors must be informed and the responsibility for submitting the reportable event to the OfS will sit with the Board of Governors.

All other potential reportable events will be submitted by the Governance Services Manager in consultation with the Vice-Chancellor and / or other member of the Executive Leadership Team in accordance with the Reportable Events Procedure.

The Board of Governors retains oversight of reportable events through its Audit Committee.

The Governance Services Manager is specifically responsible for:

- Notifying the Chair of the Board of Governors of decisions made under this Policy at the earliest opportunity, including any responses received from the OfS.
- Reporting all decisions regarding potential reportable events and reportable events to the University's Audit Committee at its next scheduled meeting. Where a reportable event is deemed serious, it must be escalated immediately to the Chair of the Audit Committee.
- Keeping Executive Leadership Team informed of any decisions and developments relating to reportable events, including requests for additional information and any correspondence from the OfS.

All University staff and academic partners are responsible for co-operating fully with this policy and reporting any event or matter in a timely manner to the Governance Services Manager via the designated email address: **reportableevent@marjon.ac.uk**

Where it is not possible to report the event to the Governance Services Manager, the written report should be submitted to the Vice-Chancellor or Chair of the Board of Governors. In cases of uncertainty, the default position should be to notify the Governance Services Manager of the incident or event without delay.

Where an event or matter relates to an academic partner, the Academic Registrar and Academic Dean of Partnerships must be informed immediately to ensure the matter can be investigated thoroughly within the required five working days. If the partner institution is also registered with the OfS, both the University and the partner must independently assess whether the event or matter is reportable, in accordance with any respective F3 notices and the expectations outlined in this policy.

Making a report

Individuals submitting a report to the Governance Services Manager under this policy will be required to complete a form which captures the following information, as set out in the University's Reportable Event Procedure:

- The type of event – whether always reportable under Annex A (Table 1) of Regulatory Advice 16, or Schedule 1 of the F3 notice; other event under Annex A (Table 1) of Regulatory Advice; or other event or matter.
- A brief description of the event or matter (max. 2,000 characters)
- Any actions taken or planned to mitigate any impact of the event or matter (max 2,000 characters)
- Explanation of why you consider this event to be material? (max. 2,000 characters) *See paragraph 494 of the Regulatory Framework for the definition of a reportable event. See Regulatory Advice 16 for further information on the materiality test that the OfS will apply.*

- If you are reporting outside of the normal 'five working days' time frame, your reasons for this.
- Any files that you have attached.
- Whether this relates to any academic partner or regulatory bodies
- Whether any existing University policies or procedures been used to manage the potential reportable event
- Whether the event or matter been reported to another individual, authority or regulatory body prior to submission under this policy
- Details of any ongoing inquires or actions taken to date
- Details of any recommendations such as changes to internal procedures to minimise the reoccurrence of this issue or matter

The determination of whether a report should be submitted to the OfS rests with the Governance Services Manager in liaison with the Vice-Chancellor having consulted with the Chair of the Board of Governors (Chair's Action) unless a board minute has been taken.

The Governance Services Manager will maintain a formal record of all decisions relating to potential and confirmed reportable events. These records will be submitted regularly to the Audit Committee via the Reportable Events tracker for oversight.

Confidentiality

The University is committed to fostering a culture of openness and accountability and encourages individuals to report events under this policy with confidence. While individuals are encouraged to identify themselves when making a report, anonymous submissions will be accepted and considered at the University's discretion.

Where an individual chooses to report anonymously, the University will make every reasonable effort to protect their identity. However, in circumstances where disclosure is necessary—such as during an investigation—the University will discuss this with the individual prior to any disclosure.

Anonymous reports will be evaluated based on the seriousness of the issues raised and the likelihood that the allegations can be substantiated through other credible sources.

Document Title	Reportable Events Policy
Version	1.0
Issuing Authority	Executive Leadership Team
Custodian	Governance Services Manager
Last Amended	27.11.2025
Sensitivity	Unclassified
Circulation	Website
Effective from	November 2025
Review Date	August 2026
Effective until	November 2026
History	Version 1.0 approved by Executive Leadership Team August 2025. Confirmed by Audit Committee 19.11.2025; Board of Governors 27.11.2025.