

Reportable Events Procedure

Contents

Background	2
Purpose Statement	2
Applicability and Scope	2
Definition of a Reportable Event	3
Responsibilities	3
Timeframe	4
Process	5
Other reportable matters	6
Appendix 1: Non-exhaustive, illustrative list of reportable events, which includes some	
are always reportable	7
Appendix 2: Reportable Events Process Diagram	
Appendix 3: Reportable Events Form	
Appendix 4: Equality Impact Assessment	15

Approved by:	University Executive Team	Date first published:	Aug-2023
Date updated:	Aug-2023		
Owner:	University Secretary	Review Date:	Aug-2028

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

 $\ensuremath{\mathbb{C}}$ Buckinghamshire New University

Background

- 1 The Office for Students (OfS) operates a risk-based approach to monitoring. The OfS maintains an updated risk assessment on all providers based on receipt of the following:
 - Indicators constructed from routine data collections
 - **Reportable events** submitted by a provider
 - Additional information that the OfS has required from a provider
 - Notifications about an individual provider from third parties
- 2 In relation to Reportable Events the OfS have issued guidance to providers about events or matters they are required to report to the OfS. These are detailed in:
 - OfS Regulatory Advice 16: Reportable Events (<u>Regulatory advice 16: Reportable events Office</u> <u>for Students</u>)
- 3 The **BNU Reportable Events Procedure** has been developed to facilitate clear governance relating to reporting requirements as required by the OfS. These being:
 - a) ongoing condition of registration F3: "Provision of information to the OfS" within the OfS Regulatory Framework for Higher Education in England (para 494)

and

b) the OfS Terms and Conditions for Funding of Higher Education Institutions.

Purpose Statement

4 This procedure provides BNU staff, students and other stakeholders with the process to be followed to identify and assess whether an event is reportable and to administer the submission and recording of any such reportable events.

Applicability and Scope

5 The Higher Education Regulatory Framework defines a reportable event as:

"any event or matter that, in the reasonable judgement of the OfS, negatively affects or could negatively affect the provider's:

- a) eligibility for registration with the OfS
- b) eligibility to comply with its conditions or registration
- c) eligibility for degree awarding powers, or its ability to comply with the criteria for degree awarding powers
- d) eligibility for university title"

6 The Regulatory Framework further clarifies that in interpreting "the reasonable judgement of the OfS", the OfS will consider "whether a reasonable provider intent on complying with all of its conditions of registration and acting in the interests of students and taxpayers would consider the event or matter to be material". In considering which events or matters to report BNU must therefore take 'materiality' into consideration.

Definition of a Reportable Event

- 7 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 full non-exhaustive, illustrative list of OfS reportable events can be found in Appendix 1.

- 8 A materiality test should be applied to ascertain whether an event is reportable. Contextual factors including the size, complexity and context within which BNU operates should be considered.
- 9 The OfS may identify additional matters that must always be reported. Where this is the case, these will be set out in an F3 Notice issued to BNU.

Responsibilities

- 10 It is BNU's responsibility to decide whether a particular event or matter constitutes a reportable event and should be reported to the OfS. In deciding whether to submit a reportable event BNU should be informed by the circumstances and context.
- 11 BNU should record the reasons for its decision to submit or not a reportable event as this will enable the University to demonstrate to the OfS that the decision has been taken with due care and attention should the OfS question it.
- 12 In respect of an F3 Notice, should the OfS conclude that BNU has not made a reasonable judgement about reporting they may take further regulatory action.
- 13 BNU should be aware that 'over-reporting' may cause the OfS to consider whether BNU's Council is properly exercising its responsibility in relation to the E conditions of registration (Governance and Management).

- 14 BNU's Council is responsible for interactions between the University and the OfS including the responsibility for reportable events. Council have given delegated responsibility to the Accountable Officer (Vice-Chancellor) and the University Executive Team (UET) to operate an effective process for reportable events. Council has oversight of this process and receives assurance that it is operating effectively through its Audit Committee which receives termly reports on OfS Compliance and Reportable Events.
- 15 Should a reportable event relate to the Accountable Officer (Vice-Chancellor), the Council will itself make the report to the OfS.
- 16 Where BNU has a partnership arrangement with another provider, who themselves are registered with the OfS, the University and the partner will make their own judgement as to whether an event should be reported to the OfS. Where this is the case BNU will liaise with the partner to inform them of the BNU position, recognising that there might be instances in which it would be appropriate for one but not both partners to make a report to the OfS.

(Note: Where a partner submits a Reportable Event to the OfS directly they are asked to share this with BNU to enable full transparency)

- 17 The University Secretary's Office is responsible for collating information to be submitted as a reportable event through the OfS Portal and for maintaining a record of all events and matters submitted.
- 18 Upon receipt of a Reportable Event the OfS will:
 - send a confirmation email
 - review its credibility, reliability and completeness
 - may request further information
- 19 The OfS will determine one of the following steps:
 - the report is recorded but no further action is required
 - a more extensive assessment is required. This may result in a change to the OfS's risk assessment of BNU or action to address
- 20 Where no further action by BNU is required the OfS will confirm this to be the case.

Timeframe

- 21 Reportable events must be made to the OfS in a timely manner. This is to enable the OfS to ensure their risk assessment for a provider is up-to-date. Therefore, providers are required to report an event "within five working days of the date that the event is identified, or if that is not possible due to exceptional circumstances, beyond the control of the provider, as soon as reasonably practicable thereafter without undue delay"
- 22 Where an event is reported outside of the five working day time-frame BNU should set out the reasons for this as part of the submission.

- 23 In considering the timeframe for submission BNU should consider:
 - Events that are likely to happen
 - Events that have already happened

Process

24 The University will operate a staged process for managing reportable events (see below and Appendix 2):

Stage	Action	Responsible
Stage 1	Identification of events or matter that may require reporting to the OfS via: <u>ReportableEvents@bnu.ac.uk</u>	Staff, Student Stakeholders
Stage 2	Collation of evidence/information	University Secretary (or nominee)
Stage 3	Consideration and application of the test of materiality and decision as to whether an event or matter is reportable	UET (or Council in the case of events relating to the Accountable Officer)
Stage 4	Reporting to the OfS	University Secretary
Stage 5	Reporting to and monitoring by Council	University Secretary

- 25 Any member of the BNU community (staff, student) or other stakeholder who holds a reasonable concern about an event or matter which comes under the categories listed in para 7 / Appendix 1 should report the matter in writing through the email inbox: ReportableEvents@bnu.ac.uk
- 26 The University Secretary will review the concern raised and:
 - Refer the matter to the appropriate University procedures (ie, Complaints, Whistleblowing) or
 - Process the matter through the **Reportable Events Procedure** and collate relevant information/evidence as required by the 'Reportable Events form' (see Appendix 3)
- 27 UET (or Council, in cases relating to the Accountable Officer) will receive and consider the completed 'Reportable Events form' and come to a view as to whether the event or matter is reportable to the

OfS. The outcome of their consideration will be recorded on the 'Reportable Events form' and this will kept on record as justification of their decision.

- 28 Where the decision is taken to report an event or matter to the OfS the University Secretary will prepare the submission and submit this through the OfS Portal. All submissions will be made on behalf of the Chair of Council.
- 29 The University Secretary will maintain a list of all Reportable Events considered and report these to Council, via its Audit Committee.

Other reportable matters

- 30 BNU will report separately to the OfS in relation to its Prevent Duty.
- 31 BNU has responsibility to notify other regulators of events or matters eg:
 - Information Commissioner's Office for personal data breaches
 - UK Visa and Immigration for international student matters

This does not negate BNU's requirement to also notify the OfS where necessary.

Appendix 1: Non-exhaustive, illustrative list of reportable events, which includes some events that are always reportable

Type of event or matter	r	ls it always reportable?
a. Matters relating to a p limited to:	rovider's ownership, legal form or corporate structure, inclu	ding but not
of: • The acquisitio provider	nat is registered ceasing to exist. This might be as a result n by another legal entity of the business operated by a ne provider with another registered or unregistered higher vider.	Yes
ii. A merger of the p education provide	provider with another registered or unregistered higher er.	Yes
iii. A change of owne Definitions below	rship, including through a sale, of the provider (see	Yes
iv. A change in the p	rovider's legal form.	Yes
 Factors in favour Amendments practice the p provider Amendments assets on diss Factors against re Administrative 	he provider's governing documents. ¹¹ of reporting may include: which affect the provider's ability to uphold and deliver in bublic interest governance principles that apply to the which relate to the treatment of the provider's charitable solution of the provider. eporting may include: e amendments which do not affect the operative the governing document(s).	No
	the provider of another entity. of reporting may include:	No

Type of event or matter	Is it always reportable?
• The entity (to be) acquired is registered with the OfS or has submitted an application for registration and for which the OfS has not yet made a final decision.	
vii. A sale of a part of the provider or its parent.	No
b. Matters related to the delivery of higher education in England, including but not li	mited to:
 The provider resolving to cease carrying on its business principally in England. 	Yes
ii. The provider resolving to fully or substantially cease providing higher education, whether or not this results in the closure of the provider.	Yes
iii. A change in the provider's business model, such as a move to focus on further instead of higher education.	No
iv. Loss, including suspension, of the provider's student sponsor licence.	Yes
c. Matters relating to the quality and standards of a provider's higher education cou but not limited to:	rses, including
i. A notification to the provider of an investigation by an awarding organisation or awarding body or by a professional, regulatory or statutory body. ¹²	Yes
 A notification to the provider that its awarding organisation or awarding body is to withdraw from the arrangement, where this is not a routine consequence of a planned contract review. 	Yes
d. Matters relating to student and consumer protection, including but not limited to:	
i. The provider receiving a complaint that it has charged or advertised fees that exceed a statutory fee limit or a fee limit imposed as a result of an approved access and participation plan.	Yes
ii. A new campus, whether in the UK or internationally.	Yes
iii. Closure of a campus, department, or subject area, whether or not this is in the provider's approved student protection plan.	Yes
iv. Termination of a partnership arrangement, whether in the UK or internationally, where this results in a contract change for students.	Yes
 v. Complaints from students that are upheld in full or in part by the provider, or by the OIA, and that result in redress for a student (including a full or partial fee refund) or changes within the provider. 	No

Type of event or matter

e. Matters relating to a provider's financial viability or sustainability, including but not limited to:

(Further education and sixth form colleges, whose primary regulator is the Education and Skills Funding Agency, are not required to report the events and matters set out in this section (e), to the OfS.)

i. A likely drop in the provider's liquidity ¹³ to below 30 days' average expenditure unless this is the provider's normal cash management policy or is mitigated through an agreed revolving credit facility, overdraft or other financing.	Yes
A likely breach of any financial covenant attached to a loan, where that breach has not been waived by the lender.	Yes
iii. For a provider with a legally binding obligation of, or which otherwise receives, financial support underpinning its financial viability and sustainability, the withdrawal of the obligation or that financial support (including as a result of a change of ownership or control of the provider, even where the new owner will offer a similar obligation or financial support), or an adverse change in the counterparty's financial position or other standing that could affect its suitability as a counterparty.	Yes
iv. A provider's external auditor has notified the provider that it may conclude that the provider is not a going concern, including where the provider is asked to submit additional information to the auditor in response to such a notification.	Yes
v. A provider's trustees or directors are considering making an assessment that the provider is not a going concern.	Yes
vi. Any matter or event that may result in the provider being unable to pay its creditors as debts fall due.	Yes
vii. A change in the provider's actual or forecast financial performance or position.	No
viii. A change in financial commitments or borrowings.	No
ix. A change in forecast or actual student numbers that was not included in the most recent financial forecasts submitted to the OfS.	No
x. For a provider that is part of a larger corporate group, any adverse change in the group's financial position.	No
xi. The sale of assets.	No
xii. A redundancy programme.	No

¹³ Net liquidity days is calculated as: ((cash and cash equivalents + current asset investments - overdrafts - bank loans and external borrowing falling due within one year - loans from directors falling due within one year) / (total expenditure - depreciation and amortisation - changes to pension provisions and pension adjustments))*365. The requirement here reflects the terminology used for the OfS's annual financial return.

Type of event or matter	Is it always reportable?
f. Matters relating to management and governance, including but not limited to:	
 Changes to the identity of the individual a provider wishes to nominate to the OfS as its accountable officer. 	Yes
ii. Changes to the identity of the chair of a provider's governing body.	Yes
iii. A change of control of the provider (see Definitions below). ¹⁴	Yes
iv. A matter relating to the provider's compliance with the Prevent duty as set out in the OfS's monitoring guidance. ¹⁵	Yes
v. The initiation of a governance review where this is not a routine part of a provider's planned arrangements.	No
Factors in favour of reporting may include:	
 The review is initiated in response to whistleblowing, or other complaints 	
 The review is initiated in response to welfare or safeguarding concerns about students or staff. 	
vi. The following events or matters relating to fraud or financial irregularity:	No
(a) The provider receives a complaint or allegation that it may have committed fraud	
(b) The provider initiates an investigation into a possible fraud or financial irregularity involving the provider	
(c) The provider is notified that a third-party is investigating the provider in relation to a possible fraud or financial irregularity	
(d) A third-party makes a finding that the provider has committed fraud.	
Factors in favour of reporting may include:	
 Involvement of any member of the governing body, the accountable officer, or any other senior officer 	
 The fraud exposes a systemic weakness in the provider's internal control arrangements that suggest other, as yet unidentified, cases could be taking place 	
The fraud involves public funding	
• The fraud is one of a repeating pattern of even small-scale frauds.	

¹⁴ If, following the change of control, the provider will be under the control of another OfS-registered provider, or a provider that has submitted an application for registration and for which the OfS has not yet made a final decision, the provider must make this clear in its report.

¹⁵ Further education and sixth form colleges that are monitored by Ofsted in relation to the Prevent duty are not required to report matters relating to their compliance with the Prevent duty to the OfS. Further information about the OfS's Prevent monitoring requirements is available at: <u>www.officeforstudents.org.uk/advice-and-</u> <u>guidance/student-wellbeing-and-protection/counter-terrorism-the-prevent-duty/</u>.

Туре	of event or matter	ls it always reportable?	
	Factors against reporting may include:		
	• The monetary scale of the fraud is below £25,000 or two per cent of the provider's total income (whichever is smaller).		
vii.	Legal or court action.	No	
	Factors in favour of reporting may include:		
	 Involvement of any member of the governing body, the accountable officer or any other senior officer where this relates to their duties for the provider 		
	 An individual case, or a pattern of cases, exposes a systemic weakness in the provider's management and governance arrangements 		
	 Findings of a coroner where these relate to a student death and expose a systemic weakness in the provider's management and governance arrangements. 		
	Factors against reporting may include:		
	Isolated employment tribunal cases		
	• The issue is a commercial dispute relating to business activities where the monetary scale of any adverse outcome is likely to be below £25,000 or two per cent of the provider's total income (whichever is smaller).		
viii.	Regulatory investigation and/or sanction by other regulators or funding bodies, for example the Education and Skills Funding Agency, Ofsted, the Charity Commission, ¹⁶ the Equality and Human Rights Commission or the Arts Council.	No	
	Factors against reporting may include:		
	 The action is a routine inspection that is undertaken as part of a regulator's planned oversight activities. 		
g. Mat	ters relating to information provision, including but not limited to:		
i.	Any matter which affects the accuracy of the information contained in the provider's entry in the OfS Register. ¹⁷	Yes	
ii.	Inaccuracies or omissions in the information finally submitted by a provider to the OfS or the designated data body, including where this may have an impact on the OfS's use of the data including in determining compliance	No	

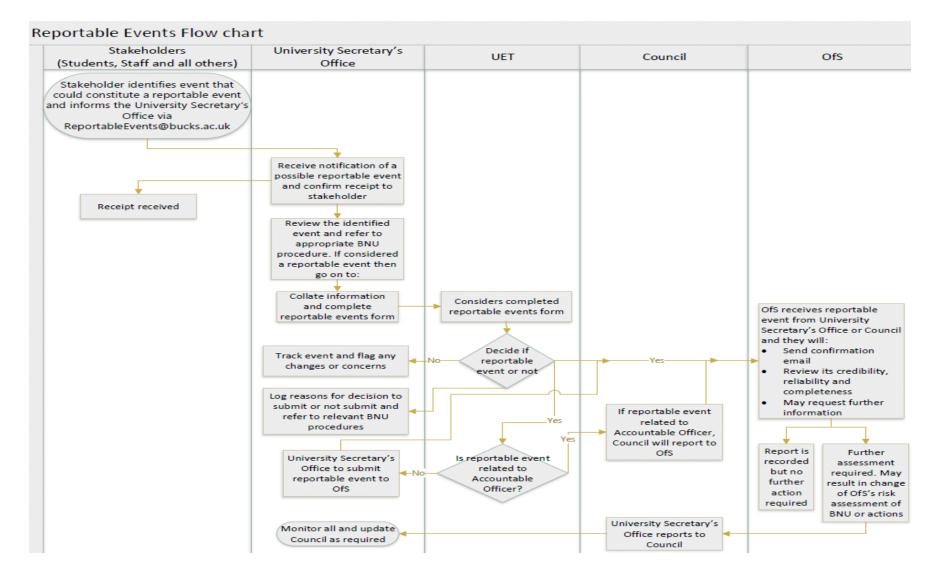
¹⁶ Some registered providers are charities registered with, and subject to direct regulation by, the Charity Commission. Those providers must also comply with the Charity Commission's reporting requirements. Some registered providers are exempt charities; they are exempt from registration with, and direct regulation by, the Charity Commission. The OfS is the principal regulator of exempt charities and has published guidance for those exempt charities (Regulatory advice 5: Exempt charities). This is available at:

www.officeforstudents.org.uk/publications/regulatory-advice-5-exempt-charities/.

¹⁷ The OfS Register is available at: <u>www.officeforstudents.org.uk/advice-and-guidance/the-register/the-ofs-</u> register/.

of event or matter	Is it always reportable?
with another condition of registration, the provider's funding allocation, or statistics published by the designated data body.	
Factors in favour of reporting may include:	
 Inaccuracies or omissions mean that students or other activities are not included in returns when they should be or vice versa. 	
Factors against reporting may include:	
 Minor or administrative errors which have been resolved through a validation process following initial submission of the data 	
Inaccuracies or omissions are restricted to a small number of students	
 Inaccuracies or omissions have a small impact on the OfS's decisions or publications or on the designated data body's process or publications. 	

Appendix 2: Reportable Events Process Diagram



Appendix 3: Reportable Events Form

OfS Reportable Event form

Event or Matter to be considered

(please provide a short description of the event or matter which may constitute a reportable event)

Relationship to OfS's illustrative list of reportable events

(provide the relevant from Appendix 1 of BNU Reportable Events Procedure)

Ту	be of Event	ls it always reportable

Questions to consider

(indicate a Yes/No response. Where 'Yes' provide an explanation)

Does this event negatively affect or could negatively affect BNU's:		
- eligibility for registration with the OfS?		
- eligibility to comply with its conditions of registration?		
- eligibility for degree awarding powers, or its ability to comply with the criteria for degree awarding powers?		
- eligibility for University title?		

Is this an event / matter that is:		
- likely to happen?		
- has already happened?		

Does this event or matter relate to the Accountable Officer?	
Does this event affect any of BNU's partners that are themselves registered with the OfS?	

Materiality test

(provide a rationale to explain the circumstances and context and what materiality test has been undertaken)

Advantages / Risks of Submitting to the OfS

(detail any foreseen advantages or risks to BNU)

Advantages	Possible Concerns

Timeliness of Reporting/Submission

(Events should normally be reported "within five working days of the date that the event is identified". Where this is not possible please provide reasons.)

Decision and Rational

(Record the outcome of UET/Council consideration together with any rationale)

Event/ Matter	Report to OfS (Yes/No)	Rationale	
Decision taken by (UET or Council):		Date:	

Further Action:

Action	Responsible	Timeline
Event and supporting documentation to be submitted to OfS via the OfS		
portal		
(Events should normally be reported		
"within five working days of the date that		
the event is identified". Where this is not		
possible please provide reasons.)		
Event to be added to BNU's OfS		
Reportable Event Tracker		
Event to be reported to xxx		
Committee at the next meeting		

Appendix 4: Equality Impact Assessment

1. What is changing and why?

This procedure outlines the process through which BNU and its partners inform the OfS of any reportable events. What is deemed a reportable event is based partly on the non-exhaustive, illustrative list of examples provided by the OfS and on an assessment of their materiality.

2. What do you know?

This procedure is required by the OfS to maintain its updated risk assessment of BNU and enables BNU to ensure it is compliant with the OfS Conditions of Registration.

3. Assessing the impact	t			
	Could benefit	May adversely impact	What does this mean? Impacts identified from what you know (actual and potential)	What can you do? Actions (or why no action is possible) to advance equality of opportunity, eliminate discrimination, and foster good relations
a) How could this affect different ethnicities? Including Gypsy, Roma, Traveller, Showmen and Boaters, migrants, refugees and asylum seekers.			Through clearly outlining its reporting structures, this procedure aids BNU and the OfS in identifying any potential risks occurring as a result of its business practice, including those that would affect stakeholders of all ethnicities. It may especially help students of all ethnicities under reportable event d.v. ensuring that upheld complaints against the institution are recorded by both BNU and the OfS. Annual monitoring of reportable events via Council will also ensure that any trends in events reported that suggest some groups might be experiencing discrimination or a poorer student experience are identified and stopped.	BNU must implement this procedure to comply with its Conditions of Registration. Through implementing it BNU will improve its reporting of events, with this action benefitting equality in the University.
b) How could this affect cisgender and transgender men and women (including maternity/pregnancy	X		Through clearly outlining its reporting structures, this procedure aids BNU and the OfS in identifying any potential risks occurring as a result of its business practice, including those	BNU must implement this procedure to comply with its conditions of registration. Through implementing it BNU will improve its reporting

impact), as well as non- binary people?		 that would affect stakeholders of all gender identities. It may especially help students of all gender identities under reportable event d.v. ensuring that upheld complaints against the institution are recorded by both BNU and the OfS. Annual monitoring of reportable events via Council will also ensure that any trends in events reported that suggest some groups might be experiencing discrimination or a poorer student experience are identified and stopped. 	of events, with this action benefitting equality in the University.
c) How could this affect disabled people or carers? <i>Including neurodiversity,</i> <i>invisible disabilities and</i> <i>mental health conditions.</i>		 Through clearly outlining its reporting structures, this procedure aids BNU and the OfS in identifying any potential risks occurring as a result of its business practice, including those that would affect stakeholders with disabilities and their carers. It may especially help disabled students and their carers under reportable event d.v., ensuring that upheld complaints against the institution are recorded by both BNU and the OfS. Annual monitoring of reportable events via Council will also ensure that any trends in events reported that suggest some groups might be experiencing discrimination or a poorer student experience are identified and stopped. 	BNU must implement this procedure to comply with its conditions of registration. Through implementing it BNU will improve its reporting of events, with this action benefitting equality in the University.
d) How could this affect people from different faith groups?		Through clearly outlining its reporting structures, this procedure aids BNU and the OfS in identifying any potential risks occurring as a	BNU must implement this procedure to comply with its conditions of registration. Through implementing it BNU will improve its reporting

		result of its business practice, including those that would affect stakeholders from different faith groups. It may especially help students from all faith groups under reportable event d.v., ensuring that upheld complaints against the institution are recorded by both BNU and the OfS. Annual monitoring of reportable events via Council will also ensure that any trends in events reported that suggest some groups might be experiencing discrimination or a poorer student experience are identified and stopped.	of events, with this action benefitting equality in the University.
e) How could this affect people with different sexual orientations?		 Through clearly outlining its reporting structures, this procedure aids BNU and the OfS in identifying any potential risks occurring as a result of its business practice, including those that would affect stakeholders from all sexual orientations. It may especially help students of all sexual orientations under reportable event d.v., ensuring that upheld complaints against the institution are recorded by both BNU and the OfS. Annual monitoring of reportable events via Council will also ensure that any trends in events reported that suggest some groups might be experiencing discrimination or a poorer student experience are identified and stopped. 	BNU must implement this procedure to comply with its conditions of registration. Through implementing it BNU will improve its reporting of events, with this action benefitting equality in the University.

f) How could this affect different age groups or generations?		Through clearly outlining its reporting structures, this procedure aids BNU and the OfS in identifying any potential risks occurring as a result of its business practice, including those that would affect stakeholders from all age groups or generations. It may especially help students from all age groups or generations under reportable event d.v., ensuring that upheld complaints against the institution are recorded by both BNU and the OfS. Annual monitoring of reportable events via Council will also ensure that any trends in events reported that suggest some groups might be experiencing discrimination or a poorer student experience are identified and stopped.	BNU must implement this procedure to comply with its conditions of registration. Through implementing it BNU will improve its reporting of events, with this action benefitting equality in the University.
g) How could this affect those who are married or in a civil partnership?		Through clearly outlining its reporting structures, this procedure aids BNU and the OfS in identifying any potential risks occurring as a result of its business practice, including those that would affect stakeholders with differing marital and partnered statuses differently. It may especially help students with all different marital and partnered statuses under reportable event d.v., ensuring that upheld complaints against the institution are recorded by both BNU and the OfS. Annual monitoring of reportable events via Council will also ensure that any trends in events reported that suggest some groups might be experiencing discrimination or a	BNU must implement this procedure to comply with its conditions of registration. Through implementing it BNU will improve its reporting, with this action benefitting equality in the University.

		poorer student experience are identified and stopped.	
h) How could this affect people from different backgrounds such as: socio- economic disadvantage, homeless, alcohol and/or substance misuse, people experiencing domestic and/or sexual violence, ex- armed forces, looked after children and care leavers.		Through clearly outlining its reporting structures, this procedure aids BNU and the OfS in identifying any potential risks occurring as a result of its business practice, including those that would affect stakeholders from all backgrounds. It may especially help students from all different backgrounds in particular under reportable event d.v., ensuring that upheld complaints against the institution are recorded by both BNU and the OfS. Annual monitoring of reportable events via Council will also ensure that any trends in events reported that suggest some groups might be experiencing discrimination or a poorer student experience are identified and stopped.	BNU must implement this procedure to comply with its conditions of registration. Through implementing it BNU will improve its reporting, with this action benefitting equality in the University.
i) How could this affect people with multiple intersectional experiences?		Through clearly outlining its reporting structures, this procedure aids BNU and the OfS in identifying any potential risks occurring as a result of its business practice, including those that would affect stakeholders with multiple intersectional experiences. It may especially help students with multiple intersectional experiences under reportable event d.v., ensuring that upheld complaints against the institution are recorded by both BNU and the OfS. Annual monitoring of reportable events will also ensure that any trends in events reported	BNU must implement this procedure to comply with its conditions of registration. Through implementing it BNU will improve its reporting, with this action benefitting equality in the University.

	experiencing	some groups might be g discrimination or a poorer student are identified and stopped.		
4. Overall outcome				
No major change needed 🛛	Adjust approach 🗆	Adverse impact but continue \Box	Stop and r	emove 🗆
5. Details of further action	ons needed			
None				
6. Arrangements for deli	very and future monitoring			
the OfS. This means that both	0	ducted by the University Secretary's Office, po ocedure will be under constant scrutiny. Furthe , whichever comes sooner.	•	0
7. Completed by:	Paul Robson	Secretariat Administrator	Date	18/08/2023
8. Signed off by:	Emma Tomsett	University Secretariat Manager	Date	23/08/2023



High Wycombe Campus Queen Alexandra Road High Wycombe Buckinghamshire HP11 2JZ

Aylesbury Campus 59 Walton Street Aylesbury Buckinghamshire HP21 7QG

Uxbridge Campus 106 Oxford Road Uxbridge Middlesex UB8 1NA

BNU based at Pinewood Studios

Pinewood Studios Pinewood Road Iver Heath Buckinghamshire SL0 0NH

Missenden Abbey London Road Great Missenden Buckinghamshire HP16 0BD

Telephone: 01494 522 141

- **f** BucksNewUni
- ✓ BucksNewUni
- BucksNewUni
- BucksNewUniversity

If you have any queries about this policy, please contact the School or Directorate responsible for the policy