



Oakswood College

Empowering Through Education



Reportable Events

Policy

PROMOTING EXCELLENCE • ENSURING COMPLIANCE
SUPPORTING OUR COMMUNITY



GOVERNANCE



QUALITY



COMPLIANCE



EXCELLENCE



Reportable Events Policy & Procedure

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1. What is a Reportable Event?

What the OfS say about Reportable Events

In accordance with the [OfS Guidance on Reportable Events](#) published 12 March 2026 and effective from 31 March 2026, the Regulatory Framework defines Reportable Events as follows:

13. The regulatory framework defines a reportable event as: A reportable event is any event or matter that, in the reasonable judgement of the OfS, negatively affects or could negatively affect:

- a. The provider's eligibility for registration with the OfS.*
- b. The provider's ability to comply with its conditions of registration.*
- c. The provider's eligibility for degree awarding powers, or its ability to comply with the criteria for degree awarding powers, where the provider:
 - i. holds degree awarding powers; or*
 - ii. has submitted an application for degree awarding powers to the OfS, and for which the OfS has yet to reach a final decision.**
- d. The provider's eligibility for university title, where the provider:
 - i. holds a university title; or*
 - ii. has submitted an application for university title to the OfS, and for which the OfS has yet to reach a final decision. 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 in its own commercial, reputational or other interests), would consider the event or matter to be material.**

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 in its own commercial, reputational or other interests), would consider the event or matter to be material.

The Regulatory Framework for Higher Education in England (referred to above), along with regulatory notices and regulatory advice (as referenced above), can be found here: <https://www.officeforstudents.org.uk/advice-and-guidance/regulation/the-regulatory-framework-for-higher-education-in-england/>

2. Scope and purpose of this Policy

Further to the details set out in Section 1 of this Policy, it is a requirement of OfS registration that Oakwood College complies with all Conditions of Registration including those relating to Reportable Events (OfS Conditions E4 and F3). To comply with these conditions and as set out in paragraph 494 of the OfS Regulatory Framework Guidance on Reportable Events (see section 1.3 above), Oakwood College must report particular incidents or circumstances ('Reportable Events') to the OfS, as well as any material adverse changes in its position ('Material Adverse Events'), promptly and without delay.

The purpose of this Policy is to set out the operational principles and procedures governing the institutional management of this area. It is a fundamental principle of this policy that the use of sound professional assessment and judgement in reporting and investigation of any incidents and events should be applied to ensure that issues are given the appropriate level of consideration with due rigour and are managed appropriately, in order to identify necessary actions and robust resolutions.

This Policy and Procedure apply to the following:

- all staff of Oakwood College, irrespective of their contract of employment with Oakwood College;
- Students of Oakwood College;
- Governors of Oakwood College;
- Any other individual or organisation which has a relationship with Oakwood College (such as partners/subcontractors providing any services on behalf of Oakwood College).

Limitations

Incidents or events may occur from time to time which fall under the definition of a possible 'Reportable Event' and as such, should be dealt with in accordance with this policy and its procedures. Such incidents and events may be brought to the attention of Oakwood College via concerns raised by individuals, groups or organisations, internal or external reviews, audits or inspections. Not all such incidents and events will fall within the scope of this policy and procedures.

However, it is foreseeable that incidents or events connected with Oakwood College, its activities both on and off-site, its community and other stakeholders, will arise. Those which have a minor and/or immaterial impact, including on Oakwood College's finances, educational delivery (including health and safety provision) and student contracts, and which do not fall within the scope of the reporting requirements set by the OfS (as outlined in Section 1 of this Policy, HERA 2017 and the Regulatory Framework and its guidance), will be

dealt with in accordance with normal Oakwood College protocols and relevant policies and procedures (for example, the College's Business Continuity & Significant Incident Plan, or the Student Complaints Procedure; these examples are not exhaustive).

3. Compliance with OfS requirements regarding Reportable Events

To manage our compliance with OfS Conditions E4 and F3 which both govern Reportable Events, Oakwood College has a Reportable Events Incident Assessment & Record of Decision Form template (Appendix A). This utilises the illustrative examples provided by the OfS in its guidance and helps us document our decision-making. The key considerations for determining whether an event or matter constitutes a reportable event are:

- Does the event/matter in question fall into one or more of the categories provided as illustrative examples by the OfS guidance (which are incorporated into our decision-making template)?
- Does the event/matter satisfy the 'materiality test'? (i.e. does it or could it negatively affect our ability to comply with any of the OfS Conditions of Registration that apply to us?)

Further to the above, there is therefore a range of incidents that might constitute a Reportable Event. This could be anything from a change to the structure of Oakwood College that has a significant financial, governance or other impact, to a new Chief Executive, to an investigation by any accrediting body (including our validating university), to a report or allegation of serious fraud. The likelihood of the Oakwood College needing to make a Reportable Event to the OfS is assessed by the overall Oakwood College as low, but must be continuously monitored and relevant records must be kept of how the Oakwood College has reached any decision on whether an event or matter constitutes a Reportable Event.

The OfS provides non-exhaustive [guidance](#) about Reportable Events, and following independent registration with the OfS, Oakwood College has a Policy and Procedure (see further on in this section) for assessing and determining whether or not an event or matter constitutes a Reportable Event that requires reporting to the Office for Students. This procedure also helps to ensure that Oakwood College has a consistent, rigorous and robust process for determining and recording the assessment and decision-making regarding possible Reportable Events.

The Office for Students needs to be notified of Reportable Events promptly and without delay. Staff should therefore escalate any incident or matter as soon as they become aware of it, and in any event within five working days if there is a reasonable possibility that it could constitute a reportable event. Resolution timescales are determined on a case-by-case basis by the Office for Students and should not delay internal escalation or reporting.

This Policy and Procedure has been developed following the relevant OfS guidance: <https://www.officeforstudents.org.uk/media/2d8c85eb-98ad-4039-bd98-f19f0bfff303/ra16-reportable-events-october2021.pdf>

Any questions relating to Reportable Events, including any policy queries, should be addressed to the Head of Governance, Quality, Compliance & Information Systems.

4. Allied Policies

Policies that are allied to this Reportable Events Policy & Procedure include:

- Access & Participation Statement
- Anti-Bribery, Fraud and Corruption Policy
- Business Continuity Policy and Plan
- Code of Practice on Freedom of Speech
- Policy on Sexual Misconduct, Harassment & Unacceptable Behaviours
- Risk Management Policy
- Financial Sustainability Policy
- Management and Governance Policy
- Partnerships and Collaborations Policy
- Student Complaints Policy and Procedure
- Prevent and Safeguarding Policy and Procedure
- Anti-Bribery, Fraud and Corruption Policy
- Whistleblowing Policy
- Business Continuity Plan
- Academic Governance and Academic Standards Management Policy
- Admissions, Recruitment and Widening Access Policy
- Information, Marketing and Promotions (CMA) Policy
- Data Protection Policy and Procedure
- Student Fees policy incl. refunds and compensation
- Student Contract (terms and conditions)
- Staff Policy on Data Processing, Security and Privacy
- Staff Grievance Policy

The above list is not exhaustive, and there may be other Oakwood College policies which apply or are relevant in the event of a potential or suspected Reportable Event.

5. Internal Procedure for Reportable Events

a) Roles and Responsibilities

The Head of Governance, Quality, Compliance & Information Systems holds strategic and managerial responsibility for Reportable Events, including making Reportable Events

submissions to the Office for Students. This may include seeking guidance from the OfS where strictly necessary.

Where the Head of Governance, Quality, Compliance & Information Systems is unable to fulfil any of their normal duties regarding Reportable Events as set out in this Policy and its procedures, the CEO may undertake or delegate any or all of these duties, as deemed necessary and appropriate. Where duties are delegated, the CEO and the Head of Governance, Quality, Compliance & Information Systems will both be kept informed throughout the process and will be copied into all correspondence.

The Board of Governors holds responsibility for the monitoring and oversight of Reportable Events. This is managed via the following:

- ‘Reportable Events’ is a standing agenda item on the Board of Governors’ Agenda.
- The Chair of the Board of Governors and the Chair of the Audit and Risk Committee are notified in the event of a Reportable Event needing to be made;
- An annual report to the Board of Governors on Quality & Compliance sets out the annual record of whether any Reportable Events have needed to be made, including whether any assessments of possible Reportable Events have been undertaken;
- Audit and Risk Committee may, as necessary, approve policies, procedures and protocols relating to Reportable Events and the institutional management of them.

b) Timeline and method for submitting a Reportable Event to the OfS

In order to ensure compliance with the relevant OfS condition and its requirements for Reportable Events, the following timelines and principles must be followed:

- It is important that events are reported to the OfS in a timely way so that the regulator’s risk assessment for Oakwood College is up to date.
- A provider is required to report an event within 5 working days¹ of the date the event is identified² or, if that is not possible due to exceptional circumstances beyond the control of the provider, as soon as reasonably practicable thereafter and without undue delay.

¹ The OfS guidance states that “For these purposes, a ‘working day’ is any day that is not a Saturday, Sunday, or a day which is a bank holiday in England under the Banking and Financial Dealings Act 1971.”

² This timeframe is set out in the F3 Notice that the OfS issue to each provider imposing the requirement to report Reportable Events. The OfS will consider whether a provider met the timescales for reporting an event as part of their assessment of the event. Where a provider is reporting outside the ‘five working days’ time frame, it should set out the reasons for this as part of its submission of a reportable event.

- A reportable event must be submitted online via the OfS Portal, together with all the information OfS needs as part of the initial submission. This may include:
 - A description of the event that is being reported
 - An explanation of why Oakwood College considers the event to be material where the materiality test has been applied, and
 - A description of any action the College is taking to mitigate any impact of the event.
 - Appendix A to this Policy should be fully completed and signed off prior to reporting to the OfS; this tool should support Oakwood College in providing the information required by the OfS with the initial submission.

c) The OfS guidance advises separating possible Reportable Events as follows:

- i. Events that have yet to happen – where the provider can foresee an event or matter that is relevant to the provider’s compliance with its conditions of registration (or to its authorization for degree awarding powers or university title), the event should be reported within 5 working days of the provider becoming aware that the event or matter may or will have that effect. This may include, for example, a provider realising that it will not be able to meet a deadline for the submission of data.
- ii. Events that have already happened – should be reported within 5 working days of the date the event is identified by the provider.

d) Process for Identifying and raising awareness of a reportable Event

The following may constitute a Reportable Event:

1. An event occurs that falls within the scope of one or more OfS Conditions of Registration;
2. An event that falls within the scope of relevant other statutory duties required for compliance with OfS registration (e.g. the Prevent Duty);
3. Serious or significant events that do not fall within either of the above categories, but which may fall within the scope of the OfS’ expectations of what constitutes a Reportable Event (Appendix A to this Policy can be used as an indicative guide).

Where an event as specified above occurs:

- i. This shall be immediately referred (and in all cases normally within 48 hours of the event occurring) to the Head of Governance, Quality, Compliance & Information Systems as the Oakwood College officer responsible for managing Reportable Events;

- ii. Any member of staff, student or any other stakeholder can raise concerns about a possible Reportable Event. To do so, they should report the matter via email to compliance@oaksgroup.co.uk, copying in the CEO and Head of Governance, Quality, Compliance and Information Systems.

In the event that the Head of Governance, Quality, Compliance & Information Systems is unavailable to receive a referral of a possible Reportable Event:

- i. The member of staff concerned should refer the matter to the CEO, copying in the Head of Governance, Quality, Compliance & Information Systems;
- ii. The CEO will liaise and may delegate, as necessary, management of the matter to another member of the Senior Management Team in the absence of the Head of Governance, Quality, Compliance & Information Systems;
- iii. The Head of Governance, Quality, Compliance & Information Systems will be copied into all correspondence for quality assurance and record management purposes.
 - a. Receipt of a referral of a matter that may constitute a possible Reportable Event

On receipt of a referral:

- i. The Head of Governance, Quality, Compliance & Information Systems will liaise with the relevant member(s) of staff to organise a Reportable Events Determination meeting;
- ii. At the Reportable Events Determination meeting, Oakwood College will undertake an assessment to review whether the matter constitutes a Reportable Event (see below).

e) Reportable Events Determination meeting

At the Reportable Events Determination meeting:

1. The Reportable Events Incident Assessment & Record of Decision Form (Appendix A to this Policy) should be used to determine and document Oakwood College's decision about whether an event constitutes a Reportable Event;
2. It is recommended that at least 2 members of staff complete the assessment leading to the decision about whether an event/matter constitutes a Reportable Event. Normally, the Head of Governance, Quality, Compliance & Information Systems will be one of these members of staff unless they are unavailable.
3. Once completed, the form should be signed off by the CEO as Oakwood College's Accountable Officer.

4. In the event that the CEO is not available, the sign-off will normally revert to the Chair of the Board of Governors, or the Deputy Chair if the Chair of the Board of Governors is also not available.

Incident Assessment & Record of Decision Form (APPENDIX A to this Policy)

The Incident Assessment & Record of Decision template can be found as Appendix A to this Policy. An editable version of this document can be requested from the Head of Governance, Quality, Compliance & Information Systems.

f) Making a Report of a Reportable Event to the OfS

The Head of Governance, Quality, Compliance, and Information Systems is responsible for making reports to the OfS of Reportable Events. These must be submitted through the OfS Portal using the applicable Portal Key. This is held by the Head of Governance, Quality, Compliance, and Information Systems.

In the event that the Head of Governance, Quality, Compliance & Information Systems is not available for any period during which a Reportable Event needs to be made, the CEO will oversee the management of the Reportable Event, ensuring any necessary liaison with the Office for Students takes place, which may require delegation to another officer of the Oakwood College.

Full instructions about how to access the online portal and how to submit reportable events are enclosed in Annex A of the OfS Portal Access Key Letter. The OfS can be contacted at regulation@officeforstudents.org.uk or on 0117 931 7305 if we have any questions about Reportable Events. For technical issues, the contact details are portal@officeforstudents.org.uk or call 0117 931 7399 for technical support.

6. Confidentiality regarding Reportable Events

Matters that may constitute a Reportable Event may be highly sensitive. Disclosure of such matters will follow the normal internal Oakwood College data processing procedures and conventions of necessity and proportionality.

Given the size of the Oakwood College, to facilitate our operational management, all members of the Senior Management Team will normally be kept informed of all Reportable Events once these have been identified, with clear management designations delegated by the CEO (or Chair of the Board of Governors in the event the CEO is unavailable).

No member of staff or governor shall disclose any information regarding Reportable Events to any third party without just cause. In the event of any media or other third-party enquiries regarding a possible, ongoing or concluded Reportable Event, the communication

should be immediately forwarded to the CEO, copying in all members of the Senior Management Team.

7. Monitoring of Reportable Events

The Board of Governors holds ultimate responsibility for ensuring that Reportable Events are managed and monitored appropriately.

If a Reportable Event is identified and must be made, the Chair of the Board of Governors and the Chair of Audit & Risk Committee will be notified as soon as possible, normally within 24 hours of the Reportable Event being made.

8. Recordkeeping

The Head of Governance, Quality, Compliance & Information Systems will maintain all records arising from a Reportable Events Determination meeting. These will be held in Oakwood College SharePoint, in the Quality Assurance site.

Appendix A: Reportable Events Incident Assessment & Record of Decision Template

This form should be completed as the formal record of Oakwood College that sets out the institutional decision-making as to whether or not an event/matter constitutes a Reportable Event that should be reported to the Office for Students, in accordance with OfS Condition F3.

The [OfS Guidance on Reportable Events](#) (effective from 31 March 2026) states:

"For cases where a significant decision about reporting is finely balanced, a provider should consider whether recording the reasons for its decision, whatever that decision may be, would allow it to demonstrate to the OfS that the decision had been taken with due care and attention and with regard to relevant matters."

"...for some events or matters, a provider will need to make a judgment about whether a report is required or not. A provider will need to consider the materiality test as it decides whether a report should be made. Table 1 in Annex A [of the OfS Guidance] includes a non-exhaustive list of matters that may, in principle, fall under the definition of a reportable event. These are illustrative examples only. For these, and any other matters which are not 'always reportable' for a provider, a provider will need to reach a judgment about reporting in a particular instance by applying the materiality test."

The tables on this template should be completed in order of occurrence to facilitate the assessment of whether or not the event/matter should be reported to the Office for Students as a Reportable Event. Fuller guidance on Reportable Events can be found below in Appendix B towards the end of this document.

Table 1: Overview

Event/Matter in question:	
Date of Occurrence of Event/Matter:	
Notes/Contextual information/Issues for Consideration:	
Deadline for reporting to the OfS if Event/Matter deemed a Reportable Event:	
Date this assessment began:	
Name(s) and roles of staff conducting this assessment: <i>List all members of staff and their job titles who are completing this form on behalf of Oakwood College. It is</i>	

recommended that 2 members of staff normally complete this assessment together.

Table 2: Internal Assessment against OfS Annex: A - Examples of Reportable Events

The following table should now be completed to support decision-making about whether an event or matter is a Reportable Event that requires reporting to the Office for Students in accordance with Condition F3.

An 'X' should be placed in the right-hand column against any/all given example contexts that are directly or partly applicable to the matter/event in question. Where a given context is partly applicable, this should be indicated in the right-hand column.

Type of event or matter	Is it always reportable?	Insert X if applicable
a. Matters relating to a provider's ownership, legal form or corporate structure, including but not limited to:		
i. The legal entity that is registered ceasing to exist. This might be as a result of: <ul style="list-style-type: none"> • The acquisition by another legal entity of the business operated by a provider • A merger of the provider with another registered or unregistered higher education provider. 	Yes	
ii. A merger of the provider with another registered or unregistered higher education provider.	Yes	
iii. A change of ownership, including through a sale, of the provider (see Appendix C to this Policy, below in this form).	Yes	
iv. A change in the provider's legal form.	Yes	
v. Amendments to the provider's governing documents. Factors in favour of reporting may include: <ul style="list-style-type: none"> • Amendments which affect the provider's ability to uphold and deliver in practice the public interest governance principles that apply to the provider 	No	

<ul style="list-style-type: none"> • Amendments which relate to the treatment of the provider’s charitable assets on dissolution of the provider. Factors against reporting may include: • Administrative amendments which do not affect the operative provisions of the governing document(s). 		
vi. An acquisition by the provider of another entity. Factors in favour of reporting may include: <ul style="list-style-type: none"> • 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. 	No	
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 limited to:		Insert X if applicable
i. 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 courses, including but not limited to:		Insert X if applicable
i. A notification to the provider of an investigation by an awarding organisation or awarding body or by a professional, regulatory or statutory body.	Yes	
ii. 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:		Insert X if applicable
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	
e. Matters relating to a provider's financial viability or sustainability, including but not limited to:		Insert X if applicable
i. A likely drop in the provider's liquidity 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	
ii. 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	Yes	

standing that could affect its suitability as a counterparty.		
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	
f. Matters relating to management and governance, including but not limited to:		Insert X if applicable
i. 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 Appendix C to this Policy below in this form).	Yes	
iv. A matter relating to the provider's compliance with the Prevent duty as set out in the OfS's monitoring guidance.	Yes	
v. The initiation of a governance review where this is not a routine part of a provider's planned arrangements. Factors in favour of reporting may include: <ul style="list-style-type: none"> • 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. 	No	

<p>vi. The following events or matters relating to fraud or financial irregularity:</p> <p>(a) The provider receives a complaint or allegation that it may have committed fraud;</p> <p>(b) The provider initiates an investigation into a possible fraud or financial irregularity involving the provider;</p> <p>(c) The provider is notified that a third-party is investigating the provider in relation to a possible fraud or financial irregularity;</p> <p>(d) A third-party makes a finding that the provider has committed fraud.</p> <p>Factors in favour of reporting may include:</p> <ul style="list-style-type: none"> • 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. • 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). 	No	
<p>vii. Legal or court action.</p> <p>Factors in favour of reporting may include:</p> <ul style="list-style-type: none"> • 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. <p>Factors against reporting may include:</p> <ul style="list-style-type: none"> • Isolated employment tribunal cases 	No	

<ul style="list-style-type: none"> 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). 		
<p>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.</p> <p>Factors against reporting may include:</p> <ul style="list-style-type: none"> The action is a routine inspection that is undertaken as part of a regulator's planned oversight activities. 	No	
<p>g. Matters relating to information provision, including but not limited to:</p>		<p>Insert X if applicable</p>
<p>i. Any matter which affects the accuracy of the information contained in the provider's entry in the OfS Register.</p>	Yes	
<p>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 with another condition of registration, the provider's funding allocation, or statistics published by the designated data body.</p> <p>Factors in favour of reporting may include:</p> <ul style="list-style-type: none"> 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. 	No	
<p>h. Matters relating to relevant sub contractual arrangements. (These reportable events only apply where the requirements in condition E10.5 to E10.11 apply to the provider. In this section (h.), the term</p>		

'relevant sub contractual arrangement' has the meaning given in condition E10.12)		
i. The provider entering into a new relevant sub contractual arrangement.	Yes	
ii. The suspension or termination of a relevant sub contractual arrangement	Yes	
iii. Changes in the contractual basis of a relevant sub contractual arrangement – for example where a contract changes from a sub contractual agreement to a validation agreement.	Yes	
iv. Significant changes to the size and shape of a provider's relevant sub contractual arrangements. This includes where either partner has taken steps to significantly increase or reduce the number of students that can be recruited to the sub contractual delivery, or the number of students registered on sub contractual courses has increased significantly beyond forecast recruitment.	Yes	
v. Any audit undertaken (by a provider's internal audit function, or otherwise) which has resulted in a 'low' or 'no assurance' opinion where the subject matter relates to relevant activity under a relevant subcontractual arrangement in any way. We would expect the audit report to normally be submitted as part of the reportable event.	Yes	
vi. Any allegations of, or opening of investigations into, suspected fraud, misuse of public funding, financial or data irregularities by any party (for example, including with respect to recruitment agents contracted by either the lead or delivery partner) in relation to a relevant sub contractual arrangement. Once investigations have taken place, we would expect the outcome and any investigation report to normally be submitted as part of the reportable event.	Yes	
vii. Allegations of, or investigations into, widespread academic misconduct or inappropriate recruitment or admissions practices within a relevant sub contractual arrangement. Where investigations have taken place, we would expect the outcome and any investigation report to normally be submitted as part of the reportable event.	Yes	

viii. Any notification from SLC or DfE that they intend to investigate and/or potentially cease or suspend payments, in relation to a relevant sub contractual arrangement.	Yes	
ix. Where the provider had existing contracts in relation to relevant sub contractual arrangements which were in force at the time the requirements in condition E10.5 to E10.11 took effect for the provider, that the provider cannot operate in accordance with its subcontracting information source (as defined in E10.12) by virtue of the terms and conditions of those contracts, despite having taken all reasonable steps to ensure that the terms and conditions enable it to do so. ¹	Yes	
x. Where the provider had existing contracts in relation to relevant sub contractual arrangements which were in force as at 31 March 2026 and publication of certain information set out in the 'Subcontractual fee retention section' of Regulatory advice 9 would have directly conflicted with the terms and conditions of those contracts (such that publication would have put the provider in breach of contract), that the provider cannot publish that information by virtue of the terms and conditions of those contracts, despite having taken all reasonable steps to do so. ²	Yes	

Table 3: Record of event categorisation

Which (if any) categories in Table 2 does the event/matter fall into (List all eg 'a(i), b(ii) etc, or state 'none'):	
--	--

Table 4: Decision on whether action is needed

Does the event/matter require to be reported to the OfS as a Reportable Event? (Yes/No)	<i>Does the event/matter satisfy the materiality test - does it negatively affect or could it negatively affect the Oakwood College's ability to comply with any conditions of registration?</i>
Give the reason(s) for the above decision to report/not report:	
Additional Notes / Considerations:	

Table 5: Accountable Officer Sign-Off

Name and role of Accountable Officer (or nominee in the event of unavailability):				
DECISION:	EVENT SHOULD BE REPORTED TO OFS	<input type="checkbox"/>	EVENT SHOULD NOT BE REPORTED TO OFS	<input type="checkbox"/>

DECLARATION OF ACCOUNTABLE OFFICER	
I confirm that I agree with the above decision and authorise the relevant action to be taken in relation to the above decision.	<input type="checkbox"/>
Signature of Accountable Officer:	
Date of completion of this form and sign-off decision (DD/MM/YYYY):	

Appendix B: Relevant extracts of the OfS Guidance on Reportable Events

The following extracts are taken from the [OfS Guidance on Reportable Events](#) published in March 2026.

Definition of a reportable event

13. The regulatory framework defines a reportable event as: A reportable event is any event or matter that, in the reasonable judgement of the OfS, negatively affects or could negatively affect:

- a. The provider's eligibility for registration with the OfS.
- b. The provider's ability to comply with its conditions of registration.
- c. The provider's eligibility for degree awarding powers, or its ability to comply with the criteria for degree awarding powers, where the provider:
 - i. holds degree awarding powers; or
 - ii. has submitted an application for degree awarding powers to the OfS, for which the OfS has yet to reach a final decision.
- d. The provider's eligibility for university title, where the provider:
 - i. holds a university title; or
 - ii. has submitted an application for university title to the OfS, and for which the OfS has yet to reach a final decision. 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 in its own commercial, reputational or other interests), would consider the event or matter to be material.

Identifying matters that should be reported (aligned with March 2026 guidance)

19. In the OfS's principles-based regulatory system, it is the responsibility of a provider to determine whether a particular event or matter constitutes a reportable event and should be reported. This approach ensures that reporting is informed by the circumstances and context in which an individual provider is operating, rather than by a set of rigid rules that cannot take context into account.

20. The overarching definition of a reportable event reproduced in paragraph 13 above encapsulates the OfS's requirement for events or matters it considers need to be reported. The definition also includes the test the OfS will apply in interpreting the 'reasonable

judgement of the OfS' to judge whether a particular event or matter is reportable. 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 (rather than in its own commercial, reputational or other interests), would consider the event or matter to be material – we refer to this as the 'materiality test'.

21. We consider that there are some matters that must always be reported, by all providers, because these are matters that, in our judgement, a reasonable provider would always consider to be reportable. This is because we would expect these to be directly relevant to our assessment of a provider's eligibility for registration, or compliance with its conditions of registration, or its eligibility for degree awarding powers or university title, or compliance with the criteria for degree awarding powers. These matters are identified in Table 1 in Annex A and, for example, include matters that relate to a change of ownership or control of a provider. The F3 Notice issued to providers refers to these matters, specifically.

22. We may identify some additional matters that must always be reported by an individual provider. These are matters that, in our judgement, the individual provider would always consider to be reportable. This is because we would expect these to be directly relevant to our assessment of the matters set out in the overarching definition, given the provider's particular context and our assessment of risk for that provider. These matters will be identified in the F3 Notice issued to the provider.

23. For other events or matters, a provider will need to consider whether the event or matter negatively affects or could negatively affect the provider's: a. Eligibility for registration. b. Compliance with its conditions of registration. c. Eligibility for degree awarding powers or compliance with the criteria for degree awarding powers (where the provider holds, or has applied to the OfS for, degree awarding powers). d. Eligibility for university title (where the provider holds, or has applied to the OfS for, university title).

24. We are clear therefore that, for some events or matters, a provider will need to make a judgement about whether a report is required or not. A provider will need to consider the materiality test as it decides whether a report should be made. Table 1 in Annex A includes a non-exhaustive list of matters that may, in principle, fall under the definition of a reportable event. These are illustrative examples only. For these, and any other matters which are not 'always reportable' for a provider, a provider will need to reach a judgement about reporting in a particular instance by applying the materiality test.

Footnote in guidance: Further education and sixth form colleges, whose primary regulator is the Education and Skills Funding Agency (ESFA), are not required to report certain events and matters relating to their financial viability and sustainability to the OfS. These events and matters are identified in Table 1 in Annex A. The OfS will obtain relevant information from the ESFA. This does not affect the generality of the overarching definition of a 'reportable event', reproduced in paragraph 11 above, and it remains the case that further education and sixth form colleges are required to comply with the

requirements of initial and ongoing condition of registration D (financial viability and sustainability) to register, and remain registered, with the OfS.

Similarly, Ofsted, rather than the OfS, is responsible for monitoring the implementation of the Prevent duty by further education and sixth form colleges. Those providers are not required to report matters relating to their compliance with the Prevent duty to the OfS. This is made clear in Table 1 in Annex A. The OfS is able to obtain the relevant information from Ofsted.

25. That judgement may depend on a number of factors, including the size and complexity of a provider and the context in which an event or matter takes place. For example, an investigation into a possible low-value fraud involving one of a provider's senior officers would be likely to constitute a reportable event, whereas an investigation into a fraud of a similar value involving a junior member of staff would not. Similarly, submitting an additional 10 humanities students in the HESES return would not be likely to constitute a reportable event, but submitting an additional 10 clinical stage medicine students would. Such contextual factors should be taken into account in determining whether a matter falls into the definition of a reportable event set out above.

26. In practice, the OfS expects a provider to make a reasonable decision about whether a particular event or matter should be reported or not. In reaching its decision, a provider should consider the particular event or matter and the context in which it has arisen, rather than the number and type of matters it has previously reported or not reported. To assist a provider in reaching its reporting decisions, Table 1 in Annex A sets out the factors that are likely to be relevant to a provider's judgements about reporting for some common matters. The factors are included as guidance only and do not constitute an exhaustive list of relevant factors in each case. Their inclusion does not detract from the need for a provider to exercise judgment in relation to the events and matters that may be reportable on the basis of the definition of reportable events contained in paragraph 494 of the regulatory framework (and reproduced above). In particular, the references to monetary amounts in the examples relating to fraud and court action should not be viewed as absolute thresholds which trigger reporting in all cases.

27. We will determine for ourselves whether we consider an event to be, in fact, reportable. This must be the case because the requirement to report flows from a condition of registration, and the OfS needs to assess on a routine basis whether the requirements of conditions of registration are met. It is possible that the judgment a provider makes about whether a particular event or matter should be reported may be different from the judgment of the OfS. We are unlikely to draw negative conclusions about such a difference in judgment where the event or matter is not one that must always be reported, and it is clear that a provider has properly considered the OfS's requirements for reporting. For cases where a significant decision about reporting is finely balanced, a provider should consider whether recording the reasons for its decision, whatever that decision may be, would allow it to

demonstrate to the OfS that the decision had been taken with due care and attention and with regard to relevant matters.

28. The OfS will judge whether the event should have been reported in accordance with the Notice issued under condition F3, and the definition of reportable event set out above. We 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 (rather than in its own commercial, reputational or other interests), would consider the event or matter to be material and therefore reportable. If the OfS concludes that a provider has not made a reasonable judgment about reporting, we will consider whether we should take further regulatory action. This includes where we conclude that a provider, in reporting an event, has not met the timescales for reporting, which are set out in the F3 Notice and explained in this guidance document. Reportable event requirements stem from the ongoing condition of registration F3, which governs the provision of information to the OfS. This means that a failure to report in the way specified in an F3 Notice could cause us to revisit our risk assessment for condition F3 or Applies from 1 January 2022 8 consider whether there may have been a breach of that condition. Increased risk of a breach, or an actual breach, would cause the OfS to consider whether further regulatory action was required.

29. The circumstances in which further regulatory action in relation to a provider's reporting decisions is most likely to be relevant are those cases where the OfS judges that a provider has not made a reasonable decision, for example, where it has deliberately or recklessly failed to report a significant event, acted dishonestly or sought to cover up information. This approach reflects the way in which the OfS considers the intervention factors in paragraph 167 of the regulatory framework when deciding whether and how to intervene in cases of concern. An intervention in relation to a failure to comply with the reporting requirements imposed through condition F3 is more likely where the provider has not informed the OfS and we have become aware of an event or matter from other sources, such as through our own regulatory activity, whistleblowing, or media reporting.

30. Similarly, a pattern of over-reporting, such that events that clearly do not meet the OfS's definition of a reportable event are repeatedly reported, may cause the OfS to consider whether a provider's governing body is properly exercising its responsibilities to ensure that it continues to comply with its reporting obligations. The OfS may, for example, reconsider in these circumstances its risk assessment for ongoing conditions E2 (management and governance) and E3 (accountability).

31. More information about the OfS's approach to regulatory intervention can be found in Regulatory advice 15: Guidance on monitoring and intervention. The OfS's Compliance and Student Protection team can guide the OfS's requirements for reportable events, but, as set out above, it is a provider's responsibility to decide whether a particular event or matter constitutes a reportable event and should be reported.

Appendix C: Guidance on Change of Ownership

Change of ownership

The OfS is principally, but not exclusively, concerned with situations where 50 per cent or more in the shareholding of the registered provider (or the closest equivalent, where the provider is not limited by shares) are, or may be, in common ownership. Common ownership includes:

- Ownership by the same person or entity
- Ownership by multiple entities themselves under common ownership or control
- Ownership by multiple individuals or entities who, by agreement or practice, exercise their ownership rights in a co-ordinated way (and without restricting the scope of our understanding of what constitutes common ownership, we will deem people who are 'connected' to be exercising their ownership rights in a co-ordinated way)
- Ownership by multiple individuals or entities on behalf of, or acting under the direction or in the interests of, the same third party, including a case where ownerships are held on trust for a common beneficiary
- Any similar structure. Ownership does not require beneficial ownership.

A provider:

- must inform the OfS of any changes in ownership where 50 per cent or more of the ownership of the registered provider is in common ownership, and a change affects the majority ownership rights. This includes the creation of majority ownership rights for the first time, the transfer of majority ownership rights to a new holder, the introduction of a new entity to majority ownership rights and majority ownership rights coming to an end
- must inform the OfS of any change in ownership that affects 15 per cent by value or voting rights of the registered provider's shares, or closest equivalent. A provider must do so whether the change is brought about in one transaction or a series of connected transactions.

A provider does not need to inform the OfS of entirely unconnected transactions provided none of those transactions is individually above our notification threshold. A provider:

- is not required to inform the OfS of changes in ownership where 50 per cent or more of the ownership of the registered provider is in common ownership, and the changes only affect less than 15 per cent by value or voting rights of the minority ownership rights.

Some examples of changes that must be reported include:

- Where all or any part of the majority ownership rights in the provider change, this must be notified (see examples below):

Example 1: there are five shareholders, each holding 10 per cent of the shares in a provider. They are business partners and act in a co-ordinated way. One shareholder sells their shareholding to the others. This must be notified.

Example 2: there are three shareholders, each holding 20 per cent of the shares in a provider. They are business partners and act in a co-ordinated way. One sells a 10 per cent shareholding to a relative who is a connected person. This must be notified.

Example 3: There are three shareholders, each holding 20 per cent of the shares in a provider. They are business partners and act in a co-ordinated way. One sells their shareholding to a third party.

- Where additional share capital is issued, or shares are bought back, or the voting rights that attach to existing shares are changed.
- Where a controlling proportion of a provider's shares is directly, or indirectly such as through those of its parent organisation(s), acquired by another individual(s), partnership(s) or organisation(s). Change of control 'Control' has the meaning given by section 1124 of the Corporation Tax Act 2010, and 'change of control' means a change in control so defined. Where two or more entities or individuals, by agreement or practice, exercise their rights in a co-ordinated way, with the result that they together have control so defined, each will be treated as having control of the provider. A provider is required to notify the OfS of any change in the individual(s) or entity(ies) who have control of the provider.