

Guidance on reporting significant events

Introduction

This document provides guidance on Research England's requirement for higher education providers (HEPs) in receipt of our funding to notify us about specific significant events, as detailed in Research England's terms and conditions of funding.

Research England's [terms and conditions](#) of funding state that:

“Governing bodies and accountable officers...should...be as open as possible about all the decisions and actions that they take that may affect funding provided by Research England and report these to Research England without delay.”

They further state that:

“The higher education provider's accountable officer must inform Research England about major changes in research and knowledge exchange strategies. Where it is deemed appropriate, Research England will share any such information with UKRI”.

These requirements are broad, and Research England recognises that without supporting guidance, their applicability to specific circumstances will rarely be straightforward to determine. The purpose of this guidance is to help providers focus on the information we need to see. To minimise the risk of unnecessary burden we have:

- a. defined that information as narrowly as we can to minimise the risk that we are asking for things we do not need.
- b. emphasised proactive voluntary disclosures of potential issues to maximise the possibility that Research England can offer reassurance that a provider's plans create no issue for us before decisions have been taken.
- c. indicated that disclosures may begin with an informal conversation allowing the provider to seek clarity as to what, if anything, needs to be shared more formally so there is no need to second-guess our information requirements.

Within the context of the accountability framework in place for the funding we provide, the significant events process acts as a source of assurance to ensure our confidence in meeting our responsibilities in managing public money through the bodies we fund.

We hope to retain an approach which minimises information requirements and de-risks the process of disclosure for providers. We reserve the right to revise this guidance, extending the kinds of information we seek if that proves necessary.

Research England is seeking information only as described in the significant events process. For disclosures that do not sit under the significant events process please see other relevant UKRI policy:

[UKRI Whistleblowing Policy](#)

[UKRI Counter Fraud and Bribery Policy](#)

[UKRI Research Integrity](#)

[UKRI Policy on the Governance of Good Research Practice](#)

[UKRI Preventing Harm \(safeguarding\) in Research and Innovation Policy](#)

[UKRI Complaint procedure](#)

The proper use of quality-related (QR) funding

As our terms and conditions of funding set out, HEPs must use Research England funds only for activities that are eligible for funding under the Higher Education and Research Act 2017. Part of our aim in providing guidance on reporting significant events is to ensure through a proportionate approach that this condition is met. We know that HE providers are large contributors to the costs of the research they undertake and that in general the risk that QR (which is considered part of RE's Strategic Institutional Research Funding, or 'SIRF') is not being used to support research will be low.

We do, however, need to ensure that where providers may struggle to continue to prioritise research, there is a clear expectation that QR research funds are spent on research or on the maintenance of capability which underpins research (research costs related to specific projects for which other funding has been provided are not an appropriate use of QR as we would expect QR to support costs not covered by other income sources). We are continuing our focus on encouraging proactive disclosure of potential issues (with the mutual benefit that both Research England and the provider can understand each other's positions clearly) over formal information requirements and schemes of compliance.

In keeping with our approach, and in line with the requirements in our [terms and conditions \(paragraph 23\)](#), we are inviting you to advise us via our Engagement Leads if you can foresee circumstances in which you may not be able to fully utilise your QR funding in supporting research activity or on the maintenance of capability which underpins research. We ask you to alert us to these circumstances before you take decisions which make them likely or inevitable so that Research England can discuss

with your actions you may be contemplating and offer advice on whether, in our view, there may be any implications relating to the funding we provide.

Your formal reporting requirements remain as in our existing terms and conditions. This does not mean that you will be in breach of the terms and conditions for failing to report something which, up to now, you would not have needed to report. We do, however, advise you to contact us if **both** of the following are true:

- a. you are considering plans to reduce your research activity (by reducing staff numbers working on research, research time, numbers of supported applications etc.)
- b. these plans reflect a change to the level of research activity to an extent that, in your estimation, within the current REF cycle, you are unlikely to fully utilise your QR funding in supporting research activity or on the maintenance of capability which underpins research.

We neither expect nor recommend that you devote significant time to assembling large amounts of data prior to an initial conversation as:

- a. there is a high likelihood that we will not need that information.
- b. no inferences will be drawn from an absence of quantitative information in the first conversation.

We are taking this approach as a means of helping you manage the risk that you find yourself in a non-compliant position as a result of a substantial reduction in research activity.

If you have moved beyond the point where there is a possibility that you will not fully utilise QR on research to the point where that is likely (e.g., if it is the probable outcome of decisions you have taken), we consider that our terms and conditions oblige you to formally report the likelihood and we ask you to do so via our new significant events process. We do, however, strongly recommend that you speak to us informally before decisions which create that likelihood are taken.

In any such discussion we have a single objective: to ensure that QR funding, which is otherwise unhypothecated, is spent on research and the maintenance of capacity which supports research. We have no intention of directing activity so long as that condition is met or seeking information which is not relevant to assurance on that point. If you consider that your risk of failing to meet this condition is negligible, there is no need to speak to us in relation to this matter.

Significant events process

We do not believe, at this stage, that a more detailed scheme of data collection and monitoring is proportionate to support the assurance needs mentioned above.

It is a requirement of our [terms and conditions \(paragraph 52\)](#) that providers “must inform Research England about major changes in research and knowledge exchange strategies”. Therefore, we are introducing a single process for reporting significant events, as well as administrative changes or potential changes relevant to governance matters. The process covers:

- a. If there is a likelihood that you will be unable to fully utilise your QR funding in supporting research activity.
- b. Any discussion of potential exit from the OfS-regulated HE system with OfS.
- c. Any decision taken or formally proposed not to make any submissions to future Research Excellence Framework (REF) exercises.
- d. Changes in accounting officer.
- e. Proposed or possible events, such as mergers, changes of institutional form or takeovers.

Likelihood that QR will not be fully utilised on research

This refers to the circumstances described in the proper use of QR section above. While we request that you proactively advise us if there is a possibility these circumstances will arise, it is a requirement that you advise us if this has become likely (e.g., if decisions have been taken which you expect to have that outcome).

Discussion of potential exit from the OfS-regulated HE system with OfS

If you have advised OfS that there are plausible scenarios which may require you to cease to be an approved fee cap provider, or if OfS have advised you that matters you have reported to them oblige them to consider that possibility, we expect to be advised that contact of that nature has taken place as soon as is practicable thereafter. This is to ensure we have advance warning of any circumstances which may affect your eligibility for Research England funding (we can only fund approved fee cap providers). There is no need to provide details: we will seek further information at our discretion.

Decision taken or formally proposed not to submit to future Research Excellence Framework exercises

If you have contemplated not submitting to a future REF and the discussion has reached the point of a formal discussion at your top management meeting or governing body, we expect to be advised that such a discussion has taken place. This is to ensure we have advance warning of any fundamental shift in the role research plays in your institution. There is no need to provide details: we will seek further information at our discretion.

Changes in accounting officer

The significant events process will provide a standard means of advising us of changes of accounting officer.

Proposed mergers, takeovers or changes of institutional form

This section refers to events which result in the formal transfer of the activities and undertaking of one HEP to another body, be it another HEP, another public or private body, or a new corporation whether or not it pursues HEP status and adheres to our terms and conditions of funding, or the transfer of activities and undertaking from another body into a HEP. This may involve the ceasing of operations of one or both of the parties as a legal entity, unless it is a transfer of only part of the undertaking. This includes the transfer of or employment by staff engaged in academic duties to a new or existing subsidiary of the institution.

We require a minimum of six months' notice of any merger or takeover or similar event in order to ascertain whether it creates any risk to Research England funding. It is not automatic in all scenarios that we will consider a HE provider which has transformed itself in this way to be the same organisation as its predecessor for funding purposes.

A longer period of notice than six months is likely to be in the interests of the new provider as it will minimise the risk of disruption relating to technical issues (it is not straightforward to calculate funding allocations based on previous research assessments where one or both of the predecessor institutions no longer exist, and we need to ensure fairness both to the merged provider and to the other providers we fund). We welcome disclosures of possible mergers and takeovers where there is no certainty that they will be concluded, and institutions may find it beneficial to engage with us when considering the feasibility of actions in this space.

Our guiding principle in these instances is to facilitate change, so long as that change does not involve a change of mission that creates a risk of Research England funding being issued contrary to a fund's eligibility criteria or not being used for the intended purposes. We aim to quickly establish whether we have any concerns in that regard so that uncertainty as to our position does not become an impediment to the providers' plans.

How to report significant events

HEPs are expected to notify Research England about a significant event as soon as is practicable after the provider has determined that the issue is reportable under this process. This should relate to current (or future planned) events. Information in relation to past events may be reported where the provider considers that the impact is material and ongoing and, as yet no formal report to Research England has been made.

Significant events must be reported to Research England by the accountable officer of the HEP, or by their appointed delegate. Events must be reported by completing a notification form, which can be accessed via this link: [Report a significant event](#)

After a notification has been made via this form, a confirmation email will be provided to both the accountable officer, or their appointed delegate, who has made the submission and (where different) the head of provider.

In reporting an event via this form, providers will be asked to provide a supporting description of up to 2000 characters. This should seek to explain concisely what is and is not involved. The description should not include any personal data.

The purpose of notification stage of the significant event process is to ascertain the existence of issues, not to assess their materiality. Therefore, detailed descriptions are not necessary and supporting documents will not be accepted at this stage.

We may contact the accountable officer, or their appointed delegate, to seek further detail.

When the initial assessment is complete, we will notify the accountable officer, or their appointed delegate, to confirm whether any further action is required at that stage and, if so, what that will comprise.

Any enquiries relating to significant events should be sent to significantevents@re.ukri.org; however, events themselves **must** be reported using the [form](#).

Use of information

Provider-level

Within the context of the accountability framework in place for the funding we provide, the significant events process acts as a source of assurance to ensure our confidence in meeting our responsibilities in managing public money through the bodies we fund. It also acts to ensure we are in receipt of information about any changes to the governance arrangements or structural form of providers, which may have an administrative consequence for our dealings with the provider.

The information reported to us will therefore help us to identify providers with which we need to have further engagement to establish whether there is an increased risk to the discharging of our funding responsibilities, or to effect any administrative changes.

We will undertake an initial assessment of all notifications received to determine an appropriate course of action. In undertaking initial assessments, we may refer to any prior notifications received to consider whether the cumulative effect of these indicates

the need for further action, even where a single notification does not by itself lead to this decision.

[Advice on sector health](#)

We will draw on notifications received to support delivery of our mission to create and sustain the conditions for a healthy, dynamic, diverse, and inclusive research and knowledge exchange system in the higher education sector. This may include quantifying the prevalence of this type of issue across groups of providers and the sector as a whole, without identifying individual providers.

Information management

Information provided through the notification process and in response to any requests for further information will be treated as confidential. Providers are asked not to provide any personal data (as defined in the [UK GDPR](#)) in describing the event, and to minimise the provision of personal data should further information be requested. At the notification stage the only personal data required is the name and email address of the accountable officer, or delegate reporting the significant event on their behalf. This is to allow us to acknowledge receipt and request any further information where required.

All Information on significant events notified will be managed securely, with access limited within Research England and to others in UKRI on a need-to-know basis. It is recognised that any information provided will be sensitive and therefore all forms, and consequent correspondence will be treated as OFFICIAL SENSITIVE and will be securely destroyed when it is no longer needed.

Where we identify a need to disclose any information with third parties, including the Department for Science, Innovation and Technology for example to best serve the public interest, this will be as allowed or required by law. UKRI must follow the principles, guidance, and advice outlined in '[Manging public money](#)' and is mindful of public perceptions around the appropriate use of public money.