



OPERATIONAL AND FINANCIAL REGULATIONS

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PREAMBLE

1. The Operational and Financial Regulations provide a statement of the core principles of the Richmond American University London (regarded as the “University” from here on), regarding non-academic matters, including:
 - a. [Data Standards](#)
 - b. [Estates and Facilities](#)
 - c. [Finance](#)
 - d. [Human Resources](#)
 - e. [Information Technology](#)
 - f. [Marketing, Recruitment and Communication](#)
2. The University has been accredited by the Middle States Commission on Higher Education (MSCHE) in the United States to award degrees since 1986 and accreditation was reaffirmed in 1996, 2006, and 2016.
3. The University was granted Taught Degree Awarding Powers in the UK in 2018 and has been registered with the Office for Students (OfS) as an Approved Provider since 2019.
4. Only the University’s Board of Trustees has the authority to revise or change the Operational and Financial Regulations, on the recommendation of the University’s Operations Committee. The President may suspend the Operational and Financial Regulations only with the approval of the University Board.
5. Requests for the University Board’s consideration of suspension of any of the Operational and Financial Regulations must be submitted in writing to the President by or on behalf of a member of the Standing Committee of the Board, the University Board, the Operations Committee, or other appropriate member of the Board. Any such written submission must state the reason for the request and the case in support of the suspension of the Operational and Financial Regulations.
6. Suspension of the Operational and Financial Regulations may be considered only in exceptional cases, such as those where an urgent decision is necessary in the interests of a student or group of students or an essential operational matter where amendment or revision of regulations is inappropriate. All requests for suspension of the Operational and Financial Regulations and the decisions by or on behalf of the University Board shall be recorded by the Secretary to the Board and reported to the Board of Trustees.

PART A: THE DATA STANDARDS REGULATIONS

1. **Purpose.** The Data Standards Regulations form part of the Operational Regulations. They outline the rules followed to safeguard assets of the University and provide the governance framework for reporting to regulatory bodies and related statutory and other returns, the data required for analysis of accurate management information, and controls to provide assurance that data is being properly utilised for the delivery of the University's vision, mission and values, and the achievement of the Strategic Plan.
2. **Scope.** The Data Standards Regulations set out the framework in which the University's data and information will be managed and maintained. Any changes to the Data Standards Regulations must be approved by the Trustees with policy approval delegated to the University Board.
3. **Compliance.** The Data Standards Regulations apply to all staff and University officers, and to independent members of the Board of Trustees. Failure to comply with the Data Standards Regulations and associated policies and procedures may be treated as misconduct leading to formal disciplinary action, per the Employee Handbook, or as outlined in the By-laws and Constitution for Trustees. The University Board and all Budget Holders have a responsibility for taking all reasonable actions to ensure proper and appropriate use of University data and information. They must also ensure that the use of these resources is legal, properly authorised, and delivers value for money.
4. **Maintaining the Regulations.** Only the Board of Trustees, usually via its Finance and Resources Committee, has the authority to revise or change the Data Standards Regulations. Revisions or changes normally require the approval and recommendation of the Operations Committee and/or the University Board. The President may suspend the Data Standards Regulations only with the approval of the University Board.
5. **Data Principles – Definitions:**
 - a. **Data Privacy and Legal Requirements** – the rights of individuals over their personal data and how this is processed in alignment with the UK Data Protection Act 2018, the UK General Data Protection Regulations (UK GDPR), the Family Educational Rights and Privacy Act (FERPA) and compliance with other relevant legislation, as per [Appendix A](#).
 - b. **Information Security** – controls and policies to appropriately protect the confidentiality, integrity, and availability of information.
 - c. **Data Quality** – the principles and definitions for datums, data structures and data accuracy, as expected and required by our regulators.

6. Data Governance

- a. **The Board of Trustees** has primary responsibility for defining and ensuring compliance with the mission, vision, values, and objectives of the University and for its institutional policies, financial oversight and planning in accordance with the expectations and requirements of the Middle States Commission on Higher Education (MSCHE), the Office for Students, and other relevant regulatory and statutory bodies.
- b. **Audit and Risk Committee (ARC)** is recognised as having the expertise to supervise, scrutinise, and report on the University's risk management systems with authority delegated to it from the Board of Trustees. Their remit is not confined to financial matters and includes estates and facilities. ARC oversees the internal and external audit processes which provides assurance to the Trustees and has delegated authority to approve the internal audit plan. As part of committee's remit of risk management control, ARC may also consider and review the University's statutory and regulatory requirements and obligations, including but not limited to health and safety, estates and facilities, data standards, and such other areas of risk deemed appropriate by the Board of Trustees.
- c. **The University Board (UB)** is the senior policy making and budgeting body of the University and is entrusted with the responsibility to ensure that all staff and faculty work to deliver the University vision, mission, and values and that the University remains in compliance with its legal, regulatory, and financial obligations. UB formally agrees the University Strategic Plan for recommendation to the Board of Trustees and formally agrees the annual budget, for recommendation to the Board of Trustees. UB monitors and sets policy for finances, budgets, risk and for all non-academic operations, and monitors, reviews, and assesses the academic and academic-related work of the University through the committees and departments which report to it. It has ultimate responsibility for University finances, for the final approval of all operational policies and approval of the opening or closing of degree programmes and related matters.
- d. **The Standing Committee of the University Board (SCUB)** comprises the President/Vice Chancellor and the Chairs of the three main University Board Committees: the two Senior Vice Presidents (Deputy Vice Chancellors) and the Vice President Student Affairs. Other members of the University Board or individuals from across the University may be invited to a meeting of SCUB. It considers matters arising in the day-to-day business of the University, as covered by the terms of reference of the University Board. SCUB can be called at any time to address urgent matters. SCUB acts on behalf of University Board and is empowered to take decisions in accordance with University Regulations, Policies and Procedures, recommend Chair's Action to the

President, and make direct recommendations to the Board of Trustees. SCUB would not normally agree policy but may make recommendations on policy changes to University Board and other Committees.

- e. **The Operations Committee (OC)** is entrusted by the University Board to develop, deliver, and review policies and procedures related to the operations of the University in accordance with its terms of reference and the University's Operational Regulations; ultimate budgetary decisions remain with the University Board. OC is responsible for the University's operational planning and delivery, including the Marketing, Recruitment and Public Relations Plan, the Estates and Facilities Plan, the IT Plan, the HR Plan, the Fundraising and Development Plan, and the delivery of specified Major Projects as may be allocated by the University Board from time to time.
- f. **Information Technology and Data Governance Committee (ITDGC)** makes recommendations with regard to data quality, information security, data privacy, records, and public information to the Operations Committee for consideration by University Board. ITDGC is responsible for supporting the delivery of the University's IT Plan and assisting the delivery of other areas of the Strategic Plan.

7. Data Privacy and Legal Requirements

To ensure that the University manages and utilises data and information appropriately, systems for control and monitoring will be established. These shall include:

- a. The obligations on the University and its staff in relation to personal data, governed by EU, and UK data privacy legislation, this being the General Data Privacy Regulations (GDPR), Privacy and Electronic Communications Regulations (PECR) and the Data Protection Act 2018 (DPA 2018), collectively known as Data Privacy Legislation, in addition the US Family Educational Rights and Privacy Act (FERPA).
- b. Regular internal and external audit of the relevant data and systems.

8. Information Security

To ensure that the University's data is secure, the University shall:

- a. Maintain update to date hardware and software.
- b. Monitor national and international developments.
- c. Provide regular training for staff, faculty, and students on information security.
- d. Engage in regular internal and external audit of the relevant data and systems.
- e. Implement, monitor, and maintain appropriate information security controls to protect the confidentiality, integrity, and availability of University data.

9. Data Quality

The University shall apply principles and definitions for datums, data structures and data accuracy, as expected and required by our regulators, and as required for efficient and effective leadership and management. To achieve this, the University shall:

- a. Engage in regular internal and external audit of the relevant data and systems.
- b. Agree and apply consistent data definitions.
- c. Agree and apply a consistent data retention policy.
- d. Ensure data meets the requirements and expectations of key regulatory bodies, especially those of the UK designed data body, the Higher Education Statistical Agency (HESA).
- e. Ensure publicly available information is accurate, update and complies with Competition and Markets Authority (CMA) rules.

APPENDIX A

Laws that are particularly relevant to the use of IT include:

- Obscene Publications Act [1959](#) and [1964](#)
- [Protection of Children Act 1978](#)
- [Police and Criminal Evidence Act 1984](#)
- [Copyright, Designs and Patents Act 1988](#)
- [Counter Terrorism and Security Act 2015](#)
- [Criminal Justice and Immigration Act 2008](#)
- [Computer Misuse Act 1990](#)
- [Human Rights Act 1998](#)
- [Data Protection Act 2018](#)
- [General Data Protection Regulation 2018](#)
- [Regulation of Investigatory Powers Act 2000](#)
- [Prevention of Terrorism Act 2005](#)
- [Terrorism Act 2006](#)
- [Police and Justice Act 2006](#)
- [Freedom of Information Act 2000](#)
- [Freedom of Information \(Scotland\) Act 2002](#)
- [Equality Act 2010](#)
- [Privacy and Electronic Communications \(EC Directive\) Regulations 2003](#) (as amended)
- Defamation Act [1996](#) and [2013](#)
- [Family Educational Rights and Privacy Act \(FERPA\)](#)

PART B: THE ESTATES AND FACILITIES REGULATIONS

1. **Purpose.** The Estates and Facilities Regulations form part of the Operational Regulations. They outline the rules followed to safeguard the assets of the University, provide the governance framework for managing the University buildings, facilities and equipment, controls to provide a safe and compliant environment for all students, staff and guests, and assurance that the resources are being properly utilised for the delivery of vision, mission, and values and the achievement of the Strategic Plan.
2. **Scope.** The Estates and Facilities Regulations set out the framework in which the University's estates and facilities will be managed and maintained and are underpinned by the Estates and Facilities Policies and Procedures (EFPPs). Any changes to the Estates and Facilities Regulations must be approved by the Trustees with policy approval delegated to the University Board.
3. **Compliance.** The Estates And Facilities Regulations apply to all University students, staff, faculty, members of the Board of Trustees, contractors, and visitors. Failure to comply with the Estates and Facilities Regulations and associated policies and procedures (EFPPs) may be treated as misconduct leading to formal disciplinary action, per the Employee Handbook, or as outlined in the By-laws and Constitution for Trustees. The University Board and all Budget Holders have a responsibility for taking all reasonable actions to ensure health and safety and the proper and appropriate use of university facilities.
4. **Maintaining the Regulations.** Only the Board of Trustees, usually via its Finance and Resources Committee, has the authority to revise or change the Estates and Facilities Regulations. Revisions or changes normally require the approval and recommendation of the Operations Committee and/or the University Board. The President may suspend the Estates and Facilities Regulations only with the approval of the University Board.
5. **Estates and Facilities Principles**
 - a. The University shall publish clear principles of estates management to ensure that the University maintains and develops systems of controls which are both legally compliant and conform with good financial management and compliance with health and safety requirements.
 - b. The University shall maintain a transparent framework of estates and facilities management responsibilities and decision making.
 - c. The University shall ensure that staff and faculty abide by the highest standards of integrity when making decisions about the use of University facilities.

6. Estates Governance

- a. The Board of Trustees** has primary responsibility for defining and ensuring compliance with the mission, vision, values, and objectives of the University and for its institutional policies, financial oversight and planning in accordance with the expectations and requirements of the Middle States Commission on Higher Education (MSCHE), the Office for Students (OfS), and other relevant regulatory and statutory bodies.
- b. Audit and Risk Committee (ARC)** is recognised as having the expertise to supervise, scrutinise, and report on the University's risk management systems with authority delegated to it from the Board of Trustees. Their remit is not confined to financial matters and includes estates and facilities. ARC oversees the internal and external audit processes which provides assurance to the Trustees and has delegated authority to approve the internal audit plan. As part of committee's remit of risk management control, ARC may also consider and review the University's statutory and regulatory requirements and obligations, including but not limited to health and safety, estates and facilities, data standards, and such other areas of risk deemed appropriate by the Board of Trustees.
- c. The Finance and Resources Committee** has delegated authority from the Board of Trustees to monitor performance in the areas of Finance, Human Resources, Estates and Facilities, Information Technology, as well as resources and assets in their widest sense. This includes the authority to approve financial, human resource and contractual commitments and capital projects and infrastructure investment on behalf of the Board of Trustees in accordance with the powers of the Board as set out in the Constitution and By-Laws of the University.
- d. The University Board (UB)** is the senior policy making and budgeting body of the University and is entrusted with the responsibility to ensure that all staff and faculty work to deliver the University vision, mission, and values and that the University remains in compliance with its legal, regulatory, and financial obligations. UB formally agrees the University Strategic Plan for recommendation to the Board of Trustees and formally agrees the annual budget, for recommendation to the Board of Trustees. UB monitors and sets policy for finances, budgets, risk and for all non-academic operations, and monitors, reviews, and assesses the academic and academic-related work of the University through the committees and departments which report to it. It has ultimate responsibility for University finances, for the final approval of all operational policies and approval of the opening or closing of degree programmes and related matters.

- e. **The Standing Committee of the University Board (SCUB)** comprises the President/Vice Chancellor and the Chairs of the three main University Board Committees: the two Senior Vice Presidents (Deputy Vice Chancellors) and the Vice President Student Affairs. Other members of the University Board or individuals from across the University may be invited to a meeting of SCUB. It considers matters arising in the day-to-day business of the University, as covered by the terms of reference of the University Board. SCUB can be called at any time to address urgent matters. SCUB acts on behalf of University Board and is empowered to take decisions in accordance with University Regulations, Policies and Procedures, recommend Chair's Action to the President, and make direct recommendations to the Board of Trustees. SCUB would not normally agree policy but may make recommendations on policy changes to University Board and other Committees.

- f. **The Operations Committee (OC)** is entrusted by the University Board to develop, deliver, and review policies and procedures related to the operations of the University in accordance with its terms of reference and the University's Operational Regulations; ultimate budgetary decisions remain with the University Board. OC is responsible for the University's operational planning and delivery, including the Marketing, Recruitment and Public Relations Plan, the Estates and Facilities Plan, the IT Plan, the HR Plan, the Fundraising and Development Plan, and the delivery of specified Major Projects as may be allocated by the University Board from time to time.

- g. **The Estates and Facilities Committee (EFC)** is responsible for reviewing, monitoring, and delivering the estates and facilities plan, proposing initiatives to improve the physical and operational support infrastructure of the University, and considering proposals for the commercial use of University physical assets.

7. Estates and Facilities Policies and Procedures (EFPPs)

The University shall provide effective policies and procedures for the management and administration of the University's estates and facilities. These shall include:

- a. Health and Safety
- b. Emergency Management Plan (including Business Continuity Plans)
- c. Room Use and Hire
- d. Fire Safety Management
- e. Environmental & Sustainability
- f. Water Management
- g. Electrical Appliance
- h. Disability Discrimination Act Compliance
- i. Contractors

j. Waste Management & Recycling

The Estates and Facilities Policies and Procedures (EFPPs) are located within the “Operational Policies” section on the [University Policies Page](#).

PART C: THE FINANCIAL REGULATIONS

1. **Purpose.** The Financial Regulations form part of the Operational and Financial Regulations. They outline the rules followed to safeguard the assets of the University, provide the governance framework for managing financial affairs and controls to provide assurance that the resources are being properly utilised for the delivery of vision, mission and values and the achievement of the Strategic Plan. The governance approach is intended to be simple to understand, practical and has been designed to reflect the culture of the University.
2. **Scope.** The Financial Regulations set out the framework in which the University's finances will operate and they are underpinned by the Financial Policies and Procedures (FPPs). These set of regulations, policies and procedures will underpin The Financial Regulations. Any changes to the Financial Regulations must be approved by the Trustees with policy approval delegated to the University Board.
3. **Compliance.** The Financial Regulations and the FPPs apply to all University staff, faculty, students and members of the Board of Trustees. Failure to comply may be treated as misconduct leading to formal disciplinary action, per the Employee Handbook, the Student Code of Conduct or as outlined in the By-laws and Constitution for Trustees.
4. The members of the Standing Committee of the University Board (SCUB) and all Budget Holders have a responsibility for taking all reasonable actions to safeguard assets under their control. They must also ensure that the use of these resources is legal, properly authorised, and delivers value for money.
5. **Maintaining the Regulations.** Only the Board of Trustees, usually via its Finance and Resources Committee, has the authority to revise or change the Financial Regulations. Revisions or changes normally require the approval and recommendation of the Operations Committee and/or the University Board. The President may suspend the Financial Regulations only with the approval of the University Board.
6. **Financial Principles**
 - a. The overall purpose of the Financial Regulation and the Financial Policies and Procedures (FPP) is to ensure that the University maintains and develops systems of financial controls which are both legally compliant and conform with good financial management.
 - b. A transparent framework of financial management responsibilities and decision making is essential to the effective management of the University's financial affairs.
 - c. All staff have a duty to abide by the highest standards of integrity when making decisions about the use of University monies.

7. Financial Governance

- a. The Board of Trustees** has primary responsibility for defining and ensuring compliance with the mission, vision, values, and objectives of the University and for its institutional policies, financial oversight and planning in accordance with the expectations and requirements of the Middle States Commission on Higher Education (MSCHE), the Office for Students (OfS), and other relevant regulatory and statutory bodies.
- b. Audit and Risk Committee (ARC)** is recognised as having the expertise to supervise, scrutinise, and report on the University's risk management systems with authority delegated to it from the Board of Trustees. Their remit is not confined to financial matters and includes estates and facilities. ARC oversees the internal and external audit processes which provides assurance to the Trustees and has delegated authority to approve the internal audit plan. As part of committee's remit of risk management control, ARC may also consider and review the University's statutory and regulatory requirements and obligations, including but not limited to health and safety, estates and facilities, data standards, and such other areas of risk deemed appropriate by the Board of Trustees.
- c. The Finance and Resources Committee** has delegated authority from the Board of Trustees to monitor performance in the areas of Finance, Human Resources, Estates and Facilities, Information Technology, as well as resources and assets in their widest sense. This includes the authority to approve financial, human resource and contractual commitments and capital projects and infrastructure investment on behalf of the Board of Trustees in accordance with the powers of the Board as set out in the Constitution and By-Laws of the University.
- d. The University Board (UB)** is the senior policy making and budgeting body of the University and is entrusted with the responsibility to ensure that all staff and faculty work to deliver the University vision, mission, and values and that the University remains in compliance with its legal, regulatory, and financial obligations. UB formally agrees the University Strategic Plan for recommendation to the Board of Trustees and formally agrees the annual budget, for recommendation to the Board of Trustees. UB monitors and sets policy for finances, budgets, risk and for all non-academic operations, and monitors, reviews, and assesses the academic and academic-related work of the University through the committees and departments which report to it. It has ultimate responsibility for University finances, for the final approval of all operational policies and approval of the opening or closing of degree programmes and related matters.

- e. **The Standing Committee of the University Board (SCUB)** comprises the President/Vice Chancellor and the Chairs of the three main University Board Committees: the two Senior Vice Presidents (Deputy Vice Chancellors) and the Vice President Student Affairs. Other members of the University Board or individuals from across the University may be invited to a meeting of SCUB. It considers matters arising in the day-to-day business of the University, as covered by the terms of reference of the University Board. SCUB can be called at any time to address urgent matters. SCUB acts on behalf of University Board and is empowered to take decisions in accordance with University Regulations, Policies and Procedures, recommend Chair's Action to the President, and make direct recommendations to the Board of Trustees. SCUB would not normally agree policy but may make recommendations on policy changes to University Board and other Committees.
- f. **The Operations Committee (OC)** is entrusted by the University Board to develop, deliver, and review policies and procedures related to the operations of the University in accordance with its terms of reference and the University's Operational Regulations; ultimate budgetary decisions remain with the University Board. OC is responsible for the University's operational planning and delivery, including the Marketing, Recruitment and Public Relations Plan, the Estates and Facilities Plan, the IT Plan, the HR Plan, the Fundraising and Development Plan, and the delivery of specified Major Projects as may be allocated by the University Board from time to time.
- 8. **Deputy Vice Chancellor, Finance and Operations (DVC FO).** The President shall appoint a Deputy Vice Chancellor, Finance and Operations (DVC FO), in accordance with the By-Laws and Constitution of the University. The roles and responsibility of the DVC FO shall be determined by the President and approved by the Board of Trustees.
- 9. The Deputy Vice Chancellor, Finance and Operations (DVC FO) is responsible for:
 - a. Maintaining the Finance Regulations and submitting any changes to the University Board and the Board of Trustees for approval.
 - b. Reviewing and updating the FPP that support the Financial Regulations for approval by University Board.
- 10. **Budget Holders.** The University Board shall designate budget holders with a defined list of responsibilities.
- 11. **The University Budget**

- a. The DVC FO shall present the University's budget to the University Board, the Finance and Resources Committee, and the Board of Trustees.
- b. The budget shall normally come to the FRC in April, for approval by the Board in May.
- c. The DVC FO shall ensure that detailed budgets, including the plans for fixed assets purchases, are set within the agreed annual limits that supports the University Strategic Plan
- d. The DVC FO shall ensure the submission of timely and accurate budgets to the relevant US and UK regulatory and statutory bodies.
- e. The budget shall be reviewed:
 - i. not less than monthly by the Standing Committee of the University Board
 - ii. not less than six times a year by the University Board
 - iii. Quarterly by the Board of Trustees, usually via the Finance and Resources Committee and/or the Audit and Risk Committee

12. Financial Monitoring and Control

To ensure that the University does not exceed its overall budget, appropriate systems will be established to monitor and control expenditure. These shall include:

- a. Internal and external audit functions
- b. Banking controls
- c. Accounting controls
- d. Integrity policies for the receipt of gifts and hospitality and declaration of conflicts of interest
- e. Fraud and corruption policies
- f. Financial risk management policies and procedures

13. Financial Policies and Procedures (FPPs)

The University shall provide effective systems of policies and procedures for the management and administration of the University's financial affairs. These shall include:

- a. The Financial Planning and Budgeting Framework
- b. The Financial Monitoring and Control Framework which includes *inter alia* banking controls, accounting controls, internal and external audit, financial risk management.
- c. The Financial Systems and Procedures Framework which includes *inter alia* accounting, income, staff and non-staff expenditure, fixed assets, taxation.
- d. The External Arrangements Framework which includes *inter alia* partnerships and joint working, private consultancies and other paid work
- e. A schedule of delegated authority
- f. A schedule of authorised expenditure

The Financial Policies and Procedures (FPPs) are located within the "Operational Policies" section on the [University Policies Page](#).

PART D: HUMAN RESOURCES REGULATIONS

1. **Purpose.** The Human Resources (HR) Regulations form part of the Operational Regulations. They outline the rules with regard to employees and employment-related matters. Along with the Employee Handbook, associated HR Policies and Procedures (HRPP), and an individual's Contract of Employment, they set out the responsibilities of both the University and each employee in relation to HR policies and practices.
2. **Scope.** The HR Regulations are underpinned by the HR Policies and Procedures (HRPP), and they reflect the legislative and regulatory requirements for operating in the UK HE sector, including those set out by the Office for Students (OfS), the Middle States Commission on Higher Education and other relevant bodies, as revised from time to time. Any changes to the HR Regulations must be approved by the Trustees with policy approval delegated to the University Board.
3. **Compliance.** The HR Regulations apply to all University staff and faculty, including part-time, adjunct, fractional and student workers. Failure to comply with the HR Regulations may be treated as misconduct leading to formal disciplinary action, per the Employee Handbook, or as outlined in the By-laws and Constitution for Trustees.
4. **Maintaining the Regulations.** Only the Board of Trustees, usually via its Finance and Resources Committee, has the authority to revise or change the HR Regulations. Revisions or changes normally require the approval and recommendation of the Operations Committee and/or the University Board. The President may suspend the HR Regulations only with the approval of the University Board.
5. **HR Governance**
 - a. **The Board of Trustees** has primary responsibility for defining and ensuring compliance with the mission, vision, values and objectives of the University and for its institutional policies, financial oversight and planning in accordance with the expectations and requirements of the Middle States Commission on Higher Education (MSCHE), the Office for Students (OfS) and other relevant regulatory and statutory bodies.
 - a. **Audit and Risk Committee (ARC)** is recognised as having the expertise to supervise, scrutinise, and report on the University's risk management systems with authority delegated to it from the Board of Trustees. Their remit is not confined to financial matters and includes estates and facilities. ARC oversees the internal and external audit processes which provides assurance to the Trustees and has delegated authority to approve the internal audit plan. As part of committee's remit of risk management control, ARC may also consider and review the University's statutory and regulatory requirements and obligations, including but not limited to health and safety, estates

and facilities, data standards, and such other areas of risk deemed appropriate by the Board of Trustees.

- b. The Finance and Resources Committee** has delegated authority from the Board of Trustees to monitor performance in the areas of Finance, Human Resources, Estates and Facilities, Information Technology, as well as resources and assets in their widest sense. This includes the authority to approve financial, human resource and contractual commitments and capital projects and infrastructure investment on behalf of the Board of Trustees in accordance with the powers of the Board as set out in the Constitution and By-Laws of the University.
- c. The University Board (UB)** is the senior policy making and budgeting body of the University and is entrusted with the responsibility to ensure that all staff and faculty work to deliver the University vision, mission, and values and that the University remains in compliance with its legal, regulatory, and financial obligations. UB formally agrees the University Strategic Plan for recommendation to the Board of Trustees and formally agrees the annual budget, for recommendation to the Board of Trustees. UB monitors and sets policy for finances, budgets, risk and for all non-academic operations, and monitors, reviews, and assesses the academic and academic-related work of the University through the committees and departments which report to it. It has ultimate responsibility for University finances, for the final approval of all operational policies and approval of the opening or closing of degree programmes and related matters.
- d. The Standing Committee of the University Board (SCUB)** comprises the President/Vice Chancellor and the Chairs of the three main University Board Committees: the two Senior Vice Presidents (Deputy Vice Chancellors) and the Vice President Student Affairs. Other members of the University Board or individuals from across the University may be invited to a meeting of SCUB. It considers matters arising in the day-to-day business of the University, as covered by the terms of reference of the University Board. SCUB can be called at any time to address urgent matters. SCUB acts on behalf of University Board and is empowered to take decisions in accordance with University Regulations, Policies and Procedures, recommend Chair's Action to the President, and make direct recommendations to the Board of Trustees. SCUB would not normally agree policy but may make recommendations on policy changes to University Board and other Committees.
- e. The Operations Committee (OC)** is entrusted by the University Board to develop, deliver, and review policies and procedures related to the operations of the University

in accordance with its terms of reference and the University's Operational Regulations; ultimate budgetary decisions remain with the University Board. OC is responsible for the University's operational planning and delivery, including the Marketing, Recruitment and Public Relations Plan, the Estates and Facilities Plan, the IT Plan, the HR Plan, the Fundraising and Development Plan, and the delivery of specified Major Projects as may be allocated by the University Board from time to time.

6. **Budgets.** All HR spending is controlled by the financial regulations and associated policies and procedures.
7. **Freedom of Speech and Expression.** The University has a legal responsibility under the Education Act 1988 that lawful free speech should never be prevented or inhibited on campus. The University must also protect freedom of speech across the campus. HR operations will support, assist, and deliver this requirement. This responsibility is reinforced in the University By-Laws and Constitution.
8. **PREVENT.** The Prevent Duty requires the University to have due regard for the need to prevent people from being drawn into terrorism. The HR Regulations recognise this duty and the responsibility of the University to ensure the protection of freedom of speech and expression.
9. **Equality.** The policy of the University is that staff and students, prospective students or employment candidates are considered without regard to race, colour, religion, sex, sexual orientation, gender identity, national or ethnic origin, or age. The University complies with the UK Equality Act (2010). The University will make reasonable and appropriate adjustments for individuals with diagnosed and documented learning difficulties, disabilities, or related needs, in line with the requirements of the Equality Act (2010).
10. **The Employee Handbook.** The University shall produce and keep up to date an appropriate Employee Handbook. The Employee Handbook ('Handbook') provides a written collection and summary of the University's policies, procedures, and practice.
 - a. The University Board is responsible for maintaining and updating the Employee Handbook and associated policies and procedures, normally on the recommendation of the HR Committee.
 - b. The Employee Handbook is designed to answer employees' questions on the employer's procedures and to avoid time-consuming case-by-case practice design. In addition, handbooks help to avoid the risk of having different rules for different employees.

11. HR Policies and Procedures (HRPPs)

The University shall provide effective policies and procedures for the management and administration of the University's HR matter. These shall include:

- a. Alcohol, drugs & other substance
- b. Anti-bribery
- c. Dignity at work (Anti-harassment and bullying)
- d. Appraisal
- e. Capability
- f. Conflict of interest
- g. Consensual Relationships
- h. Disciplinary rules and procedures
- i. Employee tuition
- j. Equal opportunities
- k. Fixed-term contracts
- l. Grievance procedure
- m. Managing sickness absence
- n. Probation
- o. Public interest disclosure (whistleblowing)
- p. Recruitment and selection
- q. Redundancy and reorganisation
- r. References
- s. Retirement
- t. Smoking
- u. Training and development
- v. Working families

The HR Policies and Procedures (HRPPs) are located within the "Operational Policies" section on the [University Policies Page](#).

PART E: INFORMATION TECHNOLOGY REGULATIONS

1. **Purpose.** The Information Technology (IT) Regulations form a part of the Operational Regulations. They provide a statement of the core principles of the University with regard to maintenance and delivery of Information Technology to students and staff, and to supporting the delivery of reports and information to external bodies.
2. **Scope.** The IT Regulations set out the framework in which the University's Information Technology will be managed and maintained and they are underpinned by the IT Policies and Procedures (ITPP). Any changes to the IT Regulations must be approved by the Board of Trustees with policy approval delegated to the University Board.
3. **Compliance.** The IT Regulations apply to all students, staff, faculty members, and to independent members of the Board of Trustees. Failure to comply with the IT Regulations may be treated as misconduct leading to formal disciplinary action, per the Student Code of Conduct, the Employee Handbook, or as outlined in the By-laws and Constitution for Trustees. The University Board shall approve and provide IT rules and guidance for staff and students. IT issues are covered by the University's student complaints and appeals procedures, as understood by the terms of the University's subscription of the Office of the Independent Adjudicator (OIA).
4. **Maintaining the Regulations** Only the Board of Trustees has the authority to revise or change the IT Regulations. Revisions or changes normally require the approval and recommendation of the Operations Committee and/or the University Board. The President may suspend the IT Regulations only with the approval of the University Board.
5. **IT Governance**
 - a. **The Board of Trustees** has primary responsibility for defining and ensuring compliance with the mission, vision, values, and objectives of the University and for its institutional policies, financial oversight and planning in accordance with the expectations and requirements of the Middle States Commission on Higher Education (MSCHE), the Office for Students, and other relevant regulatory and statutory bodies.
 - b. **Audit and Risk Committee (ARC)** is recognised as having the expertise to supervise, scrutinise, and report on the University's risk management systems with authority delegated to it from the Board of Trustees. Their remit is not confined to financial matters and includes estates and facilities. ARC oversees the internal and external audit processes which provides assurance to the Trustees and has delegated authority to approve the internal audit plan. As part of committee's remit of risk management control, ARC may also consider and review the University's statutory and regulatory requirements and obligations, including but not limited to health and safety, estates

and facilities, data standards, and such other areas of risk deemed appropriate by the Board of Trustees.

- c. **The Finance and Resources Committee** has delegated authority from the Board of Trustees to monitor performance in the areas of Finance, Human Resources, Estates and Facilities, Information Technology, as well as resources and assets in their widest sense. This includes the authority to approve financial, human resource and contractual commitments and capital projects and infrastructure investment on behalf of the Board of Trustees in accordance with the powers of the Board as set out in the Constitution and By-Laws of the University.
- d. **The University Board (UB)** is the senior policy making and budgeting body of the University and is entrusted with the responsibility to ensure that all staff and faculty work to deliver the University vision, mission, and values and that the University remains in compliance with its legal, regulatory, and financial obligations. UB formally agrees the University Strategic Plan for recommendation to the Board of Trustees and formally agrees the annual budget, for recommendation to the Board of Trustees. UB monitors and sets policy for finances, budgets, risk and for all non-academic operations, and monitors, reviews, and assesses the academic and academic-related work of the University through the committees and departments which report to it. It has ultimate responsibility for University finances, for the final approval of all operational policies and approval of the opening or closing of degree programmes and related matters.
- e. **The Standing Committee of the University Board (SCUB)** comprises the President/Vice Chancellor and the Chairs of the three main University Board Committees: the two Senior Vice Presidents (Deputy Vice Chancellors) and the Vice President Student Affairs. Other members of the University Board or individuals from across the University may be invited to a meeting of SCUB. It considers matters arising in the day-to-day business of the University, as covered by the terms of reference of the University Board. SCUB can be called at any time to address urgent matters. SCUB acts on behalf of University Board and is empowered to take decisions in accordance with University Regulations, Policies and Procedures, recommend Chair's Action to the President, and make direct recommendations to the Board of Trustees. SCUB would not normally agree policy but may make recommendations on policy changes to University Board and other Committees.
- f. **The Operations Committee (OC)** is entrusted by the University Board to develop, deliver, and review policies and procedures related to the operations of the University

in accordance with its terms of reference and the University's Operational Regulations; ultimate budgetary decisions remain with the University Board. OC is responsible for the University's operational planning and delivery, including the Marketing, Recruitment and Public Relations Plan, the Estates and Facilities Plan, the IT Plan, the HR Plan, the Fundraising and Development Plan, and the delivery of specified Major Projects as may be allocated by the University Board from time to time.

- g. Information Technology and Data Governance Committee (ITDGC)** makes recommendations with regard to data quality, information security, data privacy, records, and public information to the Operations Committee for consideration by University Board. ITDGC is responsible for supporting the delivery of the University's IT Plan and assisting the delivery of other areas of the Strategic Plan.
- 6. Budgets.** All IT spending is controlled by the Financial Regulations and associated Financial Policies and Procedures (FPP).
- 7. Freedom of Speech and Expression.** The University has a legal responsibility under the Education Act 1988 that lawful free speech should never be prevented or inhibited on campus. The University must also protect freedom of speech across the campus. IT operations will support, assist, and deliver this requirement.
- 8. PREVENT.** The Prevent Duty requires the University to have due regard for the need to prevent people from being drawn into terrorism. The IT Regulations recognise this duty and the responsibility of the University to ensure the protection of freedom of speech and expression.
- 9. Equality.** The policy of the University is that staff and students, prospective students or employment candidates are considered without regard to race, colour, religion, sex, sexual orientation, gender identity, national or ethnic origin, or age. The University complies with the UK Equality Act (2010). The University will make reasonable and appropriate adjustments for individuals with diagnosed and documented learning difficulties, disabilities, or related needs, in line with the requirements of the Equality Act (2010).
- 10. The University aims to meet the following industry standards with regard to IT provision:**

 - a. ISO 27001 Information Security Management Systems
 - b. ISO 27701 GDPR Compliance
 - c. ISO 38500 IT Governance
 - d. ITIL4 IT Service Management
- 11. IT Policies and Procedures (ITPP)**

The University shall provide effective policies and procedures for the management and administration of the University's IT infrastructure. These shall include:

- a. Data Protection
- b. Data Retention
- c. Data Quality
- d. Subject Access Request
- e. Information Security
- f. Employee Privacy
- g. CCTV
- h. Information Handling
- i. Access Control
- j. Acceptable Usage
- k. Third Parties
- l. IT Change Management
- m. Remote Working Policy
- n. Bring Your Own Device (BYOD)

The IT Policies and Procedures (ITPPs) are located within the "Operational Policies" section on the [University Policies Page](#).

PART F: MARKETING, RECRUITMENT, AND COMMUNICATION REGULATIONS

1. **Purpose.** The Marketing, Recruitment and Communication (MRC) Regulations form part of the Operational Regulations. They outline the rules followed to ensure compliance with legal and regulatory requirements and the expectations of regulatory bodies and related statutory and other returns. Their purpose is to ensure that marketing, recruitment, and communication activities are being properly utilised for the delivery of vision, mission and values and the achievement of the Strategic Plan.
2. **Scope.** The MRC Regulations set out the framework for the University's marketing and recruitment activities and they are underpinned by the [Marketing, Recruitment and Communication Policies and Procedures \(MRCP\)](#). Any changes to the MRC Regulations must be approved by the Board of Trustees with policy approval delegated to the University Board.
3. **Compliance.** The MRC Regulations apply to all University student, staff, faculty, and members of the Board of Trustees. Failure to comply with the MRC Regulations may be treated as misconduct leading to formal disciplinary action, per the Student Code of Conduct, the Employee Handbook, or as outlined in the By-laws and Constitution for Trustees.
4. **Maintaining the Regulations.** Only the Board of Trustees, has the authority to revise or change the MRC Regulations. Revisions or changes normally require the approval and recommendation of the Operations Committee and/or the University Board. The President may suspend the MRC Regulations only with the approval of the University Board. The University Board approves the institutional MRC strategies and monitors the delivery of their goals and objectives.
5. **MRC Principles**
 - a. The University shall deliver a recruitment process and communicate with external organisation and individuals in a manner which ensures it is able to meet conditions of registration with the Office for Students (OfS) and requirements of accreditation with the Middle States Commission on Higher Education (MSCHE), and other regulatory and statutory bodies.
 - b. The University Board shall approve and provide MRC rules and guidance for staff and students. MRC issues for enrolled students are covered by the University's student complaints and appeals procedures, as understood by the terms of the University's subscription of the Office of the Independent Adjudicator (OIA). Complaints and appeals from applicants prior to admission are covered by a separate policy.
 - c. The University Board shall set and agree recruitment targets annually, in line with the objectives of the Strategic Plan, and report these to the Board of Trustees. Entry requirements and the final decision on admission sit with the Academic Board.

- d. The University Board shall recommend tuition and other pricing and scholarship budgets to the Board of Trustees and do so in sufficient time to ensure prompt publication and dissemination of costs to prospective students.

8. MRC Governance

- a. **The Board of Trustees** has primary responsibility for defining and ensuring compliance with the mission, vision, values, and objectives of the University and for its institutional policies, financial oversight and planning in accordance with the expectations and requirements of the Middle States Commission on Higher Education, the Office for Students, and other relevant regulatory and statutory bodies.
- b. **Audit and Risk Committee (ARC)** is recognised as having the expertise to supervise, scrutinise, and report on the University's risk management systems with authority delegated to it from the Board of Trustees. Their remit is not confined to financial matters and includes estates and facilities. ARC oversees the internal and external audit processes which provides assurance to the Trustees and has delegated authority to approve the internal audit plan. As part of committee's remit of risk management control, ARC may also consider and review the University's statutory and regulatory requirements and obligations, including but not limited to health and safety, estates and facilities, data standards, and such other areas of risk deemed appropriate by the Board of Trustees.
- c. **The Finance and Resources Committee** has delegated authority from the Board of Trustees to monitor performance in the areas of Finance, Human Resources, Estates and Facilities, Information Technology, as well as resources and assets in their widest sense. This includes the authority to approve financial, human resource and contractual commitments and capital projects and infrastructure investment on behalf of the Board of Trustees in accordance with the powers of the Board as set out in the Constitution and By-Laws of the University.
- d. **The University Board (UB)** is the senior policy making and budgeting body of the University and is entrusted with the responsibility to ensure that all staff and faculty work to deliver the University vision, mission, and values and that the University remains in compliance with its legal, regulatory, and financial obligations. UB formally agrees the University Strategic Plan for recommendation to the Board of Trustees and formally agrees the annual budget, for recommendation to the Board of Trustees. UB monitors and sets policy for finances, budgets, risk and for all non-academic operations, and monitors, reviews, and assesses the academic and academic-related work of the University through the committees and departments which report to it. It has ultimate responsibility for University finances, for the final approval of all

operational policies and approval of the opening or closing of degree programmes and related matters.

- e. **The Standing Committee of the University Board (SCUB)** comprises the President/Vice Chancellor and the Chairs of the three main University Board Committees: the two Senior Vice Presidents (Deputy Vice Chancellors) and the Vice President Student Affairs. Other members of the University Board or individuals from across the University may be invited to a meeting of SCUB. It considers matters arising in the day-to-day business of the University, as covered by the terms of reference of the University Board. SCUB can be called at any time to address urgent matters. SCUB acts on behalf of University Board and is empowered to take decisions in accordance with University Regulations, Policies and Procedures, recommend Chair's Action to the President, and make direct recommendations to the Board of Trustees. SCUB would not normally agree policy but may make recommendations on policy changes to University Board and other Committees.
- f. **The Operations Committee (OC)** is entrusted by the University Board to develop, deliver, and review policies and procedures related to the operations of the University in accordance with its terms of reference and the University's Operational Regulations; ultimate budgetary decisions remain with the University Board. OC is responsible for the University's operational planning and delivery, including the Marketing, Recruitment and Public Relations Plan, the Estates and Facilities Plan, the IT Plan, the HR Plan, the Fundraising and Development Plan, and the delivery of specified Major Projects as may be allocated by the University Board from time to time.
- g. **The Marketing and Recruitment Committee** is responsible for reviewing and delivering the University's marketing and recruitment policy and practice. The Marketing and Recruitment Committee makes recommendations to the Operations Committee on new programme developments, targets, entry qualification, student tuition, finance matters, branding, public relations activities, and related marketing activity.
- 6. **Budgets.** All MRC spending is controlled by the Financial regulations and associated policies and procedures.
- 7. **Freedom of Speech and Expression.** The University has a legal responsibility under the Education Act 1988 that lawful free speech should never be prevented or inhibited on campus. The University must also protect freedom of speech across the campus. Communication operations will support, assist and deliver this requirement.

8. **PREVENT.** The Prevent Duty requires the University to have due regard for the need to prevent people from being drawn into terrorism. The MRC Regulations recognise this duty and the responsibility of the University to ensure the protection of freedom of speech and expression.
9. **Equality.** The policy of the University is that staff and students, prospective students or employment candidates are considered without regard to race, colour, religion, sex, sexual orientation, gender identity, national or ethnic origin, or age. The University complies with the UK Equality Act (2010). The University will make reasonable and appropriate adjustments for individuals with diagnosed and documented learning difficulties, disabilities, or related needs, in line with the requirements of the Equality Act (2010).
10. The University shall publish accurate, clear, accessible, and up-to-date information on the University website on:
 - a. Tuition
 - b. Other fees
 - c. Scholarships
 - d. Accommodation
 - e. Required regulatory information, including on visa and immigration and Cleary Act data
 - f. Information on academic programmes
 - g. Information of research and public benefit activities
 - h. Complaints and appeals procedures

11. MRC Policies and Procedures (MRCPPs)

The University shall provide effective policies and procedures for the management and administration of the University's MRC infrastructure. These shall include:

- a. Access and participation
- b. Cookies Policy
- c. CMA Policy
- d. Scholarship Policy
- e. Branding and identity

The MRC Policies and Procedures (MRCPPs) are located within the "Operational Policies" section on the [University Policies Page](#).

VERSION MANAGEMENT

Responsible Department: Deputy Vice Chancellor (Operations)			
Approving Body: Board of Trustees			
Version no.	Key Changes	Date of Approval	Date of Effect
1.0	Initial version	12/10/2023	
2.0	Major Addition of Operational Committee under Governance; Replacement of CFO to DVC Finance & Operations (DVC FO); Replacement of Executive to SCUB; Minor Changes to the Format; Addition of Family Educational Rights and Privacy Act (FERPA) in Data Standards Regulation; Removal of academic policies under MRC; Removal of FPPs that are incorporated by the Full version of Financial Regulations.	15/11/2023	15/11/2023
		Restricted Access? <i>Tick as appropriate:</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	