



ST. HUGH'S COLLEGE, OXFORD

**SERIOUS INCIDENT REPORTING POLICY AND PROCEDURES**

Date Policy Ratified by Governing Body: 11 March 2026

Author/Responsible Officer: College Secretary

Committee Responsible: Finance and General Purposes Committee

Date to be reviewed by: 11 March 2027

# Serious Incident Reporting Policy and Procedures

## Introduction

This policy outlines the College's process for identifying, recording, and reporting serious incidents in accordance with the Charity Commission's guidance.

## Legal and Regulatory Context

This policy is aligned with the requirements of the Charity Commission for England and Wales, including the guidance [How to report a serious incident in your charity - GOV.UK](#) (CC47).

## Responsibility to Report

The Charity Commission requires charities to report serious incidents. If a serious incident takes place within the College, it is important that there is prompt, full and frank disclosure to the Commission. The College has a responsibility to report what happened and, importantly, let the Commission know how the incident is being dealt with, even if it has also been reported to the police, donors or another regulator. The Commission will be looking for assurance that the College has taken steps to limit the immediate impact of the incident and, where possible, prevent it from happening again.

## Serious Incidents

All trustees, officers, key management personnel, and heads of department should be aware of the potential for the following to constitute serious incidents:

- significant harm to beneficiaries, staff, volunteers or others who come into contact with the College through its work;
- significant loss of the College's money or assets;
- significant damage to the College's property, and;
- significant harm to the College's work or reputation.

The Charity Commission has published guidance and a set of examples to assist in the identification of serious incidents which should be the primary guidance in deciding to make a report.<sup>1</sup>

It is the responsibility of the Trustees to decide whether an incident is significant and should be reported. This responsibility is delegated to the Principal as set out below.

---

<sup>1</sup> Charity Commission, '[How to report a serious incident in your charity - GOV.UK](#)', and see further for the Commission's Examples Table.

## Notification Procedure

Any Trustee or member of key management personnel who becomes aware of a potential serious incident must report it to the Principal at the earliest opportunity. If the Principal is unavailable or has a potential conflict of interest, the incident should be reported to the Vice-Principal or the Bursar. In such circumstances, the Vice-Principal or Bursar will exercise the Principal's delegated responsibilities under this policy, including determining whether a Serious Incident Report should be made.

College Officers and Heads of Department have primary responsibility within their area of responsibility to be aware of the guidance in this policy to notify the Principal of a possible serious incident.

## Who is Responsible for Reporting

Trustees:

- Trustees are ultimately responsible for ensuring serious incidents are reported. This is delegated to the Principal as set out below.
- Trustees must be aware of and follow this policy. The Serious Incident Reporting Policy is kept under review by the Finance and General Purposes Committee and reported annually to the Risk, Audit & Governance Committee.

Principal:

- The Principal has delegated authority on behalf of the Governing Body to determine whether or not a Serious Incident Report should be made, taking account of Charity Commission Guidance.
- Where necessary, the Principal will take appropriate legal or other professional advice.
- The Principal may also convene an extraordinary meeting of Governing Body to discuss the potential report should they judge this necessary.
- In cases where the Principal determines that a Serious Incident Report should be made, they will instruct the College Secretary to submit the report and to inform the Trustees that a report has been made.
- In cases where the Principal determines that there are not grounds for making a Report, they will instruct the College Secretary to notify the Risk, Audit & Governance Committee at its next meeting, including the reasons why a Report was not judged appropriate.

Responsible Officer – College Secretary:

- Coordinates incident recording and reporting.
- Acts as the main point of contact with the Charity Commission.

All Staff:

- Must report any concerns or incidents directly to the Principal or to their manager without delay.

## Assessment

The following assessment procedure should be followed:

- Each incident should be considered on a case-by-case basis.
- The Principal will take account of all known facts and may commission an additional investigation where necessary.
- In determining to submit a report, the Principal will have reference to the Charity Commission guidance on serious incident reporting and other legal and professional advice.
- In making a proportionate estimation of potential reputational harm, the Principal should take into account the context of:
  - a. the College's status and reputation as a world-class higher educational and research institution;
  - b. the size of the College's endowment, Fellowship, and staff and student bodies;
  - c. the College's charitable objects and the College Strategy approved by Governing Body;
  - d. the media attention which the College attracts as a prominent institution; and
  - e. the likelihood of lasting reputational harm to the College in the mind of a reasonable person.
- In assessing significance, the Principal should consider:
  - a. the degree of actual, alleged or potential harm to the person affected, or to the College's work, reputation or resources;
  - b. where relevant, the extent to which the facts of the alleged incident might indicate a wider potential risk (for example, an allegation of misconduct against someone in a position of significant authority within the College)
  - c. whether the incident has been reported to the police or other public authorities, and, if so, whether they are investigating it or taking any other action;
  - d. and whether there has been any systemic or repeated failure of the College's internal policies or safeguards, or whether the incident is a single episode that has been detected and dealt with or remedied appropriately.
- In considering unproven allegations, the Principal should consider the extent to which any preliminary investigation indicates that there is a *prima facie* case to answer.

- Many incidents will not require a report to be made to the Commission. The Principal should instruct the College Secretary keep a record on file of individual incidents which do not meet the threshold of seriousness, particularly those which constitute a systemic failure and/or where a pattern of incidents or further developments would likely meet the threshold of seriousness.

## Reporting Procedure

Once an incident is deemed serious, the following steps must be taken:

- a. Notify the full board of Trustees. The Principal will instruct the College Secretary to inform Governing Body in writing before submission and will consider summoning an extraordinary meeting of Governing Body if necessary.
- b. The Principal will determine the appropriate content of the report, taking account of Charity Commission guidance, input from senior Officers as appropriate, and any external legal advice. The Principal will instruct the College Secretary to submit the report to the Charity Commission via their online form as soon as possible.
- c. Notify other regulators or authorities (e.g. police, ICO) where appropriate.
- d. A copy of any Serious Incident Report and the annual report which the College submits to the Charity Commission will be forwarded to the Chair of the Risk, Audit and Governance Committee for that Committee's consideration.

## Record-Keeping

The College will maintain a central log of all serious incidents reported internally and externally. This log will include dates, nature of the incident, actions taken, and outcomes. Confidentiality will be maintained as far as possible.

## Review and Learning

All serious incidents will be reviewed to identify lessons learned, with recommendations being made to Governing Body as necessary. Trustees will consider whether policies, procedures, or practices need to be amended to prevent recurrence.

## Policy Review

This policy will be reviewed annually or after any serious incident to ensure it remains effective and in line with regulatory guidance.