



Serious Incident Policy

1. Purpose

- 1.1 This policy sets out how the **Academic Registrars' Council (ARC)** identifies, manages, records and reports serious incidents in accordance with the requirements of the **Charity Commission for England and Wales**.
- 1.2 ARC is committed to the highest standards of governance, integrity and transparency. This policy supports trustees in meeting their legal duties and ensures that serious incidents are handled promptly, responsibly and proportionately.

2. Scope

- 2.1 This policy applies to:
 - a) all trustees of ARC
 - b) executive committee members, staff and contractors
 - c) Volunteers, members of ARC or event organisers acting on behalf of ARC
 - d) all ARC activities, including meetings, conferences, training events, publications, digital platforms and membership services
- 2.2 This policy operates alongside, and does not replace, ARC's obligations to report incidents to statutory or regulatory bodies (for example the police or the Information Commissioner's Office).

3. Legal and Regulatory Context

- 3.1 The Charity Commission requires charities to report serious incidents promptly, fully and honestly. The responsibility for reporting rests with **ARC's trustees**, even where tasks are delegated to officers or staff.
- 3.2 Failure to report a serious incident may be regarded as a failure of governance or trustee duty.

4. What Is a Serious Incident?

- 4.1 A **serious incident** is an adverse event, whether actual or alleged, which results in or risks **significant**:
- a) harm to individuals who come into contact with ARC through its work
 - b) loss or misuse of ARC's money or assets
 - c) damage to ARC's property or digital systems
 - d) harm to ARC's work, standing, or reputation
- 4.2 "Significant" should be judged in the context of ARC's size, activities, finances, membership profile and public standing.

5. Examples Relevant to ARC

- 5.1 Examples of incidents that **may** need to be reported include (this list is not exhaustive):
- a) serious safeguarding concerns arising at ARC organised events or activities
 - b) allegations of serious misconduct by a trustee, officer or individual acting on ARC's behalf
 - c) fraud, theft, or significant financial loss, including misuse of ARC funds
 - d) serious data protection or cyber security breaches involving member or delegate data
 - e) major governance failures, including conflicts of interest not properly managed
 - f) incidents likely to cause serious reputational harm to ARC or undermine member confidence
 - g) credible allegations linking ARC activities to extremism, discrimination or unlawful activity
- 5.2 Where there is uncertainty, incidents should be escalated so trustees can determine whether reporting is required.

6. Roles and Responsibilities

Trustees

- Hold ultimate responsibility for identifying and reporting serious incidents
- Ensure that this policy is implemented and reviewed
- Oversee ARC's response and learning from incidents

Chair of Trustees / Designated Responsible Officer

- Acts as the lead for serious incident management
- Coordinates internal information gathering
- Liaises with the Charity Commission and other regulators where required
- Ensures the full trustee board is informed promptly

Officers, Staff, Volunteers and Executive Committee Members

- Must report any actual or suspected serious incident immediately to the Chair of Trustees or the designated officer

7. Internal Reporting and Escalation

7.1 Any individual connected with ARC who becomes aware of a potential serious incident must report it **without delay**. Internal reports should include sufficient detail to allow trustees to assess:

- a) what has happened
- b) who may be affected
- c) the immediate risks to ARC or others

7.2 ARC will not penalise individuals for raising concerns in good faith.

8. Managing a Serious Incident

8.1 When a serious incident is identified, ARC will:

- a) take immediate steps to protect individuals and reduce further risk
- b) secure relevant records and information
- c) consider whether other authorities or regulators must be notified
- d) manage communications carefully, including with members where appropriate

- 8.2 Trustees will ensure that ARC can demonstrate what action has been taken and why.

9. Reporting to the Charity Commission

- 9.1 Once trustees determine that an incident is serious, ARC will report it to the Charity Commission **as soon as reasonably possible** using the Commission's online reporting system.
- 9.2 Reports will normally include:
- a) a summary of what happened and when
 - b) who was affected
 - c) immediate actions taken
 - d) steps being taken to manage the incident and prevent recurrence

10. Record Keeping and Confidentiality

- 10.1 ARC will maintain a confidential record of all serious incidents, including decisions, actions and outcomes. Records will be retained securely and handled in accordance with data protection legislation.
- 10.2 Information will be shared only where necessary and appropriate.

11. Review, Learning and Improvement

- 11.1 All serious incidents will be reviewed by the trustees to identify lessons learned and to determine whether changes are required to:
- a) governance arrangements
 - b) policies or codes of conduct
 - c) event management, data handling or financial controls
- 11.2 Learning will be used to strengthen ARC's governance and risk management.

12. Policy Review

This policy will be reviewed at least every **three years**, or earlier if there are changes to Charity Commission guidance, legislation, or ARC's activities.

Version No	Approved By	Approval Date	Main Changes	Review Period
1.0	ARC Executive	10.07.2026	Approved	Three Years

Annex A

Serious Incident Decision Flowchart

Use this flowchart whenever something goes wrong or a concern is raised.

Step 1 – Has something gone wrong?



An incident, allegation, concern, or unexpected event has occurred
(including something reported by a member, delegate, supplier, or third party)

→ **YES** → go to Step 2

→ **NO / business as usual** → no action under this policy

Step 2 – Does it involve ARC or its activities?



Is the issue connected to:

- ARC governance or decision making?
- ARC funds, assets, data or systems?
- ARC events, meetings, publications or communications?
- Someone acting on behalf of ARC?

→ **YES** → go to Step 3

→ **NO** → manage locally, record if appropriate

Step 3 – Could it be significant?



Ask **any** of the following:

- Could someone be seriously harmed or at risk?
- Could ARC lose a **significant** amount of money or assets?
- Could this seriously damage ARC's **reputation, credibility or member confidence**?
- Could this indicate a **serious governance failure or misconduct**?
- Might ARC need to explain its actions publicly or to a regulator?

➔ **YES / POSSIBLY / UNSURE** → go to Step 4

➔ **CLEARLY NO** → record internally; no Commission report required

If unsure, always escalate. The decision to report rests with trustees.

Step 4 – Escalate immediately



Report the issue **without delay** to:

- **Chair of Trustees**, or
- **Designated Responsible Officer**

Immediate actions may include:

- protecting individuals
- securing data or funds
- pausing activities
- preserving records

➔ go to Step 5

Step 5 – Trustee assessment



Trustees consider:

- What has happened?
- Who is affected?
- What is the current and future risk?
- What action is being taken?

➔ **Trustees decide it IS a serious incident** → Step 6

➔ **Trustees decide it is NOT a serious incident** → record decision and rationale

Step 6 – Report externally



If deemed a serious incident:

- Report to the **Charity Commission** as soon as reasonably possible

- Report to other regulators or authorities if required (e.g. ICO, police)

The report should explain:

- what happened
- what ARC has done
- what ARC is doing next

 go to Step 7

Step 7 – Review and learn



Trustees:

- monitor the situation until resolved
 - review lessons learned
 - update policies, controls or practices if needed
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Key Principles for ARC Trustees

- **Timeliness over perfection** – report early, update later if needed
- **Transparency** – explain both the issue and the response
- **Proportionality** – significance is judged in ARC's context
- **Escalation is protection** – raising concerns is good governance