



**REPORTING MISCONDUCT UNDER  
THE RHODES SCHOLAR CODE OF CONDUCT  
WITH EFFECT FROM TRINITY TERM 2026**

**Table of contents**

How to report misconduct .....	1
Accommodations and Protective Measures .....	3
Investigating Complaints .....	5
Timetable .....	6
Resolving Complaints.....	6
Sanctions and Responses .....	6
Appeals.....	7

## How to report misconduct

This document gives guidance as to where to direct any complaint, whether it falls under the University of Oxford Code of Discipline and/or individual college disciplinary codes (A) or the [Rhodes Scholar Code of Conduct](#) (B):

- A. [Statute XI on University discipline](#) contains a Code of Discipline applying to all University members and students. It sets out actions and forms of behaviour that are unacceptable in the University context (i.e. on University or college premises and/or in the course of University activity in any location, whether academic, sporting, social, cultural or other). All student members of the University are also subject to their college's code of discipline/conduct - a breach of code in the college community context is more appropriately dealt with through the colleges' codes. All Oxford students are subject to both the above codes and their processes can apply in parallel.
  
- B. Any individual who wishes to report misconduct by a Scholar or guest under the Scholar Code of Conduct (i.e. arising from actions taking place outside of University or college premises and outside of University activity as listed above) should contact one of the Rhodes Trust's Conduct Officers.

The University and its colleges have teams of specialist staff and personnel dedicated to offering support to students and staff. As a Rhodes Scholar, if you have experienced misconduct yourself or wish to report misconduct you have witnessed, within the University/college context (as described at point A above), the University or your College should be your first point of contact or (where relevant), the police. You are also invited to notify a Rhodes Trust Conduct Officer of the report, should you wish to do so or feel it necessary.

Outside of the University context (as described at point B above), if you have experienced or witnessed misconduct under the Rhodes Scholar Code of Conduct, you should report it to a Rhodes Trust Conduct Officer in the first instance. The Rhodes Trust Conduct Officer (in conjunction with the Warden as appropriate) will conduct an initial triage to confirm that the most appropriate jurisdiction is the Rhodes Trust and whether immediate safeguarding or interim measures (e.g. no-contact arrangements, temporary suspension of access to Rhodes House premises) are required. The Trust reserves the right in serious cases to notify and consult with the relevant college authorities or Proctors.

Rhodes Trust Conduct Officers:

- The Warden
- The Deputy Warden for Selection and Scholar Affairs
- The Registrar or Deputy Registrar
- The Director of Scholar Programming or Associate Director of Scholar Programming
- The Director of Human Resources
- The Chair of the Trustee Academic Committee
- The Director of Global Engagement
- The Chief Operating Officer
- The nominated local or in-Country Conduct Officer: this is usually a constituency's National Secretary or their Deputy.

To contact any of the Conduct Officers, email the Warden's Office for an up-to-date email address:

Those who experience misconduct and report it via a Rhodes Trust Conduct Officer have three options:

- (i) **Disclosure:** When an individual wishes to disclose information about an incident they have experienced and to seek advice or support but does not wish to take the matter further at this time.
- (ii) **Informal complaints:** When an individual wishes to disclose information to Rhodes House and seek advice, support and informal resolution of their complaint. This is for limited types of Prohibited Conduct, if the **Conduct Officer** and both parties agrees that informal complaint is appropriate in the circumstances. Otherwise, the individual can decide to make a disclosure (option (i) above) or follow the formal complaint route (option (iii) below). Informal complaints may be resolved through a brief investigation by the Conduct Officer and an agreement between the parties about the appropriate resolution. They may also, with the agreement of both parties, be handled through mediation. Depending on the circumstances, mediation may be facilitated internally by a Rhodes House staff member or externally by a trained mediator. Complainants can opt to withdraw a complaint prior to reaching a Resolution Agreement if they do not wish to pursue the issue further. Either party (or the Conduct Officer) can withdraw the case from Informal Resolution at any time prior to reaching a Resolution Agreement and initiate a formal complaint.
- (iii) **Formal complaint:** When an individual wishes to make a written complaint and request a formal investigation. Individuals may request confidentiality when reporting misconduct. The Trust will respect privacy and confidentiality when possible, except in cases where there is significant risk of harm or where legal obligations require. It may also be difficult or impossible to investigate or respond to a complaint without disclosing information. Where information in relation to which an individual has requested confidentiality must be disclosed in the above circumstances, the Conduct Officer will inform the individual in advance to explain the need to disclose information, prior to doing so. The individual will then have a specified timeframe to raise any objection to such disclosure, after which the disclosure will take place and the investigation will proceed. Should the individual raise an objection to the disclosure, the Trust will use reasonable endeavours to find an acceptable way forward, failing which it will proceed as appropriate in line with its legal obligations. Individuals will be notified accordingly, and complainants may elect to withdraw their complaints, if they are not content for the Trust to proceed with the investigation as suggested (including in relation to the disclosure of information).

### **Accommodations and Protective Measures**

The Trust is committed to supporting Scholars who report misconduct, whether or not that misconduct falls within the Trust's investigative scope. The Trust is also obligated to support Scholars against whom a complaint has been made. In both of these cases, the specific forms of support offered, at the Warden's discretion and without limitation, may include:

- Referral to appropriate college, university, and law enforcement authorities;
- Referral to medical care and psychological counselling;
- Follow-up as needed with Heads of House and university authorities;

- Limited financial support when necessary to provide access to initial legal advice;
- Limited financial support when necessary to provide access to initial counselling services or needed housing changes;
- Limited financial support when necessary to provide short-term security (e.g. escorts or safe rides) at locations and activities where the Prohibited Conduct occurred;

Accommodations and protective measures are available to individuals who report Prohibited Conduct, regardless of their choice to go forward with an informal or formal complaint. The Rhodes Trust will maintain the confidentiality of accommodations to the extent that confidentiality does not impair the Rhodes Trust's ability to provide those accommodations or infringe any legal requirement.

Protective measures are designed as temporary or permanent remedies to support the well-being and safety of both parties. They may include No-Contact Agreements or Directives. The Trust may impose protective measures pending the outcome of an investigation or as a preliminary to determining which authority should investigate, on the basis that they are not to be taken as a finding of fault in advance of the outcome of an investigation.

The Conduct Officer meeting with the Complainant will:

- Specifically discuss accommodations and protective measures with the Complainant;
- Determine which accommodations and protective measures will be granted;
- Arrange necessary accommodations and protective measures to protect the Complainant and the Rhodes Trust community;
- Re-evaluate accommodations, protective measures, and remedies on an ongoing basis during and after the conclusion of any investigation to ensure that the Complainant and the Rhodes Trust community continue to be protected.

There are three possible No-Contact Directives/Agreements. All No- Contact Directives/Agreements will be (1) specific as to the persons and places to be avoided and will state clearly the requirements (e.g., the distance that an individual is directed to keep between themselves and another person or place, and the hours during which an individual is to avoid a place); and (2) will clearly state the procedure that a protected individual is to follow in the event of a suspected violation of the Directive/Agreement.

- i. A Limited Mutual No-Contact Directive is not a sanction and does not presume a Respondent has committed Prohibited Conduct. It is an accommodation for either party and is intended to maintain a harmonious and healthy educational environment for the Rhodes community. A Limited Mutual No- Contact Directive may be requested by either party and may prohibit the parties from contacting each other, either directly or through third parties, including in person, in writing, via email or any electronic method, by phone, or using any other mechanism. The individual who requests a Limited Mutual No- Contact Directive will have the option of moving to a new location in order to separate from the other party and may prohibit the parties from entering the other party's residence. In addition, the Rhodes Trust will make every effort to coordinate with the relevant college or academic department to provide the Complainant with options that allow the

Complainant to avoid being in class or extra-curricular activities with the Respondent. In cases in which the Complainant requests confidentiality or requests that no investigation or disciplinary action be pursued, the Rhodes Trust's ability to take actions that impact the Respondent may be limited.

- ii. A No-Contact Agreement is agreed to by the parties during Informal Resolution and approved by the Conduct Officer. A No-Contact Agreement may include restrictions on each party's contact with the other and limitations on either party's housing, class schedules, and extracurricular activities, as agreed by the parties and the Conduct Officer.
- iii. A No-Contact Directive may be requested by the Complainant as an interim measure after a complaint is made or as a permanent remedy after a finding of responsibility for Prohibited Conduct. A No-Contact Directive is issued by the Conduct Officer and may prohibit the Respondent from contacting the Complainant, either directly or through third parties, including in person, in writing, via email or any electronic method, by phone, or using any other communication mechanism. It may also require the Respondent to change housing, classes, and daily schedule. The Conduct Officer will advise the Complainant of options for avoiding contact with the Respondent and will minimize the burden of any No-Contact Directive on the Complainant. In general, the Conduct Officer will give the Complainant priority over the Respondent in determining classes, housing, and activities.

### **Investigating Complaints**

The Trust will consider investigating complaints under the Code of Conduct only in situations where an allegation of misconduct has been made against

- (i) a Rhodes Scholar for any conduct while that Scholar is in residence in Oxford in the course of pursuing their degree (including, if and to the extent that the Warden considers it to be practical and/or appropriate, when the conduct in question occurs overseas or otherwise away from Oxford); or
- (ii) a guest of a Scholar in residence in Oxford for behaviour that occurs in Rhodes House or at a Rhodes-sponsored event. The Trust will take reasonable steps to ensure that the Code of Conduct is publicly available. Attendance by another student or guest of a Scholar at Rhodes House or a Rhodes-sponsored event will be taken as acceptance by that student or guest of the application of the Code of Conduct to such behaviour.

The Warden will decide in the Warden's discretion whether it is appropriate for any investigation to be undertaken. Without limiting the generality of such discretion, the Warden will decide whether to launch an investigation in circumstances where it appears to the Warden that the alleged misconduct falls within, or may fall within, the jurisdiction exercisable by any of the colleges, the University, and/or the police. In the exercise of that discretion, the Warden may have regard to the disciplinary codes, rules and procedures of any relevant college and/or the University and may liaise in such manner as the Warden sees fit with personnel at the University and such college for that purpose.

If the alleged misconduct is being or will be investigated by a college, the University, and/or the police, and where disciplinary processes have been initiated by these outside bodies, the Trust may at the Warden's discretion run a concurrent investigation or wait until those processes are completed before deciding whether or not to take action. Regardless of whether the investigation has been launched or whether its outcome is still waiting for approval, the Complainant will still have access to the accommodations, such as

Rhodes House help with housing changes, provided to people who have experienced Prohibited Conduct.

Where an allegation may amount to a criminal offence, the Trust will focus solely on whether the Code has been breached, applying a civil standard of proof, and will not make determinations of criminal liability. Whether or not a Scholar is found guilty of a criminal offence or responsible for a breach of University or college regulations, the Trust reserves the right to pursue a complaint arising from the same facts under the Code of Conduct.

Once a formal complaint is made and the Warden determines to initiate an investigation, the Warden shall establish a Complaints Committee consisting of three Conduct Officers of the Trust and, in consultation with this Committee, shall decide whether to launch an internal or external investigation.

An internal investigation may be led by a Rhodes Trustee or a member of staff. An external investigation will be led by an individual with investigative expertise. In cases involving sexual misconduct, external investigators shall be individuals with experience of conducting trauma-informed and sensitive investigations.

The Complaints Committee shall oversee the investigation, review the results of the investigation and determine an appropriate resolution, sanction or response. The Complaints Committee shall, in its discretion, decide upon the procedures it will adopt for these purposes in light of what it considers to be most appropriate in the relevant circumstances.

### **Timetable**

In the case of an informal complaint, and subject to Section 3 above, the Trust will endeavour to resolve the issue within twelve weeks, or in instances where the complaint is raised within the last four weeks of a term, by the end of the fourth week of the following term.

In the case of a formal complaint, and subject to Section 3 above, the Trust will launch an internal or external investigation within four weeks. The Trust will endeavour to ensure that the investigation is completed and considered by the Complaints Committee within eight weeks.

This timetable may be adjusted as necessary to account for unforeseen factors, extenuating circumstances, breaks between terms or other relevant factors as the Complaints Committee shall determine.

### **Resolving Complaints**

Complaints may be resolved through any of the following mechanisms:

- (i) Informal resolution
- (ii) Mediation – internal or external
- (iii) Formal Investigation and determination of responsibility

Formal Investigation is the only mechanism recommended for serious offences.

## Sanctions and Responses

Any recommendation for appropriate redress and/or sanction shall be proportionate to the misconduct, based on available evidence, justified by reference to the seriousness of the conduct (escalated according to severity and recurrence) and focused on restoring safety and enabling behaviour change where appropriate. Sanctions may, without limitation, include:

1. Discussion with Respondent to explain why their behaviour was harmful;
2. Restorative sanctions and educative measures;
3. No-contact directive between the complainant and respondent;
4. Warning or official reprimand;
5. Exclusion from Rhodes House and/or Rhodes Connect on a temporary or ongoing basis;
6. Exclusion from Rhodes Trust activities and additional support (grants, trips) on a temporary or ongoing basis;
7. Notation on permanent record in Rhodes House, for consideration in invitations back to Rhodes House after graduation such as in CLSP Facilitator roles, National Secretaries etc;
8. Formal report to college/University;
9. Temporary or permanent suspension from paid or volunteer work for the Rhodes Trust;

The following severe sanctions are reserved for the most serious offences such as criminal activity and violence incl. sexual violence:

10. Temporary suspension or permanent cessation of scholarship funding;
11. Removal of the Rhodes Scholarship including loss of privilege to call oneself a Rhodes Scholar.

Based on experience, it is expected that the vast majority of incidents of misconduct will fall under sanctions 1-3 (Minor misconduct – single, non-criminal incidents without physical violence or premeditative harm).

Moderate misconduct (repeated or serious and harmful non-criminal incidents) will fall under sanctions 4-9.

In cases of sufficient seriousness that, after their investigation, the Complaints Committee recommends either of sanctions 10 or 11 (temporary suspension or permanent cessation of scholarship funding or removal of the Rhodes Scholarship including the loss of privilege to call oneself a Rhodes Scholar), the Warden and the Complaints Committee shall prepare a report for submission to the Academic Committee of the Trustees. The Scholar shall be provided with a summary of the findings of the investigation and shall have an opportunity to prepare a written statement to be included with the report. The Academic Committee shall consider the report, the Scholar's written statement and the recommendation, and shall review the procedural aspects of the investigation to ensure its fairness. They shall then make a recommendation to the full Board of Trustees. The decision of the Board of Trustees shall be final.

A guest of a Rhodes Scholar found to have committed misconduct under this code may be subject to exclusion from Rhodes House/Rhodes-sponsored events on a temporary or permanent basis. If the guest is a student of the University of Oxford and the misconduct is deemed to be severe enough, the Rhodes Trust reserves the right to report the matter to their college or the University.

## Appeals

Either party may appeal either the decision and/or the sanction. An appeal may be made by submitting a written appeal within four weeks of the sanction being issued. There are three tiers of appeal:

- Sanctions 1-3: the appeal will be to the **Warden**
- Sanctions 4-9: the appeal will be to the **Academic Committee**
- For Sanctions 10 & 11, a different process applies, as outlined in the section above.

The appeal will be considered and a decision made within four weeks. The appeals process is a review of the fairness of the decision and process, not a full re-hearing.

## Point of Contact

The Registrar: [registrar@rhodeshouse.ox.ac.uk](mailto:registrar@rhodeshouse.ox.ac.uk)