

Serious Incident Reporting Policy

Castlefields Church, CIO -- Charity No: 1192197

Purpose & Priority

The purposes of this Policy are:

- a. To mitigate, as far as is possible, any issues that pose a serious threat to the future viability and life of the church as part of our risk management
- b. To be transparent to the Charity Commission, and any other regulators, when a serious incident occurs
- c. As a charity with an income of over £25,000 income, we are required by charity law to report serious incidents as they occur, and recognise that we must confirm in our annual return that there have been no serious incidents or other matters that Trustees should have reported to the Commission but have not done so.

Timetable for reporting

To help to appreciate the urgency of reporting, a timescale applies as follows:

- A. An initial report of the incident must be made to a Trustee within 24 hours (or 4 hours if there is a Safeguarding issue)
- B. A report to the full Board of Trustees must be made within 48 hours
The Trustees must assess if there are any GDPR or other confidentiality issues impacting the content of the report and to whom onward reporting is required).
- C. A report of the basic information by the Trustees must be made to the Charity Commission within 3 days (There is an approved format to use available on the CC website)
- D. Updates with fuller information to be made to the Charity Commission at regular intervals as further information emerges – to the point of resolution

Note 1: **Safeguarding reporting** has its own special requirements especially around confidentiality and to whom reports are made and therefore they override the timetables here. They still require to be reported to the Charity Commission where relevant but may also involve a different reporting process and regulators.

Note 2: **Professional Help** must be sought by the Trustees from charity lawyers or others specialising in the area of the incident (Eg: Christian Institute). This is best practice, even if the result is a decision that this is not actually required for the ongoing reporting.

Identifying a Serious Incident

A serious incident is an adverse event, **whether actual or alleged**, which results in or risks significant:

- a. harm to the church, the church's beneficiaries, staff, volunteers or others who come into contact with us as an organisation;
- b. loss of the church's money or assets;
- c. damage to the church's property;
- d. harm to the church's work or reputation;

For the purposes of this policy, "significant" means significant in the context of the work, workers, operations, finances and reputation.

Such incidents may be in the area of:

1. protecting people and safeguarding incidents
2. financial crimes – fraud, theft, cyber-crime and money laundering;
3. large donations from an unknown or unverifiable source, or suspicious financial activity using our funds;
4. other significant financial loss;
5. links to terrorism or extremism, including 'proscribed' (or banned) organisations, individuals subject to an asset freeze, or kidnapping of staff
6. other significant incidents, such as insolvency, forced withdrawal of banking services without an alternative, significant data breaches/losses or incidents involving partners that materially affect the charity.

Note 1: The Trustees accept that this assessment is not an exact process, that each category of incident has different thresholds and that a degree of subjectivity will have to be applied when assessing the seriousness of an issue. The Trustees will consider any incident in the light of the Commission's guidance and examples and, if in doubt, take advice from charity lawyers or other appropriate professional advisors.

Note 2: It will be treated as a significant breach of responsibility if any staff, volunteer or other person in responsibility fails to communicate what may possibly be a 'serious incident' under this policy. For employees, this may require the invoking of disciplinary action.

Policy Approved by Trustees Meeting & recorded in Minutes

Date: 06/08/24

Next Review to be undertaken:
Date: (max 12 months from above date)