



Ruyton XI Towns Village Hall Serious Incident Reporting Policy

Why this policy exists

Ruyton XI Towns Village Hall (the Hall) is a charity, and its activities fall under the regulation of the charity regulator, the Charity Commission (the Commission). This policy covers serious incident reporting to the Commission as it relates to the Hall and provides the Hall with an effective and easy to follow process that closely follows the Commission's guidance.

Scope

This policy covers all the Hall's activities and operations. It does not cover or replace the Hall's obligations to report incidents to statutory authorities such as the police, health and safety executive or licensing authority that the Hall may need to do from time to time in the ordinary operation of its business.

However, incidents that are reported to the statutory authorities can become relevant to this policy, if, e.g. the Hall is subjected to an investigation by a statutory authority or if it deems itself to be at fault and there is potential reputational damage to the Hall as a result.

Background

The Commission states that it is vital that charities report serious incidents to the regulator:

- To ensure that trustees comply with their duties.
- To enable it to provide regulatory advice or guidance or use its statutory powers
- To help it better understand risks facing the sector and take appropriate action,

Whilst understanding that serious incidents will happen, it is the Commission's role to ensure that trustees comply with their legal duties and that the Hall manages the incident responsibly.

The Commission will be looking for assurance that the Hall has taken steps to limit the immediate impact of any serious incidents that may occur and, where possible, prevent it from happening again.

The Commission acknowledges that many problems can be resolved by trustees themselves. However, sometimes it needs to use its powers to protect a charity.

Reporting also enables the Commission to identify whether other charities might be affected and can give better advice to all charities to help them protect themselves.

What to report

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

- Harm to people who come into contact with the Hall through its work e.g. the Hall's beneficiaries, staff, volunteers, visitors.
- Loss of the Hall's money or assets.
- Damage to the Hall's property.
- Harm to the Hall's work or reputation

“Significant” means significant in the context of the charity, taking account of its staff, operations, finances and/or reputation.

The main categories of reportable incident are:

- Protecting people and safeguarding incidents – incidents that have resulted in or risk significant harm to beneficiaries and other people who come into contact with the Hall through its work
- Financial crimes – fraud, theft, cyber-crime and money laundering
- Large donations from an unknown or unverifiable source, or suspicious financial activity using the Hall's funds
- Other significant financial loss
- Links to terrorism or extremism, including ‘proscribed’ (or banned) organisations, individuals subject to an asset freeze, or kidnapping of staff
- 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

An incident that involves actual or alleged criminal activity will usually be reportable to the Commission. Only in exceptional circumstances, such as where the crime and the impact on the Hall are minor, e.g. one-off theft of a very small amount of money, will the Commission consider an incident involving criminal activity is not reportable.

Even when other agencies are involved, it is important that charities report the incident promptly to the Commission themselves and do not wait until someone is arrested, charged or convicted before doing this. The Hall should always tell the Commission what action we have taken or are planning to take at the time of reporting.

It is the responsibility of the Hall's trustees to decide whether an incident is significant and should be reported.

Policy

It is the Hall's policy to report all serious incidents to the Commission within 48 hours of the Chair's decision.

However, if the matter has been referred more widely to some or all the Hall's trustees, then the decision to report a serious incident must be undertaken within five working days.

What we will report

The Commission makes it clear that it is the responsibility of the trustees to decide whether an incident is significant and should be reported. The nature of the Hall's assets and activities mean that it does not deal with incidents on a frequent basis as part of its operations, so it is expected that help will be required in regard to this. To this end, the Commission provides guidance in an Examples Table which is at Annex A.

Who is responsible for reporting?

The responsibility for reporting serious incidents rests with the Hall trustees who all bear ultimate responsibility for ensuring the Hall makes a report and does so in a timely manner.

All incidents, whether deemed serious or not should be reported to the Chair of the Hall Committee immediately, either in writing or if verbally reported, confirmed in writing immediately after notification.

The Chair is then to consult the Hall Committee within 48 hours as to whether the incident constitutes a serious incident and requires reporting to the Commission.

If such a decision is made, the Chair will make the report to the Commission within 48 hours of the decision.

All discussions and decisions taken will be formally recorded and then minuted at the next available Committee meeting along with any outcomes and further action taken.

Actions we will take in response to a serious incident.

If there is a serious incident the trustees will:

- As soon as reasonably practicable prevent or minimise any further harm, loss or damage.
- Report it to the Commission as a serious incident.
- Report it to the police (and / or other relevant agencies) if we suspect a crime has been committed, and to any other regulators the Hall is accountable to.
- Put in place a communication plan for volunteers, the public, the media, and other stakeholders.
- Review what happened and prevent it from happening again – this may include reviewing internal controls and procedures, internal or external investigation and / or seeking appropriate help from professional advisers.

How we will report

The trustees delegate formal responsibility for reporting those incidents deemed to be serious incidents to the Chair of the Hall Committee who will report them to the Charity Commission using its online reporting form.

The Chair must provide a clear picture of what happened and when, the extent of any loss or harm, how the Hall is dealing with it and the possible next steps. It is not necessary to provide the names or any other personal details of any individuals involved in the incident in the initial report; the Commission will come back to us if it needs this information.

As part of its annual return to the Commission, the Hall is required to make a declaration confirming there were no serious incidents during the financial year that should have been reported to the Commission. If incidents did occur, but were not reported at the time, we will submit these before we file our annual return, so that we can make the declaration and meet our legal reporting requirements.

Policy review

This policy will be reviewed annually or at such other regular interval as the trustees decide

Approved by Committee March 2026

**Annex A to
Ruyton XI Towns Village Hall Serious Incident Reporting Policy**



**CHARITY COMMISSION
FOR ENGLAND AND WALES**

Examples table: deciding what to report

Serious incidents to report	Incidents not to report
Protecting people and safeguarding incidents	
<p>A beneficiary or other individual connected with the charity’s activities has/alleges to have suffered serious harm</p> <p>Allegation that a staff member has physically or sexually assaulted or neglected a beneficiary whilst under the charity’s care</p> <p>The Chief Executive of the charity has been suspended pending the outcome of an investigation into their alleged sexual harassment of a fellow member of staff</p> <p>Allegation that a trustee, staff member or volunteer has been sexually assaulted by another trustee, staff member or volunteer</p> <p>A staff computer is found to contain child sexual abuse images and materials.</p> <p>An internal investigation has established that there is a widespread culture of bullying within the charity</p> <p>A beneficiary or individual connected with the charity’s activities has died or been seriously harmed; a significant contributory factor is the charity’s failure to implement a relevant policy.</p> <p>Charity failed to carry out DBS checks which would have identified that a member of staff or trustee was disqualified in law (under safeguarding legislation) from holding that position.</p> <p>Repeated medication errors to beneficiaries in</p>	<p>Minor unusual/aggressive behaviour by a beneficiary towards a member of staff</p> <p>Police called to charity premises because a beneficiary is drunk and disorderly</p> <p>Charity becomes aware of allegations of abuse or neglect of a beneficiary that occurred outside the charity; the charity has reported the allegations to the appropriate agencies, and there is no harm to the charity’s reputation</p> <p>Beneficiary in a care home received the wrong medication as a ‘one-off’ error and there was no significant harm</p> <p>Logged accident book reports where there was no significant harm to individuals</p> <p>Details of reports under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) where there has been no significant harm to individuals</p> <p>Minor accidental injury to a charity service user e.g. slipping on a wet floor</p> <p>A staff member who is not in a senior position or position of specific responsibility (e.g. head of safeguarding) has bullied or harassed a fellow staff member. There is no indication of a widespread culture of bullying or harassment within the charity and the incident is dealt with by minor disciplinary action (for example, the staff member responsible has not been suspended or dismissed)</p>

<p>a care home indicating a systemic problem</p> <p>Charity discovers that an employee or volunteer coming into contact with children or at risk adults is on the sex offenders register</p> <p>There are credible safety concerns due to threats made to trustees, staff, beneficiaries, or volunteers, and/or damage to its property linked to what the charity does or who it supports. As a result, any one or more of the following may apply:</p> <ul style="list-style-type: none"> • the charity is unable to deliver key services to beneficiaries, including beneficiaries who may already be vulnerable • there is a serious risk of harm to trustees, staff, volunteers or beneficiaries • there is a serious risk of harm to charity property • the charity may be forced to close services permanently • the charity may be forced to consider closure 	<p>A staff member who is not in a senior position or position of specific responsibility is dismissed for marrying a member of the community in which the charity is working, in breach of the charity's code of conduct but not in breach of local laws</p> <p>Minor, unusually aggressive behaviour by a beneficiary, or minor damage caused to charity property, which does not result in the closure of key services, as the charity has no ongoing safety concerns</p>
<p>Fraud, cyber-crime and money laundering</p>	
<p>Charity's Chief Executive and Treasurer produced false invoices for charity services A bogus fundraising scheme is being promoted online, using charity's name Charity funds lost due to an online or telephone 'phishing scam', where trustees were conned into giving out bank account details</p> <p>Attempted fraud by a member of charity staff but intercepted by internal financial controls Any actual/alleged fraud or money laundering should be reported. Any actual/alleged cyber-crime should be reported with the exception of the example in the right-hand column</p>	<p>Attempted cyber-crimes that are blocked by the charity's computer network security systems, except where the attempted cyber-crime is unusual in nature and the charity wants to bring it to the attention of the Commission</p>
<p>Theft</p>	
<p>Each month, between £100-£200 goes missing, suspected stolen, from the cash till in the charity shop. It has been going on for six months and has been reported to the police.</p>	<p>One-off random theft of items such as jewellery or a mobile phone at the charity's premises</p> <p>Theft of small amounts of cash belonging to a</p>

<p>Charity office has been broken into and computers, holding personal details of beneficiaries and donors, stolen Remember, there is no minimum loss figure that should be reported. You need to decide whether incidents are serious enough to report, in the context of your charity and its income, taking account of the actual harm and potential risks posed</p>	<p>beneficiary, by another beneficiary, at a charity event Theft of a collection tin thought to contain small amount of cash</p>
<p>Unverified or suspicious donations</p>	
<p>A significant amount over £25,000 is donated to the charity from an unknown or unverifiable source</p>	<p>Large legacy left in a will, received via solicitor dealing with probate, on condition donor remains anonymous</p> <p>Large donation made by an anonymous donor via solicitor who is aware of their identity</p> <p>Low value donations from unknown sources – refer to our guidance on due diligence and monitoring end use of funds</p>
<p>Other significant financial loss</p>	
<p>Significant loss of charity funds in a poor investment scheme, commissioned by trustees, without professional advice Sudden loss of 20% or more of charity's income (e.g. due to termination of major donor contract); charity has no reserves, meaning staff will be laid off and services stopped</p> <p>Substantial loss of charity funds due to legal costs incurred in a court case; excludes those charities routinely undertaking budgeted litigation on behalf of beneficiaries The charity's main premises is severely damaged in a fire and the charity is unable to deliver services to its beneficiaries</p>	<p>Loss of charity funds where the value lost represents less than £25,000 of charity assets and is less than 20% of the charity's income. There is no significant impact on the charity's services.</p> <p>Charity property overseas is damaged due to bad weather conditions (e.g. office roof blown off during a storm) but doesn't prevent charity from delivering services to beneficiaries A vehicle owned by the charity is badly damaged in an accident. Nobody was hurt, the damage is covered by insurance and the charity is still able to deliver services to its beneficiaries</p>
<p>Links to terrorism or extremism</p>	
<p>Charity discovers that an overseas partner has passed money to a member of charity's personnel who is a designated individual, subject to financial restrictions</p> <p>A member of charity staff or volunteer has been arrested for terrorism related offences Charity's warehouse in a war zone has been raided and vehicles/ stock taken at gunpoint</p> <p>Charity personnel have been detained or</p>	

<p>kidnapped by a terrorist group overseas A visiting speaker has used a charity event to promote extremist messages, via live speech or social media</p>	
Other significant incidents – Disqualified person acting as a trustee	
<p>Any person acting as a trustee or senior manager while disqualified – refer to the Commission’s guidance</p>	<p>A trustee or senior manager voluntarily steps down from trusteeship when disqualified for having an IVA (Individual Voluntary Arrangement)</p>
Charity subject to investigation by a regulatory body	
<p>Charity is subject to official investigation by another regulator e.g. Fundraising Regulator, Police, UK Visas & Immigration, Ofcom, Information Commissioner, Care Quality Commission or Care Inspectorate Wales</p>	<p>Routine inspections by a sector regulator e.g. Ofsted, CQC or CIW, do not need to be reported to the Commission unless there are adverse findings that place the future of the charity in doubt, relate to other categories of serious incidents or are likely to attract negative media attention</p>
Major governance issues	
<p>Mass resignation of trustees, leaving the charity unable to function</p> <p>Evidence that trustees have routinely signed blank cheques</p>	<p>One or two trustees stepping down at year-end, due to other commitments</p>
Fundraising issues	
<p>Suspicious of unauthorised public collections in the name of the charity</p> <p>Charity hasn’t complied with law on requirements for solicitation statements or professional fundraising agreements</p> <p>Significant funds, due under a fundraising arrangement, have not been paid by the professional fundraiser, or commercial partner to the charity</p> <p>Incident has taken place involving a fundraising agency which will incur serious damage to the charity’s reputation</p>	<p>A missing collection tin thought to contain a small sum of money</p> <p>Failure of a sponsor, e.g. of a local fun run, to submit small amounts of money raised for the charity</p>
Data breaches or loss	
<p>Charity's data has been accessed by an unknown person; this data was accessed and deleted, including the charity's email account, donor names and addresses</p> <p>A charity laptop, containing personal details of beneficiaries or staff, has been stolen and there is no encryption or other security measures that would prevent the perpetrator</p>	<p>A charity laptop or mobile phone (not containing confidential data) has gone missing – it’s been reported to the police</p>

<p>from accessing this information A Data Protection Act breach has occurred and been reported to the ICO</p>	
<p>Incidents involving partners</p>	
<p>A delivery partner of the charity is alleged to have links to terrorism and extremism A delivery partner of the charity has ceased to operate and this has prevented the charity from providing assistance to its beneficiaries</p> <p>The charity's subsidiary trading company has gone into liquidation and this has resulted in financial difficulties which place the future of the charity in doubt</p> <p>Staff of another organisation within the same federated structure are found to have been committing systematic abuse of beneficiaries and this has significantly damaged the reputation of the charity</p>	<p>A serious incident has taken place involving a partner but it has no or minimal impact on the charity's reputation or the partner's ability to deliver its work with the charity A delivery partner of the charity has ceased to operate and this has had some impact on the charity's ability to provide assistance to its beneficiaries but it is not a material impact and the assistance to beneficiaries hasn't stopped</p>
<p>Other, including criminality</p>	
<p>Any other type of incident that appears serious and likely to damage reputation or incur loss of charitable funds/assets</p> <p>Extensive information is circulated online about a charity, which is designed to generate, and shows signs of succeeding in generating, widespread negative coverage and criticism of the charity, or individuals associated with it, resulting in sustained or threatening online abuse</p>	<p>One-off online complaints from members of the public, who oppose a charity's cause</p>