



# SERIOUS INCIDENT REPORTING POLICY AND PROCEDURES

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# I. Veterans Coastal Retreats' approach to reporting

## **Purpose**

This policy outlines the procedures for identifying, reporting, and managing serious incidents within Veterans Coastal Retreats (VCR). It ensures compliance with our charity regulator's guidelines and promotes transparency and accountability.

This guidance is based on that issued by the Charity Commission (England and Wales) but goes beyond it to take into consideration wider issues within our charity and also other regulators.

## **Applicability**

This policy applies to all trustees, other volunteers, employees, contractors, and third-party representatives of the charity. Its requirements should be reflected in other policies and procedures, agreements and contracts, as necessary.

## 2. Addressing and Identifying Serious Incidents

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

- Harm to the charity's beneficiaries, staff, volunteers, or others who come into contact with the charity through its work.
- Loss of the charity's money or assets or damage to the charity's property.
- Harm to the charity's work or reputation.

### Investigating an Incident

Any incident that causes an injury or harm should be investigated. For serious incidents it may be necessary to have it formally investigated, or even be investigated by external authorities. However, even if it is only minor and only requires an informal review by line management, the following process should be followed.

- Identify what happened and the extent of any injury or harm.
- Assess if there is a serious incident, or other, reporting requirement.
- Identify the cause and, in particular, if a mistake was made by someone and/or there was a weakness in policy or procedures.
- Identify what reasonable steps should be taken to prevent or at least mitigate the risk of it happening again, who should take these steps and a timescale for doing so.

### Responsibility to Report

The responsibility for reporting serious incidents rests with the charity's trustees. Trustees may delegate the task to an employee or professional adviser, but they retain ultimate responsibility for ensuring timely and accurate reporting.

### What to Report

Incidents that must be reported include, but are not limited to:

- Fraud, theft, or significant financial loss.
- Significant harm to beneficiaries, staff, or volunteers.
- Major governance issues.
- Any other incident that could seriously impact the charity's reputation or operations.

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 charity 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 charity'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.

Examples of what we should and should not report are contained in the Charity Commission (England & Wales) – [Serious Incident Examples Table](#) – Deciding What to Report.

### 3. Procedures: How to Report

**Confirm:** As soon as a serious incident is suspected it should be confirmed as a reportable event by checking the guidance at: [How to report a serious incident in your charity - GOV.UK](#)

**Report:** If the incident is confirmed to require reporting it must be reported to the Charity Commission via email at [rsi@charitycommission.gsi.gov.uk](mailto:rsi@charitycommission.gsi.gov.uk). The report should include:

- What happened.
- How the charity is dealing with the incident.
- Any steps taken to prevent a recurrence.

If a reportable incident involves actual or alleged **criminal activity** it must also be reported to the relevant agencies:

- safeguarding incidents: report allegations or incidents of abuse or mistreatment of people who come into contact with the charity through its work to:
  - the police and obtain a crime reference number (call 101 or make a report at a local police station), and
  - the local authority and other relevant agencies, see Protecting people and safeguarding incidents below
- fraud and cyber-crime: report allegations or incidents of fraud and cyber-crime to [Action Fraud via its online reporting tool](#), ensuring you obtain a crime reference number and making clear that you are representing a charity.
- theft: report allegations or incidents of theft to the police (call 101 or make a report at a local police station) and obtain a crime reference number
- links to terrorism and extremism: report links or alleged links to terrorism and extremism to the police and obtain a crime reference number. If this is not done immediately, **this may be considered a criminal offence** under Section 19 of the Terrorism Act 2000. Report this type of incident to the police in the following ways:
  - [via the National Crime Agency website](#)
  - call the Metropolitan Police Anti-Terrorist Hotline on 0800 789 321
  - call 101 or report it at a local police station
- criminal activity overseas: you should usually report any actual or alleged criminal activity that takes place overseas to local law enforcement authorities and/or safeguarding organisations in the location where this occurred. There may also be circumstances where it is necessary to report this to UK authorities. For further guidance on this, please see the Commission's guidance on criminal reporting. [Guidance on criminal reporting including overseas](#)

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 charity are minor for example 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 VCR reports the incident promptly to the Commission themselves and does not wait until someone is arrested, charged or convicted before doing this. Always report what actions have been taken or will be taken at the time of reporting.

**Follow-Up Report:** VCR should provide updates as the situation develops and when the incident is resolved.

### Other Reporting

- **Emergency Services.** VCR representatives would always dial 999 to inform the Police and/or emergency services, if there was an immediate threat of harm or serious damage to property. The Police would be informed in the event of suspected or actual criminal activity, serious injury or death or if an incident poses a significant risk to public safety, such as a bomb threat or large-scale disturbance.
- **Charity.** All serious incidents and any that might be criminal in nature or result in a claim or complaint are to be reported to the Board and our insurers. We will seek advice from professional advisers, where appropriate to do so.

**Other Regulators.** In addition, there may be a requirement to notify other UK regulators depending on the nature of the incident. Below is a non-exhaustive list of some.

- **Disclosure and Barring Service (DBS):** if an individual has been dismissed or removed from working with children or vulnerable adults (or would have been if they had not left first) because they harmed or posed a risk of harm or there are concerns that an individual may pose a risk of harm to children or vulnerable adults.
- **Local Authority Environmental Health Department:** For incidents in certain sectors like retail, warehousing, and offices.
- **Care Quality Commission (CQC):** If the incident occurs in a healthcare setting, such as a hospital, care home, or clinic.
- **Ofsted (Office for Standards in Education, Children's Services and Skills):** If the incident involves safeguarding issues or affects the welfare of children and young people.
- **Department for Education (DfE):** For significant incidents that may impact the operation of educational institutions.
- **Environment Agency:** For incidents that may have caused environmental harm, such as chemical spills.
- **Animal and Plant Health Agency (APHA):** For incidents involving animal welfare, diseases, or biosecurity.

## 4. Regulatory Guidance

**Charity Commission (England & Wales) – [Serious Incident Examples Table](#) – Deciding What to Report.**

**Charity Commission (England & Wales) - [How to report a serious incident in your charity.](#)**

