



The Matthew Smith Almshouse Charity

Registered Charity Number: 1204496

Serious Incident Reporting Policy

Rev	Update	Approved
1	Initial policy	13/5/26

1. Introduction

This policy applies to the trustees, staff and volunteers of Matthew Smith Almshouse Charity and sets out the guidelines and procedures for identifying, recording, assessing and reporting serious incidents to the Charity Commission in accordance with regulatory requirements. Its purpose is to outline the charity's duty to protect its beneficiaries, staff, volunteers, reputation and assets. Ultimate responsibility for enacting this policy will reside with the trustees.

2. Definition of a Serious Incident

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 charity through its work
- Loss of charity money or assets
- Damage to the charity's property
- Harm to the charity's reputation or the services it provides
- Breach of law or regulation
- Material governance failure

Examples include (but are not limited to):

- Safeguarding concerns involving beneficiaries or staff
- Significant financial loss, fraud, theft or other causes that threaten the charity's ability to operate and serve its beneficiaries, or where the charity's financial reserves are not sufficient to cover the loss
- Cybercrime or data breaches (e.g., personal data leak)
- Criminal incidents involving charity staff or trustees
- Major governance issues (e.g., serious conflicts of interest or trustee disputes)

Other significant incidents:

- A trustee or member of staff of the charity is disqualified in law from holding the position, e.g., because they have an unspent conviction for fraud or theft, they are an undischarged bankrupt, they are on the sex offenders register or they are disqualified from acting as a trustee or senior manager
- The charity has been forced into insolvency or to wind up, e.g., unmanageable debts or reduced income streams
- The charity's banking operations are threatened due to the charity's bank has withdrawn banking services and another bank will not accept the charity
- The charity is subject to an investigation by the police or another agency/regulator
- The charity has major governance problems, e.g., mass resignation of trustees/staff, or other events, leaving it unable to operate

3. Responsibilities

The charity's trustees are responsible for ensuring serious incidents are identified and reported appropriately. Whilst all trustees bear ultimate responsibility for ensuring the charity makes a report, and does so in a timely manner, the Board of Trustees delegate operational responsibility to the Chairperson, who will ensure investigation is done by a suitable trustee and then

- Assess reported incidents
- Escalate concerns to the Trustees
- Maintain a record of all incidents
- Submit reports to the Charity Commission where required

The Trustees recognise that if they decide not to make a report about something serious that has happened in the charity and the Charity Commission later becomes involved, they will need to be able to explain why the decision was made not to report at the time.

The Trustees recognise that protecting people and safeguarding responsibilities are key governance priorities for the charity.

4. Reporting Process

- a) **Identification:** Staff, volunteers, or partners must report any suspected serious incident to the Designated Safeguarding Officer or a Trustee immediately.
- b) **Internal Review:** The incident will be assessed by the Board of Trustees to determine if it meets the threshold for reporting.
- c) **Decision & Reporting:** If deemed reportable, the trustees (or delegated officer with Trustee approval) will submit a **Serious Incident Report** to the Charity Commission using the online reporting tool.
- d) **Record Keeping:** A central log of all incidents and reports will be maintained for audit and governance purposes.

Trustees acknowledge that if a serious incident is to be reported this must be done using the Charity Commission's 'Report a serious incident' online form.

- e) If applicable, a report will also be made to any other relevant authority, such as the police, Action Fraud, National Crime Agency, local authorities, or other relevant regulatory or statutory agencies. Trustees will inform the Commission of which other authorities they have reported the incident to.

5. Timelines

Trustees recognise that reports must be made promptly, in some cases with timely advice from professional advisors, **as soon as is reasonably possible** after the incident has been

identified and assessed. This includes initial reporting followed by updates as new information becomes available.

6. Safeguarding-Specific Considerations

Where safeguarding issues or actual or alleged criminal activity are involved, incidents will also be reported to relevant statutory agencies (e.g., police, local safeguarding boards) alongside Charity Commission notification. In the case of the Police (tel. no. 101) a crime reference number will be obtained.

In cases of fraud and cybercrime, reports of allegations or incidents will be made to Action Fraud via its online reporting tool, obtaining a crime reference number.

7. Safeguarding incidents occurring outside of the charity

If the charity becomes aware of a safeguarding incident that has taken place outside of its own activities, it may still have a duty to respond. This could include situations where:

- The charity provides safeguarding services (in line with its charitable purposes) and therefore regularly deals with incidents that arise externally.
- The charity is made aware of alleged abuse affecting a beneficiary, staff member, volunteer, or another person it comes into contact with through its work, even though:
 - the incident was not connected to the charity's activities, and
 - the person responsible was not a trustee, staff member, or volunteer of the charity.

In these cases, the trustees will carry out an internal review and ensure that the matter is reported to the police and the local authority. Where it is found, or alleged, that the charity failed to respond appropriately and this led to further harm, the Charity Commission will also be notified.

8. Learning and Follow-up

Following any serious incident, the charity will review what happened, identify lessons learned, and take steps to prevent recurrence. This may include policy updates, staff training, or process improvements.

9. Annual Assurance

The trustees confirm through the Annual Return whether any serious incidents have occurred and been reported. If serious incidents have not been reported, trustees must explain why.

10. Review

This policy will be reviewed bi-annually or following a serious incident, whichever comes first.

11. Approval

This policy has been approved for issue by the board of trustees of Matthew Smith Almshouse Charity. (13th May 2026)

Signature: 

Name: PAUL HODGSON (TREASURER)

Date: 13th May 2026