

Policy for Reporting Serious Incidents



1. Purpose

3 Counties Vineyard Church (“the Church”) is committed to safeguarding people, protecting its assets, and maintaining public trust.

This policy sets out how the Church identifies, responds to, manages, and reports serious incidents in line with Charity Commission requirements and good governance practice.

2. Scope

This policy applies to:

- Trustees
- Staff
- Volunteers
- Church leaders
- Anyone acting on behalf of 3 Counties Vineyard Church

It covers incidents arising from church activities, ministries, events, premises, and any situation where the Church’s people, assets, or reputation may be affected.

3. Overview

A serious incident (as defined by the Charity Commission for England and Wales) is an adverse event, whether actual or alleged, which results in or risks significant:

- Harm to people who come into contact with the Church through its work (including beneficiaries, staff, volunteers, congregation members, attendees and members of the public)
- Loss of the Church’s money or other assets
- Damage to the Church’s property (including buildings and premises)
- Harm to the Church’s work, reputation or ability to operate

If you would be concerned to see it reported in the media, or you are unsure whether it meets the threshold, treat it as a potential serious incident and report it internally without delay.

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For example: a serious incident may include but is not limited to;

Safeguarding

- Abuse or alleged abuse of a child or adult at risk
- Serious safeguarding failures or concerns involving staff, or volunteers
- Failure to follow safeguarding policies or statutory reporting duties

Financial or governance issues

- Significant fraud, theft, or financial loss
- Misuse of charitable funds
- Major governance failures (e.g. trustees acting outside their authority)

Operational or reputational harm

- Serious damage to church buildings affecting safety or operations
- Data breaches involving sensitive personal information
- Serious complaints that indicate systemic failure
- Media coverage that could seriously damage public confidence
- Health and safety incident resulting in serious harm or fatality

Legal or regulatory matters

- Criminal investigations involving trustees, staff, or volunteers
- Serious breaches of charity law or other legal obligations

What makes an incident “serious”?

It is considered serious if it:

- Has caused or could cause significant harm
- Shows systemic weakness in governance or safeguarding
- Puts the charity at serious risk, even if no harm has yet occurred

4. Reporting requirement

The trustees must ensure that serious incidents are reported promptly to the Charity Commission via a Serious Incident Report (SIR), with prompt, full and frank disclosure of what happened and how the Church is dealing with it, even where the matter has also been reported to another body. Other reporting bodies may include:

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- Safeguarding authorities (for example, Local Authority children's services, adult safeguarding, LADO where relevant)
- The police (where a crime is suspected or alleged)
- Other regulators as appropriate (for example, the Information Commissioner's Office (ICO) for personal data breaches, or the Health and Safety Executive (HSE) for notifiable incidents)

A guide to reporting workflow and timescales

- **Immediately:** make the situation safe, obtain urgent medical help where required, contact emergency services/statutory agencies if appropriate, and preserve evidence where this is safe and lawful.
- **As soon as possible (same day wherever practicable):** report internally to the Safeguarding Lead (if safeguarding-related) and the Chair of Trustees (or the Vice Chair if the Chair is unavailable or conflicted).
- **Within 24 hours:** create/complete the Serious Incident Reporting Form (Appendix A) and secure any relevant records.
- **Within 72 hours:** trustees (or an urgent delegated group) decide whether an SIR is required and record the rationale either way.
- **Submit the SIR:** as soon as reasonably possible once the charity becomes aware of the incident and has sufficient verified information to make a meaningful report. Where not all facts are known, submit what is known and provide updates as the situation develops.

5. Immediate Actions

Where a serious incident occurs or is suspected, the Church will take immediate, proportionate steps to safeguard people, limit harm, and protect the Church's assets and reputation.

- Prioritise safety and take immediate steps to protect those at risk
- Preserve evidence where appropriate
- Contact statutory authorities (such as the police or local safeguarding agencies) when required
- Inform the Safeguarding Lead and the Chair of Trustees as soon as possible

6. Internal Reporting

Anyone who becomes aware of a potential serious incident must report it internally without delay to:

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- Safeguarding Lead (for safeguarding-related matters)
- Chair of Trustees (or Vice Chair / another nominated trustee if the Chair is unavailable or conflicted)

A written record must be made and stored securely (use Appendix A where appropriate).

As a minimum, record:

- Date and time of incident (or allegation/concern),
- Date/time the Church became aware
- Location and activity/setting
- How the incident was discovered/reported (e.g., disclosure, observation, complaint)
- People affected (using anonymised descriptions where possible) and immediate impact
- Immediate actions taken and any ongoing risks/controls in place
- Who was notified internally and externally (and any reference numbers)

7. Reporting to the Charity Commission

The trustees are collectively responsible for ensuring a Serious Incident Report (SIR) is made to the Charity Commission when required. In practice, trustees may delegate drafting and submission to an authorised person (for example, the Chair of Trustees, Safeguarding Lead, Church Operations Manager or a professional adviser), but trustees retain ultimate responsibility for ensuring the report is accurate, timely, and not misleading.

- **Decision and rationale:** the trustees will record the decision to report (or not) and the rationale. If the trustees decide not to report and the Commission later becomes involved, trustees may need to explain why the matter was not reported at the time.
- **Conflicts:** where the allegation/incident involves the Chair, Safeguarding Lead, or a trustee, the decision and external communications must be led by another trustee (e.g., Vice Chair) and conflicts must be managed in line with the Church's conflicts-of-interest arrangements.
- **What the SIR should cover:** what happened; when/where; how the Church became aware; the impact and any ongoing risks; actions taken so far; who has been notified (police/safeguarding/other regulators); and what steps are planned to prevent recurrence.

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- **Updates:** where significant new information arises (e.g., investigation outcomes, enforcement action, or material change in risk), the trustees will submit an update to the Charity Commission quoting the original SIR reference where available.

8. Investigation and Ongoing Management

The trustees will ensure that:

- Appropriate investigations are carried out
- The Church cooperates fully with statutory and regulatory authorities
- Action is taken to address any failings or risks identified
- Policies, procedures, and training are reviewed and improved where necessary
- Confidentiality will be maintained wherever possible, particularly in safeguarding cases.

9. Communication and Media

All external communications relating to a serious incident will be managed by:

- The Chair of Trustees, or
- A trustee or other individual delegated by the Chair

No other person is authorised to make statements on behalf of the Church without approval.

10. Record Keeping

The Church will:

- Keep secure records of all serious incidents, decisions, reports made and actions taken (including where a decision is made *not* to submit an SIR)
- Maintain a central serious incident log (date identified, category, status, key actions, external notifications, outcomes, and learning)
- Store information in line with data protection legislation, sharing and recording only what is necessary; use anonymised descriptions where possible
- Review incidents periodically to identify learning, update risk controls, and improve policy/procedure/training

11. Review

This policy will be reviewed bi-annually by the trustees of 3 Counties Vineyard Church.

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12. Approval

This serious incident reporting policy was approved by the Board of Trustees on 15th June 2026

Signed: *P J Taylor*

Philip J Taylor (Chair of trustees)

Date for next review: June 2028

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Appendix A: Serious Incident Reporting Form

Confidential – For Internal Use Only

This form must be completed as soon as possible after a serious incident has occurred or been identified, in line with the Serious Incident Policy of 3 Counties Vineyard Church and Charity Commission guidance.

Data protection: record information factually and proportionately. Do not include unnecessary personal data. Where possible, use anonymised descriptors (e.g., “a volunteer”, “a child attendee”). Only include names or identifying details where essential for safeguarding, legal or regulatory purposes.

Section 1: Reporter Details

- Name of person completing this form:
- Role (e.g. Trustee, Staff, Volunteer, Leader):
- Contact details (email and phone):
- Date report completed:

Section 2: Incident Details

- Date of incident/allegation (or date range if ongoing):
- Time of incident (if known):
- Date/time the Church first became aware:
- How was it discovered/reported? (e.g., disclosure, complaint, observed, audit):
- Location of incident (on/off church premises) and activity/setting:

Section 3: Description of the Serious Incident

Please give a clear and factual account of what happened, including what is known at this stage and what is alleged. Include how it was discovered, who was involved/affected (use anonymised descriptions where possible), any immediate impact, and any immediate actions taken (including preserving evidence where appropriate).

You may need to use the space below and on the next page:

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Section 4: Impact Assessment (initial)

- Impact on people (harm/risk of harm):
- Impact on money/assets/property:
- Impact on services/operations:
- Reputational impact / likelihood of media interest:
- Any ongoing risks and controls in place:
-

Section 5: Category of Serious Incident

(Please tick all that apply)

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- Safeguarding concern (child or adult at risk)
- Serious harm to a person
- Allegation of abuse or misconduct
- Criminal activity or alleged criminal activity
- Financial loss, fraud, or theft
- Significant financial or governance failure
- Serious reputational damage or media interest
- Regulatory or legal breach
- Other (please specify): _____

Section 6: People Affected

- Who has been affected by the incident?
(e.g. children, adults at risk, staff, volunteers, congregation, members of the public)
- Are any children or adults at risk involved?
 Yes No

If yes, provide brief details (do not include unnecessary personal data):

Section 7: Immediate Actions Taken

Please outline any immediate actions already taken to manage the situation or reduce risk.

- Have emergency services been contacted?
 Yes No Not applicable

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- Have statutory agencies been informed? (e.g. Police, Social Services, Local Authority Designated Officer)
 Yes No Not applicable

Section 8: Ongoing Risk and Impact

- Is there an ongoing risk to people, the church, or the charity?
 Yes No

If yes, please explain:

- Is this incident likely to attract media or public attention?
 Yes No Unsure

Section 9: Notifications

Trustee Notification

- Have the Trustees been informed?
 Yes No
- Name of Trustee(s) informed:
- Date Trustees informed:

External notifications (where applicable)

- Police notified? Yes No N/A Date/time: Reference number (if any):
- Safeguarding authority/LADO notified? Yes No N/A Date/time: Ref/contact:
- ICO notified (personal data breach)? Yes No N/A Date/time: Ref/contact:
- HSE notified (health & safety)? Yes No N/A Date/time: Ref/contact:
- Insurer notified? Yes No N/A Date/time: Ref/contact:

Section 10: Declaration

I confirm that the information provided in this form is accurate to the best of my knowledge and has been shared in accordance with the Serious Incident Policy of 3 Counties Vineyard Church, using only information that is necessary and proportionate.

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- Name:
- Signature: Date:

Section below to be completed by a delegated Trustee of 3 Counties Vineyard

Section 10: Charity Commission Reporting

- Does this incident meet the threshold for reporting to the Charity Commission?
 Yes No Under consideration
- Trustee decision date and decision-maker(s):
- Brief rationale (including why it is / is not “significant” in the context of the Church):

- If reported, date of SIR submission:
- SIR reference number (if available):
- Name/role of person authorised to submit the SIR on behalf of trustees:
- Will an update to the Charity Commission be required? (e.g., investigation outcome) Yes No Unsure

Section 11: Follow-Up Actions and Outcomes

Please outline any planned or completed actions, including reviews, policy changes, disciplinary actions, safeguarding responses, or external reporting.

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Section 12: Delegated trustee details

- Name:
- Signature:
- Role:
- Contact details:
- Date report completed: