



Serious Incident Reporting Policy

1. General Policy

- 1.1 The PCC of St Margaret's Church (the Parochial Church Council, "the PCC") acknowledge that ultimate responsibility for the management of serious incidents and for reporting them to the Charity Commission for England and Wales rests with them. An integral part of this responsibility is the development and maintenance of a policy that enables serious incidents to be identified, assessed, managed, and reported appropriately.
- 1.2 Our policy is to identify and manage serious incidents in order to:
 - minimise any harm to the church by enabling the PCC to make informed decisions and take timely action;
 - ensure that the church undertakes required reporting to the Charity Commission and any other relevant authorities.
- 1.3 The PCC's overriding responsibility is to develop, oversee and maintain systems, procedures and controls that enable the church to pursue the purposes for which it was established and to be honouring to God.
- 1.4 In so doing, the PCC recognises and accepts that serious incidents can occur even in well-run organisations and seeks, so far as possible, to mitigate risks that pose a serious threat to the church's people, work, finances, reputation or future viability, while being transparent with the Charity Commission and any other relevant regulators.
- 1.5 In constructing this policy, the PCC has had due regard to Charity Commission guidance *How to report a serious incident in your charity*.

2. Responsibility for Reporting Serious Incidents

- 2.1 The PCC understands that the Charity Commission requires charities to report serious incidents promptly, fully, and frankly. Where a serious incident occurs, the Commission expects to be told what has happened and how the charity is responding, even if the matter has also been reported to the police, safeguarding authorities, insurers, donors, or other regulators.
- 2.2 While responsibility for compliance with this duty rests collectively with the PCC as trustees, the PCC formally delegates the *operational task* of submitting serious incident reports to the Charity Commission as follows:
 - in the first instance, to the Vicar;
 - in the absence or unavailability of the Vicar, to the Churchwardens;
 - where neither the Vicar nor the Churchwardens are able to submit the report in a timely manner, they may direct another appropriate member of the staff team to submit the report on their behalf.
- 2.3 Any report submitted under this delegated authority is deemed to be made on behalf of the PCC. The PCC remains collectively responsible for the accuracy, completeness, and timeliness of the report and for the actions taken in response to the incident.
- 2.4 The PCC shall be informed as soon as reasonably practicable of any serious incident reported to the Charity Commission, the content of the report submitted, and any subsequent correspondence or required actions.

- 2.5 Reportable incidents may arise not only from activities within St Margaret’s Church itself, but also from:
- a subsidiary trading company;
 - an organisation financially supported by the church where the incident materially affects the church’s work, people, finances, or reputation;
 - another linked organisation, including (where applicable):
 - a church plant initiated by St Margaret’s;
 - a church within the same denominational family where branding, leadership or communications are shared;
 - a co-working charity sharing strategy or resources.
- 2.6 Where there is a grant agreement, memorandum of understanding or partnership agreement with any organisation identified in paragraph 2.5, appropriate provisions should be included to ensure that serious incidents are reported promptly to St Margaret’s Church PCC, enabling the PCC to meet its obligations under this policy.

3. Identifying and Assessing Serious Incidents

- 3.1 A serious incident is an adverse event, whether actual or alleged, which results in or risks significant:
- harm to beneficiaries, staff, volunteers, or others who come into contact with the church;
 - loss of the church’s money or assets;
 - damage to the church’s property;
 - harm to the church’s work or reputation.
- “Significant” is to be understood in the context of the church’s size, activities, finances, and reputation.
- 3.2 The main categories of reportable incident include:
- a. safeguarding incidents involving risk of significant harm;
 - b. financial crime, including fraud, theft, cyber-crime, or money laundering;
 - c. large donations from unknown or unverifiable sources or suspicious financial activity;
 - d. other significant financial loss;
 - e. links to terrorism or extremism, including proscribed organisations or individuals subject to asset freezes;
 - f. other serious incidents such as insolvency, loss of banking facilities, serious data breaches, or incidents involving partners that materially affect the church.
- 3.3 The PCC recognises that assessing seriousness involves judgement. The PCC will consider incidents in the light of Charity Commission guidance and, where appropriate, seek professional advice.

4. Process and timing of reporting

- 4.1 All staff, office-holders and volunteers should be made aware of this policy and given guidance on identifying and reporting potential serious incidents.
- 4.2 Safeguarding incidents must be reported and managed in accordance with the church’s Safeguarding Policy.

- 4.3 Other incidents that may be serious should be reported without delay to the Vicar, a Churchwarden, or a PCC member so that timely assessment and action can take place. Indicative timescales for internal reporting relative to the categories identified in section 3.2 are:
- a. within one hour (unless this conflicts with safeguarding procedures);
 - b. within two working hours;
 - c. within one working day;
 - d. within two working hours;
 - e. within two working hours;
 - f. within two working hours.
- 4.4 The Vicar, Churchwarden or delegated person should assess the incident and, unless it is clearly not serious, ensure the PCC is informed and that a decision is made about reporting, advice to be sought, and any confidentiality or data-protection issues.
- 4.5 A report to the Charity Commission should be submitted as soon as reasonably possible after the incident has been assessed and initial actions identified. Reports should not be delayed because all details are not yet known.
- 4.6 Any additional reporting required by law, regulation or denominational guidance shall be undertaken as agreed by the PCC.
- 4.7 Failure by any staff member, volunteer, or office-holder to report a matter that may constitute a serious incident will be treated as a significant breach of responsibility and may result in disciplinary action. This policy does not form part of any contract of employment and may be amended at any time.

5. Adoption of this Policy

- 5.1 The PCC of St Margaret's Church formally adopted this policy at its PCC meeting held on 22 January 2026.