



THE CHURCH
OF ENGLAND

Practical guidance: How to make a Safeguarding Serious Incident report to the Charity Commission

House of Bishops

Version Control		
V1.1	January 2019	Published (Approved by the Charity Commission on 24 October 2018)

Introduction

This guidance explains how to prepare a **safeguarding Serious Incident Report** and submit it to the Charity Commission.

This guidance is for Diocesan Safeguarding Advisers, Diocesan Secretaries, Parish Safeguarding Officers and the Safeguarding Officers in Religious Communities¹. It sits alongside the main Guidance on how to identify a safeguarding Serious Incident **and what to do when one occurs**, which can be accessed [here](#).

For guidance on how to report Serious Incidents that do not relate to safeguarding, such as financial crime, significant financial loss and data protection breaches, please see the relevant guidance².

It is important to remember that the requirement to report a Serious Incident to the Charity Commission is in addition to any requirement to notify the police, local authority, statutory agency or other relevant authority.

This guidance is effective from 1 January 2019.

1. What is a safeguarding “Serious Incident”?

A safeguarding Serious Incident is an adverse event, whether actual or alleged, which results in or risks **significant** harm to the charity’s beneficiaries, employees, office holders, volunteers or to others who come into contact with the charity through its work. This includes where there are allegations or incidents of abuse of or risks to beneficiaries or others connected with the charity’s activities. What is considered to be “significant” is a matter for the trustees to determine, as it will depend on the context of the charity, taking into account its operations, staff, finances and reputation.

The following should be reported to the Charity Commission as a safeguarding Serious Incident:

- beneficiaries of your charity (adults or children) have been, or are alleged to have been, abused or mistreated while under the care of the charity, or by someone connected with the charity, for example a trustee of the PCC or DBF, a member of the clergy, a Church Officer, employee or volunteer;
- a person who comes into contact with the charity through its work (including a Church Officer, an employee or a volunteer) has been abused or mistreated (alleged or actual) and the abuse or mistreatment is connected with the activities of the charity (for example it occurred during a religious service, a home visit by clergy or a pastoral visitor or an activity or event run by the PCC or DBF);
- there has been a breach of the House of Bishops’ guidance or other safeguarding procedures or policies at the charity which has put beneficiaries and other persons who come into contact with the charity through its work at significant risk of harm, including failure to report safeguarding concerns to statutory agencies or to carry out relevant vetting checks which would have identified that a person is disqualified in law, under safeguarding legislation, from working with children, young people or adults; or

¹ A very small number of Religious Communities are “closed” and are not charities as they do not provide sufficient public benefit. Religious Communities that are not charities do not need to report Serious Incidents to the Charity Commission.

² [Guidance for PCCs on reporting non-safeguarding Serious Incidents:](#)
[Guidance for DBFs and Religious Communities](#) on reporting non-safeguarding Serious Incidents.

- alleged or actual incidents in the workplace which have resulted in or risk significant harm to trustees, employees, office holders or volunteers and are considered to be “serious” in the context of the charity. An incident should always be reported where the level of harm to the victims and/or the likely damage to the reputation of or public trust in the charity is particularly high. For example: allegations of serious sexual abuse of and by a staff member, office holder or volunteer; abuse by a senior member of staff or office holder or if a widespread of culture of bullying, abuse or sexual harassment is uncovered.

Any incident which is connected with the activities of the charity and involves actual or alleged criminal activity should always be reported to the police and/or the local authority, as well as to the Charity Commission as a Serious Incident. You should not wait until someone has been arrested, charged or convicted, before reporting an incident.

2. What is not a Serious Incident?

If an incident is not Serious, or it is not connected with the charity’s activities, it does not need to be reported. Disclosures that abuse is occurring outside the charity and which are not connected to the charity or its activities should be reported to the relevant authorities. However, as the abuse does not relate to the charity’s activities, and the alleged perpetrator is not connected with the charity, it is not a Serious Incident for these purposes and so should not be reported to the Charity Commission.

3. When should a Serious Incident be reported to the Charity Commission?

The Charity Commission expects Serious Incidents to be reported to it “promptly”, i.e. as soon as is reasonably possible after it happens, or immediately after you become aware of it³. In practice, a report should be made once sufficient information has been gathered for the report to be meaningful. However, there may be occasions where it is appropriate for a brief initial report to be made, with an indication that a follow-up report will be made once additional information has been obtained.

It is important to report Serious Incidents in a timely manner, as a failure to report a Serious Incident that subsequently comes to light may be considered by the Charity Commission to be mismanagement, or a serious governance failure. This could result in the Charity Commission taking regulatory action, particularly if further abuse has taken place following the initial Serious Incident that was not reported.

If a charity’s trustees become aware that a Serious Incident has been identified in a charity which it funds, and the Serious Incident has been reported to the Charity Commission, the funder charity should NOT also report the Serious Incident to the Charity Commission UNLESS:

- the association between the funder charity and the funded charity in which the Serious Incident occurred would, in the minds of the public, risk causing significant reputational damage to the funder charity; and/or
- the Serious Incident has a significant impact on the staff, work or operations of the funder charity.

³ See Section 6 on Bulk Reporting.

It is anticipated that such “double reporting” would only be needed in exceptional circumstances.

4. Who is responsible for preparing and submitting the Serious Incident Report?

Responsibility for making a Serious Incident report in a timely manner rests with the trustees. However, this responsibility should be delegated formally to the Diocesan Secretary (for DBFs and PCCs) and to the Safeguarding Officer for Religious Communities.

The PCC Safeguarding Officer is responsible for:

- contacting the DSA if they consider a safeguarding Serious Incident may have occurred and providing the DSA with any information requested;
- taking such steps or actions required to safeguard beneficiaries or those connected with the PCC, in consultation with the DSA and the PCC’s trustees (where appropriate); and
- reporting back to the PCC’s trustees in relation to the management and reporting of the Serious Incident.

The Diocesan Safeguarding Adviser is responsible for:

- deciding (in consultation with the Diocesan Secretary) whether an incident is a Serious Incident that needs to be reported to the Charity Commission;
- working with, supporting and providing guidance to the relevant PCC’s Safeguarding Officer;
- deciding whether an incident is sufficiently serious to require it to be separately reported to the Charity Commission, or whether it can be included in the bulk Serious Incident Report submitted every six months; and
- preparing the Serious Incident Reports (individual and bulk) and providing them to the Diocesan Secretary in a timely manner for submission to the Charity Commission.

The Diocesan Secretary is responsible for:

- supporting the Diocesan Safeguarding Adviser to decide whether an incident is a Serious Incident that needs to be reported to the Charity Commission;
- reporting to the DBF’s trustees (in relation to the Serious Incidents occurring within the DBF) in accordance with the terms of the delegation;
- submitting the Serious Incident Reports to the Charity Commission on behalf of the DBFs and PCCs;
- sending a copy of all PCC Serious Incident Reports to the relevant PCC’s Safeguarding Officer; and
- sending a copy of all Serious Incident Reports to the National Safeguarding Team (**NST**)⁴.

The Safeguarding Officer in a Religious Community is responsible for:

- deciding whether an incident is a Serious Incident that needs to be reported to the Charity Commission;
- reporting to the Religious Community’s trustees in relation to the Serious Incidents in accordance with the terms of the delegation;
- preparing the Serious Incident Report and submitting it to the Charity Commission;
- sending a copy of the Serious Incident Report to the trustees of the Religious Community;

⁴ at rsi.nst@churchofengland.org

- sending a copy of the Serious Incident Report to the Diocesan Safeguarding Adviser for the Diocese in which the Serious Incident occurred;
- sending a copy of the Serious Incident Report to the Religious Community's episcopal Visitor; and
- sending a copy of the Serious Incident Report to the NST⁵.

When gathering information in order to prepare a safeguarding Serious Incident Report, it is important to take care not to undermine the work of the police (or other investigating authorities) by leading potential witnesses or contaminating evidence.

5. How is a Serious Incident Report submitted to the Charity Commission?

Serious Incident Reports must be submitted to the Charity Commission by email to rsi@charitycommission.gsi.gov.uk.

DBFs and PCCs

The Charity Commission has agreed that Diocesan Secretaries can submit bulk reports for their DBF and the PCCs in their diocese every six months, rather than reporting each incident separately, provided that particularly serious or significant incidents, and/or those likely to attract media attention are reported immediately. Diocesan Safeguarding Advisers should prepare:

- any individual reports required for the Diocesan Secretary to submit, using the template in Annex A; and
- bulk reports every six months covering their DBF and the PCCs in their Diocese, when required, using the template in Annex B. The bulk reports should indicate clearly to the Charity Commission on behalf of which charity each Serious Incident report is being submitted.

Where a Serious Incident relates to both a PCC and a DBF, for example if an allegation is made against a parish priest whose stipend is paid by the DBF, the DBF only needs to make one Serious Incident report on behalf of the PCC, unless there is risk of significant particular harm to the reputation of the DBF as a result of the Serious Incident.

Religious Communities

The Safeguarding Officer for the Religious Community should prepare individual safeguarding Serious Incident reports using the template at Annex A and submit them to the Charity Commission.

6. How do I decide which Serious Incidents should be individually reported and which can be included in the bulk report?

The Charity Commission's guidance states that particularly serious or significant incidents, and/or those likely to attract media attention, should be reported to it immediately, rather than waiting to include it in the next bulk report. In light of this it is proposed that incidents where:

⁵ at rsi.nst@churchofengland.org

- there is a live risk of harm to beneficiaries (for example, the alleged perpetrator is an office holder in another parish within the diocese, or in another diocese, or holds other trusteeships or positions of responsibility in other charities);
- the person against whom allegations have been made is a senior office holder at the charity;
- the alleged incident is, or a series of alleged incidents taken together are, particularly serious in the context of the charity; or
- the incident is likely to attract substantial media interest⁶ which results in (or risks) significant harm to the charity's reputation;

should be reported to the Charity Commission immediately, and not included in the bulk reports.

However, it is also important to ensure that those incidents included in bulk reports are, in fact, Serious Incidents that require reporting.

7. What information needs to be included in the Serious Incident Report?

When preparing a Serious Incident report, it is important to remember what the Charity Commission's concerns are when it reviews Serious Incident reports. You need to provide sufficient detail in your report to give the Charity Commission a clear picture of what happened and when, the extent of any harm caused, how the charity is dealing with the incident and what the charity's next steps are. The templates in Annexes A and B are designed to assist you to provide the necessary information to the Charity Commission.

Although the Charity Commission will not investigate whether a criminal offence has occurred (that being the role of the police), it will scrutinise the conduct of the charity's trustees and the steps they have taken to protect the charity and its beneficiaries, now and in the future. This includes making sure that the charity's trustees have proper procedures and systems in place to handle allegations, are dealing with them responsibly and are reporting incidents where appropriate to the police, social services and other relevant agencies. The Charity Commission will also want to know whether the charity's trustees are managing the risks of such incidents occurring again, so far as is practicable, by making any necessary changes to existing procedures and practice as a result of the Serious Incident.

When reporting an historic allegation of abuse, the report should confirm that the Diocesan Safeguarding Adviser has informed the Diocesan Safeguarding Adviser in the diocese in which the alleged perpetrator now holds office (if relevant). The Charity Commission also expects the DBF of the diocese in which the alleged perpetrator now holds office to make a Serious Incident report to inform the Charity Commission of the steps taken as a result of the allegation reported to protect the beneficiaries (and any others who come into contact with the DBF through its work) in that diocese from any potential risk of harm.

Safeguarding Serious Incident Reports should state what happened, the nature of the risk and the steps you are taking to deal with the incident. In particular, it should include details of:

⁶ If you are uncertain how to respond to media reports once the Serious Incident Report has been made, you can contact the Charity Commission's media team for support and advice on pressenquiries@charitycommission.gsi.gov.uk.

- who you are and the authority you have to report the Serious Incident on behalf of the charity's trustees;
- who in the trustee body is aware of the incident, for example all or only some of the trustees (this is particularly relevant where the Serious Incident involves a trustee, someone connected to a trustee, or senior member of staff);
- the incident itself, when it happened and when the charity first became aware of it;
- what action is being taken to deal with the incident and prevent future problems, including whether and how the charity's internal policies and procedures (including the House of Bishops' guidance and any guidance from the NST) are being followed;
- whether and when the incident was reported to the police or another regulator / statutory agency (including official reference numbers); and
- any media handling lines you may have prepared (where appropriate).

Although the initial report to the Charity Commission should be anonymised, the Charity Commission may require further details and information in relation to any Serious Incident reported to it.

The Diocesan Secretary (or, for Religious Communities, the person submitting the Serious Incident report) should be the named contact provided to the Charity Commission should it have any follow-up queries or require further information. Where follow-up queries are received, any assistance required should be sought (as appropriate) from the relevant PCC's Safeguarding Officer, the Diocesan Safeguarding Adviser, the Diocesan Registrar, the Diocesan Bishop and/or the NST.

8. Next steps: What happens once a Serious Incident has been reported?

The Charity Commission may, on receipt of a Serious Incident report:

- (a) request further information on the incident from the charity;
- (b) give regulatory advice or guidance to the reporting charity;
- (c) take such steps as it considers necessary to protect other charities, for example where the alleged perpetrator is also a trustee, or volunteers or works in another charity; or
- (d) require the charity to provide it with regular updates in relation to any on-going investigation.

If, after the Serious Incident has been reported, you become aware of any material changes to the facts reported to the Charity Commission or further significant developments occur, you should make a follow-up report of the Serious Incident to the Charity Commission, which may be included in the bulk report if there is no live risk of harm etc.

If an individual against whom allegations were made and which were reported to the Charity Commission as a Serious Incident is subsequently exonerated, or the allegations were found to be false or groundless following further investigation by the charity, police or other agency, the Diocesan Secretary should inform the Charity Commission.

The Diocesan Secretary should keep a record of all Serious Incident Reports submitted, and any follow-up correspondence, together with copies of any papers that are sent to the Charity Commission. The records must be stored securely, so that they can be referred to at a later date if necessary. Where a Serious Incident report is made on behalf of a PCC, a copy of the report should also be sent to the PCC's Safeguarding Officer and stored securely.

Further guidance on Serious Incident reporting can be found on the Charity Commission website⁷.

⁷ Charity Commission Guidance for charity trustees about Serious Incidents: how to spot them and how to report (17 October 2018) <https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity>

ANNEX A
 TEMPLATE FOR INDIVIDUAL SERIOUS INCIDENT REPORTS

Full name of the charity	
Charity registration number (or, if the PCC is not registered, state that it is an excepted charity)	
Charity's address	
Date of Report's submission to the Charity Commission	
Name of person submitting the Report and position in the charity (or authority on which Report is being submitted)	
Email address of person submitting the Report	
Name and contact details (email and telephone) of named contact for follow-up queries	
Who in the trustee body is aware of the Incident	
Nature of the Incident ⁸	
<p><u>Details of the Incident:</u></p> <p><u>What</u> happened?</p> <p><u>When</u> and <u>how</u> did it happen?</p> <p><u>When</u> and <u>how</u> did the charity first become aware of it?</p> <p>Is it an isolated incident, or part of a series of incidents? If part of a series, provide full details.</p>	
<p><u>Whether or not the incident is historic, is there any on-going risk of harm? If so:</u></p> <ul style="list-style-type: none"> - <u>describe what this risk is and who may be at risk; and</u> - <u>provide details as to what steps have been taken and who has been informed to reduce any live risk of harm to beneficiaries.</u> 	

⁸ Summarise incident in one sentence – e.g. allegation that a child was abused (single incident) during a Church-run activity by a volunteer helping at that activity.

<p>Who in the charity is involved (trustee, office holder, employee, volunteer, beneficiary) and what is their role in the charity? Are you aware of any positions they also hold in other charities?</p> <p>Will any disciplinary action need to be taken against an individual? Has the person resigned? If so, provide details.</p>	
<p><u>Has the Incident been reported to the police, the local authority or to any other relevant regulator?</u> If so, provide the name of the relevant regulator and the (e.g. crime) reference number.</p> <p>If there has been any delay in reporting the incident to the police, local authority or other regulator, please provide details and explain.</p>	
<p>Provide details of the charity's <u>internal policies and procedures</u> that relate to the Incident:</p> <ul style="list-style-type: none"> - Explain how the policies and procedures were followed (and, if not, why not)? - Are any changes to existing policies and procedures required to reduce the chances of similar incidents reoccurring? If so – explain and if not, also explain. <p>Explain any lessons learned and steps being taken by the charity to reduce the chances of similar incidents reoccurring.</p>	
<p>Is it likely that the public / media will become interested in the Incident? If so, what plans have been made to respond to any media stories?</p>	
<p>Provide details of any anticipated next steps.</p>	
<p>Provide any additional information that is not provided above which is of relevance to the Serious Incident being reported.</p>	

ANNEX B
 TEMPLATE FOR BULK SAFEGUARDING SERIOUS INCIDENT
 REPORTS

**BULK SAFEGUARDING SERIOUS INCIDENT REPORT FOR CHARITIES IN THE
 DIOCESE OF []**

DATES COVERED BY REPORT: [] TO []

Report submitted by: [Full Name], Diocesan Secretary

Date Report Submitted: []

If further information is required in relation to any of the incidents in the Bulk Report below, please contact [FULL NAME], the Diocesan Secretary, at [email address] and [telephone number].

[Full name of DBF⁹] Charity registration number: [] Charity's address: []	
Serious Incident 1	
Nature of the Incident¹⁰	
Who in the trustee body is aware of the Incident?	
<u>Details of the Incident:</u> <u>What happened?</u> <u>When</u> and <u>how</u> did it happen? <u>When</u> and <u>how</u> did the charity first become aware of it? Is it an isolated incident, or part of a series of incidents? If part of a series, provide full details.	
<u>If the incident is historic, is there any on-going risk of harm? If so:</u> <ul style="list-style-type: none"> - <u>describe what this risk is and who may be at risk; and</u> - <u>provide details as to what steps have been taken and who has been informed to reduce any live risk of harm to beneficiaries.</u> 	

⁹ As listed on the Charity Commission's website.

¹⁰ Summarise incident in one sentence – e.g. allegation that a child was abused (single incident) during a Church-run activity by a volunteer helping at that activity.

<p>Is anyone in the charity involved (trustee, office holder, employee, volunteer, beneficiary) and what is their role in the charity? Are you aware of any positions held by them in other charities?</p> <p>Will any disciplinary action need to be taken against an individual? Has anyone resigned? If so, provide details.</p>	
<p><u>Has the Incident been reported to the police, local authority or to any other relevant regulator?</u> If so, provide the name of the relevant regulator and the (e.g. crime) reference number.</p> <p>If there has been any delay in reporting the incident to the police, local authority or other regulator, please provide details and explain.</p>	
<p>Provide details of the charity's <u>internal policies and procedures</u> that relate to the Incident:</p> <ul style="list-style-type: none"> - Explain how the policies and procedures were followed (and, if not, why not)? - Are any changes to existing policies and procedures required to reduce the chances of similar incidents reoccurring? If so – explain and if not, also explain. <p>Explain any lessons learned and steps being taken by the charity to reduce the chances of similar incidents reoccurring.</p>	
<p>Is it likely that the public / media will become interested in the Incident? If so, what plans have been made to respond to any media stories?</p>	
<p>Provide details of any anticipated next steps.</p>	
<p>Provide any additional information that is not provided above which is of relevance to the Serious Incident being reported.</p>	

Serious Incident 2¹¹	
Nature of the Incident¹²	
Who in the trustee body is aware of the Incident?	
<p><u>Details of the Incident:</u></p> <p><u>What</u> happened?</p> <p><u>When</u> and <u>how</u> did it happen?</p> <p><u>When</u> and <u>how</u> did the charity first become aware of it?</p> <p>Is it an isolated incident, or part of a series of incidents? If part of a series, provide full details.</p>	
<p><u>If the incident is historic, is there any on-going risk of harm? If so:</u></p> <ul style="list-style-type: none"> - <u>describe what this risk is and who may be at risk; and</u> - <u>provide details as to what steps have been taken and who has been informed to reduce any live risk of harm to beneficiaries.</u> 	
<p>Is anyone in the charity involved (trustee, office holder, employee, volunteer, beneficiary) and what is their role in the charity? Are you aware of any positions held by them in other charities?</p> <p>Will any disciplinary action need to be taken against an individual? Has anyone resigned? If so, provide details.</p>	
<p><u>Has the Incident been reported to the police, local authority or to any other relevant regulator?</u> If so, provide the name of the relevant regulator and the (e.g. crime) reference number.</p> <p>If there has been any delay in reporting the incident to the police, local authority or other regulator, please provide details and explain.</p>	
<u>Provide details of the charity's internal policies and procedures that relate to the incident:</u>	

¹¹ Cut and paste for as many Serious Incidents as require reporting for this charity.

¹² Summarise incident in one sentence – e.g. allegation that a child was abused (single incident) during a Church-run activity by a volunteer helping at that activity.

<ul style="list-style-type: none"> - Explain how the policies and procedures were followed (and, if not, why not)? - Are any changes to existing policies and procedures required to reduce the chances of similar incidents reoccurring? If so – explain and if not, also explain. <p>Explain any lessons learned and steps being taken by the charity to reduce the chances of similar incidents reoccurring.</p>	
<p>Is it likely that the public / media will become interested in the Incident? If so, what plans have been made to respond to any media stories?</p>	
<p>Provide details of any anticipated next steps.</p>	
<p>Provide any additional information that is not provided above which is of relevance to the Serious Incident being reported.</p>	
<p>[Full name of PCC¹³]</p> <p>Charity registration number: [] (or state if it is an excepted charity)</p> <p>Charity's address: []</p>	
<p>Serious Incident 1¹⁴</p>	
<p>Nature of the Incident¹⁵</p>	
<p>Who in the trustee body is aware of the Incident?</p>	
<p><u>Details of the Incident:</u></p> <p><u>What</u> happened?</p> <p><u>When</u> and <u>how</u> did it happen?</p> <p><u>When</u> and <u>how</u> did the charity first become aware of it?</p> <p>Is it an isolated incident, or part of a series of incidents? If part of a series, provide full details.</p>	

¹³ As listed on the Charity Commission's website (if registered).

¹⁴ Cut and paste for as many Serious Incidents as require reporting for this charity. Then cut and paste with heading for each PCC in the Diocese for which safeguarding Serious Incident Reports are being made.

¹⁵ Summarise incident in one sentence – e.g. allegation that a child was abused (single incident) during a Church-run activity by a volunteer helping at that activity.

<p><u>If the incident is historic, is there any on-going risk of harm? If so:</u></p> <ul style="list-style-type: none"> - <u>describe what this risk is and who may be at risk; and</u> - <u>provide details as to what steps have been taken and who has been informed to reduce any live risk of harm to beneficiaries.</u> 	
<p>Is anyone in the charity involved (trustee, office holder, employee, volunteer, beneficiary) and what is their role in the charity? Are you aware of any positions held by them in other charities?</p> <p>Will any disciplinary action need to be taken against an individual? Has anyone resigned? If so, provide details.</p>	
<p><u>Has the Incident been reported to the police, local authority or to any other relevant regulator?</u> If so, provide the name of the relevant regulator and the (e.g. crime) reference number.</p> <p>If there has been any delay in reporting the incident to the police, local authority or other regulator, please provide details and explain.</p>	
<p><u>Provide details of the charity's internal policies and procedures that relate to the Incident:</u></p> <ul style="list-style-type: none"> - Explain how the policies and procedures were followed (and, if not, why not)? - Are any changes to existing policies and procedures required to reduce the chances of similar incidents reoccurring? If so – explain and if not, also explain. <p>Explain any lessons learned and steps being taken by the charity to reduce the chances of similar incidents reoccurring.</p>	
<p>Is it likely that the public / media will become interested in the Incident? If so, what plans have been made to respond to any media stories?</p>	
<p>Provide details of any anticipated next steps.</p>	

Provide any additional information that is not provided above which is of relevance to the Serious Incident being reported.	
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