



2025

THE SERIOUS INCIDENT REPORTING POLICY

1. Purpose

The purpose of this Policy is to ensure that individuals connected with the Central Oxford Mosque Society (COMS) can identify Serious Incidents (as defined below), de-escalate them appropriately, and report them to the Trustees. This enables Trustees to maintain oversight and decide whether a Serious Incident Report should be submitted to the Charity Commission for England and Wales (the “Commission”), alongside any other necessary actions.

Relevant People include all COMS staff, volunteers, visiting collaborators, students, and visitors who are working with or for, or otherwise engaging with COMS. All Relevant People must adhere to this Policy in their engagement with COMS.

2. Scope

This Policy outlines how COMS ensures compliance with the Serious Incident Reporting (“SIR”) requirements of the Commission, as defined in the Commission’s guidance available here:

<https://rsi.charitycommission.gov.uk/web/register/report-a-serious-incident>

Failure to adhere to this Policy will be treated as a serious matter. For staff, this may result in disciplinary action for gross misconduct; for contractors or others, this may result in the termination of engagement with COMS.

While Trustees may delegate the reporting task to a senior member of staff, they retain ultimate responsibility for ensuring that Serious Incidents are reported in a timely and appropriate manner.

3. Duty to Report a Serious Incident

Although charity law does not impose a statutory requirement to report Serious Incidents as they occur, registered charities with an income over £25,000 must confirm in their annual return that there have been no Serious Incidents that should have been reported but were not.

The Commission encourages all charities, regardless of size or income, to report Serious Incidents promptly as a matter of good practice.

COMS recognizes the importance of reporting Serious Incidents promptly and comprehensively as part of an effective risk management and governance strategy. Reporting can reduce the risk of regulatory enforcement, demonstrate good governance, and mitigate reputational harm.

4. What is a Serious Incident?

The Commission defines a Serious Incident as an adverse event—actual or alleged—that results in or poses a risk of significant:

- Harm to the charity’s beneficiaries, staff, volunteers, or others in contact with the charity.
- Loss of the charity’s money or assets.
- Damage to the charity’s property.
- Harm to the charity’s work or reputation.

“Significant” is judged in the context of the charity’s size, structure, finances, and reputation.

Examples of Serious Incidents include:

Safeguarding and People Protection

- Actual or alleged abuse or mistreatment.
- Breach of safeguarding procedures.
- Hiring individuals barred from working with vulnerable groups.

Financial Misconduct

- Fraud, theft, money laundering, or cybercrime.
- Large or suspicious donations from unverifiable sources.
- Significant financial losses.

Terrorism or Extremism Links

- Connections to proscribed groups or individuals under asset freeze orders.
- Kidnapping of staff or volunteers.

Other Significant Incidents

- Disqualification of a Trustee or senior manager.
- Insolvency or forced closure of the charity.
- Loss of banking services.
- Major police or regulatory investigations.
- Mass resignation of staff or trustees.
- Criminal charges involving trustees or employees.
- Major data breaches.
- Incidents involving partners that materially impact the charity.

If an incident might receive public or media attention, it should be reported to the Commission as early as possible, even if information is still being gathered.

5. Reporting Procedures

Training

COMS will provide training to relevant staff to help them identify Serious Incidents and understand how to respond appropriately.

Internal Reporting

Only Trustees are authorized to report Serious Incidents to the Commission. Relevant People must report any concerns internally using established procedures.

Reports should be made to the Trustees as soon as possible, and no later than 24 hours after becoming aware of the incident.

If the incident involves a Trustee, it should be reported directly to another unconnected Trustee.

6. Reporting to the Charity Commission

Trustees must:

- Respond promptly and systematically.
- Ensure all appropriate steps are taken.
- Seek to minimize further harm or risk.

They may seek external legal or professional advice when deciding whether a report is necessary.

Key considerations for the report:

- Which Trustees are aware of the incident.
- What happened and when it came to light.
- The impact on COMS or its beneficiaries.
- Actions taken and planned.
- Whether the matter has been reported to police or regulators.
- Any guidance received and how it was followed.

If a decision is made *not* to report to external authorities, the reasons (e.g., potential harm to a victim, lack of trust in due process, etc.) must be clearly documented and included in the internal report.

7. Reporting to Other Authorities

Where relevant, Trustees must also report to:

- **Police** – for actual or suspected crimes (obtain a crime reference number).
- **Local Authority** – for safeguarding concerns involving children or vulnerable adults.
- **Action Fraud** – for fraud or cybercrime.
- **Information Commissioner's Office (ICO)** – for serious data breaches (only by the Data Protection Team, in line with COMS data policies).
- **National Crime Agency (NCA)** – for incidents involving terrorism financing.

8. Review and Updates

This Policy will be reviewed every **three years** or earlier if the Charity Commission updates its guidance on Serious Incident Reporting or if deemed necessary by the Board of Trustees.

APPENDIX-1

As per charity cmiisin guidne following is instances of incidents to be reported or not:

Examples table: deciding what to report

Serious incidents to report	Incidents not to report
Protecting people and safeguarding incidents	
<p>A beneficiary or other individual connected with the charity's activities has/alleges to have suffered serious harm</p> <p>Allegation that a staff member has physically or sexually assaulted or neglected a beneficiary whilst under the charity's care</p> <p>The Chief Executive of the charity has been suspended pending the outcome of an investigation into their alleged sexual harassment of a fellow member of staff</p> <p>Allegation that a trustee, staff member or volunteer has been sexually assaulted by another trustee, staff member or volunteer</p> <p>A staff computer is found to contain images of child pornography</p> <p>An internal investigation has established that there is a widespread culture of bullying within the charity</p> <p>A beneficiary or individual connected with the charity's activities has died or been seriously harmed; a significant contributory factor is the charity's failure to implement a relevant policy</p> <p>Charity failed to carry out DBS checks which would have identified that a member of staff or trustee was disqualified in law (under safeguarding legislation) from holding that position</p>	<p>Minor unusual/aggressive behaviour by a beneficiary towards a member of staff</p> <p>Police called to charity premises because a beneficiary is drunk and disorderly</p> <p>Charity becomes aware of allegations of abuse or neglect of a beneficiary that occurred outside the charity; the charity has reported the allegations to the appropriate agencies, and there is no harm to the charity's reputation</p> <p>Beneficiary in a care home received the wrong medication as a 'one-off' error and there was no significant harm</p> <p>Logged accident book reports where there was no significant harm to individuals</p> <p>Details of reports under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) where there has been no significant harm to individuals</p> <p>Minor accidental injury to a charity service user e.g. slipping on a wet floor</p> <p>A staff member who is not in a senior position or position of specific responsibility (e.g. head of safeguarding) has bullied or harassed a fellow staff member. There is</p>

<p>Repeated medication errors to beneficiaries in a care home indicating a systemic problem</p> <p>Charity discovers that an employee or volunteer coming into contact with children or at risk adults is on the sex offenders register</p>	<p>no indication of a widespread culture of bullying or harassment within the charity and the incident is dealt with by minor disciplinary action (for example, the staff member responsible has not been suspended or dismissed).</p> <p>A staff member who is not in a senior position or position of specific responsibility is dismissed for marrying a member of the community in which the charity is working, in breach of the charity's code of conduct but not in breach of local laws</p>
Fraud, cyber-crime and money laundering	
<p>Charity's Chief Executive and Treasurer produced false invoices for charity services</p> <p>A bogus fundraising scheme is being promoted online, using charity's name</p> <p>Charity funds lost due to an online or telephone 'phishing scam', where trustees were conned into giving out bank account details</p> <p>Attempted fraud by a member of charity staff but intercepted by internal financial controls</p> <p>Any actual/alleged fraud or money laundering should be reported. Any actual/alleged cyber-crime should be reported with the exception of the example in the right hand column</p>	<p>Attempted cyber-crimes that are blocked by the charity's computer network security systems, except where the attempted cyber-crime is unusual in nature and the charity wants to bring it to the attention of the Commission</p>
Theft	
<p>Each month, between £100-£200 goes missing, suspected stolen, from the cash till in the charity shop. It has been going on for six months and has been reported to the police.</p> <p>Charity office has been broken into and computers, holding personal details of beneficiaries and donors, stolen</p> <p>Remember, there is no minimum loss figure that should be reported. You need to decide whether incidents are serious enough to report, in the context of your charity and its</p>	<p>One-off random theft of items such as jewellery or a mobile phone at the charity's premises</p> <p>Theft of small amounts of cash belonging to a beneficiary, by another beneficiary, at a charity event</p> <p>Theft of a collection tin thought to contain small amount of cash</p>

<p>income, taking account of the actual harm and potential risks posed</p>	
<p>Unverified or suspicious donations</p>	
<p>A significant amount over £25,000 is donated to the charity from an unknown or unverifiable source</p>	<p>Large legacy left in a will, received via solicitor dealing with probate, on condition donor remains anonymous</p> <p>Large donation made by an anonymous donor via solicitor who is aware of their identity</p> <p>Low value donations from unknown sources - refer to our guidance on due diligence and monitoring end use of funds</p>
<p>Other significant financial loss</p>	
<p>Significant loss of charity funds in a poor investment scheme, commissioned by trustees, without professional advice</p> <p>Sudden loss of 20% or more of charity's income (e.g. due to termination of major donor contract); charity has no reserves, meaning staff will be laid off and services stopped</p> <p>Substantial loss of charity funds due to legal costs incurred in a court case; excludes those charities routinely undertaking budgeted litigation on behalf of beneficiaries</p> <p>The charity's main premises is severely damaged in a fire and the charity is unable to deliver services to its beneficiaries</p>	<p>Loss of charity funds where the value lost represents less than £25,000 of charity assets and is less than 20% of the charity's income. There is no significant impact on the charity's services.</p> <p>Charity property overseas is damaged due to bad weather conditions (e.g. office roof blown off during a storm) but doesn't prevent charity from delivering services to beneficiaries</p> <p>A vehicle owned by the charity is badly damaged in an accident. Nobody was hurt, the damage is covered by insurance and the charity is still able to deliver services to its beneficiaries</p>
<p>Links to terrorism or extremism</p>	
<p>Charity discovers that an overseas partner has passed money to a member of charity's personnel who is a designated individual, subject to financial restrictions</p>	

<p>A member of charity staff or volunteer has been arrested for terrorism related offences</p> <p>Charity's warehouse in a war zone has been raided and vehicles/ stock taken at gunpoint</p> <p>Charity personnel have been detained or kidnapped by a terrorist group overseas</p> <p>A visiting speaker has used a charity event to promote extremist messages, via live speech or social media</p>	
<p>Other significant incidents - Disqualified person acting as a trustee</p>	
<p>Any person acting as a trustee or senior manager while disqualified – refer to the Commission's guidance</p>	<p>A trustee or senior manager voluntarily steps down from trusteeship when disqualified for having an IVA (Individual Voluntary Arrangement)</p>
<p>Charity subject to investigation by a regulatory body</p>	
<p>Charity is subject to official investigation by another regulator e.g. Fundraising Regulator, Police, UK Visas & Immigration, Ofcom, Information Commissioner, Care Quality Commission or Care Inspectorate Wales</p>	<p>Routine inspections by a sector regulator e.g. Ofsted, CQC or CIW, do not need to be reported to the Commission unless there are adverse findings that place the future of the charity in doubt, relate to other categories of serious incidents or are likely to attract negative media attention</p>
<p>Major governance issues</p>	
<p>Mass resignation of trustees, leaving the charity unable to function</p> <p>Evidence that trustees have routinely signed blank cheques</p>	<p>One or two trustees stepping down at year-end, due to other commitments</p>

Fundraising issues	
<p>Suspicious of unauthorised public collections in the name of the charity</p> <p>Charity hasn't complied with law on requirements for solicitation statements or professional fundraising agreements</p> <p>Significant funds, due under a fundraising arrangement, have not been paid by the professional fundraiser, or commercial partner to the charity</p> <p>Incident has taken place involving a fundraising agency which will incur serious damage to the charity's reputation</p>	<p>A missing collection tin thought to contain a small sum of money</p> <p>Failure of a sponsor, e.g. of a local fun run, to submit small amounts of money raised for the charity</p>
Data breaches or loss	
<p>Charity's data has been accessed by an unknown person; this data was accessed and deleted, including the charity's email account, donor names and addresses</p> <p>A charity laptop, containing personal details of beneficiaries or staff, has been stolen and there is no encryption or other security measures that would prevent the perpetrator from accessing this information</p> <p>A Data Protection Act breach has occurred and been reported to the ICO</p>	<p>A charity laptop or mobile phone (not containing confidential data) has gone missing – it's been reported to the police</p>
Incidents involving partners	
<p>A delivery partner of the charity is alleged to have links to terrorism and extremism</p> <p>A delivery partner of the charity has ceased to operate and this has prevented the charity from providing assistance to its beneficiaries</p> <p>The charity's subsidiary trading company has gone into liquidation and this has resulted in financial difficulties which place the future of the charity in doubt</p>	<p>A serious incident has taken place involving a partner but it has no or minimal impact on the charity's reputation or the partner's ability to deliver its work with the charity</p> <p>A delivery partner of the charity has ceased to operate and this has had some impact on the charity's ability to provide assistance to its beneficiaries but it is not a</p>

Staff of another organisation within the same federated structure are found to have been committing systematic abuse of beneficiaries and this has significantly damaged the reputation of the charity	material impact and the assistance to beneficiaries hasn't stopped
Other, including criminality	
Any other type of incident that appears serious and likely to damage reputation or incur loss of charitable funds/assets	