



Alexandra Park and Palace Charitable Trust Board Meeting

Date: 12th March (location TBC)

Report Title: Serious Incident Reporting Policy Update

Report of: Niki Cornwell, Finance Director

Purpose: This paper presents the Serious Incident Reporting (SIR) Policy (Version 1.2, March 2026) for Board consideration and endorsement. It outlines the requirements placed on the Alexandra Park and Palace Charitable Trust (APPCT), summarises the responsibilities of trustees and staff, and highlights the governance measures in place to ensure compliance with Charity Commission guidance.

Local Government (Access to Information) Act 1985 – NA

1. Recommendations

- 1.1 Approve the revised Serious Incident Reporting Policy (Version 1.2).
- 1.2 Note the delegation arrangements for operational submission of Serious Incident Reports.
- 1.3 Note plans for staff and trustee training to support consistent implementation

3. Background

- 3.1 APPCT is required to maintain a clear and robust approach to identifying, escalating, and reporting serious incidents. The Charity Commission expects charities to promptly report serious incidents that result in, or risk, significant harm to people, property, reputation, finances, or operations.

The policy has been reviewed and updated to reflect current Commission guidance, including expectations around safeguarding, financial crime, governance failures, reputational matters and incidents affecting partner organisations.

4. Summary of the Policy

4.1 Definition of a Serious Incident

A serious incident is defined as an actual or alleged event that poses significant risk of harm to beneficiaries, staff, volunteers, partners or the public; loss or misuse of funds; damage to property; or reputational harm. Categories include (but are not limited to):

- Safeguarding concerns
- Fraud, theft, cyber-crime, and financial irregularities
- Major data breaches
- Criminal proceedings involving trustees or senior staff
- Governance failures affecting charity operation
- Incidents involving partners where APPCT's reputation or operations could be impacted
- Extremism, terrorism, and other major risks

4.2 Staff Responsibilities

All staff, volunteers and contractors must report any concerns *internally* and must not contact the Charity Commission directly. The policy aligns with APPCT's existing procedures (Safeguarding, Data Protection, Finance Regulations, Business Continuity & Disaster Recovery, Whistleblowing).

Incidents not covered elsewhere must be reported to the Finance Director/CEO within 24 hours.

4.3 Escalation and Trustee Oversight

If the incident involves the Relevant Officer or Finance Director/CEO, it must be escalated to the Chair or Trustee Lead. The Finance Director/CEO (or Relevant Officer) must assess incidents promptly and refer potential serious incidents to the Chair and Trustee Lead within 24 hours.

A record will be kept of whether an incident was deemed reportable or not.

4.4 Reporting to the Charity Commission

Trustees retain ultimate responsibility for ensuring APPCT reports serious incident to the Charity Commission promptly. Reports must include:

- Factual account of the incident
- Impact on APPCT and individuals
- Immediate and planned actions
- Whether external authorities (police, ICO, Action Fraud, NCA) have been notified
- Media and communications considerations
- Insurance implications
- Any governance or procedural reviews underway

Where facts are still emerging, an initial report may be submitted with updates provided as investigations progress.

4.5 Follow-up Actions

After reporting, APPCT will:

- Prepare communications plans
- Obtain external legal/comms support where appropriate
- Conduct internal reviews to prevent recurrence
- Implement changes to strengthen controls
- Ensure learning is documented and shared with trustees

4.6 Ongoing Monitoring

The Charity Commission may follow up with requests for further information or guidance. In very serious cases, it may consider enforcement powers.

5. Policy Review Cycle

The policy must be reviewed every two years or sooner whenever the Charity Commission updates its SIR guidance.

6. Risks and Mitigations

Risk	Mitigation
Failure to identify or report a serious incident	Clear internal policy, mandatory reporting lines, training
Reputational damage	Prompt reporting, communications planning, transparency
Regulatory action due to late or incomplete reports	Escalation within 24 hours, trustee oversight, documented decision-making
Staff uncertainty about process	Alignment with existing policies, regular awareness training

7. Implications

Governance: Strengthens trustee oversight and compliance assurance.

Operational: Requires timely internal reporting and consistent policy implementation.

Legal/Regulatory: Ensures compliance with Charity Commission guidance and reduces risk of enforcement action.

Reputational: Demonstrates APPCT's commitment to safeguarding, probity, and transparency.

8. Legal Implications

The Council's Director of Legal and Governance has been consulted in the preparation of this report and has no comment.

9. Financial Implications

The Council's Chief Financial Officer has been consulted in the preparation of this report and has no comment.

10. Use of Appendices

Appendix One: Serious Incident Reporting Policy

11. Background Papers

None. However further information can be found on the Charity Commission Website