Serious Incident Reporting Policy

Introduction

This policy outlines the procedures for identifying, reporting, and managing serious incidents within the British Hydrological Society (BHS). It ensures compliance with our charity regulator's guidelines and promotes transparency and accountability[1].
This policy applies to all trustees, other volunteers, employees, contractors, and third-party representatives of the charity. Its requirements should be reflected in other policies and procedures, agreements and contracts, as necessary.

Definition of a serious incident

A serious incident is an adverse event, whether actual or alleged, which results in or risks significant:

- harm to the society's beneficiaries, staff, volunteers or others who come into contact with your charity through its work
- loss of the society's money or assets
- harm to the society's work or reputation

A charity must raise a concern with the charity regulator about any of the following:

- A charity not following the law, which significantly damages its reputation and public trust in charities generally
- Serious harm to the people the charity helps or other people who come into contact with the charity through its work
- Charities being used for significant private advantage
- A charity set up for illegal or improper purposes, for example to avoid paying tax
- A charity losing significant amounts of money
- A charity losing significant assets, for example land or buildings
- Criminal, illegal or terrorist activity

Investigating an incident

Any incident that causes an injury or harm should be investigated. For serious incidents it may be necessary to have it formally investigated or even be investigated by external

[1] https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity

authorities. However, even if it is only minor and only requires an informal review by Trustees, the following process should be followed:

- Identify what happened and the extent of any injury or harm.
- Assess if there is a serious incident, or other, reporting requirement.
- Identify the cause and, in particular, if a mistake was made by someone and/or there was a weakness in policy or procedures.
- Identify what reasonable steps should be taken to prevent or at least mitigate the risk of it happening again, who should take these steps and a timescale for doing so.

What to Report

Incidents that must be reported include, but are not limited to:

- *Financial crimes*: Fraud, theft, cyber-crime and money laundering including large donations from an unknown or unverifiable source, or suspicious financial activity using the charity's funds.
- *Protecting people and safeguarding incidents:* Incidents that have resulted in or risk significant harm to beneficiaries and other people who come into contact with the BHS through its work.
- *Operational:* Major governance issues, significant data breaches/losses, significant financial loss, insolvency, or forced withdrawal of banking services without an alternative.
- *External:* Links to terrorism or extremism, including 'proscribed' (or banned) organisations, individuals subject to an asset freeze, or kidnapping of staff.
- Any other incident that materially affect the charity or could seriously impact the charity's reputation or operations.

How to Report

The Charity Commission requires charities to report serious incidents. If a serious incident takes place, it is important that there is prompt, full and frank disclosure to the Commission.

The responsibility for reporting serious incidents rests with the trustees. Trustees may delegate the task to an employee or professional adviser, but they retain ultimate responsibility for ensuring timely and accurate reporting.

Initial discovery: Any trustee or volunteer must report potential incidents to the Executive Committee immediately. If one of the Executive Committee are implicated, they shall not receive the report.

Initial decision: The BHS Trustees will decide if the incident meets the "serious" threshold within two working days. If the Trustees decide not to make a report about something serious that has happened in the BHS and the Commission later becomes involved, the Trustees will need to be able to explain why they decided not to report it at the time.

Examples of what we should and should not report are contained in the Charity Commission (England & Wales) – Serious Incident Examples Table – Deciding What to Report.

Guidance about making trustee decisions is given at by the Charity Commission

Initial Report: As soon as a serious incident is identified, it must be reported to the Charity Commission at https://rsi.charitycommission.gov.uk/web/register/reporting-or-updating-a-serious-incident. The report should include:

- What happened.
- How the charity is dealing with the incident.
- Any steps taken to prevent a recurrence.

Follow-up Report: Provide updates as the situation develops and when the incident is resolved.

Other Reporting

Emergency Services. If there is suspected or actual criminal activity, serious injury or death or if an incident poses a significant risk to public safety, the emergency services should be informed.

Police: Allegations or incidents of abuse or mistreatment of people who come into contact with the BHS through its work should be reported as incidents to the police. Links or alleged links to terrorism and extremism must be reported to the police. In all cases a crime reference number should be obtained.

Charity. All serious incidents and any that might be criminal in nature or result in a claim or complaint are to be reported to the Trustees and our insurers. We will seek advice from professional advisers, where appropriate to do so.

Other Regulators. In addition, there may be a requirement to notify other UK regulators depending on the nature of the incident. Below is a non-exhaustive list of some:

- **Fraud**: Allegations or incidents of fraud and cyber-crime should be reported to Report Fraud via its online reporting tool, ensuring a crime reference number is obtained, making clear that you're representing a charity.
- **Data breach**: The Information Commissioner's Office Self-assessment tool help determine whether the incident needs to be reported to the ICO.
- **Disclosure and Barring Service** (DBS): if an individual has been dismissed or removed from working with children or vulnerable adults (or would have been if they had not left first) because they harmed or posed a risk of harm or there are concerns that an individual may pose a risk of harm to children or vulnerable adults.
- *Environment Agency:* For incidents that may have caused environmental harm, such as chemical spills.

Change record

Date of change	Change by	Reason for change
January 2026	BHS Main Committee	