



Serious Incident Reporting Policy & Procedure

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Serious Incident Reporting Policy & Procedure

Policy Statement

Royal British Legion Industries (RBLI) is committed to the identification and mitigation of risks associated with serious incidents and has a range of policies and procedures in place to support this. RBLI recognise however that sometimes things do go wrong and that when this happens it is vital to respond appropriately and to take the opportunity to learn from and develop best practice following serious incidents.

1. Introduction

RBLI as a charity and an organisation providing regulated services, in particular social care, has an obligation to report certain events to external organisations including the Charity Commission, the Care Quality Commission (CQC) and local authorities, for example Kent County Council (KCC).

In most cases events that are reportable to CQC and KCC, for example safeguarding concerns, will fall within the definition of a 'serious incident' and therefore require reporting to the Charity Commission. Responsibility for reporting serious incidents to the Charity Commission rests with the trustees, regardless of whether work has been delegated and even if the matter has already been reported to other regulators or authorities, such as CQC or the police etc.

Overall day-to-day responsibility for good governance, including the reporting of serious incidents, is delegated by the board of trustees to the Chief Executive. The actual events that could lead to the need for a serious incident report could occur across and / or within several divisions. It is therefore important to have a clear procedure detailing how and by whom they should be dealt with.

This document will ensure that the board of trustees comply with their obligations under the Charities Act 2011 and under the best practice guidance for serious incident reporting as defined by the Charity Commission.

2. Context

The circumstances under which charities operate can often be challenging. As a result, serious incidents, a definition for which can be found in section 7, will occur from time to time. The Charity Commission accepts this is the case and is looking for assurance in such instances that the charity has taken steps to limit the immediate impact of the incident and, where possible, prevent it from happening again. In addition, the Charity Commission will seek to ensure that trustees have complied with their legal duties.

Serious incident reporting by charity trustees is one of the key compliance and monitoring tools used by the Charity Commission. Where serious incidents occur and are either reported or drawn to the attention of the regulator, the Charity Commission will decide whether to investigate any actual or potential misconduct or mismanagement in the administration of the charity. It is likely to do so where there is a 'serious threat or risk' to its beneficiaries, services, assets, or reputation.

3. Principles

RBLI has adopted the following principles in relation to preventing, responding to and investigating serious incidents:

- RBLI will ensure that appropriate policies, procedures, processes, and controls are in place to reduce the likelihood of occurrences or mitigate the impact if it happens. These will include, although will not be limited to, the following areas: safeguarding, complaints, conflicts of interest, financial, recruitment and disciplinary.
- RBLI is committed to responding on a timely and comprehensive basis to all serious or potentially serious incidents. This includes making all necessary external reports within the timeframes dictated.
- During the response and investigation of serious incidents the needs of those affected will be the primary concern.
- RBLI will aim for openness, honesty, and transparency between the board of trustees, advisory boards, all members of staff, volunteers, and beneficiaries during an investigation, subject to any rules of confidentiality and compliance with GDPR and information security requirements.
- Investigations and actions required will always be proportionate to the incident, although they will also always be subject to any regulatory or legal requirements.
- Where the incidents involve several organisations RBLI will always work in partnership to ensure that incidents are managed effectively.

4. Purpose

The purpose of this procedure is to ensure that risks associated with serious incidents are identified and managed in accordance with RBLI policies and procedures.

5. Scope

This procedure applies to all members of staff, volunteers, and trustees within RBLI.

6. Related Documents

This Procedure provides a framework for the identification, assessment and reporting of serious incidents. It does not replace any existing policies and procedures and should be read in conjunction with the following:

- Risk Management Strategy
- Conflicts of Interest Policies
- Whistleblowing Policy 2019
- Safeguarding Vulnerable Groups 2019
- Safeguarding Lead Contacts 2020
- Anti-fraud, Bribery and Corruption Policy
- Anti-Money Laundering Policy

7. Definitions

An **incident** is any event or circumstance which could foreseeably have resulted, or did result, in unnecessary damage, loss or harm. This also includes near misses. A **near miss** is an event that does not cause harm, but one that had the potential to.

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

- harm to RBLI's beneficiaries, staff, volunteers, or others who come into contact with RBLI through its work
- loss of RBLI's money or assets
- damage to RBLI's property
- harm to RBLI's work or reputation

Significant is determined in the context of RBLI by considering its staff, operations, finances and / or reputation.

Definitions in relation to safeguarding issues are provided in the relevant RBLI policies.

8. Working in Scotland

RBLI is registered with the Scottish Charity Regulator, OSCR. Although OSCR do not need a report when RBLI has reported to the Charity Commission it is important to understand the reporting regime in place within Scotland.

OSCR has Notifiable Events guidance. The definition of a notifiable event is something that could 'have a significant impact' on the charity. There is no legal requirement to make the report, however good governance means that that RBLI, an organisation that seeks to always be transparent and accountable, would report such events, if they were not reported elsewhere. Whilst OSCR would like to receive reports as soon as possible, there is a recognition that events need to be investigated and responded to, resulting in reports having a slight delay in certain circumstances.

It should be the charity trustees who make the report. This will be done using the 'Notifiable Events Form' on the OSCR website. In any report the following should be outlined:

- What the event is and how it has or may have a serious impact on the charity
- What action, if any, has been already taken
- What further plans the charity trustees have in place to deal with the event
- What plans the charity trustees have in place to mitigate similar things happening in the future

Where something criminal has happened, or there is a suspicion that this is the case, a report should be made to Police Scotland. The crime reference number given in this case should be included in the report to OSCR.

It is up to the trustees of RBLI to decide whether an event is serious enough to be reported.

Types of notifiable events are given below:

- Fraud and Theft
- Substantial financial loss
- Incidents of abuse or mistreatment of vulnerable beneficiaries
- Not enough charity trustees to make a legal decision
- The charity has been subject to a criminal investigation or an investigation by another regulator or agency; sanctions have been imposed or concerns raised by another regulator or agency

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- Significant sums of money or property have been donated to the charity from an unknown or unverified source
- Suspicions that the charity and / or its assets are being used to fund criminal activity, including terrorism
- A charity trustee is acting whilst disqualified

9. Roles and Responsibilities

The roles and responsibilities in relation to serious incidents are noted below:

Person	Roles & Responsibilities
Board of Trustees	Overall responsibility for ensuring that RBLI complies with all relevant legislation and follows best practice in relation to serious incidents including reporting to the Charity Commission and if appropriate OSCR. Day to day management of serious incident reporting is delegated to the Director of Finance & Corporate Services.
Chief Executive	Creating a culture of compliance and adherence to organisational policies and procedures. Responsible for risk management across RBLI, which includes ensuring that all serious incidents are dealt with appropriately, including reporting to external organisation, and that learning is identified and disseminated across RBLI.
Senior Management Team	Responsible for ensuring there are divisional systems and processes in relation to serious incidents and reporting thereof. Demonstrating leadership by supporting members of staff in making reports of serious incidents and ensuring that learning from investigations support divisional and organisational continuous improvement.
Director of Finance & Corporate Services	Responsible for investigating all serious incidents, including making sure that the board of trustees are kept fully informed and agreeing / making the reports to the Charity Commission. Holds overall responsibility for ensuring that systems and processes are in place to undertake investigations.
Finance Controller	Responsible for leading on all financial serious incidents in accordance with relevant policies and procedures.
Managers	Responsible for ensuring that members of staff and volunteers understand the policies and procedures that relate to serious incidents and that they feel safe to report issues and know that the information they share will be treated with respect and acted upon appropriately.
All staff	Reporting all serious or potential serious incidents to their line manager and the Director of Finance & Corporate Services. Contributing fully to investigations in an open and honest way.

10. Incidents with Additional Management and Reporting Actions

Serious Incidents

This procedure covers serious incidents.

Safeguarding Incidents

Safeguarding incidents must be reported to the appropriate organisations in accordance with RBLI's Safeguarding Vulnerable Groups 2019 document and any regulatory and / or contractual requirements.

Financial Crime

Financial crime incidents must be reported in accordance with the relevant RBLI policies and procedures, which are based on current legislation.

RIDDOR

All RIDDOR incidents must be reported to the Health and Safety Executive (HSE) in accordance with the relevant RBLI policies and procedures.

GDPR and Information Security

All GDPR and information security incidents must be reported internally and externally in accordance with the relevant RBLI policies and procedures.

11. Action to Take

If something does go wrong the following actions should be taken immediately:

- prevent or minimise further harm, loss, or damage
- prepare a communication plan for staff, volunteers, members, the public, funders, and the media
- make the necessary reports (see sections 12 and 13 below)
- undertake a root cause analysis to prevent the incident from occurring again (see section 14 below)

12. Reporting – Internally

If a member of staff becomes aware of an incident that may be classed as serious, they are required to report to their manager and the Director of Finance & Corporate Services. An internal reporting template is included at **Appendix 1**. All reporting must be in compliance with RBLI's data protection requirements.

The Director of Finance & Corporate Services and the Chief Executive will review the details of the incident and make a report to the board of trustees. The board of trustees will determine whether there is a need to report the incident to the Charity Commission. Where a report is required the details will be provided by the Director of Finance & Corporate Services and the template at **Appendix 2** completed for board approval. The Director of Finance & Corporate Services will be the internal point of contact for the Charity Commission.

Where it is necessary to report an issue to the Scottish Charity Regulator, OSCR, this will also be undertaken by the Director of Finance & Corporate Services, on behalf of the board of trustees.

RBLI has a central email account, incidents@rbli.co.uk, for members to staff to use when asking for advice and support in relation to incidents. This email is monitored by the Director of Finance & Corporate Services, the Head of Corporate Governance, and the Executive Assistant to the Chief Executive.

13. Reporting – Externally

Obligations

Although the statutory obligation placed on charities to report serious incidents is annually, in the Annual Return, in practice the Charity Commission guidance on serious incident reporting refers to an expectation of more regular reporting, as noted in the extract below:

“You should report an actual or suspected incident promptly. This means as soon as is reasonably possible after it happens, or immediately after you become aware of it”. (Extract from the Charity Commission guidance)

The responsibility for reporting serious incidents rests with RBLI’s trustees. This has been delegated to the Director of Finance & Corporate Services however all trustees bear ultimate responsibility for ensuring that a report has been made and this has been undertaken in a timely manner. Decisions made by the Director of Finance & Corporate Services will always be reported back to trustees, regardless of whether this was to report or not.

Reporting obligations for other regulators or external organisation will be covered in the relevant policies and procedures. The reports are likely to be made by the relevant manager or director however details should always be reported to the Director of Finance & Corporate Services to ensure that reporting requirements for the Charity Commission are met. The main areas are summarised below:

- **Criminal activity:** if a reportable incident involves actual or alleged criminal activity then it must be reported to the relevant agencies. Fraud, theft, and money laundering are covered by RBLI policies and procedures. Potential links to terrorism and extremism should be reported to the Police. Failure to do this immediately may mean that RBLI is committing a criminal offence under section 19 of the Terrorism Act 2000. An incident that involves actual or alleged criminal activity will usually be reportable to the Charity Commission. Only in exceptional circumstances, such as where the crime and the impact on RBLI are minor, for example a one-off theft of a very small amount of money, will the Charity Commission consider an incident involving criminal activity as not reportable.
- **Safeguarding incidents:** safeguarding incidents could involve beneficiaries, staff, volunteers, and people who come into contact with RBLI through its work, for example people who attend an event run by RBLI. For RBLI, a charity that provides services to adults at risk, the term safeguarding has a particular meaning under UK legislation and incidents will require reporting to statutory safeguarding agencies. For the purpose of being a charity and the reporting obligations to the Charity Commission as a regulator, the term safeguarding relates to the range of measures in place to protect the people who come into contact with RBLI from abuse and mistreatment of any kind, including neglect.

Even when other agencies are involved, it is important that charities report the incident promptly to the Charity Commission themselves and do not wait until someone is arrested, charged, or convicted before doing this. The report should include any action already taken or planned to be taken by RBLI.

Timings

Most cases will require trustees of a charity to make a judgement as to whether and when an incident should be reported. The Charity Commission guidance is clear on the following expectations:

- Serious incidents should usually be reported immediately, or as soon as possible if evidence or reports are being gathered in relation to the issue.
- The Charity Commission should be informed of any actual or suspected criminal activity within or involving the charity as soon as possible after the incident, particularly *“where an individual may have committed an offence which calls into question their suitability to be involved in or connected to a charity, whether as a trustee, member of staff or volunteer”*.
- As RBLI has an income over £25,000 the Annual Return must include a signed declaration that there are no serious incidents or other matters relating to the charity over the previous financial year that should have been brought to the attention of the Charity Commission but was not. If an incident has taken place but was not reported it should be done before the Annual Return is submitted to the Charity Commission.
- In cases where there is doubt as to whether an incident is serious / significant / high risk, the Charity Commission recommends that it is reported anyway.

What to report

The Charity Commission provides examples to help trustees decide what should be reported, which can be found at the following link: [Examples table: deciding what to report](#). Whilst this document is not a definitive list of reportable incidents it does indicate the types of incidents that should and should not be reported.

The main categories of reportable incidents are provided in **Appendix 3**.

How to report

The online form for the Charity Commission should be used to report serious incidents, which can be found [here](#).

The Director of Finance & Corporate Services will make the report on behalf of the trustees once all details have been agreed. The following information will be required for the report and will be collected and collated as part of the internal reporting stage:

- contact details
- the charity name and its registration number
- reference numbers and contact details if the incident has been reported to other organisations, like the police
- names and registration numbers of other charities involved in the incident, if relevant
- date of the incident
- what happened
- date RBLI found out about the incident
- how RBLI found out about the incident
- what impact the incident has had on RBLI’s beneficiaries, finance, staff, operations, or reputation
- whether the trustees are aware of the incident
- which of RBLI’s policies or procedures relate to the incident and whether they were followed
- what steps RBLI has taken to deal with the incident
- what steps RBLI has taken to prevent similar incidents
- where applicable, RBLI’s media handling or press lines, including a link to a press release if available

The report can be updated at a later stage if material changes to the facts that were reported come to light or there are significant developments. This includes if allegations were found to be false or groundless following further investigation by the charity, the police, or another regulator / agency. The same form can be used for this, with the only additional information required being the incident reference number from the confirmation email.

Annual Report

As a matter of good practice, all charities, regardless of size or income, should report serious incidents to the Charity Commission promptly. As a charity with income over £25,000, RBLI is required, as part of the annual return, to sign a declaration confirming there were no serious incidents during the previous financial year that should have been reported to the Charity Commission but were not. Should incidents have occurred, but were not reported at the time, these should be submitted before the Annual Return, so that this declaration can be made.

Until all serious incidents have been reported, RBLI will not be able to make this declaration, or complete the annual return, which is a statutory requirement under section 169 of the Charities Act 2011. It is an offence under section 60 of the Charities Act 2011 to provide false or misleading information to the Commission, which includes through the annual return.

If trustees fail to report a serious incident that subsequently comes to light, the Charity Commission may consider this to be mismanagement, for example where the trustees have failed to manage the risks properly and breached their legal duties. This may prompt regulatory action, particularly if further abuse or damage has arisen following the initial incident.

Confidentiality, Data Protection and Data Sharing

The Charity Commission is a public body and the Freedom of Information Act (FOIA) applies. Although the Charity Commission will attempt to resist requests for information, it is advisable to minimise the amount of sensitive or personal data that is included in any Serious Incident Report as it may be disclosed if an application under the FOIA is made.

When submitting a serious incident report to the Charity Commission the following personal data will be required:

- contact details including name, telephone number, email address and connection with the charity
- the name, date of birth and address of any trustees of the charity who are disqualified and the reason for disqualification so that the Charity Commission can verify the information, assess any risks to other charities and determine whether any regulatory action is required
- where you have reported the serious incident to another regulator / agency, the name and contact details of your contact at that regulator / agency so that the Charity Commission can contact them for more information if required and, in some cases, coordinate the response

The Charity Commission does not otherwise require personal data, or any third party's personal data and no further personal data should be provided unless an incident cannot be reported without doing so. If personal data is needed this should be restricted to the minimum amount necessary to submit the report.

14. Continuous Improvement

RBLI is an organisation committed to continuous improvement. This includes learning from serious incidents. As such root cause analysis will be undertaken for every serious incident. For some issues, such as safeguarding within the care setting, this is undertaken automatically. In other areas it may need to be a standalone exercise. In these cases, it will be undertaken by the Director of Finance & Corporate Services. In all cases a report will be made to the board of trustees, which include details of how the impact of the incident was mitigated and what steps have been taken to prevent similar incidents from occurring in the future. The senior management team will be involved throughout this process to ensure that any resulting action plan, including the due dates, is realistic and achievable.

Appendix 1: Serious Incident Reporting Template for Employees

CONFIDENTIAL

Report to Director of Finance & Corporate Services – Serious Incident

To: Director of Finance & Corporate Services	[insert name]
Copy to: [insert line manager]	[insert name]
From:	[insert name and title]
Date:	[insert date]
Urgent:	Yes / No [insert date response required by]
Details of suspected / known incident	
<p>[insert the following details:</p> <ul style="list-style-type: none"> - type of incident (incident / serious incident) - location of incident if applicable - nature of incident, for example <ul style="list-style-type: none"> o safeguarding o financial o H&S o GDPR / information security - cause of incidents, if known, including any relevant events leading up to the incident - name of person(s) involved (note: if these are included within other reports do not include again, this must always be in accordance with RBLI’s data protection policies and procedures) - nature, value (if applicable) and timing of incident - details of witnesses, if applicable - details of any further investigation that has been undertaken - immediate actions taken to reduce impact of incident and / or risk of reoccurrence, including details of who took the actions - reports already made e.g. to CQC - any other relevant information] <p>Note: the details should be based on facts and not opinions and should be as full as possible</p>	
Signed:	

Appendix 1: Serious Incident Reporting Template for Employees

The following section of this form is to be completed by the Director of Corporate Service	
<u>Date report received:</u>	[insert date]
<u>Date receipt of form acknowledged:</u>	[insert date]
Action to be Taken	
[include in here the decision made by the board of trustees]	
<u>Signed:</u>	
<u>Dated:</u>	

For serious incidents, record the date that the incident was declared to the following individuals or organisations (where relevant):

Board of Trustees	
CQC	
KCC	
HSE	
Charity Commission	
Others (include details)	

Appendix 2: Serious Incident Reporting Template for Trustees

Action	Comments
Name and role of person reporting	Note: this will be Director of Finance & Corporate Services
Date of report	
Has the incident happened or has there been serious allegations or suspicions that it has happened?	
When did the incident happen, who was involved, include their position within RBLI. Is this person still involved with the charity?	
What is the effect of the incident on RBLI or its beneficiaries or both?	
What is the financial loss to RBLI (if appropriate)?	
What action, if any, has been taken since the incident?	
Has there been any publicity about the incident?	
Has RBLI conducted its own inquiry or investigation into the incident and what was the outcome?	
If the police, another regulator or law enforcement or government agency is involved, please specify the name of the agency and what action it has taken, if anywhere relevant, provide the reference number	
Confirmation that reports have been made to the local Safeguarding Board if it involves abuse or welfare concerns about vulnerable beneficiaries	
If RBLI has any policies or procedures that apply to the incident in question, confirm they were followed, and if not explain why (consider explaining the procedures and/or sending a copy of the relevant policy)	
Whether as a result the trustees have determined that current policies or procedures need to be revised, or new ones put in place if they do not already exist	

Appendix 3: Examples of Serious Incidents

Serious Incident:	You should inform the Charity Commission:
<p>Financial Crimes: Fraud, theft, cyber-crime, and money laundering</p> <p>Things to consider:</p> <ul style="list-style-type: none"> - the value of the loss: the higher the value the more serious the incident is likely to be, indicating that it should be reported - where the person accused is involved in RBLI e.g. if trustee or senior employee involved - where the person accused is involved with other charities - numerous incidents have taken place that appear connected or there seems to be a pattern or trend - an incident has been committed repeatedly over a long period of time - several separate incidents have occurred over a short period of time (this may be indicative of weak controls and governance, which is why it should be reported) - the funds lost or at risk are from a public appeal, collection, or grant funding - where there are signs of public interest, such as significant media reporting - where RBLI has had to take serious action against an individual such as disciplinary action, investigation, or suspension 	<p>If there is any actual or suspected criminal activity within or involving the charity as soon as possible after the incident</p>
<p>Other significant loss</p> <p>This relates to any financial loss due to other causes that threatens RBLI’s ability to operate and serve the beneficiaries or where the financial reserves are not sufficient to cover the loss.</p>	<p>If there is any significant loss of funds or other property with a value of 20% or more of the charity’s income, or £25,000, whichever is the smaller amount.</p> <p>Examples include:</p> <ul style="list-style-type: none"> • significant fire, flood or storm damage destroying or seriously damaging the charity’s main premises • losing a court case and having to pay substantial legal fees or damages out of charity funds • loss of significant institutional donors, public funding or key delivery contracts

Appendix 3: Examples of Serious Incidents

	<p>that threatens the charity’s ability to operate and being unable to replace these to ensure the charity’s survival</p> <ul style="list-style-type: none"> • significant financial penalties for breaches or non-compliance imposed by HMRC, Gambling Commission, HSE, ICO, Fundraising Regulator or other regulators
<p>Significant sums of money or other property donated to the charity from an unknown, unidentified, or unverified source or suspicious financial activity using RBLI’s funds</p> <p>There is a need to act with due diligence in relation to donations that cannot be verified to ensure that RBLI is not in breach of its duties under the Finance Act 2011.</p>	<p>If there is an unusually large one-off donation (£25,000 or more) or a series of smaller donations (totalling £25,000 or more) from a source that cannot be identified. The donations may take the form of goods. The report should include reference to what checks were undertaken before accepting or declining the donation.</p> <p>Other suspicious financial activity should also be reported. Examples include, although are not limited to:</p> <ul style="list-style-type: none"> - request from a third party to cash a cheque for a large sum of money - request from a third party to pay a fee to release funds to be donated to the charity
<p>The charity (including any individual staff, trustees, or volunteers) has any known or suspected monetary / finance-based links to a ‘prohibited’ (or banned) organisation or to terrorist or other unlawful activity</p> <ul style="list-style-type: none"> - Includes facilitation payments (bribes or inducements), protection money or ransoms - Need to report to the National Crime Agency - Failure to do so may constitute a criminal offence <p>There is also the need to be aware if RBLI is being abused for extremist purposes; for example, when carrying out activities and events involving guest speakers or when promoting literature and educational materials, perhaps via RBLI’s website and on social media</p>	<p>If it comes to your attention or you suspect that a trustee, member of staff, volunteer or anyone associated with the charity has any such links, you must immediately report this. This includes being subject to an asset freeze. It should also be reported if:</p> <ul style="list-style-type: none"> - someone within or closely connected to the charity, or one of RBLI’s delivery partners, is placed on a UK or international terrorist list or is subject to an asset freeze - charity funds or assets have been used / diverted (perhaps via a delivery partner) to support a terrorist group or for other terrorist purposes - the charity has been used to circumvent asset freezing measures - charity personnel have been kidnapped or harmed by terrorist groups, including overseas, when representing RBLI or carrying out its work

Appendix 3: Examples of Serious Incidents

<p>A person disqualified from doing so is currently acting as a trustee or senior manager of RBLI</p>	<p>When it comes to light that a trustee is disqualified unless the Charity Commission has issued a waiver. The same applies for senior managers</p>
<p>Insolvency</p>	<p>As soon as this fact is known</p>
<p>Forced withdrawal of banking services without an alternative</p>	<p>If RBLI's operations are threatened because the main or only bank has withdrawn banking services, and RBLI cannot find another bank</p>
<p>Significant data breaches / losses</p>	<p>It is discovered that there has been a significant data breach or loss within RBLI</p>
<p>Incidents involving partners that materially affect RBLI</p>	<p>It is discovered that an incident has occurred involving one of the RBLI's partners in the UK or internationally, which materially affects the charity, its staff, operations, finances and / or reputation, such that it is serious enough to be reported. Partners in this context includes the following and the people who come into contact with them through their work (such as their beneficiaries, staff and volunteers):</p> <ul style="list-style-type: none"> - a delivery partner of RBLI - a subsidiary trading company - an organisation that receives funding from RBLI - another charity or organisation that is linked to RBLI
<p>Employees or trustees are the subject of criminal proceedings in connection with the charity</p>	<p>When the details become known</p>
<p>Suspensions, allegations and incidents of abuse or mistreatment of vulnerable beneficiaries and other people who come into contact with the RBLI through its work</p> <p>Note: Police, local authorities or other relevant regulators should also be contacted</p>	<p>If any one or more of the following things occur:</p> <ul style="list-style-type: none"> - There has been an incident where the beneficiaries of RBLI have been or are being abused or mistreated (alleged or actual) while under the care of RBLI or by someone connected with your charity such as a trustee, member of staff or volunteer - Other incidents of abuse or mistreatment (alleged or actual) of people who come into contact with RBLI through its work,

Appendix 3: Examples of Serious Incidents

	<p>which have resulted in or risk significant harm to them</p> <ul style="list-style-type: none"> - Breaches of RBLI procedures or policies which have put people who come into contact with RBLI at significant risk of harm; this includes failure to carry out relevant vetting checks which would have identified a person is disqualified in law from holding their position within RBLI.
<p>RBLI has been subject to a criminal investigation, or an investigation by another regulator or agency; or sanctions have been imposed or concerns raised by another regulator or agency such as HMRC, the Health and Safety Executive or the Care Quality Commission</p>	<p>If RBLI has been the subject of any criminal investigation or if another regulator or agency has imposed any formal sanction on it. The Charity Commission should be advised of significant developments and notified of the outcome of the investigation by other agencies and the outcome of any criminal court proceedings</p>
<p>RBLI has experienced major governance problems, such as mass resignation of staff or trustees, or other events, leaving it unable to operate</p>	<p>Of the relevant details</p>