

# Group Analytic Society International (GASi) Serious Incident Reporting Policy and Procedures

## Purpose

The Management Committee of Group Analytic Society international (“GASi” or the “Charity”) as Trustees of this CIO will adhere to this Serious Incident Reporting Policy and ensure all members can easily access this policy via the website.

## Introduction

1. As a UK CIO registered charity, the Charity Commission for England and Wales expects the Trustees to promptly report any serious incidents to the Commission, and the Trustees have a duty to act Immediately when made aware of such an incident. A serious incident is defined as any event, actual or alleged that risks or results in harm to anyone associated with the Charity including: any loss of funds or assets, or harm to the Charity’s reputation.

2. Whilst GASi is rooted in group analytic values of dialogue, reflection, valuing social and cultural differences, inclusivity through diversity of the membership by providing face to face and online events and psychological containment—these practices support our community after legal reporting obligations have been met. They do not replace or delay compliance with legal duties.

### 3. **What is a serious incident?**

3.1 The Commission defines a serious incident in its SIR Guidance as an adverse event, whether actual or alleged, which results in or risks significant:

- (a) harm to a charity’s beneficiaries, staff, volunteers or others who come into contact with the charity through its work;
- (b) loss of a charity’s money or assets;
- (c) damage to a charity’s property; and/or
- (d) harm to a charity’s work or reputation.

“Significant” means significant in the context of the charity, taking account of its staff, operations, finances and/or reputation.

3.2 The SIR Guidance<sup>1</sup> identifies the following main categories of reportable incidents:

- (a) 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 charity through its work (this includes incidents of abuse or mistreatment (actual or alleged) and a breach of procedures or policies which has put people who come into contact with the charity at risk, including failure to carry out checks which would have identified that a person is disqualified in law from holding their position within the charity e.g. under safeguarding legislation, from working with children or adults)<sup>2</sup>;
- (b) financial crimes: fraud, theft, cyber-crime and money laundering;
- (c) large donations from an unknown or unverifiable source, or suspicious financial activity using the charity's funds;
- (d) other significant financial loss;
- (e) links to terrorism or extremism, including 'proscribed' organisations, individuals subject to an asset freeze, or kidnapping of staff; and
- (f) other significant incidents, such as:
  - (i) a trustee or a senior manager being disqualified from holding that position;
  - (ii) something has happened to force the charity into insolvency or to wind up;
  - (iii) forced withdrawal of banking services and difficulties securing alternative accounts;
  - (iv) the charity is subject to a police investigation or a significant investigation by another agency/ regulator (the SIR Guidance states that a charity does not need to report routine regulatory inspections unless they resulted in significant adverse findings that place the future of the charity in doubt, are likely to damage the charity's reputation or public

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<sup>1</sup> <https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity>

<sup>2</sup> The Commission's guidance '*Safeguarding and protecting people for charities and trustees*' (25 October 2018) is available here: <https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees>

confidence in the charity, or relate to any of the other categories of serious incidents);

- (v) major governance problems, such as mass resignation of staff or trustees, or other events, leaving the charity unable to operate;
- (vi) the charity's trustees or employees are the subject of criminal proceedings, in connection with the charity or their role in it;
- (vii) there has been a significant data breach or loss within the charity; and
- (viii) an incident has occurred involving one of the charity's partners in the UK or internationally which materially affects the charity, its staff, operations, finances and/or reputation (this includes delivery partners, subsidiary companies, funding recipients and organisations linked to the charity (for example as part of a federated structure)).

#### 4. **Legal and Regulatory Context**

This policy is intended to be aligned with the Charity Commission for England and Wales, Including the guidance 'How to report a serious Incident In your Charity' (CC47). Trustees must act promptly and cooperate with relevant authorities.

All charities with an income over £25,000 per year must confirm in their annual return to the Charity Commission that they have reported any/all serious incidents which have arisen.

The Commission also considers that, as a matter of good practice, all charities regardless of size or income should report serious incidents to the Commission promptly.

The Charity's trustees and management take serious incidents and threats to the Charity very seriously and consider that reporting serious incidents to the Commission and other relevant authorities comprises an important part of the effective and appropriate response to any such incident.

In particular, the Charity understands that reporting a serious incident to the Commission demonstrates that it has the appropriate processes in place to manage risk and take the correct action. Where a report is made, it can also limit the likelihood that the Commission will take any formal regulatory or enforcement action.

If the Charity fails to report a serious incident that subsequently comes to light, the Commission may consider this to be indicative of mismanagement in the administration of the Charity and may ask the Charity to explain why it was not reported at the time. The failure to report a serious incident could prompt or add to the seriousness of regulatory action, particularly if further abuse or damage has arisen following the initial incident.

The potential for reputational damage can also be lessened if the Charity is able to show that any serious incident has been handled appropriately.

## **Responsibilities**

### **5. Trustees**

- a. Are ultimately responsible for ensuring serious Incidents are reported
- b. Must be aware of their duties under the relevant guidance (on serious incident reporting and associated matters, such as safeguarding and financial management and must follow this policy and any other relevant policies of the Charity.

### **6. Responsible Officer (one of the Co-Chairs)**

- a. Coordinates Incident recording and reporting
- b. Acts as the main point of contact with the Charity Commission

### **7. All staff and Volunteers (including trustees)**

- a. Must report and concerns or Incidents to one of the Co-Chairs of the Management Committee without delay

## **8. Identification and Internal Reporting**

Staff or volunteers should not seek to make a serious incident report to the Commission themselves. Instead, they should report their concerns so that appropriate action can be taken by the appropriate team member.

Any trustee, staff, member or volunteer who becomes aware of a potential serious Incident must report it immediately to one of the Co-Chairs. An Internal Incident form must be completed within 24 hours and stored securely.

Assessing whether a reportable serious incident has occurred is a matter for the trustees to determine, having reviewed and considered the SIR Guidance and any related Commission documents or other guidance, and they may seek advice from professional advisers before doing so.

## 9. External Reporting Procedure

Once an Incident Is deemed “serious” by the Trustees, the following steps must be taken.

- b. Prepare a report with the details of:
  - (1) What happened
  - (2) When and where it occurred
  - (3) Who was Involved
  - (4) Immediate actions taken
  - (5) Further steps taken to manage the Incident
- c. Submit the Report to the Charity Commission via their online form as soon as possible
- d. Notify other regulators or authorities (e.g. police, ICO) where appropriate

The trustees will report serious incidents to the Commission promptly and **regardless of whether the incident has already been resolved**. The urgency of reporting will depend on factors including the nature and seriousness of the incident, the potential impact on the Charity and whether it is likely that there will be media coverage of the incident.

The trustees will liaise with relevant staff to gather the appropriate information required to report the matter to the Commission.

The trustees may delegate responsibility for reporting a serious incident to a senior member of staff – any delegation should be clear about the scope of the report, trustee oversight of it and the deadline for submission. The SIR Guidance makes it clear that decisions made by others should be reported back to trustees, particularly where incidents were ‘borderline’ and the charity considered making a report but decided not to.

### Record-Keeping

10. The charity will maintain a central log of all serious incidents reported Internally and externally. This log will include dates, nature of the Incident, actions taken, and outcomes. Confidentiality will be maintained as far as possible.

## 8. Review and learning

It is important that GASi appropriately manages and responds to a serious incident. This includes learning from the incident and taking steps to minimise further harm in consequence of the incident and to prevent similar incidents from occurring in the future.

Senior employees and trustees should consider whether GASi has taken appropriate steps to respond to a serious incident and ensure that sufficient controls and

procedures are put in place to mitigate and manage any future risks to the Charity and its beneficiaries. This should be documented.

### **Policy Review**

13. The policy will be reviewed annually or after any serious incident to ensure it remains effective and in line with regulatory guidance.

# UK Charity Serious Incident Reporting Form

## Group Analytic Society international (Charity No: 1174815) Internal Form

**CONFIDENTIAL WHEN COMPLETED – FOR INTERNAL USE ONLY**

### 1. Incident Details

- Date of Incident: [DD/MM/YYYY]
- Location: [specify where the incident occurred]
- Description of incident:  
(Provide a detailed summary of the event, including how and when it was discovered.)
- Category: [Financial fraud/Cybersecurity/ Safeguarding/Government issue/other]

### 2. Impact Assessment

- Affected individuals or Areas: [Describe who or what was impacted]
- Potential Consequences: [Reputational damage, financial loss, operational disruption]
- Urgency Level: [Low/Medium/High]

### 3. Actions Taken

- Immediate Response: [Detail actions taken to contain the incident]
- Stakeholders Informed: [List parties informed, e.g. trustees, legal advisors]
- Preventative Measures: [Describe long-term actions to prevent recurrence]

### 4. Trustee Awareness & Decision-Making

- Trustees Notified: [Yes/No]
- Date of Trustee Notification: [DD/MM/YYYY]
- Trustee Actions & Decisions: (Summarize trustee discussions and decisions about the incident)

### 5. External Reporting

- Reported to Charity Commission? [YES /NO]
- Reference Number: [If applicable]
- Reported to Other Authorities? [Police, ICO, HMRC, etc]

- Additional Information: [Any further notes, including expected follow-up actions.]

## CONTACT DETAILS

This policy has been approved and authorised by the Trustees:

**Name:**

**Position**

**Date:**

**Signature:**

**Policy version:** September 2025

**Date of review:** September 2026

**Contact:** office@groupanalyticsociety.co.uk

### Duty to Report

- **Trustees are ultimately responsible** for ensuring that serious incidents are reported to the Charity Commission.
- **Immediate risks to safety, or suspected criminal behaviour, must be reported to the police or safeguarding authorities first**, before or alongside internal reporting.
- All serious incidents must be reported **promptly** to the Co-Chairs, who will work with the Trustees to decide and make external reports as required.
- Dialogue and reflection are important but **must never delay urgent reporting**.

### How to Report

1. **Complete the Serious Incident Report Form** (available on our website or from the Co-Chairs).
2. **Submit the form confidentially** to the Co-Chairs.
3. The Co-Chairs will:
  - a. review the report,
  - b. consult Trustees and, where appropriate, legal or safeguarding professionals,
  - c. make any required reports to the Charity Commission and/or relevant authorities,
  - d. oversee follow-up actions.

### Confidentiality and Care

- Reports will be handled sensitively, fairly, and in line with data protection requirements.
- Support will be provided both to the person raising the concern and to anyone named in a report.
- GASi will ensure processes are transparent and respectful.

**Our Ethos in Practice**

- Once immediate risks are addressed and reporting obligations fulfilled, GASi may draw on its group analytic values to support reflection and learning.
- We encourage respectful dialogue and inquiry to help the community process difficult experiences.
- We believe that open conversation fosters understanding, accountability, and collective responsibility.
- Our aim is to integrate compliance with our deeper commitment to psychological safety and containment.

**Review**

This policy will be reviewed annually by the Trustees to ensure continued compliance with Charity Commission guidance and alignment with GASi's values.

Document: dated October 2025  
To be reviewed September 2026