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THE DUKE OF EDINBURGH'S
INTERNATIONAL AWARD



SERIOUS INCIDENT REPORTING POLICY

THE INTERNATIONAL AWARD FOR YOUNG PEOPLE, INDIA

Version 1.2
May 2024

#WORLDREADY

Serious Incident Reporting Policy
The Award Programme Foundation (APF)

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1. Serious Incident Reporting Policy

1.1. The Award Programme Foundation (APF), is a charity registered under Indian Trust Act regulated by the Maharashtra Charity Commissioner

1.2. The APF requires all licensed Institutions of The International Award of Young People (IAYP) to report, as soon as possible, any serious incident, complaint, and possible claim to the APF that may provoke significant adverse publicity or financial or legal liability for a Licensee or the APF. Licensees are required to keep the APF informed about the progress on any of these matters.

1.3. If a serious incident takes place that is associated with the Award, it is important that there is prompt, full and frank disclosure to the relevant authorities and regulator in the relevant city or State jurisdiction.

1.4. If a reportable incident involves actual or alleged criminal activity, licensees must also report it to the relevant law enforcement agencies in the city or State jurisdiction where the incident(s) occurred. The obligation to report an incident to the APF in no way affects the obligation to report actual or alleged criminal activity to the relevant law enforcement agencies.

1.5. Licensees should normally report to the APF once the relevant authorities have been informed.

1.6. The focus of the Serious Incident Reporting Policy ('SIR Policy') is to provide Licensees with guidance to determine what constitutes a serious incident, what to report, to whom and when. The primary purpose of the policy is to govern serious incident reporting in a licensee's ambit within the country of India.

2. What is a serious incident?

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

- I. harm to one or more of the Award's beneficiaries, staff, volunteers, or others who come into contact with a licensed Licensee of the Award.
- II. loss of the APF's or a licensee's money or assets.
- III. damage to the APF's property.
- IV. harm to the APF, licensees and/or the Award's work or reputation.
- V. systems failure and technology failure leading to significant business impact

3. Categories of serious incident

3.1. Any reportable incident should be fully risk-assessed, and a report should not be made if there is reasonable risk that doing so may cause further harm to the victim/survivors, or where due process and operation of the rule of law is not reasonably assured.

3.2. The categories for reporting serious incidents are very broad and are summarised as follows:

- I. 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 Licensee

through its work. Please refer to the APF's Safeguarding Policy for further guidance and requirements.

II. financial crimes – fraud, theft, cyber-crime and money laundering.

III. large donations from an unknown or unverifiable source, or suspicious financial activity using the APF's funds.

IV. other significant financial loss.

V. major systems failure – such as failure or major data breach with the Online Record Book, Award Community and Alumni platforms.

VI. links to terrorism or extremism, including 'proscribed' (or banned) organisations, individuals subject to an asset freeze or kidnapping of staff or Award volunteers.

VII. other significant incidents, such as insolvency, forced withdrawal of banking services without an alternative, significant data breaches/losses or incidents involving partners that materially affect the Licensee.

4. Determining what to report to the APF

4.1 To determine whether or not an incident is reportable under the APF's SIR Policy, the incident should be evaluated to identify its seriousness based on the risk it presents of provoking significant adverse publicity and financial or legal liability for a Licensee or the APF.

4.2 To identify if there is a significant risk in one or more area you should complete an analysis using the Award's 'tension triangle' outlined below. Analysis using the 'tension triangle' should be conducted using three key areas of consideration: behaviour, proximity and reputation. A significant risk in one or more area deems the incident reportable to the APF

4.3 Below is a non-exhaustive list of questions specific to each key area which can be used to form part of your analysis.

4.3.1 Behaviour – questions and considerations:

- Does the actual or alleged incident reflect a breach of the volunteer Code of Conduct?
- Is the actual or alleged incident illegal in the jurisdiction?
- Is the actual or alleged incident illegal in India/under international law?
- Is the actual or alleged incident a result of negligence?
- What other factors need to be considered relating to the behaviour involved in the incident?

4.3.2 Proximity – questions and considerations:

- What is the relationship between the alleged or actual perpetrator and the Licensee or donor?
- Who is/are the human victim(s)? What is the relationship between the victim(s) and the Licensee or donor?
- Did the incident(s) take place during activity directly associated with the Award?
- What other factors need to be considered relating to the proximity of the incident to the Licensee or donor?

4.3.3 Reputation – questions and considerations:

- What is the potential for adverse publicity for the Brand?
- Is there a reputational risk for key stakeholder individuals or organisations?
- What other factors need to be considered relating to publicity connected to the incident?

4.4 Finally, the result of the triangulated evaluation or analysis should be cross-referenced against a risk-assessment on any potential risks of further harm to the victim(s)/survivor(s) associated with reporting the incident to the APF.

5. Who should report a serious incident?

5.1. The responsibility for reporting serious incidents on behalf of a Licensee to the APF is an obligation enshrined in Licensee's licenses, and rests with the licence signatory of the Licensee:

Licensees or Operating Partners - the Board of APF should be consulted and informed by the National Director. In practice the signatory of the licensee may report on behalf of the licensed signatory.

6. To whom and when to report a serious incident

6.1. Licensed Licensees must report an actual or alleged serious incident promptly. This means, it must be reported as soon as is reasonably possible after it happens, or immediately after the Licensee becomes aware of it.

6.2. If a serious incident takes place, it is important that there is prompt, full and frank disclosure to the relevant authorities and/or regulator in the relevant country or jurisdiction.

6.3. If a reportable incident involves actual or alleged criminal activity, licensed Licensees must also report it to the relevant law enforcement agencies in the city or State of jurisdiction where the incident(s) occurred. The obligation to report an incident to the APF in no way affects the obligation to report actual or alleged criminal activity to the relevant law enforcement agencies.

6.4. Licensed Licensees should only report to the APF once the relevant authorities in the jurisdiction have been informed.

I. Licensees and Operating Partners – should report any incident to the National Director of IAYP in the first instance.

6.5. Serious incidents should be reported via a form which can be provided by your Programme team upon request.

7. Complaints procedure

7.1. The SIR Policy and the associated serious incident reporting procedure are independent from and do not affect the APF's complaints procedure.

7.2. In the event that an incident constitutes a reportable serious incident, and a stakeholder also wishes to make a complaint to the Licensee or APF in relation to the

incident or the response to the incident, both the SIR Policy procedure and the complaints procedure should be pursued independently.

7.3. The complaints procedure, as set out in the Complaints Policy:

The Award recognises that there will be occasions when someone wishes to complain about how activities are managed, how services are delivered or due to the conduct of an Award staff member or volunteer.

In the first instance, the complainant and Award Centre or National Award Licensee must try to resolve the issue informally.

If this cannot occur, the following process should be followed:

1. The APF will designate a suitable member of staff to seek a resolution.
2. The designated member of staff will acknowledge and confirm the complaint within 5 working days.
3. The APF will seek to resolve the complaint within one month.
4. Any outcome will be provided in writing to ensure that all are correctly informed and that any review or remedial action is carried out.

If the complaint is not resolved and the complainant wishes to appeal, final resolution will be coordinated by the APF.

5. Should you wish to make a complaint specifically about the SIR Policy and/or the associated serious incident reporting procedure, please contact the National Director of IAYP.

8. Further information

8.1. For further information or to discuss any aspect of this policy, please contact your dedicated Programme Office or the Programme Manager.

To report any complaint/feedback:

- Email at dsl@dofe.in

or

- Mail through post at The Award Programme Foundation: First Floor, 86/1 Shahpur Jat, August Kranti Marg, Near Asian Games Village, New Delhi – 110049, India | Contact: +9111-41087062