

Serious Incident Reporting Policy

The Duke of Edinburgh's International Award

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1. Serious Incident Reporting Policy Overview

- 1.1. The Duke of Edinburgh's International Award USA (Award USA) requires all sublicensed Award Award Centers and Operating Partners (Award Centers) to report, as soon as possible, any serious incident, complaint, and possible claim to Award USA that may provoke significant adverse publicity or financial liability for the Award Center or Award USA. Licensed Award Centers are required to keep Award USA informed about the progress on any of these matters.
- 1.2. 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 county, state, or jurisdiction and in compliance with local and federal laws. Award Centers should normally report to Award USA once the relevant authorities have been informed.
- 1.3. The responsibility for reporting serious incidents on behalf of the Award USA rests with the CEO of Award USA or the Chairperson of the Board of Directors, when appropriate.
- 1.4. The focus of this policy is to provide licensed Award Units with guidance to determine what is as serious incident, what to report, to whom and when. The primary purpose of the policy is to govern serious incident reporting within the United States. If a reportable incident involves actual or alleged criminal activity, then licensed Award Centers must also report it to the relevant agencies in the local jurisdiction where incident occurred.

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 the Award's beneficiaries, staff, volunteers or others who come into contact with a licensed Award Center
 - II. loss of the licensed Award Center's money or assets
 - III. damage to Award USA property
 - IV. harm to Award USA, the Foundation, licensed Award Center's work or reputation
 - V. systems failure and technology failure leading to significant business impact

3. Deciding what to report and when

- 3.1. Licensed Award Centers must report an actual or alleged serious incident promptly. This means as soon as is reasonably possible after it happens, or

immediately after the Award Center becomes aware of it.

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 Award Center through its work. Please refer to Award USA'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 Award USA 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 that would impact Award Centers or Award USA participants
- 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 Award Center

3.3 An example of how to determine if a serious incident report is needed can be found [here](#). An example of information to be collect in the reporting of a serious incident can be found [here](#). Contact the VP of Program and Operations if you have questions determining if a serious incident has occurred.

3.4 Finally, any incident that is reported should be fully risk assessed and not made if they may cause further harm to the victim/survivors or due process and operation of the rule of law is not reasonably assured.

3.5 Among Award Staff and Award Leaders an volunteers must comply with mandatory reporting laws at the state and federal level.

4. Who should report

4.1. The responsibility for reporting serious incidents on behalf of a licensed Award Center to the Award USA rests with the licensed signatory of the Award Center:

- i. **Independent Award Center** – the obligation rests with the licensed holder, typically a Principal, Head of School, or the organization's CEO or Director. In practice, the Award Coordinator should consult and inform the Senior Management Team of

their organization before reporting to Award USA.

- ii. **Award USA** - the CEO of Award USA should consult with the Board of Directors before reporting to local authorities or the Foundation.

4.2. The responsibility for reporting serious incidents on behalf of the Award USA rests with Award USA's CEO or Chairperson of the Board of Directors. The CEO is required to report all serious incidents to the Foundation.

5. Who to report a serious incident to

5.1. If a serious incident takes place, it is important that there is prompt, full and frank disclosure to the relevant local and federal authorities. Licensed Award Centers should report to Award USA once the relevant authorities have been informed.

6. Reporting criminal activity

6.1. If a reportable incident involves actual or alleged criminal activity then a licensed Award Center must report it to the relevant agencies:

- I. **safeguarding incidents:** you should report allegations or incidents of abuse or mistreatment of people who come into contact with the Award to:
 - a) the police and obtain a crime report, and
 - b) the local authority and other relevant county, state, or federal agencies
- II. **fraud and cyber-crime:** you should report allegations or incidents of fraud and cyber- crime to the relevant government agency.
- III. **theft:** you should report allegations or incidents of theft to the police and obtain a crime report,
- IV. **links to terrorism and extremism:** you should report links or alleged links to terrorism and extremism to the police report

7. Complaints procedure

7.1. Award USA recognises that there will be occasions when someone wishes to complain about how Award activities are managed, how services are delivered or due to the conduct of an Award staff member or volunteer. The complaints procedure, as set out in the International Handbook for Award Leaders is as follows.

7.2. In the first instance, the complainant must try to resolve the issue informally. If this cannot occur, the following process must be followed:

- 1. Award USA 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. Award USA 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.

7.3. If the complaint is not resolved and the complainant wishes to appeal, final resolution will be coordinated by the CEO of Award USA.

8. Further information

8.1. For further information or to discuss any aspect of this policy, please contact the VP of Operations at Award USA.