



Policy Document

SERIOUS INCIDENT REPORTING POLICY

Policy Owner	The Duke of Edinburgh's International Award Nepal
Board Approval	December 1, 2024
Policy Responsibility	Designated Safeguarding Lead
Issue Date	December 4, 2024
Last Review	N/A

October 2024
Version: 1.0

Serious Incident Reporting Policy
October 2024

Version control

Version	Date	Author	Notes
1.0	07 October 2024	Senior Operations and Programme Officer	Approved by the Executive Committee (Dec 1, 2024)

Relevant Policies:

1. Safeguarding Policy
2. Code of Conduct
3. Whistleblowing Policy
4. Privacy Policy

Content

Serious Incident Reporting Policy	3
What is a Serious Incident?	3
Categories of Serious Incident	4
Determining What to Report to the NAO	5
Who Should Report a Serious Incident?	6
To Whom and When to Report a Serious Incident	7
Complaints Procedure	8
Further Information	8
Serious Incident Reporting Template	9

Serious Incident Reporting Policy

- 1.1 Saskham Yuwa Nepal, National Award Operator (NAO) and administrative body of The Duke of Edinburgh's Award in Nepal, is obliged by the law to report to local authorities or relevant law enforcement agencies any serious incident, accident or potential claim that may have adverse impact on the organisation.
- 1.2. The NAO requires all sub-licensed Operating Partners (Award Centers and Open Award Centers) to report, as soon as possible, any serious incident, complaint and possible claim to the that may provoke significant adverse publicity or financial or legal liability for the concerned Operating Partner, NAO or the Duke of Edinburgh's International Award Foundation. They are required to keep the NAO 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 local authorities.
- 1.4. If a reportable incident involves actual or alleged criminal, Operating Partners (Award Centers and Open Award Centers) must also report it to local authorities. The obligation to report an incident to the NAO in no way affects the obligation to report actual or alleged criminal activity to local authorities or relevant law enforcement agencies in Nepal.
- 1.5. Operating Partners (Award Centers and Open Award Centers) should normally report to the NAO once the relevant authorities have been informed.
- 1.6. The responsibility for reporting serious incidents to local authorities or relevant law enforcement agencies on behalf of the NAO rests with the National Chair.
- 1.7. The focus of the Serious Incident Reporting Policy ('SIR Policy') is to provide licensed Operating Partners 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 the context of The Duke of Edinburgh's International Award

What is a Serious Incident?

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

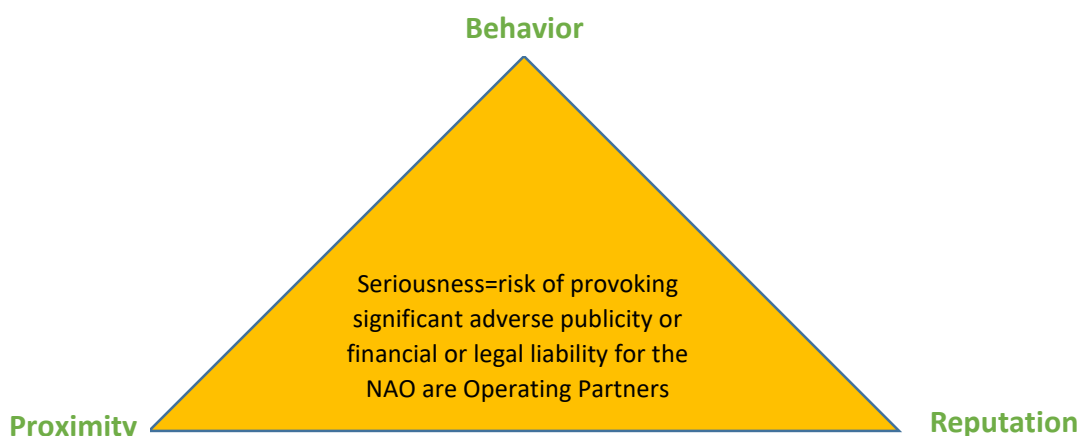
- harm to one or more of the Award's beneficiaries, staff, volunteers or others who come into contact with the NAO
- loss of the NAO's or the Operating Partner's money or assets.
- damage to the NAO's property.
- harm to the Foundation, NAO, Operating Partners and/or the Award's work or reputation.
- systems failure and technology failure leading to significant business impact

Categories of Serious Incident

- 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.
- The categories for reporting serious incidents are very broad and are summarized as follows:
 - **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 NAO through its work. Please refer to the NAO's Safeguarding Policy for further guidance and requirements.
 - **financial crimes** – fraud, theft, cyber-crime and money laundering.
 - **large donations from an unknown or unverifiable source, or suspicious financial activity using the NAO's funds.**
 - **other significant financial loss.**
 - **major systems failure** – such as failure or major data breach with the Online Record Book, Award Community and Alumni platforms.
 - **links to terrorism or extremism**, including 'proscribed' (or banned) organizations, individuals subject to an asset freeze, or kidnapping of staff or Award volunteers.
 - **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 NAO.
- SWC, a government body responsible for regulating I/NGOs in Nepal produced a useful table to inform I/NGOs on what to report in these scenarios. See [Here](#)

Determining What to Report to the NAO

- To determine whether or not an incident is reportable under the NAO's Serious Incident Reporting 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 the Foundation, the NAO, or the Operating Partners.
- 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: behavior, proximity and reputation. A significant risk in one or more area deems the incident reportable to the NAO



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

- **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 Nepal under law?
 - Is the actual or alleged incident a result of negligence?
 - What other factors need to be considered relating to the behavior involved in the incident?
- **Proximity – questions and considerations:**
 - What is the relationship between the alleged or actual perpetrator and the Operating Partner or donor?
 - Who is/are the human victim(s)? What is the relationship between the victim(s) and the Operating Partner or donor?
 - Did the incident(s) take place during activity directly associated with the Award?

Serious Incident Reporting Policy October 2024

- What other factors need to be considered relating to the proximity of the incident to the Operating Partner or donor?
- **Reputation – questions and considerations:**
 - What is the potential for adverse publicity for the Brand?
 - Is there a reputational risk for key stakeholder individuals or organizations?
 - What other factors need to be considered relating to publicity connected to the incident?

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 NAO.

Who Should Report a Serious Incident

The responsibility for reporting serious incidents on behalf of an Operating Partner to the NAO is an obligation enshrined in sub-licenses, and rests with the license signatory of the Operating Partner:

- **Award Centers-** typically a Principal or Director of the school, should be consulted and informed by the Award Leader or Award Coordinator before reporting to the NAO. In practice, the Award Leader or Award Coordinator may report on behalf of the management and licensed signatory.
- **Open Award Centers** – the obligation to report rests with the license holder, typically a Director of the organisation licensed as an Open Award Center. In practice, the Award Coordinator should consult and inform the Senior Management Team of their organisation, before reporting to the NAO.

The responsibility for reporting serious incidents to the concerned local authorities on behalf of the NAO rests with the National Chair. The National Chair is required to report all serious incidents to the National Board with designated responsibility of Designated Safeguarding Lead for safeguarding, serious incidents and their oversight

To Whom and When to Report a Serious Incident

- Operating Partners 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 Operating Partners become aware of it.
- If a serious incident takes place, it is important that there is prompt, full and frank disclosure to the relevant authorities and jurisdiction in Nepal.
- If a reportable incident involves actual or alleged criminal activity, Operating Partners must also report it to the relevant law enforcement agencies in Nepal. The obligation to report an incident to the NAO in no way affects the obligation to report actual or alleged criminal activity to the relevant law enforcement agencies.
- Operating Partners should only report to the NAO once the relevant authorities in the jurisdiction have been informed
- A Designated Safeguarding Lead has been appointed by the NAO who ensures the safety and well-being of young people involved in The Duke of Edinburgh's International Award in Nepal. The responsibilities of the Designated Safeguarding Lead are as follows:
 - Oversee the implementation and adherence to relevant safeguarding policies across all levels of the NAO.
 - Act as the primary point of contact for all safeguarding concerns, serious incidents, and allegations.
 - Maintain a clear and confidential record of all reported incidents and actions taken.
 - Work closely with Award Leaders, Award Coordinators, and NAO staff to ensure safeguarding protocols are followed.
 - Ensure all staff and volunteers are trained on recognizing and reporting safeguarding concerns.
 - Regularly review and update the Serious Incident Reporting Policy to align with national laws and international standards.
 - Monitor and assess safeguarding and serious incidents risks associated with Award activities and events.
 - Handle all safeguarding concerns with strict confidentiality, ensuring sensitive information is securely stored and only shared on a need-to-know basis.
 - Ensure compliance with the safeguarding standards set by The Duke of Edinburgh's International Award Foundation and national laws.
 - Promote a culture where safeguarding is a shared responsibility, encouraging openness and trust among all participants and staff.

Complaints Procedure

- The Serious Incident Reporting Policy and the associated serious incident reporting procedure are independent from and do not affect the NAO's complaints procedure.
- In the event that an incident constitutes a reportable serious incident, and a stakeholder also wishes to make a complaint to the Operating Partners or NAO in relation to the incident or the response to the incident, both the Serious Incident Reporting Policy procedure and the complaints procedure should be pursued independently.
- The complaints procedure is as follows:
 - *The NAO recognizes 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 the NAO staff member or volunteer.*
 - *In the first instance, the complainant and Operating Partners must try to resolve the issue informally.*
 - ***If this cannot occur, the following process should be followed:***
 - *The National Chair will designate a suitable member of staff in order to support the Designated Safeguarding Lead to seek a resolution.*
 - *The designated member of staff will acknowledge and confirm the complaint within 5 working days.*
 - *The Designated Safeguarding Lead will seek to resolve the complaint within one month.*
 - *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 National Chair*

Should you wish to make a complaint specifically about the Serious Incident Reporting Policy and/or the associated serious incident reporting procedure, please email at report.doeianepal@gmail.com

If a person feels that the NAO has not dealt appropriately with a matter of concern, they may make a report to the Duke of Edinburgh's International Award Foundation at operations@intaward.org

Further Information

For further information or to discuss any aspect of this policy, please contact your dedicated account manager.

Serious Incident Reporting Template

DATA PROTECTION: This form is used to collect information for the purpose of gathering compliant details as part of the complaints process. We don't share your personal data provided in this form with any third parties. We take your personal data privacy seriously. The data you provide to us is securely stored and we will keep the data we capture from this form for five years

Report Date:
Reported By: Contact Details:
Incident Date and Time:
Incident Location:
Involved Individuals and their Roles:
Nature of Incident: [Check the appropriate box and provide details] <input type="checkbox"/> Health & Safety <input type="checkbox"/> Misconduct <input type="checkbox"/> Abuse/Harassment <input type="checkbox"/> Property Damage <input type="checkbox"/> Other: [Specify].....
Description of Incident: <i>Provide a detailed description of the incident, including events leading up to it, and any immediate actions taken.</i>
Witnesses: Contact Details:
Immediate Action Taken: <i>Describe any immediate action taken to address the situation, including medical attention, disciplinary action, or other interventions.</i>

Serious Incident Reporting Policy
October 2024

<p>Further Actions Required:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Investigation Needed <input type="checkbox"/> Contact Authorities <input type="checkbox"/> Provide Counseling/Support <input type="checkbox"/> Other: [Specify].....
<p>Follow-up Plan: <i>Outline any follow-up steps or actions planned to address the incident and prevent recurrence.</i></p>
<p>Reported To: Name: Position: Date of Report Submission:</p>
<p>Additional Comments (if any)</p>

For NAO Use Only	
Incident Review Date	
Action Taken by NAO	Details of Any Further Actions Taken by The NAO
Reviewing Officer	Name: Signature: Date: