

Implementation Requirements for Serious Incident Reporting Policy of the International Award Foundation

The Duke of Edinburgh's International Award China

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Version Control

Version	Date	Author	Notes
1.0	February 2020	China NAO	Interim policy – to be reviewed by the Foundation.
2.0	May 2023	China NAO	Updated to include new guidance on how to determine whether to report an incident to the Foundation.

Relevant policies

1. Safeguarding policy
2. Whistleblowing policy
3. Data protection policy

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1. Serious Incident Reporting Policy

The Duke of Edinburgh's International Award (hereinafter referred to as the "Award") is an international award granted by the Duke of Edinburgh's International Award Foundation (hereinafter referred to as the "Foundation"). Shanghai Enshaw Technology Group Co., Ltd. is the official agency of the Duke of Edinburgh's International Award in mainland China (excluding the Hong Kong Special Administrative Region, Macau Special Administrative Region, and Taiwan of the People's Republic of China, hereinafter the same) and has obtained an exclusive, transferable license for the relevant intellectual property rights from the Duke of Edinburgh's International Award Foundation to sublicense the relevant intellectual property rights to carry out its business. In this "Implementation Requirements for the Serious Incident Reporting Policy of the International Award Foundation" (hereinafter referred to as "this Document"), Shanghai Enshaw Technology Group Co., Ltd., Beijing Intaward International Culture Development Co., Ltd., and their affiliated companies are collectively referred to as "China NAO" or "we".

1.1. As a registered charity in the UK, the Duke of Edinburgh's International Award Foundation is obliged by UK law to report to the UK Charity Commission any serious incident, accident, or potential claim that may have an adverse impact on the organization. As the licensed agency for the Award, China NAO will handle reports of serious incidents from Award Delivery Partners (as defined below) in accordance with this Document.

1.2. China NAO requires all licensed Award Delivery Partners in mainland China (hereinafter referred to as "Award Delivery Partners," including but not limited to National Award Centers (NACs), Award Centers (ACs), Open Award Centers (OACs), and Recognized Activity Providers (RAPs)) to promptly report to China NAO any serious incidents, complaints, and potential claims that may generate significant negative public opinion or result in financial or legal liabilities for the Award Delivery Partners, China NAO, or the Foundation. Award Delivery Partners need to keep China NAO informed of the progress of these matters.

1.3. In the event of a serious incident related to the Award, Award Delivery Partners should promptly, fully, and honestly disclose it to the relevant departments and regulatory authorities in mainland China.

1.4. If the incident to be reported involves actual or suspected criminal conduct, the Award Delivery Partners must also report it to the relevant law enforcement agencies in the country or jurisdiction where the incident occurred. The obligation to report the incident to China NAO does not affect the obligation to report actual or alleged criminal conduct to the relevant law enforcement agencies.

1.5. Award Delivery Partners should generally report to China NAO before or at least at the same time as reporting to the relevant law enforcement agencies.

1.6. The responsibility for reporting serious incidents to the UK Charity Commission on behalf of the

Foundation lies with the Foundation's International Trustees.

1.7. The focus of the Serious Incident Reporting Policy (hereinafter referred to as "SIR Policy") is to provide guidance to Award Delivery Partners and China NAO on determining what constitutes a serious incident, what should be reported, to whom, and when. The primary purpose of the policy is to govern serious incident reporting within the International Award Association.

1.8. Award Delivery Partners have an obligation to develop their own serious incident reporting policy in accordance with the Foundation's SIR Policy and the requirements of this Document, as the rules and basis for handling serious incident reports. Award Delivery Partners should provide evidence of policies and procedures that comply with the SIR Policy and the requirements of this Document to China NAO. The serious incident reporting policy of the Award Delivery Partners should not conflict with or contradict the Foundation's SIR Policy and this Document; if conflicts or contradictions exist, the Foundation's SIR Policy and this Document shall take precedence over the award delivery partner's serious incident reporting policy.

2. What is a serious incident?

2.1. A serious incident is an actual or alleged adverse event that may result in or pose a significant risk to the following aspects:

- I. Harm to the Award's beneficiaries, employees, volunteers, or others who come into contact with Award Delivery Partners.
- II. Loss of funds or assets of the Foundation, China NAO, or Award Delivery Partners.
- III. Damage to the property of the Foundation or China NAO.
- IV. Harm to the Foundation, China NAO, Award Delivery Partners, and/or the Award's work or reputation.
- V. System failure and technical failure leading to significant business impact.

3. Categories of serious incidents

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

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

- I. Protecting people and safeguarding incidents - events that have resulted in or risk significant harm to beneficiaries and other people who come into contact with China NAO or Award Delivery Partners through their work. Please refer to the Foundation'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 Foundation's funds.

4.3.2 Proximity – questions and considerations:

- What is the relationship between the alleged or actual perpetrator and the Award Delivery Partners, China NAO, or the sponsor?
- Who is/are the human victim(s)? What is the relationship between the victim(s) and the Award Delivery Partners, China NAO, or the sponsor?
- 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 Award Delivery Partners, China NAO, or the sponsor?

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 organizations?
- What other factors need to be considered relating to publicity connected to the incident?

4.4 Finally, Award Delivery Partners should cross-reference the result of the triangulated evaluation or analysis against a risk assessment on any potential risks of further harm to the victim(s)/survivor(s) associated with reporting the incident to China NAO and the Foundation.

5. Who should report a serious incident?

5.1. The responsibility for reporting serious incidents on behalf of a licensed Award Delivery Partners to China NAO is an obligation enshrined in the delivery partner's licence and rests with the licence signatory of the Award delivery partner:

The Principal or Director of the Award Delivery Partners is the primary person responsible for reporting serious incidents to China NAO. In practice, the Award Coordinator should consult and inform the Senior Management Team of their organization before reporting to China NAO. The Award Coordinator may report on behalf of the Award delivery partner.

5.2. The responsibility for reporting serious incidents to the UK Charity Commission on behalf of the Foundation rests with the Foundation's International Trustees. The Foundation's Director of Operations is required to report all serious incidents to the designated Trustee(s) responsible for safeguarding, serious incidents, and their oversight.

6. To whom and when to report a serious incident

6.1. Licensed Award Delivery Partners must promptly report actual or alleged serious incidents to China NAO. This means the incident must be reported as soon as reasonably possible after it occurs, or

immediately after the Award Delivery Partners becomes aware of it.

6.2. If a serious incident occurs, it is crucial for the Award Delivery Partners to provide prompt, full, and frank disclosure to the relevant law enforcement agencies and/or regulators in Mainland China.

6.3. If a reportable incident involves actual or alleged criminal activity, Award Delivery Partners must also report it to the relevant law enforcement agencies in the country or jurisdiction where the incident(s) occurred. The obligation to report an incident to China NAO in no way affects the obligation to report actual or alleged criminal activity to the relevant law enforcement agencies.

6.4. Award Delivery Partners should report to China NAO either before or at least simultaneously with reporting the incident to the relevant authorities in Mainland China.

Award Delivery Partners should report any serious incident to the China NAO's Operations Team, and the email address for receiving such reports is: ceo@intawardchina.cn.

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

7. Complaints procedure

7.1. The Serious Incident Reporting (SIR) Policy and the associated serious incident reporting procedure are independent from and do not affect the Foundation's complaints procedure.

7.2. If an incident constitutes a reportable serious incident, and a stakeholder also wishes to make a complaint to the Foundation 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:

First, the Award Delivery Partners must attempt to resolve the complaint amicably with the complainant. If the Award Delivery Partners cannot resolve the complaint through amicable negotiation, the Award Delivery Partners should report the complaint to China NAO (the email address for receiving complaints is ceo@intawardchina.cn), and should assist China NAO in resolving the complaint through amicable negotiation with the complainant. If both the Award Delivery Partners and China NAO cannot resolve the complaint through amicable negotiation, the Foundation's complaint process should be followed.

8. More information

8.1. For further information or to discuss any aspect of the content this Document, please contact China NAO's Operations team at email: operations@intawardchina.cn.