

POLICY:	Incident Reporting
EFFECTIVE DATE:	April 19, 2021
DATE LAST REVIEWED:	April 19, 2021
HISTORY OF REVISIONS:	
SUPERSEDES:	All previous policies and statements
APPROVED BY:	Brandon Literacy Council Inc. Board of Directors
RELATED DOCUMENTS:	<ul style="list-style-type: none"> ▪ Stakeholder Feedback and Complaints Policy ▪ Harassment and Abuse Prevention Policy ▪ Harassment and Abuse Prevention Code of Conduct ▪ Progressive Discipline Policy ▪ Confidentiality Policy

PURPOSE:

The purpose of this policy is to establish appropriate processes and procedures to receive and address incident reports which breach either Brandon Literacy Council Inc.’s Learner or Learning Agreement.

SCOPE:

This policy is inclusive of, but not limited to, all Brandon Literacy Council Inc. (BLC) stakeholders such as its employees, contract workers, volunteers, board members, learners, donors, funders, community partners, the Brandon and area community in general and other groups or organizations that have an interest in BLC.

POLICY STATEMENT:

BLC views incident reporting as a necessary way for it to ensure the quality of its services and to learn and improve its practices for the future. The information received through an incident report process can help BLC take steps to better support individuals, to improve administrative practices, and create both transparency and accountability at BLC.

DEFINITIONS:

Incident: An instance of something happening; an event or occurrence; a violent event, such as a fracas or assault.

Stakeholder: A person with an interest or concern in something, especially program participants such as, but not limited to, providers and recipients of organizational and programming services.

RESPONSIBILITIES:

The Executive Director is responsible for creating stakeholder awareness of and access to this policy and its associated procedures, as well as receiving and directing stakeholder incident reporting in accordance with this policy.

It is BLC's intention to:

- Ensure that incident reports are properly identified and dealt with appropriately as per specific policies herein and per associated policies such as Stakeholder Feedback and Complaints Policy and Harassment and Abuse Prevention Policy.
- Provide a fair process which is clear and easy for incident reporters to follow (that is, any stakeholders who report an incident, from now on referred to as the 'Complainant').
- Ensure all incidents are handled appropriately, fairly and in a timely manner.
- Ensure that all incidents are, whenever possible, resolved according to workplace etiquette and comply with all prevailing legal requirements.

PROCEDURES:**1. Stakeholder Reporting**

- a. Any instance where a potential breach of either the BLC's Learner or Learning Agreement occurs, or is experienced, witnessed, and reported by and among BLC stakeholders, will be considered an incident and will be addressed according to the Incident Reporting Policy (IRP) herein.
- b. Incident Reports must be submitted in writing to the Executive Director or to any BLC Board member in the following ways:
 - i. By email to feedback@blcbrandon.com
 - ii. By mail to Brandon Literacy Council Inc., 129-12th Street, Brandon, MB R7A 4L8
 - iii. By in-person drop off to the secure Feedback, Complaints, and Incident Reporting box located in the BLC reception area.
- c. Since feedback and complaints can come in any form (e.g., hand-written notes, or emails) the Incident Reporting Form (Annex 1) outlines the following information as essential for BLC's needs:
 - i. The date and time the incident occurred.
 - ii. The Complainant's full name and contact information. Note that the Complainant has the right to choose to remain anonymous.
 - iii. The name and title of the person submitting incident report—if the incident report is submitted on the Complainant's behalf.
 - iv. A concise incident report summary.

- v. The name or names of persons involved in the incident, including any witnesses to the incident.
- d. BLC will consider any feedback or complaint received and reported by BLC (either by or amongst stakeholders) that demonstrates a breach of both BLC's Learner and Learning Agreement as an incident, which BLC will then address according to this IRP. Once BLC confirms the incident, it requires the Complainant to complete an incident report as per point (1.c.) above.
- e. BLC will handle all personal information for any stakeholder involved in a feedback or complaint sensitively and with the utmost degree of confidentiality.
- f. Both the Executive Director and a representative from BLC's Board of Directors (hereafter referred to as the 'Board') will address any feedback, complaint, or incident that alleges any occurrence of harassment or abuse of any nature (inclusive of, but not limited to mental, verbal, physical or sexual abuse) according to specific provisions within BLC's Incident Reporting Policy, Harassment and Abuse Prevention Policy and Harassment and Abuse Prevention Code of Conduct.
- g. BLC's Executive Director will immediately report any feedback, complaint, or incident report that indicates criminal activity to local authorities for action by appropriate law enforcement entities.

2. Stakeholder Incident Resolution Process

- a. The Executive Director will address all incidents reported to BLC using the following resolution process:
 - i. The Executive Director will inform a representative of BLC's Board of Directors that an incident has occurred.
 - In the notification, the Executive Director will identify one unbiased BLC personnel to participate in the resolution and oversee all incident resolution stages. The BLC Board will confirm the Executive Director's choice.
 - ii. Within two working days from when the Executive Director received the incident report, the Executive Director will send an acknowledgement letter to the Complainant in writing, either by mail or email, indicating they received the incident report. In this letter of acknowledgement, the Executive Director will, at minimum, outline for the Complainant:
 - That an unbiased BLC personnel will oversee the entire incident resolution process and provide that person's name.
 - The date by which the Complainant will receive a reply to the resolution from the Board. For example, if the next board meeting is February 1, they would provide their detailed reply within 20 working days from the next board meeting.
 - A copy of the Incident Reporting Procedure herein.

- iii. If the incident report allegation relates to specific individuals, the Executive Director will inform those persons that their conduct has been reported as an Incident. Afterward, the Executive Director and the unbiased BLC personnel will provide the individual alleged in the incident report (hereafter referred to as 'the Alleged') a fair opportunity to respond to the incident report allegation and will ensure the following processes take place:
 - That BLC will send the Alleged an anonymized summary of the incident report allegation.
 - That the Alleged acknowledges, by signature, that they have received and understand the incident report allegation.
 - That the Alleged indicates whether they choose to respond to the incident report allegation in writing or verbally (that is, in person, or via online meeting) with the Executive Director and the unbiased BLC personnel.
 - That all written and verbal communication regarding the incident report is documented and signed by all parties involved in the incident acknowledgement and response.
- iv. The Executive Director and unbiased BLC personnel will assess, identify, and document a resolution to the incident report based on the incident report itself, plus the incident responses (provided by both the Complainant and the Alleged) involved in the incident report allegation.
 - Whether the incident report is proven to be justified or not, the reply to the incident report's Complainant and the Alleged must describe: any action taken to investigate the complaint, the investigation's conclusions, and any action taken to resolve the incident.
 - Any disciplinary measure employed to resolve the feedback or complaint (which results from the resolution process) will align with BLC's Progressive Discipline Policy.
 - BLC must support all incident report resolutions with specific reference to its standing policies and procedures and together with all prevailing relevant legal requirements.
 - In instances where the incident report, or its resolution, falls outside standing BLC policies, BLC must support its resolution by referencing prevailing, relevant legal requirements.
- v. Both the Complainant and the Alleged will receive a notification of the incident resolution from the Board within 20 working days from the next board meeting.
 - If the notification is not possible because, for example, an investigation has not been fully completed, BLC will send a progress report every 20 working days to both the Complainant and the Alleged until the incident resolution is complete.

3. Appeals to Incident Resolutions

- a. Any Stakeholder directly affected by, or involved in, an Incident Resolution (hereafter referred to as 'Resolution') who feels that the issue has not been fairly resolved can appeal for the Resolution to be formally reviewed by BLC's Board.
 - i. Any stakeholder who requests board review appeal must first make their appeal in writing and then submit it to the BLC Board of Directors either via the Executive Director, or directly to the Chair of the BLC Board of Directors.
 - ii. The BLC Board must then acknowledge to the stakeholder that they received their appeal within five working days from which they received it. The acknowledgement to the stakeholder will, at minimum, provide:
 - The names of both the Board Chair and the unbiased board representative who will provide oversight throughout the Resolution's review.
 - The date by which the stakeholder will receive a reply to the resolution from the Board. For example, if the next board meeting is February 1, their detailed reply would be provided five working days after.
 - A copy of the Resolution Appeal Procedure herein.
- b. The Board Chair will be responsible for tabling a review of the Resolution at the next occurring BLC Board of Directors meeting.
 - i. The Board of Directors (the 'Board') will review the Resolution to determine if the resolution followed BLC standing policies and prevailing relevant legal requirements.
 - ii. In instances where the Board finds that the Resolution follows BLC standing policies and prevailing legal requirements, the Resolution and its actions will remain valid.
 - iii. In instances where the Board finds that the Resolution does not follow BLC standing policies and prevailing legal requirements, it will consider both the Resolution and its actions invalid. In its responsibility, the Board will then identify the correct course of action to remediate the Resolution.
 - Whether the reviewed Resolution is found to be either valid or invalid, justified or not, the BLC Board Chair's reply to the stakeholder's resolution appeal must describe all actions taken to review the Resolution, the review's conclusions, and any remediations made to correct the Resolution.
 - The Executive Director will implement and enforce all conclusions and actions that result from the BLC Board's resolution review.

4. Variations in Incident Report Procedures

- a. The Executive Director and the BLC Board may vary the feedback, complaints and incident procedure for good reason that is inclusive of, but not limited to, conflict of interest. For example, a complaint about the Executive Director should not also have the Executive Director involved in decision-making process that determines its Resolution.

- i. When such an instance occurs, the party in conflict of interest (with the policy provisions above) is to be immediately replaced, in practice, by a representative from the BLC Board of Directors, as selected by the BLC Board's Chair.
- b. As a registered Charity, BLC is overseen by the Canada Revenue Agency (CRA) Charities Directorate. Stakeholders maintain the right to inform the CRA Charities Directorate of the Incident Report at any time.
 - i. Information about the kind of complaints the CRA can involve itself in and how to submit a complaint can be found online at:

<https://www.canada.ca/en/revenue-agency/services/charities-giving/charities/contact-charities-directorate.html>

5. Retaliation

- a. Anyone who retaliates in any way against a person who has reported an incident, given evidence in an incident investigation, or who been found guilty of an incident, will themselves be considered to have committed harassment and will be subject to corrective action, as described previously.
- b. Any interference with the conduct of an investigation, or retaliation against a complainant or witness, may itself result in further disciplinary action.

QUESTIONS:

Direct any questions about this policy to the Executive Director.

REFERENCES:

English Oxford Living Dictionaries:

<https://en.oxforddictionaries.com/>

Surrey Place Centre – Statement of Policy and Procedure:

<http://www.surreyplace.on.ca/wp-content/uploads/2017/04/Stakeholder-Feedback-And-Complaints.pdf>

Vantage Point Feedback Policy:

<http://www.thevantagepoint.ca/feedback-policy>

POLICY REVIEW:

The BLC Board will review this Incident Report Policy at least every three years to ensure that it remains relevant and appropriate. The Executive Director both implements and monitors this policy for its effectiveness.

BOARD CHAIR'S CERTIFICATE:

I, the undersigned, the duly appointed Board Chair of Brandon Literacy Council Inc., hereby certify this policy's adoption.

Robert D. Harrison

Date

Board Chair

Annex 1: Incident Report Form



Brandon Literacy Council Inc. – Incident Report

Personal Information

Report Date: Year Month Day			Report Time:			
Full Name of Child / Youth / Adult:						
Age: (N/A for Adult)		Date of Birth: Year Month Day			Gender:	
Address:	Apartment or Unit Number:		House or Building Number & Street:		Box Number:	
	City / Town:			Province:	Postal Code:	
Phone: (Primary)			Phone: (Other)			
Name of Parent / Guardian / Caregiver:						
Notified: (Yes / No)		Date / Time of Notification:				
Address: (if different from above)						
Phone: (if different from above)						

Incident Information

Date of Incident: Year Month Day			Time of Incident:		
Location of Incident:					
Description of Incident:					



Brandon Literacy Council Inc. – Incident Report

Name / Contact Information of Witnesses:	
Description of Injuries Sustained:	
Description of Action Taken:	
Additional Information You Think May Be Relevant:	
Direct Quotes from Child / Youth / Adult: (NOTE: if this is an abuse allegation, do not interview, but report only the comments shared with you.)	

NOTE: If this is an allegation of abuse, it must be reported to a protection agency or the police

Declaration

<i>I hereby confirm that the information provided in this report is accurate to the best of my knowledge.</i>			
Name:		Position:	
Address:	Apartment or Unit Number:	House or Building Number & Street:	Box Number:
	City / Town:	Province:	Postal Code:
Phone: (Primary)		Phone: (Other)	
Signature:		Date: Year Month Day	