



Network of Asia and Pacific Producers

Standard Compliant Mechanism

Addendum to

1. Network of Asia and Pacific Producers Policy and Procedure for Protection of Children and Vulnerable Adults – 2017
2. Network of Asia and Pacific Producers Anti-Fraud and Anti-Corruption Policy (Prevention and Awareness Policy) 2020
3. Network of Asia and Pacific Producers Anti- Harassment and Anti-Bullying Policy and Procedures - 2020
4. Network of Asia and Pacific Producers Anti- Harassment, including Anti-Sexual Harassment, Code of Conduct for Travel - 2020
5. Network of Asia and Pacific Whistle Blower Policy- 2020

Policy Author: Network of Asia and Pacific Producers

Date written/Updated: **01/11/2020**

Date Passed by the Board Protection Committee:

Date shared with others:

1. Reporting structure of a protection case under all of the above mentioned NAPP Policies

1.1 - Internal cases:

- i. Any Aggrieved person can submit his/ her complaint to the Social Compliance Officer of NAPP OR the NAPP CEO/COO OR the Board Level Protection Safeguarding and compliance committee OR to their respective Reporting Manager.
- ii. The complaint/concern to be submitted via email ONLY marking CONFIDENTIAL in the subject line.
- iii. The NAPP Operation Committee of Board level Protection Safeguarding and Compliance Committee will take the initial assessment of the case. Legal Counsel can be part of the committee as required on case to case basis.
- iv. The Operations Committee members will decide internally, the process to undertake case recording, identification of the allegation breach and preliminary analysis on the information provided in reference to all the policies available at NAPP.
- v. The members together will agree on case identification, processing and assessment plan and steps to be taken to 'Act to Protect', including timelines and budgets. This will be presented to the Chair and Board Level PSCC Members for approval before proceeding. Deliberations on this aspect should take no more than two working days. The Chair and/or Vice Chair would then provide their approval to proceed, including feedback on the proposal put forth.
- vi. Risk Register will be filled and submitted to the PSCC.
- vii. Operations Committee would take a maximum of 5-10 days to present the allegation identification, case processing and assessment plan, timelines and budget to the Chair and Board Level PSCC Members. Since case assessment is handled on a case to case bases, it is advisable that the Operations Committee work within the timelines as noted in the NAPP relevant policies.
- viii. The Operations committee would also be involved if the decision has to be executed in a phased manner and approved by the board.
- ix. Members in the Board Level Protection, Safeguarding and Compliance Committee and members of the Operations Committee will work together and reach a conclusion in their respective committees. No member should act alone, regardless of their positions in these committees. If the PSCC members require, they can take the support of the FI Sr. Advisor.

1.2 External Cases:

- **IDENTIFICATION AND REPORTING of a PROTECTION ALLEGATION**
 - Identified directly by Producer Network and its representatives, members or communicated by a 3rd party had any safeguarding concerns or who suspects risk should submit his/ her complaint to compliance and safeguarding @ NAPP which, the two protection focal points and the Social Compliance and Gender Officer have password access to. The CEO/COO reserves the right to change the password if required. When reporting via email subject heading must be marked CONFIDENTIAL Protection/Safeguarding trigger.



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- The 2 protection focal points and the Social Compliance and Gender Officer, Legal person constitute the **NAPP Operations Committee** of Board Level PSCC.
- The Operations Committee members will decide among them the process to undertake case recording, identification of the alleged breach and preliminary analysis on the information provided in reference to all the policies available at NAPP.
- **ASSESSMENT and DETERMINE THE RESPONSE- REMEDIATION ACTION PLAN**
 - Analysis will be done based on information received and field-level assessment/ fact finding.
 - Operations Committee would take a maximum of 5-10 days to present the allegation identification and case processing & assessment plan, timelines and budget to the Chair and Board Level PSCC Members
- **ACT TO PROTECT. SUPPORT THE IMPLEMENTATION OF THE REMEDIATION (withdrawal + prevention)**
 - The Operations committee would also be involved if the decision has to be executed in a phased manner along with the Regional General Managers, Program consultant and SPO/HL/CP. This may also include ; reporting and collaborating with relevant authorities or expert organizations.
 - Members in the Board Level Protection, Safeguarding and Compliance Committee and members of the Operations Committee will work together and reach a conclusion in their respective committees
 - No member should act alone, regardless of their positions in these committees. If the PSCC members require, they can take the support of the FI Sr. Advisor
- **MONITOR and Case CLOSURE**
 - VERIFICATION to ensure that remedial actions defined have been implemented and report will be submitted by the social compliance officer.
 - The closure status report will be submitted to the CEO/COO and the PSCC of the board.

2. Composition of committee

2.1. Internal Cases – among consultant/ board

- a. Social Compliance Officer of NAPP\
- b. One protection focal point from South Asia / Central Asia region
- c. One protection focal point from South East Asia region
- d. In case of Conflict of Interest arising due to reporting lines or if the complainant does not wish to trigger the case because of any one or all in the Operations Committee members, in that case, CEO/COO will be part of the operations committee or CEO/COO can nominate a person from that particular region.
- e. One Legal person as Advisor - on case to case basis.
- f. One member from amongst non-governmental organisations or associations committed to the cause of women or a person familiar with the issues of Child labour, Forced Labour and Gender Based Violence - on case to case basis.

2.2 External Cases/ Producer organisation cases

- a. Social Compliance Officer of NAPP
- b. One protection focal point from South Asia region
- c. One protection focal point from South East Asia region
- d. In case of Conflict of Interest arising due to reporting lines or if the complainant does not wish to trigger the case because of any one or all in the Operations Committee, in that case, CEO/COO will be part of the operations committee or CEO/COO can nominate a person from that particular region.
- e. One Legal person as Advisor

3. Members Responsibilities:

3.1 Conflict of Interests

This principle would apply to any person on the Committee who has an allegation brought against them with regard to harassment or related offences. Should there be any conflict of interests in the roles and responsibilities of members of Operational Committee and the allegations reported, two unaffiliated members of the Committee and the CEO/COO should nominate replacements. These persons need to be trained on protection as indicated above.

3.2 Confidentiality:

Members acknowledge that NAPP is the rightful owner of all confidential information and undertakes all necessary and suitable measures to maintain an appropriate level of confidentiality at the discretion of the Chair.

Confidential information is understood as all information and documents gathered during the course of involvement in the initial assessment of the case by the operational Committee. The Chair may decide to and will be accountable for disclosure of information to a defined audience on a need to know basis.

In case of breaches of confidentiality, the Committee may request the Protection safeguarding and compliance committee to withdraw membership with immediate effect.

3.3 Information Access Requests

1. No information of the operational committee will be disclosed or shared by her/his own understanding but the request will be made to the CEO/COO and further the need will be assessed and shared if necessary.
2. As the social compliance officer does also hold copy of the case processing document, in case the request is made to her/him then it will be forward to CEO/COO who will assess and decide.

3.4 Documentation

- a. All confidential supporting documents will be under the custody of CEO/COO for any further reference.
- b. These documents cannot be accessed by other members of the Operations Committee. Should members of the Operation Committee require to see documents, they would need to request this via email.



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- c. The CEO/COO is responsible to ensure no privacy laws are breached by the members of the Operations Committee, including distribution of confidential documents.
- d. Physical copy of the decision will be signed by NAPP Board Level PSCC, Members, NAPP CEO/COO and NAPP Chair. Further the same will be documented.
- e. This hard copy document would be housed under lock and key and the CEO/COO and Social Compliance and Gender Officer will have access. If the Protection, Safeguarding and Compliance Committee of the Board require to see these documents, a request would be made to the CEO/COO marking copy to NAPP Chair.

4. Appeal

- a. If the complainant or the subject of the complainant if filed on behalf of this person and/or the alleged perpetrator are not satisfied with the outcome of the investigation, they may appeal in writing to the NAPP PSCC of the Board stating the full grounds of appeal, within one week of the date on which the decision was sent to them.
- b. The NAPP PSCC with three members of the NAPP board will hold an appeal meeting, normally within one week of receiving the written appeal. This will be dealt with impartially by members who have not previously been involved in the case (although they may ask anyone previously involved to be present). Either party can bring a representative for this meeting.
- c. The NAPP Board Chair and CEO/COO will confirm the final decision in writing, usually within one week of the appeal hearing.
- d. This is the end of the procedure and there is no further appeal.

Mr. Pravakar Meher

Chairperson

Network of Asia and Pacific Producers

Date: 10/12/2020

Mr. Sanjeet Singh Khurana

Chief Operating Officer

Network of Asia and Pacific Producers

Date: 10 - 12 - 2020