

# FLN POLICIES

Version 1 | September 23



# Hello!

- This document covers the general policies, rules and regulations and internal guidelines that FLN will adhere to as an organization.
- These guidelines flow from our vision and mission (as captured in the FLN Charter) and our Societies Memorandum of Association and Rules. In case of any conflict between these policies and the MoA and Charter, the MoA and charter will prevail.
- This policy deck is version 1, and will need to be modified and changes as FLN grows. Any
  changes to this policy deck will be made after discussion in the working group and approval
  by the governing body (by circulation through email or in a meeting)
- Feel free to reach out to any FLN Working Group member of the email id :freelibrariesnetworkfln@gmail.com for any clarification.
- These guidelines are version 1 and will be applicable from September 15 2023 and reviewed and updated periodically



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### LIST OF ACRONYMS /TERMS/ DEFINITIONS USED

**Governing Body:** This refers to body as defined in the MoA that governs the Society. It will be a minimum 7 member body consisting of members elected in the AGM In the first year the Governing Body will be members as listed out in the MoA.

**President, General Secretary and Treasurer:** The powers and duties shall be as per MoA and they shall be appointed at AGM of the Society.

**FLN Working Group:** This is a group constituted of active and participating FLN members and is based on member availability and interest. List of active working group members is updated quarterly on FLN website. <a href="https://www.fln.org.in">www.fln.org.in</a>.

**FLN Member:** Free Library organization, Free library activities, educators, social workers, advocacy groups and researchers who have filled up the membership form and been granted FLN Member Status. Full list of FLN members is available for any FLN member or statutory body to view.

**Library Member/ user:** This refers to users of FLN Member libraries. They are typically not FLN members, but members of the public using services offered by FLN Libraries and are impacted by FLN's work

**Management:** Refers to Governing Body (including President, Treasurer, and General Secretary), FLN Working Group members, Head of FLN sub Committees. This will also include any persons hired by FLN in a managerial role.

**Project in charge**: Person leading and co-ordinate specific Project or program. These are usually short term, though some may be on going as well.

Procurement Committee: A body constituted by the FLN Working Group.

**1. GENERAL CODE OF CONDUCT OBJECTIVE:** (i) To create a safe, equal, respectful work environment. (ii) to create an open and growth oriented work

environment. This policy recognizes that inequalities in society and that within FLN we will strive to ensure those traditionally or historically excluded from participating in decision making or ownership are encouraged to participate. FLN also strives to ensure everyone has access to FLN resources, FLN members and information as to FLN's working.

# CODE OF CONDUCT:

While performing FLN duties or representing themselves as FLN members, all FLN members will act respectfully, courteously to all- to their fellow library co workers, to other FLN members, to their library members or users, to vendors, consultants, funders, community they serve, visitors to the library, other stakeholders in the free library movement. This includes behaviour whether it is online or physical. For behaviour online- see also Code of Conduct for whatsapp group and other online interactions. Also see FLN's anti discrimination policy

All FLN members shall treat with respect all FLN assets, properties and shared spaces as if it were their own. They shall take care to leave any premises, either FLN or third parties', used by them in the condition they found them in and make improvements where possible. For example FLN members shall clean up after themselves, not litter, turn off lights that are not in use etc.

Any FLN member can talk to anyone with FLN membership and FLN Working Group, FLN signatories and FLN Sub committees to to discuss issues or clarify doubts or convey any grievance or report any unwarranted act. However, all interactions are required to be civil and respectful, and no action that is considered as offensive, abusive to other FLN members or FLN member library users shall be tolerated.

#### **OPERATING AUTHORITY:** FLN Working Group

Program coordinator or sub committee head or whatsapp admins shall have the right to flag any action/behaviour as violative and investigate and recommend remedial action. Any decision can be escalated to the FLN Working Group. Any expulsion of member will be with decision of Governing Body as per process set out in C 2.5 of Rules and Reg of Society

### 1.1 CODE OF CONDUCT FOR MANAGEMENT

**OBJECTIVE:** To set conduct for Senior Management/Board/ Governing Body of Society/ Working Group Members, and employees hired at a managerial level. In this policy they shall all be collectively referred to as "**Management**"

#### CODE OF CONDUCT:

The General Code of Conduct is applicable to Management, who shall also ensure that the code is followed by all FLN members and escalate any violation and ensure that the working environment is designed to encourage courteous and respectful behaviour. In addition to the General Code FLN Management shall:

- 1. Act in the best interests of, and fulfill fiduciary obligations to FLN.
- 2. Comply with all applicable laws, rules and regulations;
- 3. Act in good faith, responsibly, with due care, competence and diligence and in a manner to enhance and maintain the reputation of the organisation, and not take any improper advantage of their position as a fiduciary or otherwise
- 4. Disclose any personal interest regarding any matters that may come before the Management and abstain from discussion, voting or otherwise influencing decision on any matter in the concerned member of FLN management may have a personal interest.
- 5. Disclose any conflict of Interest regarding any matter that comes up before the management. This could be personal interest/gain or in any other entity where the member of FLN Management has a position of responsibility.
- 6. Respect confidentiality of information relating to the affairs of FLN, acquired in the course of their service as FLN Management.
- Refrain from using the FLN's property or position for personal gain;
- 8. Not seek, accept, any gifts or incentives (offered to them personally in their capacity as FLN Management) except what is duly authorized.

**OPERATING AUTHORITY:** FLN Governing Body.

# 1.2 Code of Conduct for Online Interactions (including FLN All Member Whatsapp Group)

This code of conduct is to be read with general code of conduct and is a set of guidelines only and can be applied to FLN online interactions/ interactions on social media and other web based communication platforms

- **1. Stick to the rules of conduct online that you follow in real life:** Be polite and respectful. Don't provoke or insult. Keep conversations constructive. Support each other.
- 2. **Be Transparent:** As far as possible, please use your real name and organization, while posting in FLN whatsapp groups or on FLN social media platforms. Under no circumstance, imitate or use the name of any other person or organization. At the same time if any other FLN member is shielding their identity, please respect it and do not post personal information about others. If you believe they are impersonating someone else or misrepresenting themselves, please alert group moderators, or session moderator, or the FLN working group.
- **3. Respect the privacy of others:** Do not forward information sent to you without the permission of original sender, If posting pictures of your library members, visitors, guests, donors- make sure they are aware their picture is being taken and they consent to it being shared. With pictures of children avoid having any personal identifiers in the picture or adding it with the picture (e.g. name, school, address etc)
- 4. **Fairness first: Do not exclude anyone:** Try and keep all chat participants interested and included. Do not hold lengthy private conversations or inside jokes that make other participants feel left out.
- 5. Fact check before posting and share sources: If you are posting information for all, please try to check if facts posted are correct. Or do try to share sources of your information, so members can check for themselves if it is relevant/ outdated or incorrect source.

- 6. **Do not spam or keep discussions constructive:** Keep discussions on whatsapp group or in sessions about the topic in hand as far as possible. Do not send multiple and continuous msgs that are in no way related to the FLN group and is meant purely for advertisement purposes. This will derail discussions and you will also lose your credibility as an FLN member. In the whatsapp group, you can post anything pertaining to libraries & librarianship including about yourself, your libraries, views on reading, favourite books, library policy, best practices and standards. However, do not interrupt an existing discussion. Do give others an opportunity to share.
- 7. **Do not send inappropriate/ illegal /hurtful material:** Under no circumstances, post any material that is pornographic, obscene, deliberately and maliciously hurtful and intended to cause offense and hurt to any community or member. Do not use derogatory words, swear words deliberately to cause hurt. Do not send any information that you were told to keep in confidence. Respect copyright rules and give credit when posting materials authored by someone else.

### 2. ANTI DISCRIMINATION POLICY

**OBJECTIVE:** FLN is committed to providing an enabling, dignified and equitable work environment for all (employee, intern, volunteer consultant etc). FLN has a zero tolerance policy on discrimination, specifically caste based discrimination, or discrimination on basis of gender, sexuality, disability or religion. Secondly, FLN acknowledges, that there are existing social and economic inequalities, perpetuated and kept in place by discriminatory practices and as an organization we will endeavour to fight these discriminatory practices, within the organization - in its membership and organization structure and through our library practice, programs & policy, including in all the trainings, outreach, advocacy and program-based works conducted by FLN.

#### POLICY:

#### All are welcome:

1. FLN recognises itself as an anti-caste, gender, sexuality & disability-inclusive organisation. FLN libraries welcome readers and thinkers of ALL castes, classes, religions, gender & sexual identities and abilities.

# Representation in Membership and Leadership

- FLN shall actively ensure that it ensures representation from all classes, castes, religion, gender and sexuality in its
  profile of members. It shall actively reach out to free libraries committed to justice & equity and encourage them to join
  the network.
- 3. FLN shall ensure that its Governing Body, Working Group Committee, Sub Committees and FLN management team (when it has one) shall include in it people from lower castes, women, religious minorities, persons not conforming to traditional gender norms and persons with disabilities on it. FLN will make best efforts to have a diverse employee pool as far as possible and will prioritise FLN library members or volunteers for roles.

## Representation in Resources and Practices

4. FLN shall be mindful while building its resources collection (under the Books for All program or other programs), and its library practices documentation to ensure that it includes resources and programs that cater to groups that have been historically discriminated against.

# **Zero tolerance for Discriminatory Practices**

- 5. FLN shall not tolerate any hateful speech, writing, actions or behaviour that insults any caste, gender or religion in any of its platforms online or physical. This includes online webinars, FLN Whatsapp group, or physical workshops in any of its common platforms. FLN is committed to creating an enabling, dignified and equitable work environment for all.
- 6. FLN does not welcome or endorse any words, behaviours or actions that are: casteist, communal, islamaphobic, homophobic, transphobic or ableist, just as it does not tolerate works, behaviour or actions that are violent, threatening or bullying. Any such discussion in any FLN environments (online or physical) shall be immediately shut down.

# Awareness and Sensitivity

7. FLN will actively promote awareness and sensitivity regarding caste-based discrimination, religion based discrimination, gender based discrimination, sexuality based discrimination and other discriminatory practices that cause injustice and inequality.

# **OPERATING AUTHORITY**: FLN Working Group.

- Any person can report any discriminatory behaviour to the Working Group. On request the complaint will be kept confidential. However, the Working Group will promptly investigate such complaint and be transparent in its findings and action taken.
- Any individual in violation of these policies and values may be asked to leave immediately, or any discussions that are violative of these values may be shut down immediately.
- Any FLN Libraries or individual members, in violation may have their membership revoked by the Working Group. Any
  expulsion of members shall be as prescribed in cl 2.5 of the Rules and Reg of society- with voting by Givernign Body
  and approved by President.

# 3. RECRUITMENT AND TRAINING POLICY

**OBJECTIVE:** To identify and recruit people with best skills and aptitude for FLN. Candidates with association with FLN or FLN member libraries and strongly advocate for the "Right to Read" will be preferred. To ensure that FLN recruits people from different castes, genders, class, religion and sexual orientation. FLN will also train its employees/paid interns to acquire skills and qualifications that will help them in their roles within FLN.

#### **OPERATING PROCESS:**

- 1. Employees/consultants/ paid interns shall be selected based on FLN's current need and the candidates qualification, ability, experience and character. Reference check may be carried out at FLN's discretion.
- 2. FLN shall not distinguish between its employees/consultants on basis of gender, caste, creed, sexual orientation, disability or religion. However, FLN will make best efforts to have a diverse employee pool as far as possible and will prioritise FLN library members or volunteers for roles.
- 3. All employees will receive an appointment letter and consultants a letter of engagement, with details of remuneration and scope of services.
- 4. New joinees may need to serve a probation period, and be confirmed only after that.
- 5. Employees will require on the job training and will be able to access all trainings provided by FLN for FLN members. FLN will also make best efforts to sponsor/ subsidised any specific skill based training, in consultation with the employee.
- 6. Note that FLN may use services of others on a temporary basis (3 months-6 months) for specific projects or for specific services (educator, legal advice, accountant). Persons providing such services will be service providers and not employees and not under the purview of this policy.

**OPERATING AUTHORITY**: PRESIDENT (or FLN Director). Intimation to FLN Working Group and Governing Body

#### 4. DOCUMENTATION POLICY

**OBJECTIVE:** Maintain proper and accurate records of personnel, FLN Members, FLN supporters, FLN programs, finances, assets etc

#### **OPERATING PROCESS:**

- 1. This documentation policy should be read along with more specific documentation guidelines like Financial and Procurement policy, Books for All documentation policy, and other documentation policies to record and measure impact of specific programs. All mandatory documentation and registration required by statute (eg Societies Act, IT Act shall be maintained)
- 2. To maintain personnel record files of all employees/consultants from date of joining upto 3 months after the employee resigns.
- 3. To maintain list of all FLN members including, updated address and contact details.
- 4. To maintain list of all donors (financial and through other resources) of FLN.
- 5. All records shall be stored digitally. Physical copies shall be maintained only in those cases where they are required by statute
- 6. The data stored by FLN, especially identifying details and proprietary information, shall be kept private and confidential and shared on a need to know basis only. Some data, for example FLN member names and contacts shall be freely available to allFLN members, but they will be made available to the public only with the FLN members consent.

**OPERATING AUTHORITY:** Project In Charges, President, General Secretary, Treasurer

#### 5. ORGANIZATION ETHICS POLICY

**OBJECTIVE:** To record FLNs commitment to honesty, integrity, personal and professional responsibility and to facilitate strict and serious consequences in case of any dishonesty or malpractices.

#### **OPERATING PROCESS:**

FLN will not tolerate dishonest behaviour from its members or employees and will be entitled to investigate and implement remedial measures in the event it becomes of any dishonest action. Some dishonest actions are recorded below as illustrations. In case of any ambiguity, the Operating Authority will be empowered to identify if any action is dishonest.

# Some examples:

- 1. Using sensitive, confidential and classified information, and FLN's Intellectual Property Rights or resources for personal gains.
- 2. Intentional and Unauthorized falsification, misrepresentation, or invention of any information, data and attributing it to FLN or FLN members
- 3. Committing any act that brings disrepute to FLN
- 4. Failure to follow FLN procedures to prevent theft, fraud or the commission of other unlawful acts

In such cases, there can be an immediate investigation, and then concerned FLN employee / member expelled or take such other suitable remedial action

**OPERATING AUTHORITY:** Governing Body

#### 6. CONFLICT OF INTEREST POLICY

**OBJECTIVE:** FLN wishes to confirm to the highest ethical standards and also its members, employees and consultants. FLN, its employees, consultants will monitor themselves to avoid actual or potential conflicts of interest.

#### **OPERATING PROCESS:**

- 1. Every employee/consultant shall perform their duties and responsibilities objectively and effectively and avoid his/her private/personal or any other interest that interferes with the organisation interest.
- 2. FLN recognizes the right of employees/consultants/consultants to engage in activities outside of their employment/engagement which are private and unrelated to our business. However, there should be a full disclosure where the employees/consultants expect any conflicts, and the Operating Authority can determine if there is a conflict and take next steps (either providing a waiver in consultation with the FLN Working Group or not permitting the conflicting activity)

**OPERATING AUTHORITY:** President - to make determination if conflict of interest exists upon disclosure. FLN Working Group to provide waiver or take remedial action, as required.

#### 6. CONFIDENTIAL INFORMATION

**OBJECTIVE:** Protecting and safeguarding of all and any confidential information of FLN or others confidential information entrusted with FLN

#### **OPERATING PROCESS:**

- 1. FLN, its employees and consultants shall maintain the strictest confidentiality with respect to all data received by them that is personal, confidential, proprietary or has intellectual property protection. If in doubt as to what is confidential, please check with the Operating Authority.
- 2. Employees/consultants should not seek to take unfair advantage of the FLN through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealings
- 3. No FLN employee/ consultant should view, copy, alter or destroy another's personal electronic files without permission (unless authorized or required to do so by the management) while carrying out FLN duties or using FLN assets.
- 4. All data collected by FLN while conducting field work , research projects shall remain proprietary to FLN and published findings may be used with appropriate crediting.
- 5. All discussions in FLN AGMs, All member meets, open houses, FLN Working Group Meetings, FLN Governing Body meetings and minutes of these meetings shall be considered confidential. This is to ensure that all members are able to speak freely and candidly to be able to arrive at decisions.

**OPERATING AUTHORITY:** FLN Working Group

#### 7. FINANCIAL POLICY

**OBJECTIVE:** To fulfil FLN's mission in effective and efficient manner and always be accountable to stakeholders, which includes:- FLN Members, Donors, Partners (e.g. compact signatories) employees and beneficiaries of FLN programs and maintain complete and accurate records of all financial transactions

#### **OPERATING PROCESS:**

- 1. The Director/ Treasurer is responsible for the day-today financial management of the organization and can hire and supervise staff, independent consultants to maintain FLN's books and to help with periodic audits and filing of statements both financial and those related to compliance with the relevant authorities.
- 2. The Director is authorized to open and maintain bank accounts, receive funds and pay bills. The Director is authorised to sign cheques
- 3. The Director is authorised to sign contracts, manage expenses within the parameters of the day to day running activities that fall under approved budget. Anything over and above this will require approval from Governing Body.
- 4. The Director shall:
  - a. Submit budget/ proposed expenses to the Governing Body in the first quarter outlining all expenses anticipated for that year
  - b. Account for funds, donations, and service fee received by FLN
  - c. Report Financial results of FLN bi- annually
  - d. Pay all obligations (including salaries), bills, reimbursements promptly, that are within the approved expenses for that year and file reports for expenses
  - e. not, without the approval of the Governing Body, make commitment for bank loans, corporate credit cards, or for real estate leases or purchases without specific approval of the GB.
- 5. FLN, shall in general accept donations of all kinds, including, stock, other negotiable instruments, assets, goods and services and transfer and recording the value of the asset shall be done in a consistent manner and in compliance with accounting standards. FLN shall be entitled to sell any stock/asset given to the organization

#### **OPERATING PRINCIPLES:**

At the time of creation of this policy FLN has few financial resources. The Financial policy will have to be adapted and modified in the future as FLN raises more funds for its operations. Such modified operating process will rely in the basic building blocks below:

- 1. Keeping Records: All earning, all incomes, all expenses and dspends are to be documented and have written explanation not only as to amount, purpose and date received/spent, but also have a back up document such as a contract or authorisation wherever possible, All transactions will be by cheque or through bank account, but any cash transactions will be recorded in a cash book.
- 2. Internal Controls: There will always be processes to ensure that expenses are authorised, income monitored and all funds are kept safe and accounted for. Controls includes practices like 1 designating safe storage for funds (bank account or cash box) 2, Having a process for expense authorisation 3. Following a planned budget and accounting for deviations 4. Employing qualified finance staff 5. Having regular financial audits.
- 3. Budgeting: A budget will be prepared and presented periodically.
- 4. Financial Reporting: Budget and actual incomes and expenses will be monitored and financial reports presented annually (both to FLN members and Statutory authorities)

#### **OPERATING AUTHORITY:**

- 1. The Governing Body (GB) is ultimately responsible for the financial management of all activities.
- 2. The Treasurer is authorised to act on FLN working group/ Governing Body behalf when action is required in advance of a meeting of the Governing Body.
- 3. The Director is responsible for the day-today financial management of the organizations along with staff hired for this purpose

#### 8. PROCUREMENT POLICY

**OBJECTIVE:** Obtain highest quality goods and services for FLN at reasonable prices, exercise financial control over the purchasing process, define authority for the purchasing function, allow fair and equal opportunity among suppliers, and provide to provide for increased stakeholder confidence in the procedures followed in public purchasing.

#### **AFFIRMATIVE ACTION AND LOCAL PREFERENCE:**

- 1. Whenever possible, qualified small, minority and women-owned businesses shall be preferred while procuring goods or services
- 2. Employees and officers of FLN procuring goods shall make reasonable efforts to avoid real, apparent, or potential conflicts of interest.
- 3. Officers and employees of FLN will not solicit nor accept gratuities, favors or anything of monetary value from contractors, potential contractors, or parties to sub -agreements.

#### DOCUMENTATION

1. Records documenting the procurement or purchases shall be maintained including reason for purchase and the methodology used to determine the lowest prices, highest quality vendor

#### **OTHER GUIDELINES**

- 1. **Purchasing Agents:** The following employees are designated to act as Purchasing Agents: The Director or specific employee authorised by the Director.
  - a. **Incidental Expenses:** Purchasing Agents may make purchases of up to Rs. 25,000/- without prior approval.
  - b. **Minor expenses:** Purchasing Agents may make purchases with a value between Rs. 25,001/- and Rs. 1,00,000/- only with approval of the the Director.
  - c. **Major Expenses:** Purchasing Agents may make purchases with a value above Rs. 1.00,001/- with prior approval of a quotation by the Procurement Committee.
- 2. **Purchase Orders**: Single purchases above Rs. 50,000/- should be made against Purchase Orders.
- 3. Cash Purchase: All Expenditure in cash, per day shall not exceed 10,000.

### 9. Prevention of Sexual Harassment

**Objective:** FLN is committed to providing an enabling, dignified and equitable work environment for all (employee, intern, volunteer consultant etc). FLN has a zero tolerance policy on sexual harassment and this policy seeks to protect all from harrasment from colleagues or third parties, and provide a mechanism for quick investigation and redressal in the event of any instance of sexual harassment.

**Applicability:**Binding on all the employees of FLN; FLN management, vendors, partners and in any FLN rented owned premises, as well as any places (physical and online) being used for FLN activities. The ICC can determine what else can be applicability of this policy- for example, incidents in public transport while travelling for FLN related work etc

# 3. FLN's responsibility

- a. FLN shall make this policy available to all (FLN management, employees, interns, member libraries) and display notices where appropriate or make it available digitally.
- b. Keep all information regarding a complaint under this policy confidential.
- c. Ensure no adverse or retaliatory action, is taken against person filing a complaint of sexual harassment or any person for cooperating in an inquiry/investigation of sexual harassment.
- d. Individual FLN Libraries may have their own policies to deal with harassment at their libraries. This policy is applicable only in the context of any act of harassment taking place in the course of FLN activities, or at FLN premises (including shared premises being used for FLN activities)

In the context of this policy the following words shall mean:

- 1. **Workplace** means physical and online spaces used for FLN's work. It includes the registered office in Delhi, all online spaces for workshops, seminars, meetings, all official social media groups and any residential workshops and field trips.
- 2. **Aggrieved Person:** Any person who alleges to being sexually harassed. This includes full time employees, volunteers, interns, others operating in FLN Premises (including shared premises being used for FLN events), consultant, anyone subject to sexual harassment by FLN Management.
- 3. **Respondent:** The person against whom the complaint has been made. This can be an FLN employee, management, volunteer, intern or even a third party
- 4. **Sexual Harrasement:** This will be understood as defined in S. 2(n) and S. 3 of the Sexual Harassment of Women at the Workplace (Prevention, Prohibition and Redressal) Act 2013.

### Internal Complaints Committee of FLN(ICC)

- 1. The Internal Complaints Committee (ICC) of FLN will be constituted by the Director of FLN for redressal of complaints of sexual harassment at the workplace.
- 2. The ICC will consist of four members who will hold office for a term of three years.
- 3. Half the members of the ICC will be women & trans\* person and the Presiding Officer will be a woman who is one of the senior most positions in FLN. There will be one external member in the ICC, who is an expert on gender issues and may belong to a NGO or be a lawyer, with at least 5 years of experience.
- 4. If ICC receives a complaint of sexual harassment at the workplace against a member of the ICC, the member shall step down from the ICC.
- 5. The ICC will follow principles of natural justice while dealing with a compliant of sexual harassment at the workplace, be sensitive to the covert, private and insidious nature of Sexual Harassment.

# **Operating process:**

# Making a complaint

- a. An Aggreived Person may make a complaint of sexual harassment in writing to any member of the ICC within 3 months from the date of incident and in case of a series of incidents, within a period of three months from the date of the last incident. The ICC may accept a compliant after a period of three months with its reasons recorded in writing. If the aggrieved person needs help in putting the complaint down in writing the ICC members shall provide such assistance.
- b. Any employee who receives such a complaint- verbally or in writing should immediately communicate it to the ICC
- c. Anonymous complaints will not be acted upon.

# Procedure to be followed by the ICC on receiving a complaint.

On receiving a complaint the Presiding Officer of the ICC shall:

- 1. Communicate to the Aggrieved Person within 7 days if on the face of it a complaint is made out or not. If a complaint seems legitimate, a copy will be sent to all ICC members.
- 2. ICC will inform the Aggrieved Person in writing of the options available and at her request: a. Initiate conciliation proceedings to settle the matter between the parties, b. Conduct an inquiry by the ICC, and /or c. File a complaint about the incident(s) to the police. In the event the Aggrieved Party opts for conciliation and it fails, an inquiry will be conducted. In any event in all three options a copy of the complaint will be sent to the Respondent.
- 3. Relief during pendency of the inquiry: On a written request or the ICC can in its own capacity recommend a. Transfer of aggrieved person, b. Work from a different location c. temporarily bar Respondent from workplace or other FLN premises

- 4. Conducting an enquiry: The principles of natural justice shall be followed. At least 3 members of ICC shall be present for hearings. The Aggrieved person will be allowed to share all information and supporting documents or evidence as she wishes. The Respondent shall be entitled to a copy of the complaint. The Respondent shall be given a maximum of ten days time to submit a written reply and all corroborating material. This reply shall be provided to the Aggrieved Party.
- 5. The ICC may examine both the Aggrieved Party, Respondent, Other persons who can provide clarity on the incident and may seek such additional information as necessary
- 6. The ICC shall have the right to terminate the inquiry or give an ex-parte decision if the aggrieved Person or Respondent fail to present themselves for three consequent hearings, without sufficient cause.
- 7. The ICC shall conclude the inquiry within a period of ninety days of receiving the complaint from the aggrieved woman and send its report to the FLN director, Aggrieved Party and Respondent.

# Informing the police

When the aggrieved person wishes to register a case with the police, the ICC shall record this in writing and forward the complaint to the local police station and provide full support to the police during investigation.

In cases of rape or grievous injury or the ICC shall forward the information/complaint to the police unless the aggrieved woman specifically prohibits the ICC to do so in writing.

**Punishment:** The ICC can recommend punishment or penalty- either when an offence under this policy is made out or when the complaint is made maliciously and is false. The penalty can be

- a. Written Reprimand/Warning, or
- b. Denial of promotion, deduction of wages, suspension or termination of services
- C. Removal as member or vendor or consultant
- D. any other such measures that will be practical and applicable.

**Appeal:** An appeal shall be filed within 90 days of recommendations of the ICC to the District Labour Courts in Delhi or to the appellate authority in accordance with the provisions of the Sexual Harassment of Women at Workplace Act, 2013, within three months of the recommendations communicated, wherever applicable.