



**AAP**



# **REPORTING SCHEME AND REPORTING PROCEDURE**

**HOW TO REPORT UNDESIRABLE BEHAVIOUR  
& INTEGRITY ISSUES**

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[WWW.AAP.NL](http://WWW.AAP.NL)

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## **FOREWORD: INTEGRITY AT AAP**

Dear (volunteer) employee, donor or other stakeholder of AAP,

AAP's work is at the heart of society. On behalf of many donors and other supporters, we work with a large group of dedicated colleagues to improve animal welfare throughout Europe. In that context, an honest and transparent working culture is important. Our commitment to animal welfare goes hand in hand with the need to act ethically and responsibly. What we mean by that is laid down in our code of conduct & integrity and, among other things, in our statutes and regulations.

By publishing our code of conduct & integrity, statutes and regulations on our website, we show all stakeholders that we are accountable for our actions. This reporting arrangement provides insight into how AAP can be contacted in case of a (suspected) integrity violation and how AAP handles these reports.

We believe a safe, honest and transparent working environment is important for everyone within AAP and those dealing with AAP. For that reason we invest in awareness and try to prevent reports in the first place. In the unlikely event a report is necessary, we trust that with this reporting procedure we have removed all thresholds.

Together, we are committed to a better future for animals, which starts with ensuring a safe, ethical and transparent environment in which we can do that important work.

Erik Peeters  
Executive Director AAP

## **1. INTRODUCTION**

Stichting AAP's code of conduct & integrity is there to prevent undesirable behaviour, to promote an ethical working culture and applies to everyone who works for or with AAP. If you experience or see undesirable behaviour, AAP wants you to be able to report it safely.

In this reporting scheme, we explain to you where and how you can safely report (possible) violations of the code of conduct and what steps we take as an organisation if we receive a report. AAP encourages reports to be made, focusing on learning from mistakes to improve the work.

All reports received by AAP are handled carefully and, where necessary, confidentially, according to the procedure for reporting and following up reports, which is part of these regulations.

## 2. THE REPORTING SCHEME

### Who can make a notification?

Anyone working for or with Stichting AAP, voluntarily, employed, freelance or in the capacity of donor or supplier etc., can make a report of (possible) abuses and breaches of the code of conduct.

### What can you report under the reporting scheme?

A report can be about any of the following areas:

#### ***Inappropriate behaviour:***

Interpersonal violations, such as discrimination, harassment, sexual violence, abuse of power, sexual harassment, bullying, sexual harassment and other undesirable behaviour.

#### ***Integrity:***

(suspected) Integrity violations based on reasonable grounds - consider all violations of the AAP Code of Conduct, viz:

- Financial violations, such as fraud, theft, abuse, deliberate waste.
- Abuse of power, such as corruption, conflict of interest, sharing of confidential information, culpable negligence.
- (Suspicions of) Violations where the public interest is at stake, such as violation of the law or if persons are at risk, based on reasonable grounds.
- (Suspected) Errors in execution of AAP's work, structures, work processes or procedures with major consequences, based on reasonable grounds.

### How can you make a report?

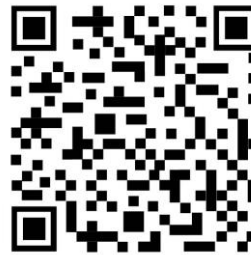
You can report abuses and violations in different ways. We advocate that if possible, cases should first be discussed internally and tried to be resolved.

Reporting can be done in the following ways:

#### ***Internal reporting lines***

- Personal/telephone/email: report to your supervisor, another manager, a confidential advisor (see chapter 7), the management, or a member of the Supervisory Board. If your report is about integrity (and therefore not about undesirable behaviour), they will then inform the integrity officer.

- Online via TrusTool: go to [www.trustool.nl/melden](http://www.trustool.nl/melden) or [aap.nl/integrity](http://aap.nl/integrity) to make a report. If you choose an anonymous report, your identity remains unknown, even to the confidential advisor.



(This QR code will take you directly to the TrusTool app on your phone).

#### ***External reporting lines***

Need help or in doubt about making a report? For advice and next steps, you can also contact our external confidential advisor: [Toke Huntjens](mailto:Toke.Huntjens@bezemerschubad.nl) (Tel. 06-54331312 or [t.huntjens@bezemerschubad.nl](mailto:t.huntjens@bezemerschubad.nl)).

If it concerns reasonable suspicions of social wrongdoing, you can also contact the external Whistleblowers Service on +31 (0)88 1331 030, [advies@huisvoorklokkenluiders.nl](mailto:advies@huisvoorklokkenluiders.nl), or directly [online](#) (Dutch) or [here](#) for English.

### When to report externally?

The basic principle of this reporting scheme is that (suspected) abuses and/or irregularities are always reported internally first, so that AAP can investigate.

There are situations where you can report suspected wrongdoing directly externally, namely if:

- Internal reporting 'cannot reasonably' be expected of you. Example: if the most senior person in the organisation is involved in the wrongdoing.
- The report is not handled or dealt with properly internally. This does require that the report has first been dealt with through the AAP reporting procedure, or should reasonably have been dealt with.

### **Report anonymously**

Anonymous reporting is possible, both via the confidential advisor (who will keep your identity secret if you wish) and via [TrusTool](#). AAP, including the integrity officer will in that case refrain from any action to find out your identity.

#### Handling anonymous report

As far as possible, AAP treats anonymous reports in the same way as other reports, provided sufficient information is available to handle them carefully. The disadvantage is that it is more difficult for AAP to offer protection to the reporter, to possibly conduct further investigations or to hear both sides of the argument. Also, the report cannot be confirmed or the reporter can't be updated about the process.

### **Ensuring confidentiality**

When dealing with a report, all involved should ensure the highest level of confidentiality. AAP does this by:

- treating all reports confidentially (or even anonymously).
- handling the notification in as small a circle as possible.
- only granting access to TrusTool to the coordinating confidential advisor and his designated substitute.
- with data subjects, define confidentiality so that the required information is available to

authorised persons on a strictly need-to-know basis.

- making it explicit that breach of confidentiality through intent or gross negligence constitutes a breach of the code of conduct & integrity and is sanctioned as such.
- protecting personal data of reporters according to GDPR (see reporting procedure H3).

### **Internal or external preliminary and further investigations**

Part of following up a report, is conducting preliminary and further investigations. Follow-up starts with an internal preliminary investigation. At any time, depending on the situation, it can be decided to engage an external investigation agency to carry out the preliminary or further investigation. An external investigation agency acts autonomously and will be requested to follow all internal arrangements as included in this scheme.

### **Protection of reporters**

Making a report is courageous. It can have (adverse) consequences for the reporter. Reporters are therefore, in accordance with the Whistleblowers Protection Act, protected by AAP against disadvantage.

AAP:

- encourages everyone to raise concerns and report unwanted behaviour and possible violations of the law or our policies. Reporting in itself will not adversely affect the reporter.
- protects persons from being disadvantaged who make a report according to the reporting procedure. In any case, detriment means:
  - dismissal or suspension, a fine referred to in Article 650 of Book 7 of the Civil Code, demotion, withholding of promotion, a negative assessment, a written reprimand,

transfer, discrimination, intimidation, harassment or exclusion, defamation or libel, early termination of a contract for the supply of goods or services, and revocation of a licence.

- a threat or attempt to detriment.

- Provides persons who report under the reporting scheme with discreet support in the form of access to care, advice and support from the Confidential Advisor and protective measures that may be determined on a case-by-case basis, such as legal, medical or psychological support. AAP indemnifies these persons from proceedings relating to prohibited information acquisition, defamation, copyright infringement or protection of personal data.

- considers both improper and malicious use of the reporting procedure, as well as harming the organisation and/or others involved in the reporting as stand-alone violations of the code of conduct.

**ANYONE CAN MAKE A  
REPORT, EITHER IN  
NAME OR  
ANONYMOUSLY.**

**A REPORT SHOULD  
NOT HAVE ANY  
ADVERSE  
CONSEQUENCES FOR  
THE REPORTER.**

### 3. PROCEDURE FOR REPORTING AND FOLLOWING UP REPORTS

It is important to report correctly and carefully. AAP would like to have the opportunity to follow up reports itself. Therefore, make the report internally if possible. For reporting and following up reports, we follow the procedure below.

#### **Reporting a (possible) malpractice or integrity violation**

Any person can make a notification in writing or verbally via the reporting lines as mentioned in chapter 2 (page 4).

##### Content integrity notification

The report contains the following information:

- name of reporter (unless anonymous) and date of notification
- a description of the (possible) wrongdoing or integrity violation.
- reasons why the reporter thinks there is a violation or something is not going the way it should.
- substantiate the report by what you have experienced, seen or read.
- identify, if possible, any care you need and fear of forms of disadvantage as a result of the report. Appropriate action will be sought on a case-by-case basis.

##### Determination of report

It is possible, if desired together with a confidential adviser, to meet the integrity officer within a reasonable time to make or explain a report. If the report is made verbally, the integrity officer records the report in writing. The reporter is given access to the written record and the opportunity to check and correct it.

#### **Follow-up and handling of the report**

The integrity officer is in charge of following up the report. Depending on the nature and content of the report, the integrity officer can follow up the report himself or delegate the

follow-up to an investigation committee to be set up.

##### Who handles the report and is informed

- The integrity officer informs the executive director of the report, unless the report concerns the executive director. In that case, (the chairman of) the Supervisory Board is informed.
- If the report concerns a Supervisory Board member, the chairman of the Supervisory Board handles the report.
- If the report concerns the chairman of the Supervisory Board, the executive director handles the report.
- If the report concerns both the director and the chairman of the Supervisory Board, an investigation committee to be set up should come up with a solution.
- If a report concerns the integrity officer, this report can be made via the manager, a confidential adviser, a MT member, or the HR manager. The latter then calls in the executive director who handles this report. The integrity officer then obviously no longer has a role.

##### Inform supervisor and auditor

Depending on agreements, AAP reports to the regulator (CBF). If necessary, we also inform the external auditor. This report is anonymous. The report does not include names, locations and other (personal) data that can be traced back to individuals. The report contains the follow-up steps that will be undertaken.

#### **Acknowledgement of receipt / registration**

The integrity officer registers the report in a register (which can also be TrusTool) and sends the reporter a confirmation of receipt within 7 calendar days (unless the report was made anonymously). This confirmation also contains information about the procedure, who will handle the report and how long it will take.

## Handling time

When following up a report, determining whether it is well-founded and carrying out preliminary and further investigations, both speed and care are required. When following up a report, AAP makes every effort to act expeditiously, but does not take hasty decisions.

### Substantive response

The integrity officer or the investigation committee delegated by him/her shall send a substantive response/assessment within three (3) months of receiving the report.

### Postponement of settlement process

The integrity officer or the investigation committee delegated by him/her may extend the handling process a maximum of two (2) times by six (6) weeks each time. This extension shall be justified in writing to reporter and accused.

## Support for reporter and possibly other stakeholders

Immediately after receiving the report, the integrity officer determines whether support is needed for the reporter or others involved. This may be psychological support, legal support or protection against possible harm in response to involvement in the report. This support for reporter and any others involved may be paid for by AAP.

Experiencing or witnessing an event can be profound. For (emotional) support, reference can also be made to [Slachtofferhulp Nederland](#).

## Investigation

### Preliminary investigation

The integrity officer conducts a preliminary investigation. The purpose of this investigation is to determine the approach for following up the report. The preliminary

investigation includes the following considerations:

- does the report indeed concern a (well-founded suspicion of) (imminent) malpractice, integrity violation or irregularity? If not, no investigation is necessary. However, an explanation is sent to the reporter. If yes, the integrity officer advises the executive director on the follow-up investigation.
- does the report concern a violation for which AAP is not responsible or which does not fall within its sphere of influence? Then AAP will not take the report any further and the reporter will be informed accordingly.
- what risks are involved and what support and protective measures should be taken, with regard to confidentiality and protection against harm or retaliation?

The integrity officer can use an investigation committee as a sounding board to formulate answers to these questions.

### Further investigation

- If the foregoing considerations point to further investigation, then the following questions, among others, will be answered to arrive at a mandate for this further research:
- is it an incident or does it involve structural wrongdoing?
  - does it concern several people or could that become the case?
  - is there any damage to third parties?
  - are they potentially criminal offences? If so, the police or judiciary will be involved in the investigation or the investigation will be handed over to them entirely.
  - is there any (potential) image damage for AAP and those involved? If so, what is the likelihood and potential damage?

### External investigator(s)

In the case of a complex situation, external investigator(s) who are specialists may be used. The external investigator(s) to be selected will depend on the nature and context of the report.

### Preliminary investigation advice

Based on the preliminary investigation, the integrity officer gives advice to the executive director or chairman of the Supervisory Board. This advice shall in any case include:

- conclusions of preliminary investigation.
- considerations whether or not to conduct a further investigation.
- if further investigation is proposed:
  - recruitment of (internal or external) investigator(s).
  - formulation of tasks and questions for investigator(s).
  - required budget.
- if no further investigation is advised this is funded with the considerations and reason(s).

### **Decision after preliminary investigation**

Based on the advice, the executive director or chairman of the Supervisory Board decides on the further follow-up of the report. If he/she does not follow the advice of the integrity officer, he/she should motivate this decision. These reasons are also shared with the reporter.

### Measures after preliminary investigation

Should the preliminary investigation reveal actual or alleged wrongdoing and/or integrity violations, certain measures may be taken to minimise further damage. These measures should be proportionate and temporary.

Measures may include:

- deny access to the office, systems and/or documents.
- suspension of an employee.
- freezing payments to a supplier.
- suspension of a partner, consider an outplacement or transport partner.

The person or party subject to a measure is informed of these measures. These measures are temporary in nature, until the investigation is completed, and final measures are taken.

### **Further investigation**

If the integrity officer does not conduct the further investigation him-/herself, but has other investigator(s) conduct the investigation internally or externally, the integrity officer does supervise the investigation. The integrity officer monitors the progress, the budget, assesses the quality of the work done, questions the investigators critically about methodology and conclusions, and takes care of communication about the investigation with the reporter and others involved.

The integrity officer may use an investigation committee as a sounding board while conducting the further investigation. In that case, the discussion is anonymous. No names, locations and other (personal) data that can be traced back to individuals are shared during the discussion.

### **Conduct of investigation**

#### Hearings

In the investigation, the adversarial principle is used. Involved parties (the reporter, the person whose actions are the subject of the report and any others involved) are then independently invited by the investigator(s).

#### The interview report

An interview report is drawn up of the interviews. The parties involved are given the opportunity to inspect the interview report. The parties involved (notifier and accused) can have their comments included in the report if, in their opinion, the interview was incorrectly reported. These comments can be incorporated into the interview report by the investigator or added as an opinion.

The investigator(s) translate(s) these outcomes of the investigation into findings, conclusions and recommendations.

## **Report**

### Draft report

Based on the report, the interviews conducted and the investigation, the investigation committee records the findings in a draft report containing the findings, the conclusion as to whether it is plausible that there is (imminent) misconduct, irregularity or integrity violation and recommendations for follow-up steps. This draft report is submitted to the executive director or the chairman of the Supervisory Board. The latter is given the opportunity to respond to the report.

### Final report

The investigator(s) then draw(s) up a final report, which includes the reporter's response, and delivers the report to the integrity officer, and the executive director or the chairman of the Supervisory Board.

## **Decision after further investigation**

### Recommendations

Following the report, the integrity officer may make recommendations to the executive director or the chairman of the Supervisory Board on the decision to be taken and/or measures to be taken. Based on the report and any recommendations, a decision is taken.

### Decision

Depending on the nature and complexity of the report and the outcome of the investigation, the executive director may seek advice from the Supervisory Board before making a decision.

This decision may include the following:

- a (disciplinary) action against the accused(s), ranging from a verbal or written warning to dismissal, whether summarily or otherwise.
- organising training to raise awareness and prevent integrity violations.

- communicating the importance of reporting (potential) abuses and integrity violations.

- mediation.

- if an external party is involved, the relationship with that external party may be terminated, or possibly continued after appropriate action is taken by the external party.

### Determine measures

In determining (disciplinary) measures, the executive director or the chairman of the Supervisory Board weighs all circumstances, including the mutual relationship between victim(s) and accused(s). If there is a power relationship where the accused is in a position of power in relation to the victim, this is an aggravating circumstance.

If in the further investigation the wrongdoing is not proven or innocence is proven, AAP takes appropriate measures to clear the accused of blame. These measures are recorded in writing. If necessary, AAP organises appropriate internal and/or external communication.

Depending on the seriousness of the case, as determined by the follow-up investigation, AAP may hand the case over to the judiciary or police. If the case is followed up by the judiciary or police, AAP includes the development of the follow-up in determining measures. Depending on the situation, internal and/or external communication takes place.

## **Completion**

### Conclusion

The integrity officer explains the conclusion, depending on the seriousness of the case, in person or in writing to the reporter and the accused. In the case of sanctions, the chief executive officer assumes this task.

## **Dissatisfaction with the decision**

If the reporter or accused is not satisfied with the process and/or decision taken, they can appeal to the executive director or to the chairman of the Supervisory Board. The latter checks whether the reporting and follow-up procedure has been followed correctly and takes measures if necessary. Should the reporter be dissatisfied with the decision of the executive director or the chairman of the Supervisory Board, the reporter can report to external confidential advisors or consult the House for Whistleblowers.

## **Recording, reporting and retention period Register of notifications**

All decisions relating to reports are stored anonymously in the register (TrusTool). This reporting register is managed in a secure

## **4. PROTECTION OF PERSONAL DATA**

1. In the investigation and handling, AAP observes the highest possible confidentiality regarding the identity of the reporter, victims, witnesses, accusers and those who give information during the investigation. Reports always remain confidential.
2. If desired, the report is stored anonymously in the reports register in AAP's secure environment. This environment can only be viewed by the integrity officer and the internal confidential counsellors. During the investigation and certainly also in any reports, we do not mention names of those involved.
3. Any person who, in the context of these reporting regulations, learns in any way of information that is clearly confidential, is obliged to keep this information confidential. An exception is made for information that AAP is obliged to share with relevant bodies (e.g. the

environment by the integrity officer and confidential advisers.

### Report

Once a year, the MT discusses all anonymised reports, their cause and lessons learned. The MT then determines the improvement actions for creating a safe environment. A summary is included in the annual report.

### Retention period

All reports and associated documentation, such as statements and investigation results, are retained in accordance with applicable laws and regulations (e.g. the Tax Office). Reports are not kept longer than necessary, but at least for a period of two years.

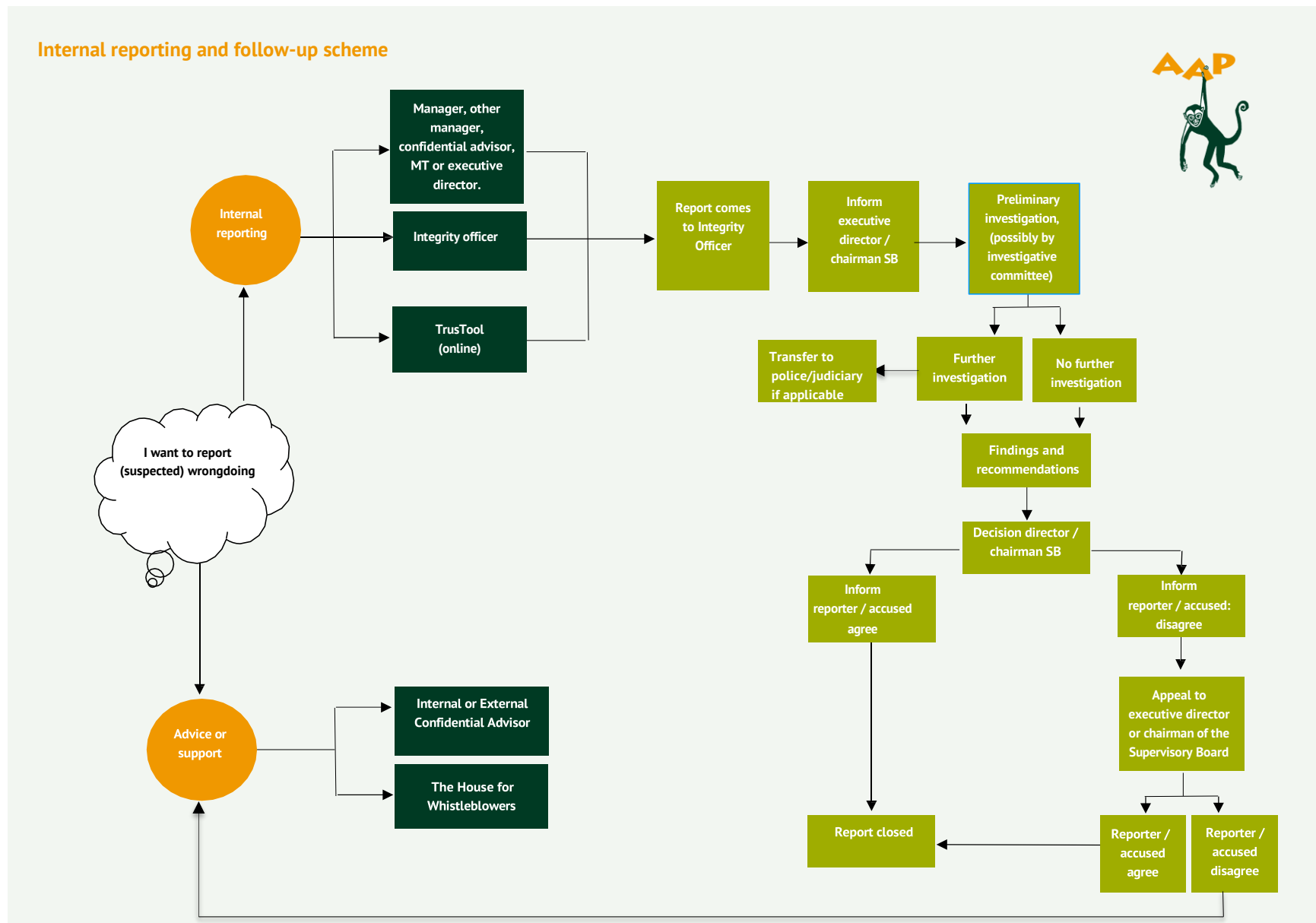
judiciary) on the basis of a legal requirement.

4. Files made on a report are kept for two years after the report has been dealt with by the integrity officer and then destroyed. (Files are kept longer if required due to applicable laws and regulations). Reports are not kept longer than necessary.

Details of the report will not be included in the personnel file of an employee (reporter/accused), unless the employee himself/herself so wishes. However, if disciplinary action is imposed on an employee based on a report, that disciplinary action will be stored in the employee's personnel file.

6. The annual report and other reports shall not include data traceable to individuals.

## 5. PROCESS SCHEME



## 6. DEFINITIONS

**Accused:** the person (or party) against whom an integrity report has been filed.

**Confidentiality:** Confidentiality is an ethical principle that limits access to and dissemination of information. It is operationalised by defining who has access to what information under what conditions. When investigating code of conduct violations, information is only accessible to a limited number of authorised persons for the purpose of completing the investigation. Confidentiality serves to create an environment where witnesses are more willing to tell their version of events and creates trust in the system and in the organisation.

**External investigation committee:** an external investigation committee consists of members not connected to AAP.

**Integrity officer:** This officer is part of the Human Resources team. All reports are received, registered and followed up by the integrity officer. Together with the confidential advisors, this employee analyses risks related to integrity, prepares the annual analysis and possible revision of policy and practice, initiates moral reflection and monitors moral

jurisprudence. This person can contribute ideas and answer questions on Integrity.

**Internal investigation committee:** An internal investigation committee consists of AAP staff who were not involved in the event, have no conflict of interest and conduct investigations

**Investigation committee:** This committee can be formed for each report to carry out preliminary and follow-up investigations in the event of well-founded reports. Also serves within AAP as a sounding board for the integrity officer when dealing with feedback.

**Report:** Any explicit written or oral notification of a (suspected) breach of the Code of Conduct, relating to the level of service, action or lack of action by the organisation, its staff, volunteers or anyone directly involved in delivering its work. A report requires response and is aimed at remediation or change.

**Report register:** In the report register, all reports are recorded for the annual reporting and improvement actions. At AAP, we use TrusTool for this purpose.

**Reporter:** Any natural person making an oral or written report.

## **7. CONTACT**

### **Integrity officer AAP**

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### **Internal confidants (both for undesirable behaviour and integrity)**

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