



## **Humanity & Inclusion – Handicap International** **Anti-Trafficking and Safeguarding Compliance** **Plan**

### **Background and Purpose**

Handicap International (Humanity & Inclusion) – “HI” has developed this Anti-Trafficking and Safeguarding Compliance Plan (“Plan”) in accordance with the U.S. Government’s zero-tolerance policy regarding trafficking in persons and exploitation, sexual abuse, child abuse and child neglect by government contractors and award recipients as set out in USAID Standard Provision M20 and M27 for U.S. Nongovernmental Organizations (“Anti-Trafficking Provisions - 2016” and “Safeguarding against Exploitation, Sexual Abuse, Child Abuse and Child Neglect Provisions - 2023”).

This plan is consistent with the *Inter-Agency Standing Committee’s Six Core Principles Relating to Sexual Exploitation and Abuse*, as amended, available at <https://psea.interagencystandingcommittee.org/update/iasc-six-core-principles> and the *Keeping Children Safe Standards*, available at <https://www.keepingchildrensafe.global/accountability/>. It also refers to anti-trafficking in persons provisions as defined in the *Protocol to Prevent, Suppress, and Punish Trafficking in Persons, especially Women and Children, supplementing the UN Convention against Transnational Organized Crime*.

The purpose of this Plan is to set out HI’s policies and procedures for: (1) making HI employees aware of the conduct prohibited under HI policies related to the Anti-Trafficking and Safeguarding Provisions and the actions that may be taken against employees for violations; (2) employing fair and safe recruitment, wage and housing practices; (3) preventing prohibited trafficking and SEAH – Child Abuse & Neglect activity by suppliers, subcontractors and subrecipients, and (4) monitoring, detecting and terminating those who engage in such activities.

### **Applicability**

This Plan sets out HI’s baseline standards for anti-trafficking and safeguarding compliance and applies presumptively to all U.S. Government contracts, subcontracts, cooperative agreements, awards and subawards.

However, it may need to be adapted or modified for projects that are larger, more complex, or involve greater risk of trafficking and safeguarding. For all contracts and awards with an estimated

value of \$500,000 or more, or involve activities outside the U.S., Project staff must examine each one individually to assess the risk of trafficking, SEAH and Child Abuse & Neglect activities, based on factors such as the number of non-U.S. citizens to be employed and whether the contract or award will involve services or supplies susceptible to trafficking in persons or improving risks of vulnerabilities. Additionally, Project staff will make sure to identify reasonable measures to reduce the risk of exploitation, sexual abuse, child abuse, and child neglect. Where implementation of projects under this award may involve children, this includes limiting unsupervised interactions with children and complying with applicable laws, regulations, or customs regarding harmful image-generating activities of children.

### **Employee Awareness Program**

Humanity and Inclusion (HI) has a [Code of Conduct and a series of institutional policies](#) which provide a framework for our activities and are designed to ensure the protection of beneficiaries and personnel. This package reflects the Anti-Trafficking and Safeguarding provisions prohibiting trafficking, sexual abuse and exploitation and child abuse-related activities, describes the actions HI may take against employees and agents who violate these provisions, and sets out the procedure for reporting and investigating Policies violations.

- Child Protection Policy (CPP)
- Protection of beneficiaries from Sexual Exploitation, Abuse and Harassment Policy (PSEAH)
- Anti-fraud, Bribery and Corruption Policy
- Code of conduct: Prevention of Abuse and Safeguarding
- Internal Investigation Policy (Guideline)

HI posts both the Policies and the Code on its Intranet System (*HIinside*) and on its website <https://www.hi.org/en/institutional-policies> where they can be accessed by all HI personnel and partners at any time.

All new personnel are required to read and acknowledge Policies and the Code at the time of hire and must also complete an **on-line mandatory training program called “fundamentals”**: it includes **a e-module on institutional policies and a e-module on PSEAH & Code of Conduct regulations**. Additionally, all personnel will benefit during the period of activity of awareness-raising or refreshing sessions on Code of Conduct, Protection Mainstreaming principles, GBV & SEAH aspects and DGA (Disability – Gender – Age intersectionality) ones.

### **Safe Recruitment and Wage Plan**

HI is a member of the [Misconduct Disclosure Scheme \(MDS\)](#). Any successful candidate for a position is subject to criminal records check and/or (depending on local legislation) reference checks including a PSEAH & Integrity background with previous employers. A check is also carried out via a *Bridger* screening for possible illegal activities.

HI prohibits the use of any misleading or fraudulent recruitment practices during the recruitment

of employees or offering of employment to employees. HI fully and accurately discloses, in a format and language accessible to the employee, all key terms and conditions of employment, including wages and benefits, work location, living conditions, housing and associated costs (where provided or arranged by HI), significant costs to be charged to the employee, and, if applicable, the hazardous nature of the work.

HI will provide to every employee an employment contract, recruitment agreement or other required work document (for community or refugee volunteer), written in a language the employee understands, containing all required information about the terms of conditions of employment, which may include, by way of example, the work description, wages, work location, living accommodations and associated costs, time off, transportation arrangements, grievance process and the content of applicable laws. It includes regulations prohibiting trafficking in persons, fraud, corruption and reference to PSEAH and Child Protection Provisions.

HI prohibits charging recruitment fees to any employee. HI will pay to all employees' wages that meet applicable host-country legal requirements or will explain any variance. HI prohibits destroying, concealing, confiscating or otherwise denying any employee access to his or her identity or immigration documents.

### **Housing Plan**

In situations where HI provides housing to employees, the housing will meet host country housing and safety standards.

### **Partners and Suppliers Compliance**

All HI contractors, consultants, vendors, suppliers, subcontractors and subrecipients ("Partners & Suppliers") must agree to comply with the applicable Anti-Trafficking and Safeguarding Provisions described on the Policies and Code of Conduct. HI will include language to that effect in all Partners & Suppliers contracts, subcontracts and sub-agreements.

Prior to the award of any Partners or Suppliers Contract, HI will verify that:

- The Supplier has well received the Policies and Code and is complying with them; and
- That after conducting due diligence, to the best of the Supplier's knowledge and belief, neither it nor any of its employees, or its contractors, consultants, suppliers, subcontractors, subrecipients or their employees, have engaged in any prohibited trafficking or safeguarding (SEAH & Child Abuse-Neglect)-related activities, or if any abuses relating to prohibited trafficking or Safeguarding (SEAH & Child Abuse-Neglect)-related activities have been found, Supplier has taken appropriate remedial and referral actions.

For Suppliers and Partners that may be more susceptible to trafficking or SEAH-Child Abuse related activities, HI may, in situations where it has direct access, inspect the Supplier's workplace or any

housing provided by the Supplier for signs of trafficking or SEAH- Child Abuse related activities. In lower-risk situations, and in remote situations, HI will review the plans and certifications of its Suppliers & Partners to ensure they include adequate monitoring procedures and reporting mechanisms.

If any Supplier fails to comply with the applicable Anti-Trafficking and Safeguarding Provisions, HI will take appropriate action to remediate the violation and prevent future violations, including, but not limited to:

- Requiring the Partner or Supplier to remove an employee or agent from the funding project,
- Suspending payments to Partner or Supplier until violation is remedied,
- Immediately terminating the Partner or Supplier Contract.

### **Reporting Requirements and Procedure**

HI's Safeguarding Framework includes two main mechanisms to record Sexual Exploitation, Abuse and Harassment (SEAH), Child Abuse & Neglect and Trafficking-related complaints:

1. an internal whistle blowing mechanism via managerial feedback, email or intranet for personnel:
  - a. Reporting directly to the immediate manager or any other manager of the organization
  - b. Reporting to a Safeguarding focal point: staff who are identified and trained either locally or at headquarters.
  - c. Access to the direct online whistleblowing mechanism – Ethics Point - via intranet or internet address: <https://hi.org/en/reporting-form>
2. A Community Feedback and Complaint mechanism for beneficiaries, partners & suppliers using several communication channels depending on the combination of different mechanisms put in place while guaranteeing the principles of survivor-centered, accessibility, security and transparency. This community mechanism deployment includes:
  - An internal communication plan designed and deployed with posters, leaflets, information sessions in local languages to ensure all stakeholders are informed and have access to the whistleblower mechanism.
  - A network of Focal Points is put in place (national level and sites) with names & contacts information made accessible for all.
  - Focal Points & managers benefit from specific awareness sessions on how to receive complaints & how to report in the centralized case management system (EthicPoint), which will lead to an HQ-led investigation.
  - MEAL and the project teams ensure information and exchange sessions with partners and communities (beneficiaries, local authorities and community leaders) and develop a communication plan adapted to the capacities of the project stakeholders.
  - Consultations with these stakeholders are organized to identify which of the different alert and complaint mechanisms are the most adapted to the context and their expectations. Then, MEAL, Focal Points and Operational teams present in each HI intervention base will be in charge of informing the partners and the communities by means of different

communication supports (posters, pictures, user's guides in the local language) about the chosen mechanism(s) and its functioning modalities.

- Beneficiaries are informed of the organization's Safeguarding framework including the Code of Conduct, protection policies and reporting rights during the first interaction between HI and the individual, usually through the first face-to-face meeting prior to the beneficiary's assessment.
- Regular community consultation times regarding the efficiency of the mechanism throughout the project will be held.
- Any person can access to the online whistleblowing mechanism via the [hi.org](https://hi.org) address.

HI personnel and Supplier Personnel who believe they or others have been subjected to prohibited trafficking-related activities is encouraged as well to contact the Global Human Trafficking Hotline at 1-844-888-FREE or [help@befree.org](mailto:help@befree.org).

HI strictly prohibits retaliation against any HI employee who reports prohibited trafficking or SEAH- related activity or other violations of these policies, or who cooperates with any internal or government investigations of such reports. Employees may do so without fear of reprisal. HI personnel who engage in any form of retaliation against those who report are subject to disciplinary action, up to and including termination of employment with HI.

### **Investigations**

All SEAH, Trafficking - related complaints and others violations of the policies are directly received or registered into the secure and protected Case Management Platform (**Ethics Point**) and processed by trained and accredited staff (HQ and field). Management of a SEAH and Trafficking incidents respects 4 main principles: **Victim – centered, Procedural fairness, Professional & certified resources, and Structured investigation ones.**

Acknowledgement of receipt and first contact are made within 48 hours with the complainant to ensure they receive required care and relevant protection measures (health, MHPSS, legal, and others) by HI directly or via referral to services / specialized stakeholders. A liaison officer is then identified and put in charge of follow up and support to the whistleblower and/or survivor.

An Initial evaluation of the allegation is made and if deemed credible HI HQ (Safeguarding & Integrity Unit) will conduct, in full coordination with the field mission, an investigation. The unit will report its findings and determine with institutional management what, if any, remedial action is appropriate.

The HI US office will be responsible for immediately notifying the Award Officer and the appropriate agency's Office of the Inspector General of the information received and any resulting remedial action taken.

HI will cooperate fully with any US Government agencies responsible for any investigations, audits or corrective actions relating to trafficking in persons or SEAH incidents, including, but not limited to, providing timely and complete responses to document requests and providing reasonable

access to HI facilities and staff.

During and after the investigation, the organization ensures the provision of health, legal or any other type of support to the victim and witnesses as needed. HI will protect all employees suspected of being victims of or witnesses to prohibited activities, prior to returning to the country from which the employee was recruited, and will not prevent or hinder these employees from cooperating fully with US government authorities if relevant.

**Posting**

HI will post this Plan on its intranet site HInside site and on its external website: [www.hi-us.org](http://www.hi-us.org). HI will also provide this plan to all workplaces, except where the work is being performed otherwise at a non - fixed location.