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**Integrated Service on Health and Development Organization**

**ISHDO**

**COMBATING TRAFFICING IN PERSON POLICY**

 **March 2021**

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# Purpose

This policy describes ISHDO’s guiding principles with respect to combating trafficking in persons.

ISHDO is opposed to all forms of trafficking in persons and is committed to mitigating the risk of trafficking in persons in connection with its operations and programs. ISHDO is committed to full compliance with the Ethiopian Government laws, [USAID’s Standard Provisions regarding Trafficking in Persons](https://www.usaid.gov/sites/default/files/documents/1868/303maa.pdf); the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, which supplement the UN Convention against Transnational Organized Crime

; and any other regulations from other agencies and governments, as applicable. ISHDO leadership understands the importance of anti-trafficking and has devoted resources to promote compliance.

2. Applicability

This policy applies to:

* ISHDO staff and volunteers, including the Board members
* ISHDO suppliers: Sub-awardees (and their staff and volunteers), independent contractors, and vendors and their employees

# General Guidelines

ISHDO prohibits:

* Engaging in any form of human trafficking
* Engaging in commercial sex acts that may be directly associated with ISHDO, which includes during work hours, while attending off-site functions, and any time in work travel status
* Using forced labor of any kind for any reason
* Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee’s identity or immigration documents
* Using misleading or fraudulent recruiting practices
* Charging employee candidates recruitment fees for employment

# Policy Implementation

ISHDO will implement this policy through:

1. Employee acknowledgement of receipt of the policy and related training
2. Compliance plans
3. Incident reporting

As required by a funder or local law, ISHDO office may edit the related resources listed at the end of this policy to ensure they are sensitive to the local context.

# 5. Receipt of the Policy and Training

All ISHDO staff will acknowledge receipt and understanding of ISHDO's Combating Trafficking in Persons Policy and accompanying resources upon hire and occasionally during ISHDO’s Compliance training. ISHDO employees are responsible for complying with this policy as well as completing any associated training mandated as a condition of continued employment.  When engaging outside parties, ISHDO staff will ensure that the requirements of this policy are communicated to ISHDO sub-awardees, independent contractors, and vendors.

# Compliance Plans

ISHDO will make available an anti-trafficking in persons compliance plan template for written anti-trafficking compliance plans. All U.S. Government-funded sub-awards with an estimated value of US$500,000 are required to complete an anti-trafficking compliance plan. The compliance plans may be adjusted based on risk factors for trafficking due to the location, beneficiary population, complexity, size of the program, or other variable deemed appropriate and relevant.

# **Incident Reporting**

All ISHDO staff are required to use their best judgement to report any suspected trafficking activity to the Board Chair, Executive Director, Chief of Party, HR Manager, or other appropriate authority.

8. Enforcement
Any violations of this policy will result in disciplinary action that may include but is not limited to termination of employment for ISHDO employees and termination of the relationship with ISHDO for non-employees.

ISHDO prohibits retaliation against any employee who reports any violation of this policy or who cooperates with any investigation of such reports. Employees who engage in any retaliation or other violation will be subject to corrective action up to and including termination of employment and reporting to local authorities as appropriate. Any supplier or supplier personnel engages in any prohibited activities, fails to report suspicious activities, or engages in retaliatory actions will be subject to action including termination of the business relationship and reporting as appropriate.

# Related Resources

* U.S. Presidential Executive Order 13627: <https://www.gpo.gov/fdsys/pkg/DCPD-201200750/pdf/DCPD-201200750.pdf>
* [USAID ADS 303:](file:///C%3A%5CUsers%5CITV%20User%5CDesktop%5CISHDO%20MANUALS%20%26%20GUIDELINES%5CUSAID%20ADS%20303%3A%20%C2%A0)<https://www.usaid.gov/sites/default/files/documents/1868/303maa.pdf>
* [U.S. Government Combating Trafficking in Persons Regulations:](https://www.usaid.gov/sites/default/files/documents/1868/303maa.pdf)
	+ [FAR 55.17: https://www.acquisition.gov/?q=/browse/far/22](https://www.acquisition.gov/?q=/browse/far/22)
	+ FAR 52.222-50: <https://www.acquisition.gov/?q=/browse/far/52>
	+ FAR 52.222-56: <https://www.acquisition.gov/?q=/browse/far/52>
* USAID Counter Trafficking in Persons Field Guide: <https://www.usaid.gov/sites/default/files/documents/2496/C-TIP_Field_Guide_Final_April%205%202013.pdf>
* United Nation Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children

<https://www.ohchr.org/en/professionalinterest/pages/protocoltraffickinginpersons.aspx>

* United Nations Convention against Transnational Organized Crime

<https://www.unodc.org/unodc/en/organized-crime/intro/UNTOC.html>

# Key Definitions

* **Bonded labor or debt bondage:** The use of a debt or other threats of financial harm as a form of coercion. Some workers inherit debt, others fall victim to traffickers or recruiters who unlawfully .exploit an initial debt assumed as a term of employment.
* **Commercial sex act:**Any sex act on account of which anything of value is given to or received by any person.
* **Forced labor:** Situations in which persons are coerced to work through the use of violence or intimidation or by more subtle means, such as accumulated debt, retention of identity papers, or threats of denunciation to immigration authorities.
* **Human trafficking:**Human trafficking means recruiting, harboring, transporting, providing, or obtaining a person for labor or services through the use of force, fraud, coercion, abduction, deception, the abuse of power or of a position of vulnerability, or the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation. Exploitation includes involuntary servitude, peonage, debt bondage or slavery, the removal of organs, and sex trafficking or other forms of exploitation.

# Anti-Trafficking in Persons Compliance Plan

ISHDO has a zero-tolerance policy regarding any ISHDO employees, consultants, volunteers, or third party or any person who works with ISHDO and at any level engaging in any form of trafficking in persons or forced labor.

This compliance plan conforms to our funders’ requirements and establishes ISHDO’s procedures for preventing trafficking in persons through awareness, reporting, recruitment and wage plans, housing plans, and sub-award and ISHDO’s Office compliance.

# Awareness Efforts

ISHDO’s Combating Trafficking in Persons Policy (policy) reflects all of the requirements stemming from our contractual and ethical obligations. The policy includes all of USAID’s Anti-Trafficking Provisions, the UN Convention against Transnational Organized Crime, which supplement the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons

, actions ISHDO may take against employees or others who violate the policy, and procedures for reporting and investigating violations. The policy has been incorporated into ISHDO’s Code of Conduct/Ethics.

All ISHDO staff have been informed via email the trafficking-related prohibitions and actions that will be taken for violations. All ISHDO staff can get access to our policy, plans, and related materials in our staff manuals.

ISHDO conducts compliance training for all staff approximately annually and as new staff are hired throughout the year as a component of ISHDO’s Code of Ethics training. This training certifies that staff understand trafficking issues and agree to comply with the policies, procedures, and principles of ISHDO’s Combating Trafficking in Persons Policy, including the reporting any violations of which they are aware. Such compliance training is targeted and customized for field staff as appropriate for the nature and scope of the activities to be performed.

#  Reporting Process

All ISHDO staff have a responsibility to report, without fear of retaliation, any activity that violates the Combating Trafficking in Persons Policy to their Executive Director, Chief of Party, HR Manager or other appropriate authority. ISHDO staff are encouraged to consult the above mentioned points of contact if they are uncertain whether a specific action would be in violation of the Combating Trafficking in Persons Policy.

#  Recruitment and Wage Plan

To the extent that ISHDO uses recruitment companies, only recruitment companies with trained employees may be used, no recruitment fees may be charged to employees, and all wages must meet applicable cooperating country legal requirements.

# Procedures for Sub-Awardees and Vendors

All ISHDO sub-awardees with U.S. Government-funded awards where the work will be performed in Ethopia and with a value of more than US$500,000 must provide ISHDO with an anti-trafficking in persons compliance plan and, as required by U.S. law, a certification that their staff and contractors at any tier have not engaged in trafficking-related activities.

ISHDO includes all applicable requirements in the award documents sent to our sub-awardees. Sub-awardees also are provided links to the ISHDO Code of Ethics and the ISHDO Combating Trafficking in Persons Policy and are asked to certify that they have read and understood those documents. A copy of sub-awardee certifications are maintained on file with ISHDO.

Failure to comply with the requirements of the Combating Trafficking in Persons Policy or the anti-trafficking in persons compliance plan is grounds for ISHDO to take any and all appropriate actions, up to and including immediate termination of that sub-awardee’s award with ISHDO.

For the purposes of each required award-specific compliance plan, “staff” means an individual engaged in the performance of the award as a direct employee, consultant, or volunteer of the awardee or any sub-awardee.

**Effective Date:** March 2021 This policy supersedes all previous policies related to combating trafficking in persons.

# ANNEX: 1 ACKNOWLEDGEMENT AND ACCEPTANCE



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 **Integrated service on Health and Development Organization (ISHDO)**

**Combating Trafficking in Persons Policy of ISHDO**

I \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ certify and acknowledge the following:

* I have received a copy of the ISHDO’s Combatting Trafficking in Persons Policy.
* I understand this policy is subject to change or may be revised by ISHDO.
* I understand that it is my responsibility to read and comply with this policy, and any revisions, and that I am bound by the provisions contained within.
* I understand that my continued employment or engagement with ISHDO is contingent on compliance with this policy.

**Print Name:** ‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐

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