**POLICY ON COMBATING HUMAN TRAFFICKING**

Document type - Policy

Applies -   to all programs and projects

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**General provisions**

The CO "SOS Civil Defense Headquarters" (hereinafter - the Organization) strongly condemns human trafficking - children, women and men. This Policy prohibits all persons with whom the Organization cooperates, to participate in any form of human trafficking. Human trafficking is a criminal act that violates fundamental human rights, as well as the inherent dignity and integrity of the human being. Disciplinary measures, including dismissal, will be applied to anyone representing the Organization who violates any aspect of this Policy. The approved Anti-Human Trafficking Policy applies to all permanent, temporary and part-time employees; interns; volunteers; visitors (including the media); contractors and consultants. Inappropriate behavior of persons representing the Organization, during and outside of working hours, has a negative impact on the work and values of the Organization. Therefore, the Policy applies to all representatives of the Organization during and after working hours, every day of the year. The Organization condemns any form of abuse or exploitation of individuals and is committed to protecting its staff, all representatives and beneficiaries as they are the most vulnerable. Anyone who falls under the category to this policy are prohibited from engaging in human trafficking.

**Terminology**

**Beneficiaries** - the Organization uses a broad definition of "beneficiary", in relation to human trafficking. It includes not only the direct beneficiaries of a particular project, but also any child or adult who is part of the affected population and who may be harmed by representatives of the Organization, who carry out activities.

**Human trafficking** is the recruitment, transportation, transfer, harbouring or reception of persons, including the exchange or transfer of control over those persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of 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](https://home-affairs.ec.europa.eu/networks/european-migration-network-emn/emn-asylum-and-migration-glossary/glossary/exploitation_en). This is the definition of human trafficking provided by the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime. Human trafficking is a combination of the following features:

* recruitment;
* transportation;
* transfer;
* sale;
* adoption for commercial purposes, use in the pornography business;
* use in military conflicts;
* involvement in criminal activities;
* transplantation or forced donation;
* forced prostitution;
* slavery and situations similar to slavery;
* forced labor;
* involvement in debt bondage;
* use of blackmail, threats, violence.

**Mandatory protocols for the prevention of human trafficking**

In order to achieve the purpose of this Policy, all persons covered by this Policy are PROHIBITED from:

* engage in the trafficking of children, women or men for sexual exploitation or purchase of any intimate services for money, including forced prostitution, child prostitution, and pedophile pornography.
* engage in the trafficking of women and girls for the purpose of forced or arranged marriages or for any «bride price» schemes.
* engage in trafficking in children, women and men for the purpose of organ removal and illegal organ trading or for the trafficking in drugs.
* use force, fraud, and coercion to compel victims to perform labor, begging or involuntary servitude.
* involve children, women or men in labor under the threat of serious harm to that person or another.

In addition, the Organization prohibits employment practices related to human trafficking, including:

* Destroying, concealing, confiscating or otherwise denying any employee access to his or her identity or immigration documents.
* Using misleading or fraudulent practices to recruit employees, such as failing to disclose key terms and conditions of employment
* Using recruiters who do not comply with local labor laws.
* Charging fees for hiring employees.
* Failing to provide an employment contract or work document where required by applicable laws.
* Knowingly receiving goods or services that have been provided or produced as a result of human trafficking or forced labor.

The Organization requires in accordance with this Policy:

* Pay wages in accordance with the requirements of Ukrainian legislation.
* Apply transparent recruitment methods that fully and accurately disclose in a language all key terms and conditions of employment, including salary and

benefits, living conditions, any housing conditions or related arrangements (if provided or organized by the ADRA), and the recovery of significant employee expenses.

* Take appropriate steps to ensure that all partners, consultants, contractors, volunteers, interns or any other persons actively involved in the activities of the

Organization comply with this policy.

**Reporting, monitoring and investigation**

* An incident or suspicion of human trafficking can be reported by staff, beneficiaries or any other victims or witnesses of the incident.
* If employees of the Organization witness violations of the Policy, they are obliged to immediately notify their supervisor.
* The notification by the employee should be detailed and include information about the facts or suspicion of a case of human trafficking, information about the victim, the offender, and witnesses.
* As part of the investigation, the following may be conducted to clarify the circumstances: interviews with persons who made the report, victims, witnesses and subjects of the investigation.
* Personal data of persons who report and are involved in the investigation are treated as confidential.
* All persons involved in the investigation sign a form on non-disclosure of details that may harm the affected person.
* The Head of the Organization provides the affected person with the necessary support in the form of information about available safety resources, psychological, legal, medical and other necessary assistance.

Problems reported to the Head of the Organization will be resolved with the following preventive measures:

* Harassment or victimization is prohibited: The Organization recognizes that the decision to report a suspicion may be difficult due to fear of retaliation by those responsible for the the potential violation. The Organization, in accordance with the Whistleblowing Policy and Whistleblower Protection Policy, will not tolerate any form of retaliation or victimization and will take all practical steps to protect those who report violations in good faith.
* Confidentiality: The Organization will endeavor to protect a whistleblower who reports if they do not wish to have their name disclosed. However, it should be understood that an investigation may be required to identify the source of the information into any potential violation, and the individual's statement may be required as part of any evidence gathered in the investigation.
* Unfounded allegations: Representatives of the Organization should be aware that if an allegation is made in good faith but is not substantiated after investigation, the Organization guarantees that no action will be taken against the complainant. However, if individuals knowingly make false allegations against false accusations against any person who makes such an accusation, disciplinary action, up to and including dismissal, will be considered.

The organization undertakes to cooperate with regulatory authorities to conduct audits and investigations into compliance with anti-trafficking regulations.

**Disciplinary consequences of human trafficking**

Any substantiated violation of this Policy will be considered an act of gross misconduct. Violations of this policy will be dealt with disciplinary procedures and contractual agreements. Violations by persons who are not employees of the Organization may result in sanctions, including disciplinary measures leading to possible dismissal, termination of all relationships, including contractual and partnership agreements, and, if appropriate legal or other similar actions. All substantiated violations by employees of the Organizations shall result in disciplinary action, up to and including dismissal. If necessary, the Organization will refer significant violations of this Policy to law enforcement authorities for the purpose of initiating criminal prosecution. The Organization will support any victims or survivors in contacting law enforcement, in which case the information will be transmitted and reported directly to the state authorities.