



## **FHI 360 Universal Anti-Trafficking Compliance Plan**

**Country Office:**

**Project Name (if project-level Compliance Plan):**

**Project start/end dates (if project-level Compliance Plan):**

**Person Responsible for Maintaining this Compliance Plan:**

### **1. Purpose and Scope**

FHI 360's policy on Combating Trafficking in Persons aligns with international and U.S. and U.K. government standards that aim to prevent trafficking in persons, especially among vulnerable populations, including relevant standards outlined in the United Nations Protocol to Prevent, Suppress, and Punish Trafficking in Persons, Especially Women and Children ("The Palermo Protocol"); the U.K. Modern Slavery Act 2015; and U.S. government's laws, regulations and policies prohibiting trafficking in persons by government contractors and award recipients, including but not limited to:

- The U.S. Government's zero-tolerance policy regarding trafficking in persons by government contractors and award recipients, as set out in FAR Subpart 22.17 and § 52.222-50(h) (for all U.S. Government contracts); and
- USAID's Standard Provision M20 for U.S. Nongovernmental Organizations ("Anti-Trafficking Provisions") (for all USAID cooperative agreements).

**All FHI 360 Personnel, Suppliers and Supplier Personnel are required to adhere to FHI 360's Combating Trafficking in Persons ("CTIP") Policy (POL 01029), including not engaging in prohibited conduct and the requirement to report observed, suspected, or known allegations of trafficking-related activity.**

**To ensure due diligence and uniform application of FHI 360's CTIP Policy, FHI 360 developed this Universal Anti-Trafficking Compliance Plan ("Universal Plan"), which outlines the key elements of FHI 360's CTIP Policy and aligns with U.S. and U.K. Government regulations and international standards related to anti-trafficking. All FHI 360 country and project offices must implement the requirements included in FHI 360's Universal Plan (this plan).**

Anti-trafficking compliance plans must be appropriate to the size and complexity of the contract or award, and the nature and scope of the activities to be performed, including the number of non-U.S. citizens expected to be employed and the risk that the contract or award will involve services that are susceptible to trafficking in persons.

Therefore, projects that are larger, more complex, or involve a greater risk of trafficking activity may need to implement measures in addition to those set out in this Universal Plan to ensure that their anti-trafficking compliance plans are appropriate to the size and complexity of the project, and the nature and scope of the activities to be performed. Those additional measures should be documented in a Supplemental Plan for High-Risk Projects ("Supplemental Plan") and included in Section 4 of this plan (if applicable).

**Criteria for determining if a project is high-risk and supplemental measures need to be added to this Universal Plan: High-risk projects are projects that involve any of the following:**

- Virtual or in-person Interaction with children (under 18 years old) in any setting
- The provision of virtual or in-person health, mental health, humanitarian aid, or other development assistance (excluding technical assistance-only projects) to women; people with disabilities; refugees; asylum seekers; internally displaced people; people who use drugs; people who sell sex; LGBTQ+ people; prisoners; homeless people; or migrant workers-- in any setting
- The implementation of activities, including technical assistance, in any of the following settings:
  - schools, refugee or internally displaced persons camps, emergency shelters, youth/recreation centers, health facilities or mobile medical units
  - an area with prior or current cases of sexual exploitation and abuse (SEA) (If uncertain, refer to the [UN IASC Dashboard](#) to determine if a Prevention of Sexual Exploitation and Abuse (PSEA) Network is operating in country and contact the PSEA Coordinator; or contact local UNICEF or USAID mission)
- The provision of direct services, excluding technical assistance-only projects, in any setting below:
  - an area that is rated by FHI 360 Global Security as extreme-risk or high-risk
  - a country listed in FHI 360's Crisis Watchlist (top 10 countries)
  - a country that has been rated "Tier 2," "Tier 2-Watchlist," "Tier 3," or "Special Case" by the most recent [U.S. Trafficking in Persons Report](#)
  - an area experiencing a current or recent disaster, disease outbreak, armed conflict, or other humanitarian crisis or emergency response
  - an area experiencing common practice of early or child marriage (anyone under 18)

**PROJECTS ONLY: CHOOSE ONE STATEMENT BELOW BASED ON THE ABOVE CRITERIA:**

- ☐ [INSERT NAME OF PROJECT] IS NOT CONSIDERED A HIGH-RISK PROJECT.
- ☐ [INSERT NAME OF PROJECT] IS CONSIDERED A HIGH-RISK PROJECT. SUPPLEMENTAL MEASURES ARE INCLUDED IN SECTION 4: "SUPPLEMENTAL PLAN."

## **2. Key Elements (minimum requirements) of the Universal Plan**

### **2.1 Activities Prohibited by FHI 360's Policy on Combating Trafficking in Persons**

FHI 360 has adopted a policy on Combating Trafficking in Persons ("[Policy](#)") that strictly prohibits its employees, volunteers, consultants, vendors, contractors, subcontractors, and subrecipients from:

- Engaging in trafficking in persons
- Purchasing commercial sex acts at any time (during work hours and non-work hours) during the period of an FHI 360 project or business activity <sup>1</sup>
- Using forced labor in the conduct of FHI 360 business
- Destroying, concealing, confiscating, or otherwise denying any FHI 360 or Supplier Personnel access to identity or immigration documents such as passports or drivers' licenses

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<sup>1</sup> Purchasing commercial sex is prohibited due to the following risks: It is not always possible to know 1) who is consenting to sell sex and who is being forced or coerced into selling sex; or 2) the person's age. Engaging in sexual activity with a person who is under the age of 18 years old, regardless of whether there is force or coercion, violates international standards, many national laws, and FHI 360's safeguarding policies.

- Using misleading or fraudulent recruitment practices, such as failing to disclose in a format or language accessible to FHI 360 or Supplier Personnel or materially misrepresenting key terms and conditions of employment, such as wages and benefits, work location, living conditions, housing or associated costs (if provided or arranged by FHI 360 or by a vendor, contractor, subcontractor, or subrecipient), any significant costs to be charged to the employee, and, if applicable, the hazardous nature of the work
- Working with recruiters that do not comply with local labor laws of the country in which recruiting takes place
- Charging recruitment fees to FHI 360 or Supplier Personnel
- Failing to provide or pay return transportation costs at the end of employment for certain employees who are not nationals of the country in which the work takes place (subject to certain exclusions and conditions)
- Providing or arranging housing that does not meet the host country housing and safety standards
- If required by law or contract, failing to provide an employment contract, recruitment agreement, or other legally required work document in writing in a language the employee understands containing a detailed description of the terms and conditions of employment, at least five days before an employee relocates to perform work

**Consequences for engaging in prohibited conduct:** FHI 360 Personnel, including staff, volunteers, or partner staff, Suppliers, and Supplier Personnel who engage in any of the prohibited activities listed above, fail to comply with any applicable compliance plan, fail to report suspected trafficking-related activity or forward a report of suspected trafficking-related activity, or otherwise violate FHI 360's Combating Trafficking in Persons policy will be subject to disciplinary action, up to and including immediate termination of employment or other relationship with FHI 360. Additionally, FHI 360 may take legal action when required, against FHI 360 Personnel who have been found to commit trafficking-related violations, including referral to the relevant authorities for appropriate action, including criminal prosecution, in all relevant jurisdictions.

## 2.2 Employee Awareness Program

[FHI 360's Combating Trafficking in Persons Policy](#) is posted on FHI 360's Electronic Document Management System ("EDMS") and FHI 360's website, where it can be accessed by all FHI 360 personnel and Suppliers at any time. The Policy is also reflected in FHI 360's Code of Ethics and Conduct (the "Code"), which is posted on FHI 360 Connect site and can be accessed by all FHI 360 personnel at any time. Both the Policy and the Code are available in English, Arabic, French, Portuguese, and Spanish. A verbal explanation of the contents is given upon request to individuals unable to read the printed information.

Employees were informed of the Policy upon its adoption via a company-wide email that linked to the Policy and instructed them to access and read it. They were also required to successfully complete online training modules on the Code and Safeguarding, including the anti-trafficking requirements. New employees are required to read and acknowledge the Code, including the anti-trafficking section, upon hire and complete the online Code and Safeguarding training modules. All employees are required to repeat the Code training e-module bi-annually, and to re-read and acknowledge the Code in the alternate years. Finally, FHI 360 conducts country- and project-specific anti-trafficking training as needed.

## 2.3 Recruitment and Wage Plan

- FHI 360 prohibits the use of any misleading or fraudulent recruitment practices during the recruitment of employees or offering of employment to employees. FHI 360 personnel must fully and accurately disclose, 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 FHI 360), significant costs to be charged to the employee, and, if applicable, the hazardous nature of the work.
- FHI 360 prohibits charging recruitment fees to any employee.
- FHI 360 will pay to all employees wages that meet applicable host-country legal requirements or will explain any variance.
- Where required by law or contract, FHI 360 will provide to every employee an employment contract, recruitment agreement or other required work document, 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, the content of applicable laws and regulations prohibiting trafficking in persons, and the prohibition on recruitment fees. If the employee must relocate to perform the work, FHI 360 will provide the required work document at least five (5) days prior to relocation.
- FHI 360 prohibits destroying, concealing, confiscating, or otherwise denying any employee access to his or her identity or immigration documents.
- FHI 360 will provide or pay the cost of return transportation at the end of employment for any employee who is not a national of the country where the work took place and was brought into that country by FHI 360 for purposes of working on a covered U.S. Government contract or award.
- FHI 360 will provide or pay the cost of return transportation at the end of employment for any employee who is not a U.S. national and was brought into the U.S. for purposes of working on a covered U.S. Government contract or award, if payment of such costs is required under existing temporary work programs or pursuant to a written agreement with the worker for portions of contracts and awards performed outside the U.S.
- FHI 360 will only use recruiting firms that have trained employees, comply with all labor laws of the country where the recruitment takes place, and comply with the prohibitions on misleading or fraudulent recruitment practices outlined above.

## 2.4 Housing Requirement

**In situations where FHI 360 provides or arranges housing for employees,** the housing will at minimum meet host country housing and safety standards.

## 2.5 Reporting Requirements and Procedures

**All FHI 360 Personnel** who observe, suspect, or receive allegations of trafficking-related activity, or any other conduct prohibited by FHI 360's CTIP Policy, are required to report the conduct as soon as possible under the circumstances, ideally within 24 hours, either orally or in writing, by contacting **one** of the following: (Reporting requirements for Suppliers included in Section 3)

- Their immediate supervisor, or, if the conduct involves the immediate supervisor, any other supervisor within their department
- FHI 360 local Human Resources (HR) representative or regional or departmental HR Partner
- FHI 360 Director of HR Partnering Useetha Rhodes [URhodes@fhi360.org](mailto:URhodes@fhi360.org) or Chief Human Resources Officer Pam Myers [PMyers@fhi360.org](mailto:PMyers@fhi360.org)
- FHI 360 Office of Compliance and Internal Audit (OCIA) via email at [Compliance@fhi360.org](mailto:Compliance@fhi360.org)

- FHI 360 OCIA's Ethics and Compliance Hotline:
  - 1-800-461-9330 in the U.S.;
  - +1-720-514-4400 outside the U.S.;
  - Skype: +1-800-461-9300; or
  - Country-specific hotline numbers listed on FHI 360's reporting website (see bullet below)
- FHI 360 OCIA's reporting website either with your name or anonymously (<http://www.fhi360.org/anonreportregistry>).

**FHI 360 Personnel who are HR staff, supervisors or hold a position at director level or above** are required to promptly report, ideally within 24 hours or as soon as possible under the circumstances, to FHI 360's Office of Compliance and Internal Audit (OCIA) or FHI 360's Headquarters HR (Director of HR Partnering or Chief Human Resources Officer) of any actual or suspected Trafficking in Persons or other violation of FHI 360's CTIP Policy that is reported to them, or that they observe or otherwise become aware of. Failure to do so is a violation of FHI 360's Policy and could lead to disciplinary action, up to and including immediate separation of employment.

**Anonymous reports** are generally more difficult to investigate due to limited information. FHI 360 Personnel, Suppliers, and Supplier Personnel are urged to provide as much detailed information as possible about the conduct, including, if possible, identifying people who were involved or who witnessed the conduct, so long as this will not put the persons identified at risk of immediate harm.

**FHI 360 Personnel, Suppliers, and Supplier Personnel should refer survivors of TIP** to local medical, psychosocial, and legal services, where available, and seek country-specific anti-trafficking organizations by consulting <https://globalmodernslavery.org>. Additional referral options include:

- The Global Human Trafficking Hotline at +1-844-888-3733 or [help@befree.org](mailto:help@befree.org)
- (Inside U.S.) The National Human Trafficking Hotline: 1-888-373-7888 or text HELP to 233733 (BEFREE)

**OCIA will investigate all reports** of prohibited trafficking-related activity or violations of FHI 360's CTIP policy, take appropriate action, and make any required notifications to government agencies.

**FHI 360 strictly prohibits retaliation** against FHI 360, Suppliers, Supplier Personnel, or program participants who report prohibited trafficking-related activity or other violations of FHI 360's CTIP Policy, or who cooperate with any internal or government investigations of such reports.

- FHI 360 Personnel can refer to FHI 360's Open Door and Non-Retaliation POL 03004 for additional information. Retaliation occurs when someone penalizes or threatens to penalize another person for reporting or expressing an intent to report what they believe in good faith to be TIP or any other violation of this policy, assisting others in reporting TIP or policy violations, or participating in investigations under this policy.
- No Program Participant or community member will be denied participation in a program or access to aid for reporting suspected or known trafficking-related activity or participating in a TIP investigation.
- Suspected retaliation should be promptly reported via one of the reporting mechanisms above.
- FHI 360 Personnel who engage in retaliation will be subject to disciplinary action up to and including separation of employment or other relationship with FHI 360.

## 2.6 Posting

FHI 360 posts this Universal Plan on its Electronic Document Management System (EDMS), FHI 360 Connect site, and on its external website, [www.fhi360.org](http://www.fhi360.org). Hard copies of the Universal Plan will be posted at all FHI 360 offices. Projects that tailor the Universal Plan to include supplemental measures, will post their project-specific compliance plans at all project workplaces and sites, except where the project's work is not being performed at a fixed location.

## 3. Supplier Compliance

### 3.1 FHI 360 requires ALL contractors, consultants, vendors, subcontractors, and subrecipients ("Suppliers"), and their employees, consultants, interns, volunteers, and agents ("Supplier Personnel") to:

- Refrain from engaging in prohibited trafficking or trafficking-related activity, or other conduct that violates FHI 360's Policy
- Take steps to prevent trafficking or trafficking-related activity by Supplier Personnel
- Promptly report suspected or known trafficking or trafficking-related activity either orally or in writing, ideally within 24 hours or as soon as possible under the circumstances, to the FHI 360 Office of Compliance and Internal Audit (OCIA) by one of the following means:
  - FHI 360 OCIA via email at [Compliance@fhi360.org](mailto:Compliance@fhi360.org)
  - FHI 360 OCIA's Ethics and Compliance Hotline:
    - 1-800-461-9330 in the U.S.;
    - +1-720-514-4400 outside the U.S.;
    - Skype: +1-800-461-9300; or
    - Country-specific hotline numbers listed on FHI 360's reporting website (see next bullet)
  - FHI 360 OCIA's reporting website either with your name or anonymously (<http://www.fhi360.org/anonreportregistry>)
- Cooperate fully with all investigations of trafficking violations and provide truthful information to investigators.

### 3.2 FHI 360 will include appropriate language reflecting the applicable requirements in Supplier contracts, subcontracts, subawards, and purchase orders, as well as the consequences for failure to comply with the above requirements, including termination of contract, subcontract, subaward, or other partnership with FHI 360.

### 3.3 If any Supplier fails to comply with applicable requirements, FHI 360 will take appropriate action to remediate the violation and prevent future violations, including, but not limited to:

- Requiring the Supplier to remove an employee or agent from a project
- Requiring the Supplier to terminate its relationship with any Supplier contractor, consultant, supplier, subcontractor or subrecipient
- Suspending payments to Supplier until violation is remedied
- Immediately terminating the Supplier contract, subcontract, or award

### 3.4 Additional requirements for certain Suppliers:

**3.4.1 Written Compliance Plans:** Where funder requirements apply, FHI 360's Suppliers must maintain their own written anti-trafficking compliance plans. which at a minimum must incorporate the requirements included in FHI 360's Universal Plan. Projects that are larger, more complex, or involve a greater risk of trafficking activity may need to implement additional measures ("Supplemental Plan") in addition to those set out in this Universal Plan to ensure that their anti-trafficking compliance plans are appropriate to the size and

complexity of the project, and the nature and scope of the activities to be performed. FHI 360 project leader should coordinate with the project's contract point of contact to determine if Suppliers are required by the funder to have their own written compliance plan in place. Suppliers who are required to have their own written compliance plan in place may use FHI 360's Universal Plan as a template to develop their own written compliance plan.

**PROJECTS ONLY: CHOOSE ONE STATEMENT BELOW THAT APPLIES:**

- ☐ SUPPLIERS ARE NOT REQUIRED BY FUNDER TO HAVE THEIR OWN WRITTEN PLAN IN PLACE.
- ☐ SUPPLIERS ARE REQUIRED BY FUNDER TO HAVE THEIR OWN WRITTEN PLAN IN PLACE THAT INCLUDES, AT A MINIMUM, THE REQUIREMENTS OUTLINED IN FHI 360'S UNIVERSAL PLAN (THIS PLAN).

**3.4.2 Supplier Certifications:** Where funder requirements apply, Suppliers that are required to have their own written compliance plan in place must submit pre-award and annual Certifications to the person at the FHI 360 project office who is responsible for maintaining FHI 360's project-level Compliance Plan (see page one). The Certifications must indicate that:

- The Supplier has implemented a compliance plan and has complied with its plan; and
- After conducting due diligence, to the best of the Supplier's knowledge and belief, neither it nor any of its employees, contractors, consultants, subcontractors, and other agents have engaged in any prohibited trafficking-related activities, and if any trafficking-related activities have been suspected, observed, or confirmed, the Supplier has taken appropriate remedial and referral actions.

**PROJECTS ONLY: CHOOSE ONE STATEMENT BELOW THAT APPLIES:**

- ☐ SUPPLIERS ARE NOT REQUIRED BY FUNDER TO SUBMIT CERTIFICATIONS TO FHI 360.
  - ☐ SUPPLIERS ARE REQUIRED BY FUNDER TO SUBMIT CERTIFICATIONS TO FHI 360.
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## 4. Supplemental Plan for High-Risk Projects

**INSTRUCTIONS TO PROJECTS:**

- *Section 4 can be deleted for country office Compliance Plans or if the project is not considered high-risk (see risk criteria in Section 1).*
- *If the project is considered high-risk, list supplemental measures to increase protections for program participants. Seek support from FHI 360's Senior Technical Advisor for Safeguarding to explore supplemental measures.*

**The following supplemental measures will be implemented in addition to the measures previously listed in this compliance plan to further mitigate risk of trafficking in persons:**