

**WEConnect International Policy on
Trafficking in Persons and Child Protection**
Updated December 16, 2020

1. PURPOSE OF TRAFFICKING IN PERSONS AND CHILD PROTECTION POLICY

The policy set forth in this document strictly prohibits Board members, all employees, suppliers, contractors, sub-contractors/awardees, at any tier, or their employees, labor recruiters, brokers and other agents from engaging in human trafficking-related activities and adhering to child protection. Trafficking in Persons activities include engaging in sex trafficking, procuring commercial sex acts (even if this practice is legal in the jurisdiction where it transpires), using force, fraud, or coercion to subject a person to involuntary servitude, or obtaining labor from a person by threats of serious harm to that person or another person, among others.

2. DEFINITIONS

- a. 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.
- b. 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.
- c. Commercial sex act: Any sex act on account of which anything of value is given to or received by any person.
- d. 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.
- e. Child is defined as any individual under the age of 18.
- f. Child abuse, exploitation, or neglect: Constitutes any form of physical abuse; emotional ill-treatment; sexual abuse; neglect or insufficient supervision; trafficking; or commercial, transactional, labor, or other exploitation resulting in actual or potential harm to the child's health, well-being, survival,

development, or dignity. It includes, but is not limited to: any act or failure to act which results in death, serious physical or emotional harm to a child, or an act or failure to act which presents an imminent risk of serious harm to a child.

- g. Physical abuse: Constitutes acts or failures to act resulting in injury (not necessarily visible), unnecessary or unjustified pain or suffering without causing injury, harm or risk of harm to a child's health or welfare, or death. Such acts may include, but are not limited to: punching, beating, kicking, biting, shaking, throwing, stabbing, choking, or hitting (regardless of object used), or burning. These acts are considered abuse regardless of whether they were intended to hurt the child.
- h. Emotional abuse or ill treatment: Constitutes injury to the psychological capacity or emotional stability of the child caused by acts, threats of acts, or coercive tactics. Emotional abuse may include, but is not limited to: humiliation, control, isolation, withholding of information, or any other deliberate activity that makes the child feel diminished or embarrassed.
- i. Exploitation: Constitutes the abuse of a child where some form of remuneration is involved or whereby the perpetrators benefit in some manner. Exploitation represents a form of coercion and violence that is detrimental to the child's physical or mental health, development, education, or well-being.
- j. Neglect: Constitutes failure to provide for a child's basic needs within WEConnect International funded activities that are responsible for the care of a child in the absence of the child's parent or guardian.
- k. For purposes of this policy, "employee" means an individual who is a direct employee, consultant, or volunteer of the organization.

3. SCOPE

This policy applies to Board members, all employees, suppliers, recipients, subrecipients and contractors, at any tier, or their employees, labor recruiters, brokers and other agents.

4. RESPONSIBLE PARTIES FOR THE POLICY

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

5. GUIDELINES

Trafficking in Persons Policy

WEConnect International employees, sub-awardees, or contractors, at any tier, or their employees, labor recruiters, brokers or other agents, are prohibited from engaging in:

- a. Trafficking in persons (as defined in the US Government Protocol to Prevent, Suppress, and Punish Trafficking in Persons, especially Women and Children, supplementing the UN Convention against Transnational Organized Crime);
- b. Procurement of commercial sex acts;
- c. Use of forced labor;
- d. Acts that directly support or advance trafficking in persons, including the following acts:
 - i. Destroying, concealing, confiscating, or otherwise denying an employee access to that employee's identity or immigration documents;
 - ii. Failing to provide return transportation or pay for return transportation costs to an employee from a country outside the United States to the country from which the employee was recruited upon the end of employment if requested by the employee, unless:
 - a) exempted from the requirement to provide or pay for such return transportation by the organization providing the relevant funding; or
 - b) the employee is a victim of human trafficking seeking victim services or legal redress in the country of employment or a witness in a human trafficking enforcement action;
 - iii. Soliciting a person for the purpose of employment, or offering employment, by means of materially false or fraudulent pretenses, representations, or promises regarding that employment;
 - iv. Charging employees recruitment fees; or
 - v. Providing or arranging housing that fails to meet the host country housing and safety standards.

Child Protection Policy

WEConnect International employees, sub-awardees, or contractors, at any tier, or their employees, labor recruiters, brokers or other agents are required to adhere to the following Child Protection Policies:

- a) treat all children with respect

- b) not use language or behaviour towards children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate
- c) not engage children under the age of 18 in any form of sexual intercourse or sexual activity, including paying for sexual services
- d) wherever possible, ensure that another adult is present when working near children
- e) not invite unaccompanied children into private residences, unless they are at immediate risk of injury or in physical danger
- f) not sleep close to unsupervised children unless absolutely necessary, in which case the supervisor's permission must be obtained, and ensuring that another adult is present if possible (noting that this does not apply to an individual's own children)
- g) never use any computers, mobile phones, video cameras, cameras or social media to exploit or harass children, or access child exploitation material through any medium
- h) not use physical punishment on children
- i) not hire children for domestic or other labour: which is inappropriate given their age or developmental stage; which interferes with their time available for education and recreational activities; or which places them at significant risk of injury
- j) comply with all relevant local legislation, including labor laws in relation to child labor
- k) immediately report concerns or allegations of child exploitation and abuse and policy noncompliance in accordance with appropriate procedures
- l) immediately disclose all charges, convictions and other outcomes of an offence that relates to child exploitation and abuse, including those under traditional law, which occurred before or occurs during association with WEConnect International
- m) be aware of behaviour and avoid actions or behaviours that could be perceived by others as child exploitation and abuse
- n) These behaviors are not intended to interfere with normal family interactions.
- o) When photographing or filming a child or using children's images for work-related purposes:
- p) take care to ensure local traditions or restrictions for reproducing personal images are adhered to before photographing or filming a child

- q) obtain informed consent from the child and parent or guardian of the child before photographing or filming a child. An explanation of how the photograph or film will be used must be provided.
- r) ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive.
- s) ensure images are honest representations of the context and the facts.
- t) ensure file labels, meta data or text descriptions do not reveal identifying information about a child when sending images electronically or publishing images in any form
- u) Ensure compliance with host country and local child welfare and protection legislation or international standards, whichever gives greater protection, and with U.S. law where applicable;
- v) Prohibit all personnel from engaging in child abuse, exploitation, or neglect;
- w) Consider child safeguarding in project planning and implementation to determine potential risks to children that are associated with project activities and operations;
- x) Apply measures to reduce the risk of child abuse, exploitation, or neglect, including, but not limited to, limiting unsupervised interactions with children; prohibiting exposure to pornography; and complying with applicable laws, regulations, or customs regarding the photographing, filming, or other image-generating activities of children;
- y) Promote child-safe screening procedures for personnel, particularly personnel whose work brings them in direct contact with children; and
- z) Have a procedure for ensuring that personnel and others recognize child abuse, exploitation, or neglect; mandating that personnel and others report allegations; investigating and managing allegations; and taking appropriate action in response to such allegations, including, but not limited to, dismissal of personnel.

6. COMPLIANCE PLAN

WEConnect International maintains a compliance plan to ensure compliance with the principles and objectives of this Policy. The contents of the compliance plan include:

- a. An awareness program for employees;
- b. Any reporting will be done without fear of retaliation to the CEO. Employees aware of potential human trafficking violations may, in addition, contact the

U.S. State Department's Global Human Trafficking Hotline directly at 1-844-888-FREE or help@befree.org;

- c. A recruitment and wage process that ensures that wages meet host country legal requirements;
- d. Ensuring that any housing provided meets host-country housing and safety standards;
- e. Suppliers, regardless of tier level, who receive Federal Grant Funds, are required to certify their compliance with this policy and procedures;
- f. Notification to all relevant Federal agencies responsible for audits, investigations, or corrective actions relating to trafficking in persons upon the receipt of any information that violates this policy; and
- g. Violation of this Policy to result in disciplinary action, up to, and including, removal from a contract, reduction in benefits, termination of a business relationship, or termination of employment.

7. EXCEPTIONS

None