



## FHI 360 Universal Safeguarding and Anti-Trafficking Compliance Plan

Country Office:

Person Responsible for Maintaining this Compliance Plan:

For Project-Level Plans:

Project Name:

Project #:

Project start/end dates:

Chief of Party/Project Leader:

### 1. Purpose and Scope

FHI 360's safeguarding policies align with international standards and U.S. and U.K. government requirements that aim to prevent trafficking in persons and protect program participants from exploitation, sexual abuse, and child abuse and neglect, especially among vulnerable populations. Relevant standards include but not limited to:

- The United Nations Protocol to Prevent, Suppress, and Punish Trafficking in Persons, Especially Women and Children ("The Palermo Protocol") (November 2000);
- [The United Nations Interagency Standing Committee \(IASC\) Six Core Principles Relating to Sexual Exploitation and Abuse, 2019](#);
- The U.K. Modern Slavery Act 2015 (March 2015);
- The Foreign, Commonwealth & Development Office (FCDO) Safeguarding against Sexual Exploitation and Abuse and Sexual Harassment (SEAH) Due Diligence Guidance for FCDO implementing partners (January 2022) and Child Safeguarding Due Diligence for external partners (November 2022); and
- The U.S. government's laws, regulations, and policies, including but not limited to: (1) FAR Subpart 22.17 and § 52.222-50 (for all U.S. Government contracts) and (2) USAID's Standard Provisions 303maa M20 ("Anti-Trafficking Provision") and 303maa M27 ("Safeguarding Provision") (for all USAID grants and cooperative agreements).

**Relevant FHI 360 safeguarding policies include:**

- Protecting Program Participants from Sexual Exploitation and Abuse
- Safeguarding of Children
- Combating Trafficking in Persons

**All FHI 360 Personnel, Suppliers, and Supplier Personnel are required to adhere to FHI 360's safeguarding policies, including not engaging in prohibited conduct and the requirement to report observed, suspected, or known allegations of trafficking-related activity, exploitation, sexual abuse, child abuse, and neglect, or other harm that occurs as a result of an individual's engagement with our organization or programs. Our safeguarding policies apply to employees, Board members, volunteers, fellows, interns, consultants, vendors, contractors, subcontractors, subrecipients, and others working on behalf of FHI 360.**

**To ensure due diligence and uniform application of FHI 360's safeguarding policies, funder requirements, and international standards, FHI 360 developed this Universal Safeguarding and Anti-Trafficking Compliance Plan ("Universal Plan"), which highlights the policies, standards, and**



procedures that FHI 360 has in place to prevent, detect, address, and respond to allegations of exploitation, sexual abuse, child abuse and neglect, and trafficking in persons. All FHI 360 country offices and projects must implement the requirements included in this Universal Plan, regardless of the funding mechanism or award amount.

## 2. High-Risk Projects

Safeguarding and 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 trafficking and safeguarding-related risks that the contract or award will involve based on populations served, services provided, and the context where activities will be implemented.

Therefore, projects that are larger, more complex, or involve a greater risk of exploitation, sexual abuse, child abuse and neglect, or trafficking in persons may need to implement measures in addition to those set out in this Universal Plan to ensure that their 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 6 of this plan (if applicable).

### **PROJECTS ONLY:**

- ☐ FHI 360's [Vulnerability Profile Tool](#) is completed for [INSERT NAME OF PROJECT]. (Check the box to acknowledge the tool is completed.)

### **PROJECTS ONLY: CHOOSE ONE STATEMENT BASED ON THE VULNERABILITY PROFILE TOOL RATING:**

- ☐ [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 6: "SUPPLEMENTAL PLAN."

## 3. Prohibited Conduct

In line with the [IASC Six Core Principles](#) and the U.S. and U.K. regulations regarding safeguarding and trafficking in persons, FHI 360 Personnel are obligated to create and maintain an environment which prevents trafficking, exploitation, sexual abuse, and child abuse and neglect and promotes the implementation of FHI 360's Code of Ethics and Conduct. FHI 360 personnel at all levels are responsible for supporting and developing systems which maintain this environment. Harm towards program participants by humanitarian and development workers constitute acts of serious misconduct and are therefore grounds for termination of employment and potential referral to law enforcement authorities. FHI 360 will take preventive measures, investigate complaints, and take appropriate action to stop any harm that may occur against any program participant and will do so in a manner that is sensitive to the unique needs of children and adolescents.

**3.1 Prohibited conduct outlined in FHI 360's safeguarding policies:** FHI 360 Personnel, Supplier Personnel, and others working on behalf of FHI 360 are prohibited from engaging in trafficking in persons and the exploitation, sexual abuse, child abuse or neglect, or other abuse of program participants as outlined in FHI 360's safeguarding policies, including but not limited to:

- Engaging in sexual activity with children (persons under the age of 18), even if they are not program participants, regardless of the age of majority or age of consent locally. Mistaken belief in the age of a child is not a defense.



- Exchanging money, employment, goods, or services for sex acts, including sexual favors or any form of humiliating, degrading, abusive, or exploitative behavior with Program Participants. This includes any exchange of assistance that is due to a program participant.
- Engaging in any sexual activity between personnel and program participants, regardless of consent by the program participants, since these interactions are subject to inherently unequal power dynamics. Such interactions undermine the credibility and integrity of humanitarian and development aid work.
- Physical or sexual assault, including oral sex or attempted or completed rape defined as penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person without the consent of the victim.
- Taking photographs of program participants that are sexual in nature.
- Showing pornographic material to or asking program participants to engage in conduct of a sexual nature via electronic or mobile interactions (e.g., texting, email, video chat).
- Offering preferential treatment or promises of preferential treatment, employment, services, or goods to a program participant for submitting to sexual conduct, including soliciting, or attempting to solicit any program participant to engage in sexual activity for compensation or reward, or promise of a relationship or marriage.
- Making threats or demands that a person submit to sexual requests as a condition of continued program participation or to avoid loss of program-related benefits.
- Engaging in any form of child abuse and exploitation; emotional abuse or ill treatment; neglect; physical abuse; or sexual abuse of children served by FHI 360 programs or whom FHI 360 Personnel encounter in the implementation of those programs, including research.
- Engaging in, facilitating, or participating in activities or ceremonies that involve female genital mutilation/cutting of any girl under 18 years of age, child marriage or informal unions, or child trafficking, regardless of local laws or customs or whether the individual under 18 years of age is a program participant or not.
- Failing to comply with local labor laws pertaining to employment and child labor, including engaging individuals under 18 years of age for domestic help in their place of work or home. In all cases, FHI 360 Personnel are prohibited from engaging children in work that deprives them of their childhood, their potential, and their dignity, and/or is harmful to their physical and/or mental development, including work that:
  - is mentally, physically, socially, or morally dangerous and harmful to children; and/or
  - interferes with their schooling by depriving them of the opportunity to attend school when there are means to do so, obliging them to leave school prematurely, or requiring them to attempt to combine school attendance with excessively long and heavy work.
- 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.
- Using misleading or fraudulent recruitment practices, such as failing to disclose in a format or language accessible to FHI 360 Personnel or Supplier personnel or materially misrepresenting key terms and conditions of employment, such as wages and benefits, work location, living

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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.



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 Personnel 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.
- Retaliating against FHI 360 personnel, supplier personnel, or program participants who report prohibited trafficking-related activity or other violations of FHI 360's safeguarding policies, or who cooperate with any internal or government investigations of such reports.

**3.2 Consequences for engaging in prohibited conduct:** FHI 360 Personnel 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 or known exploitation, sexual abuse, child abuse or neglect, or trafficking-related activity, fail to forward a report of suspected or known harm, or otherwise violate FHI 360's safeguarding policies 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 violate our safeguarding policies, including referral to the relevant authorities for appropriate action, including criminal prosecution, in all relevant jurisdictions.

## **4. Preventing Harm, Mitigating Risks, and Responding to Reports of Harm**

### **4.1 FHI 360 has dedicated staff and governance structure to support our safeguarding efforts:**

- Safeguarding and Program Support Department, including a Director, Technical Officer, and Regional Safeguarding Advisors who support project-level Safeguarding Focal Points globally.
- Investigators who respond to all allegations of misconduct that violate our safeguarding policies.
- Safeguarding Committee that includes Executive Team members who provide ultimate oversight and leadership around FHI 360's prevention, risk mitigation, and response strategies related to safeguarding.
- Office of Compliance and Internal Audit manages a risk register that is regularly reviewed, updated, and shared with the Board of Directors.

### **4.2 FHI 360's Framework and Minimum Standards for Safeguarding Program Participants**

FHI 360's [minimum standards](#) help us operationalize our policies, international standards, and funder requirements, and when effectively and fully implemented, these efforts aim to prevent harm, mitigate risk of harm, and help us respond effectively if harm does occur. The standards, which are required actions for FHI 360-funded projects that involve interaction with program



participants either directly by FHI 360 or through implementing partners and other suppliers, are organized under the eight domains below and align with our policies, funder requirements, and international standards:

1. Risk assessment and action planning
2. Safe recruitment and hiring
3. Safeguarding focal points
4. Safeguarding/PSEA networks
5. Supplier agreements and monitoring
6. Training and capacity strengthening
7. Reporting mechanisms and responding to complaints
8. Awareness-raising among program participants and staff

**Projects that involve in-person or virtual interaction with children:** FHI 360's Risk Assessment and Action Planning (RAAP) Tool, which is required for all projects that interact with program participants, includes a comprehensive set of risk factors and illustrative mitigation strategies, including those related to working with children and other populations that are at higher risk of exploitation, sexual abuse, child abuse and neglect, and trafficking. Projects that involve interaction with children need to refer to FHI 360's Child Safeguarding Procedures and include child-specific risk mitigation strategies in the project's RAAP Tool. Such measures include, but are not limited to, limiting unsupervised interactions with children; implementing safety protocols during virtual/online engagement with children; obtaining written consent from children's parents or guardians for participation in any program or activity and for taking and using photos, stories, or other media content featuring children; and complying with applicable laws, regulations, or customs regarding photographing or filming children.

#### **4.3 Recruitment, Wage, and Housing Requirements and Procedures**

- FHI 360 will not use any misleading or fraudulent 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 will not charge 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 will not destroy, conceal, confiscate, or otherwise deny any employee access to their 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.
- In situations where FHI 360 provides or arranges housing for employees, the housing will at minimum meet host country housing and safety standards.

#### 4.4 Reporting Requirements and Procedures

Where FHI 360 Personnel develop concerns or suspicions related to harm against program participants committed by a fellow worker, including colleagues at other organizations, they must report these concerns via FHI 360's established reporting mechanisms. All FHI 360 Personnel who observe, suspect, or receive allegations of trafficking-related activity, any harm toward program participants, or any other conduct prohibited by FHI 360's safeguarding policies, 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 are included in Section 5)

- FHI 360 immediate supervisor, or, if the conduct involves the immediate supervisor, any other supervisor within their department
- FHI 360 local People and Culture (HR) representative or regional or departmental HR Partner
- FHI 360 Director of HR Partnering or Chief People Officer ([see FHI 360 HR Connect site for contact information](#))
- FHI 360 Office of Compliance and Internal Audit (OCIA) via one of the following options:
  - Email: [Compliance@fhi360.org](mailto:Compliance@fhi360.org)
  - Website (anonymously or with your name) (<http://www.fhi360.org/anonreportregistry>)
  - Confidential Ethics and Compliance Phone Line: +1 833 745 8886 (local airtime charges may apply)

**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 People Officer) of any actual or suspected trafficking in persons or other violation of FHI 360's safeguarding policies 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 policies and could lead to disciplinary action, up to and including immediate separation of employment.

**FHI 360 prioritizes the dignity, rights, and safety of individuals who may have experienced harm.**

This includes ensuring that victims have access to information and resources, including referrals to medical treatment, legal assistance, and psychosocial support according to the individual's wants and needs. Our country teams are tasked with understanding local resources, including country-specific anti-trafficking organizations by consulting <https://globalmodernslavery.org>. Additional





referral options include: (The referral options below do not replace the requirement to report through FHI 360's reporting mechanisms; rather, they are additional options for support.)

- 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 conduct, including trafficking-related activity or other violations of FHI 360's safeguarding policies, take appropriate action, and notify any government agencies, as required.

#### 4.5 Raising Awareness about our Safeguarding Policies

FHI 360's takes steps to ensure FHI 360 Personnel, Supplier Personnel, and program participants are aware of our policies and how to utilize reporting mechanisms to report suspected or known harm:

- [Our safeguarding policies](#) are posted on FHI 360's internal Connect site and FHI 360's external website, where they can be accessed by all FHI 360 Personnel and Suppliers.
- Our safeguarding policies are also reflected in FHI 360's Code of Ethics and Conduct ("Code"), which is posted on our Connect site and can be accessed by all FHI 360 personnel.
- Our safeguarding policies 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 and are translated to local languages as needed.
- Upon hire, all employees are required to complete online training modules on the Code and Safeguarding, including anti-trafficking requirements.
- 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.
- The safeguarding e-module is also available to Suppliers on [academy.fhi360.org](https://academy.fhi360.org).
- FHI 360 Safeguarding Focal Points provide in-depth safeguarding training to FHI 360 personnel and implementing partners, including refresher trainings as needed.
- 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 email a copy of the tailored plan to all project personnel and post their project-specific compliance plans at all FHI 360 project workplaces and sites, except where the project's work is not being performed at a fixed location.
- Projects are required to implement awareness-raising activities to ensure program participants understand how to report suspected or known harm.

### 5. Supplier Compliance

#### 5.1 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 safeguarding policies.
- Take steps to prevent trafficking, trafficking-related activity, exploitation, sexual abuse, and child abuse and neglect by Supplier Personnel.
- Promptly report suspected or known trafficking, trafficking-related activity, or other conduct that violates FHI 360's safeguarding policies 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:

- Email: [Compliance@fhi360.org](mailto:Compliance@fhi360.org)
- Website (anonymously or with your name):  
(<http://www.fhi360.org/anonreportregistry>)
- Confidential Ethics and Compliance Phone Line: +1 833 745 8886 (local airtime charges may apply)
- Cooperate fully with all investigations of trafficking and other safeguarding-related violations and provide truthful information to investigators.

**5.2 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.

**5.3 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

**5.4 Additional requirements for certain Suppliers:**

**5.4.1 Written Compliance Plans:** Where funder requirements apply, FHI 360's Suppliers must maintain their own safeguarding and 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, exploitation, sexual abuse, or child abuse or neglect may need to implement additional measures ("Supplemental Plan") in addition to those set out in this Universal Plan to ensure that their 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 safeguarding and anti-trafficking 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.
- ☐ SOME OR ALL 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).

**5.4.2 Supplier Certifications:** Where funder requirements apply, Suppliers 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 Universal 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 or other conduct prohibited under FHI 360's safeguarding policies, and if any trafficking-related activities or other prohibited conduct 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.
  - ☐ SOME OR ALL SUPPLIERS ARE REQUIRED BY FUNDER TO SUBMIT CERTIFICATIONS TO FHI 360.
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## 6. Supplemental Plan for High-Risk Projects

### **INSTRUCTIONS TO PROJECTS:**

*Section 6 can be deleted for country office Compliance Plans or if the project is not considered high-risk (see Section 2).*

*If the project is considered high-risk, list supplemental measures to increase protections for program participants. Review FHI 360's [how-to note](#) on Connect for more information about supplemental measures or seek support from FHI 360's [Safeguarding and Program Support department](#).*

**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, exploitation, sexual abuse, and child abuse and neglect as a result of a person's engagement with our organization or programs.**