



SeeD Anti-Trafficking Policy



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This policy document outlines SeeD's policy on Anti-Trafficking. It is based on the Legal framework of Anti trafficking FAR clause 52.222-50, based on compliance plan and certification required by all USAID service providers and partners with a budget higher than 550k. It is also applied for all contracts SeeD enters and all engagements, projects and partners.

Key Concepts – What is Trafficking?

This table outlines key concepts around anti-trafficking. There are various forms of trafficking.

Key concepts of FAR	Definition
Human trafficking	According to the Palermo protocol, the legal definition of human trafficking is a crime that includes three elements: The act of recruiting, transporting, transferring, harbouring or receiving a person; By means of e.g. coercion, deception or abuse of vulnerability; For the purpose of exploitation, such as sexual exploitation, slavery and forced labour, among others.
Coercion	Threats of harm or physical restraint; any plan or pattern intended to cause a person to believe that failure to perform an act would result in serious harm or physical restraint; or abuse or threat of abuse of the legal process
Commercial sex act	Any sex act where a value is given or received
Debt bondage	Condition of a debtor where the services are not reasonably assessed or applied toward the debt or the length and duration of services are not limited or defined
Forced labour	Obtaining labour or services by threats of serious harm, physical restraints, by threat of harm, by means of abuse or threatened abuse of law According to Article 2 of the Forced Labour Convention, forced labour is "all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily". Almost 25 million people around the world are trapped in forced labour
Involuntary servitude	Same as above



Sex trafficking	when a commercial sex act is induced by force, fraud or coercion or when the person is under 18, including recruitment, harbouring, transportation, for the purposes of subjection to involuntary servitude, peonage, debt bondage and slavery
Policy	USA adopted a policy prohibiting trafficking which includes contractors, contractor employees, their subcontractors, and agents.
Modern slavery	According to Article 2 of the Slavery Convention, 1926, modern slavery is the status or condition of a person over whom any or all of the powers attaching to the right of ownership are exercised. It refers to the situation of exploitation that a person cannot refuse or leave because of threats, violence, coercion, deception, and/or abuse of power. Due to problems of environmental degradation, migration and shifting demographics, modern slavery is expected to grow (Special Rapporteur on contemporary forms of slavery, 9 September 2019)

Key Prohibitions

As part of SeeD anti-trafficking policy, employees, contractors, and subcontractors are required to do the following:

- shall not engage in trafficking;
- shall not procure commercial sex acts;
- shall not use forced labour;
- shall not destroy, conceal, confiscate or deny access to identity or immigration documents;
- shall not use misleading or fraudulent recruitment practices regarding terms and conditions, benefits and wages, location and living conditions, hazards, costs and charges to the employee;
- shall not use recruiters that do not comply with local labour laws;
- shall not charge employees recruitment fees;
- shall provide employees with return transportation or pay for it upon the end of employment unless legally permitted to remain, or seeking victim services, or legal redress;
- shall not provide housing that fails to meet housing and safety standards;
- shall not fail to provide a employment contract, recruitment agreement or other work document in writing in a language the employee understands;
- shall notify all employees and team members of the above and the actions taken against employees or agents for violations of this policy;



- SeeD will furthermore immediately terminate all relations and report to the relevant authorities;

In case any of the above prohibitions happens, then SeeD will take the following steps of action:

- If any of the above happens, by an employee, consultant or subcontractor, then the Contractor (SeeD) should notify the relevant stakeholders and partners, as well as the agency Inspector General immediately of the conduct and of the remedy;
- If the conduct or allegation affects more than one contract with the same partner, then the highest dollar value should be informed;
- Deploy one or more of the following remedies: remove the employee or employees, remove to contractor or subcontractor, suspend payments, decline to fulfil contract, terminate all relationship, suspend or debar;

Guidance Requirements

If, as part of the work done for a particular agreement or contract with a stakeholder, there arises a situation where trafficking is suspected, SeeD undertakes to do the following.

1. Disclose to relevant stakeholder or its designated agents, the contracting officer, and the USAID Inspector General, any information sufficient to identify the nature and extent of an offense and the individuals responsible for the conduct;
2. Provide timely and complete responses to relevant stakeholder, their designated agents', or Government auditors' and investigators' requests for documents;
3. Cooperate fully in providing reasonable access to the subcontractor's facilities and staff (both inside and outside the US) to allow contracting agencies and other responsible Federal agencies to conduct audits, investigations, or other actions to ascertain compliance with the Trafficking Victims Protection Act (22 U.S.C. chapter 78), Executive Order 13627, or any other applicable law or regulation establishing restrictions on trafficking in persons, the procurement of commercial sex acts, or the use of forced labour;
4. Protect all employees suspected of being victims of or witness to prohibited activities, prior to returning to the country from which the employee was recruited, and shall not prevent or hinder the ability of these employees from cooperating fully with Government authorities;
5. Provide suitable remedies, including termination, on its staff or any 2nd tier subcontractor(s) that fail to comply with the requirements of the FAR clause.

Who is responsible for these points? Responsibility for points 1,2,3 lie with the Head of Operations and relevant team lead responsible for the project or agreement where trafficking is suspected. Responsibility for points 4 and 5 lies with the Leadership Coordination Team (LCT).



Key Components of SeeD's Anti-Trafficking Policy

Components of SeeD's Anti-Trafficking Policy	SeeD focal points
a. Awareness program to inform employees described above, including Anti-trafficking material in global team meetings on a regular basis, and as part of the onboarding process of new recruits.	Head of Operations & relevant Supervisor
b. A process of employees to report, including the global human trafficking hotline and its email address. Contact and whistle-blowing details are available on the SeeD website and regularly reviewed.	Operations Unit/Head of Operations
c. A recruitment and wage plan that only uses vetted recruitment companies and agents, doesn't charge fees to candidates and employees, and complies with local labour laws	Operations Unit/Head of Operations & Supervisors running the recruitment
d. Implement a protected housing plan, in cases where housing is provided as part of the employment	Operations Unit/Head of Operations
e. Procedures to prevent agents and subcontractors from trafficking persons and to monitor, detect and terminate those who do so	Operations Unit/Head of Operations & Supervisors entering into subcontract agreements
f. Dissemination of this policy and plan at the workplace and on the website	Operations Unit/Head of Operations

Reporting Trafficking

If any SeeD employee, consultant, subcontractor, partner or other person wishes to report suspected trafficking, forced labour, exploitation or related misconduct connected to SeeD's work, they may do so confidentially and without fear of retaliation through SeeD's reporting channel:

a. **SeeD integrity reporting email:** integrity@seedsofpeace.eu

Where appropriate, reports may also be made to relevant national authorities or specialist anti-trafficking hotlines, including:



b. **National Human Trafficking Hotline:** 1-888-373-7888

c. **TTY:** 711

d. **Text:** 233733

e. **Email:** help@humantraffickinghotline.org

If you prefer to talk to us via phone or face to face, please drop us a line at integrity@seedsofpeace.eu , indicate the preferred medium and language of communication, and we will get back to you.