



# Razumkov centre

## Razumkov Centre Anti-Human Trafficking Compliance Plan

### **Purpose**

In accordance with Razumkov Centre's Human Trafficking and Worker Exploitation Policy, Razumkov Centre prohibits and prevents any form of human trafficking or exploitation of employees in the activities of the Centre, its members, staff and contractors.

Razumkov Centre is committed to protecting workers and responding promptly and appropriately to any allegations of trafficking incidents. This plan establishes Razumkov Centre's procedures for preventing human trafficking through awareness, reporting, recruitment and wage plans, housing plans, subaward compliance, and investigations.

### **Awareness Efforts**

Razumkov Centre's resources related to combatting human trafficking and worker exploitation are available to our workers at any time.

Razumkov Centre's Human Trafficking and Worker Exploitation Policy and the Compliance Plan are sent to each member of the Centre's staff via work e-mail. The Policy and this Plan are also posted on the Razumkov Centre's website and can be found [here](#)

### **Reporting Process**

All Razumkov Centre's workers must report any suspicions or allegations of human trafficking or non-compliance with the Human Trafficking and Worker Exploitation Policy that they become aware of in the course of their employment.

The person responsible for collecting relevant information, reporting and taking measures to prevent exploitation is the Director General of the Centre.

Employees are guaranteed the right to report anonymously on issues related to the prevention of human trafficking and labor exploitation and are guaranteed that there will be no negative consequences for such reporting. Reports may also be made through Hotline for Counteraction to Human Trafficking and Domestic Violence via telephone 15-47. It is also possible to send a message via the 15-47 website: <https://1547.ukc.gov.ua/>

If Razumkov Centre's employees report incidents to these outside sources, they should also report them to the Razumkov Center's Director General so that appropriate action can be taken to address the incident for the organization.

In case the Razumkov Centre implements projects funded by donors or receives institutional support from donors, any violations of the Human Trafficking and Worker Exploitation Policy identified during the implementation of projects should be reported to the donors.

## **Implementation**

### Recruitment and Wage Plan

In all hiring practices...

- Razumkov Centre abides by labor laws of Ukraine.
- Razumkov Centre's workers are prohibited from charging recruitment fees to any candidate as a condition of their prospective employment at Razumkov Centre.
- Razumkov Centre's workers should not solicit any candidate for purposes of employment using false or fraudulent pretenses, representations, or promises regarding that employment.
- Razumkov Centre's workers are prohibited from keeping, concealing, or destroying an employee's identity or immigration documents.

### *Housing Plan*

Razumkov Centre's workers must ensure that if transportation is offered to a staff member to work in an out-of-country work location, Razumkov Centre or a subrecipient will provide transportation back to their home country at the end of the employment period. A staff member who refuses to return home because they want to seek survivor services or legal redress in the host country is exempt from this requirement.

Razumkov Centre does not provide or arrange any housing for employees.

### *Assessing Risks at the Project Level*

The responsible person of the Razumkov Centre for the implementation of the Human Trafficking and Worker Exploitation Policy and the Compliance Plan is the Director General of the Centre.

The Director General monitors, controls, reports, collects information, informs law enforcement agencies, and organizes staff training on the prevention of human trafficking and labor exploitation in the activities of the Razumkov Centre.

Program Managers (Directors) of the Razumkov Centre are responsible for monitoring, identifying and mitigating specific risks of human trafficking in their programs. This includes (but is not limited to) analyzing, based on available information, the practices of Razumkov Centre's counterparties to ensure that they do not engage in any activities related to human trafficking.

If the Program Managers (Directors) believe that any party (counterparty) of the Razumkov Centre poses an increased risk, they shall report such risk and its content to the Director General of the Centre.

Subrecipients' failure to comply with the requirements of our policy or compliance plan could result in immediate termination of their subaward.

#### *Specific Obligations for USAID Projects*

Razumkov Centre keeps in mind that for USAID-funded awards there is a requirement for annual certification and ensures that this requirement is met. This requirement applies to USAID awards with performance outside of the United States and with an estimated value that exceeds \$500,000. The certification must be submitted to USAID or prime implementor and state that Razumkov Centre has implemented this compliance plan and are not engaged in any trafficking-related activities.

Likewise, USAID subrecipients and subcontractors with a subaward or subcontract value that exceeds \$500,000 are required to annually certify to Razumkov Centre that they have implemented a compliance plan and are not engaged in any trafficking-related activities.

#### **Questions**

Questions regarding this plan or the Human Trafficking and Worker Exploitation Policy should be addressed to Director General of the Razumkov Centre.