



Razumkov centre

Razumkov Centre's Human Trafficking and Worker Exploitation Policy

Purpose

The purpose of this policy is to ensure that at all Razumkov Centre program participants and workers are safe and not exposed to any threat or acts of human trafficking, and that Razumkov Centre does not work with other organizations, vendors or suppliers who may be involved in human trafficking.

Applicability

This policy applies to the members of the Razumkov Centre, members of the Razumkov Centre's governing bodies, Razumkov Centre's staff (employees), as well as individuals and organizations that provide services (perform work) for the Razumkov Centre under contractor agreements, civil law agreements, etc.

General Guidance

"Human trafficking," "worker exploitation," and "modern-day slavery" are terms used to describe situations where one person is exploited by another person for profit. The person or child may be forced to perform labor or engage in a commercial sex act. These are broad terms that cover many types of exploitation that use force, fraud, harassment, trickery or abuse of power.

Human trafficking involves three elements: 1) the perpetrator's actions to obtain or maintain labor; 2) using force, fraud, or coercion over the victim; and 3) for purpose of taking advantage of the victim.

The use of force, fraud, or coercion over a victim may include preventing a victim from controlling their own freedom, safety, personal documents, working and living conditions, and wages. If a worker does not have control over any of these areas, it is a potential sign of trafficking or exploitation.

Examples of forced labor can include situations where a worker is paid less than promised, does not receive pay, does not have access to their identification documents, or has no control over their money.

Prohibitive Behaviors

In addition to human trafficking as defined above, actions that directly support or advance trafficking are prohibited. Such actions include, but are not limited to:

- Procuring a commercial sex act
- Destroying, hiding, taking, or denying an employee access to their identity or immigration documents
- Offering employment under false pretenses
- Charging employees recruitment fees
- Providing wages and benefits that do not meet local legally required minimum standards
- Providing housing that does not meet local housing and safety standards
- Failing to provide transportation to an employee working outside of the country from which they were recruited upon the end of employment.

Mandatory Reporting

If required by the terms of cooperation with donor organizations, Razumkov Centre is required to report any violations of this policy to the funder or prime implementing partner.

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/>

Implementation

Training and Awareness

The Centre's staff must be familiarized with this policy and confirm such awareness with their own signature.

The Razumkov Centre's staff is provided with access to this policy, its text is sent to each member of the Centre's staff to his/her work e-mail, posted on the Razumkov Centre's website and available at the [link](#)

The Razumkov Centre annually conducts training for the Centre's members and staff to raise awareness of the prevention of human trafficking and exploitation of employees.

Human Resources

Razumkov Centre has an Anti-Trafficking Compliance Plan that outlines how Razumkov Centre operationalizes the requirements in this policy, providing specific instructions on the appropriate implementation of recruitment and wage plans and non-salary benefits so that Razumkov Centre does not engage in any acts that could be perceived as human trafficking.

Assessing Risks at the Project Level

Director General of the Razumkov Centre is responsible for monitoring trafficking risks. Director General is responsible for taking measures to monitor, identify and mitigate specific risks of human trafficking.

Razumkov Centre's Programme Managers (Directors) are responsible for monitoring, identifying and mitigating specific risks of human trafficking in their programmes related to the overall situation in the country and existing challenges identified in the course of programme activities.

This includes (but is not limited to) analysing, based on available information, the practices of the Razumkov Centre's counterparties to ensure that they are not involved in any activities related to human trafficking.

If the Programme Managers (Directors) believe that any party (counterparty) of the Razumkov Centre poses a high risk, they report such risk and its content to the Director General of the Centre.

In turn, the Razumkov Centre's Director General decides on informing and reporting in accordance with the above procedure, as well as on the advisability of establishing or maintaining business relations with such a counterparty.

Specific Obligations for USAID Projects

The Razumkov Centre is a grantee funded by USAID. In accordance with USAID requirements, the Razumkov Centre will annually certify to USAID or the prime recipient that it has implemented a compliance plan and is not engaged in any trafficking-related activities. The Razumkov Centre has designated the Director General of the Centre as the person responsible for submitting such certifications.

If Razumkov Centre issues subawards or subcontracts under USAID funding that exceed \$500,000, the subrecipients and subcontractors are required to annually certify to Razumkov Centre that they have implemented a compliance plan and are not engaged in any trafficking-related activities.

Enforcement

Violation of this policy constitutes an act of serious misconduct and is grounds for disciplinary action, including termination of employment and referral to law enforcement.

Whistleblowers who report alleged cases of human trafficking and employee exploitation are guaranteed anonymity and no negative consequences for such reports.

Any vendor/subrecipient or vendor/subrecipient personnel who engages in any prohibited activities, fails to report suspicious activities, or engages in retaliatory actions will be subject to action including termination of the business relationship, and reporting as appropriate.