



The International Center for Not-for-Profit Law

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Preventing Trafficking in Persons Compliance Plan: ICNL's Program on Strengthening the implementation of the NGO Law in Rwanda

Policy

ICNL is opposed to all forms of trafficking in persons and is committed to mitigating the risk of trafficking in persons in connection with its operations and programs. It is the policy of ICNL to comply fully with the provisions of our cooperative agreements regarding Trafficking in Persons.

Awareness Program

ICNL implements the Rwanda USAID project through employees assigned to the ICNL Washington office. All ICNL employees and consultants working on the Rwanda USAID project will be informed about the activities prohibited by the provisions of our cooperative agreements regarding Trafficking in Persons, the reporting system, and the actions that will be taken against the employee or consultant for violations. ICNL will share the Global Human Trafficking Hotline (1-844-888-FREE) and the e-mail address help@befree.org with all employees and consultants.

Reporting mechanism

Issues related to trafficking in persons will be reported using the procedures outlined in ICNL's Whistleblower Policies. Upon receipt of credible information regarding the commission of a prohibited activity relating to trafficking in persons, ICNL will notify the USAID Agreement Officer and the USAID Office of the Inspector General, and will fully cooperate with any Federal agencies responsible for audits, investigations, or corrective actions relating to trafficking in persons.

Recruitment and wage plan

ICNL does not employ any persons in Rwanda. ICNL does not work with recruitment companies or charge recruitment fees.

Housing Plan

In the Rwanda USAID program, housing is not arranged or provided for ICNL staff or consultants.

Subawardees

ICNL has one subawardee in the Rwanda USAID project: Conseil de Concertation des Organisations d'Appui aux Initiatives de Base (CCOAIB). A provision prohibiting Trafficking in Persons, and a provision authorizing ICNL to terminate the subaward in the event of a violation of the provisions have been included in the subaward agreement. ICNL will prepare a training session for CCOAIB focusing on the activities prohibited by the provisions of our cooperative agreements regarding Trafficking in Persons, the reporting system, and the actions that will be taken against the CCOAIB for violations.

Monitoring

ICNL monitoring of adherence to this compliance plan will take place during visits from ICNL staff to Rwanda project sites.

Remediation

Where misconduct is uncovered through individual reporting, an internal investigation, third party audit, or otherwise, the misconduct is remedied through corrective action.