

Preventing Trafficking in Persons Compliance Plan: Uganda Civil Society Strengthening Activity (CSSA)

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 Uganda Civil Society Strengthening Activity (Uganda/CSSA) program through employees assigned to the ICNL Washington office and may engage consultants. All ICNL employees and consultants working on the Uganda/CSSA program will be informed about the activities prohibited by the provisions of our subaward agreement 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 East-West Management Institute, which is responsible for notifying 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 may contract with consultants under the Uganda/CSSA program. ICNL is not working with recruitment companies, and ICNL does not charge any recruitment fees. ICNL ensures that all wages meet host country legal requirements.

HOUSING PLAN

In the Uganda/CSSA program, housing is not arranged or provided for ICNL staff or consultants.

SUBAWARDEES

ICNL does not have subawardees under the Uganda/CSSA program.

MONITORING

ICNL monitoring of adherence to this compliance plan will take place through remote monitoring by ICNL Legal Advisors and in some cases during visits from ICNL staff to project sites.

REMEDICATION

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