



ADRA Network Policies and Procedures

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ADRA Anti-Trafficking in Persons Policy		
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ADRA Denmark's Anti-Trafficking in Persons Policy

Introduction

ADRA strongly condemns trafficking in human beings - children, women, and men – and this Policy prohibits all individuals with whom, and entities with which, ADRA works from engaging in any form of trafficking in human beings. People trafficking is a criminal act that violates fundamental human rights and the inviolable dignity and integrity of the human person. Disciplinary action up to and including dismissal will be taken against anyone representing ADRA found to be violating any aspect of this Policy.

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Scope

This Policy applies to all who represent ADRA:

- All permanent, temporary, and part-time staff; board members; interns; volunteers; ADRA visitors (including media); contractors and consultants; and sub-grantees (local implementing partners and service providers). This group will be referred to as “**ADRA Representatives**” throughout the Policy.

- The Policy applies while in and outside of the workplace during working and non-working hours every day of the year.
- Associating with ADRA means that one must comply with ADRA's standards, even if the standards are higher than one's local context or governing laws.¹

Policy Statement

Abuse of power has led to many forms of exploitation within the relief and development sector. ADRA condemns any form of abusive or exploitative behavior of individuals and is committed to the protection of its staff, all representatives, and beneficiaries, as they are the most vulnerable. Everyone included in this Policy is prohibited from engaging in trafficking in children, women, and men.

Protocols to Prevent Trafficking in Persons

To accomplish the purpose of this Policy, all of those included in it:

- are prohibited from engaging in trafficking in children, women, or men for sexual exploitation or procurement of any commercial sex acts (even if this practice is legal in a particular jurisdiction) including but not limited to forced prostitution, child prostitution, and pedophilic pornography.
- shall not engage in trafficking in women and girls for purposes of forced or arranged marriages, or for any bride price schemes.
- are prohibited from engaging in trafficking in children, women, and men for removal of organs for the illicit organ trade or for the illicit dealing, running, or trafficking of narcotics and drugs.
- are prohibited from using force, fraud, or coercion to subject a child, woman, or man to forced labor, begging, or involuntary servitude.
- shall not obtain labor from a child, woman, or man by threats of serious harm to that person or another person.

Furthermore, ADRA prohibits employment practices relating to trafficking in human beings, including:

- destroying, concealing, confiscating, or otherwise denying access to an employee's identity or immigration documents.
- using misleading or fraudulent practices to recruit employees, such as failing to disclose key terms and conditions of employment.
- using recruiters who do not comply with local labor laws.

¹ These standards are listed in the ADRA Code of Conduct and the Safeguarding Code of Conduct.

- charging employees recruitment fees.
- failing to provide transportation, unless exempted, to certain employees who are brought to a country for the purpose of working on any award, including any bilateral or multilateral government contract, grant, cooperative agreement, sub-contract, sub-grant, or other sub-agreement.
- providing or arranging housing that fails to meet host country housing and safety standards.
- failing to provide an employment contract or work document where required by law.
- knowingly obtaining goods or services that have been provided or produced by trafficked or forced labor.

Lastly, ADRA requires under this Policy that:

- all wages meet host country legal requirements.
- transparent recruitment practices that fully and accurately disclose, in a format and language accessible to the employee, all key terms and conditions of employment, including wages and benefits, living conditions, any housing or associated arrangements (where provided or organized by ADRA), and significant costs to be charged to the employee.
- that in situations where ADRA provides housing to employees, the housing will at minimum meet host country housing and safety standards.
- reasonable steps are taken to ensure that all partner/sub-grantee organizations, consultants, contractors, volunteers, interns, or any person actively involved in an ADRA program comply with this Policy.

Reporting

If you have a concern that this Policy is being violated by ADRA, an ADRA Representative, or a partner of ADRA, it must be reported to the Safeguarding Focal Point at ADRA Denmark, which is the Secretary General, ADRA Denmark's Department Directors, the Country Director where the incident occurred, the ADRA Regional Office, or the ADRA Safeguarding Office (Protection@ADRA.org) as soon as possible, preferably within 24 hours.

Alternatively, you may report through the following mechanisms:

- Report anonymously through ADRA Denmark's whistleblowing platform <https://www.adra.dk/make-a-complaint/>
Sensitive complaints will go directly to the Chairman of the Board / Deputy Chairman;
- Report to ADRA Denmark's Cooperation Committee (*Samarbejdsudvalget*) via telephone (+45 4558 7700) or send a letter to:

ADRA Denmark's Cooperation Committee (*Samarbejdsudvalget*)
Concordiavej 16
2850 Nærum
Denmark

- Report anonymously using the Seventh-day Adventist Church's whistleblowing platform (<https://adventist.alertline.com/gcs/welcome>)

The procedures for reporting are further detailed in the **Global Procedures for Reporting and Receiving Allegations of Sensitive Complaints**.

If the circumstances are such that reporting a suspicion internally is inappropriate, or if the person to whom it is reported is unable to assist, the issue may alternatively be reported via the Global Human Trafficking Hotline at +1-888-373-7888, send a text to BeFree (233733), or its email address: help@befree.org.

Disciplinary Consequences for Trafficking in Persons

Any substantiated violation of this Policy will be considered an act of gross misconduct.

Where appropriate, ADRA will refer significant breaches of this Policy to the local law enforcement agencies with a view to initiating criminal prosecution. ADRA will support survivors in reporting to law enforcement and many cases will refer and report the case directly to statutory authorities.

Implementation

- To comply with this Policy, ADRA must aim to meet the ADRA Safeguarding Implementation Standards, particularly Commitments Two and Three, to effectively safeguarding against human trafficking.
- The local ADRA Board is ultimately accountable for this Policy.
- The Secretary General/Country Director is responsible for its implementation.
- All ADRA managers are also responsible to ensure the delivery of this Policy and to promote it as relevant in all aspects of their work.
- Specifically, Human Resources must adhere to the highest standards in the recruitment of staff and provide detailed information to employees regarding their rights and benefits.

Annex I: Definitions

ADRA Representatives: This term refers to anyone who represents ADRA: All permanent, temporary, and part-time staff; board members; interns; volunteers; ADRA visitors (including media); contractors (including suppliers and vendors) and consultants; and sub-grantees (local implementing partners and service providers).

Beneficiaries: In regards to trafficking in persons, ADRA uses a broad, working definition of 'beneficiary' to include not only direct beneficiaries of a particular project, but also any child or adult who is part of the affected population who might suffer harm caused by ADRA Representatives as a part of ADRA's presence.

Trafficking in persons is the recruitment, transportation, transfer, harboring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.