

## Model Safeguarding and Anti-Human Trafficking Compliance Plan

### **Background**

Save the Children Federation, Inc. (“SCUS”) has developed this Model Safeguarding and Anti-Human Trafficking Compliance Plan (“Plan”) in accordance with U.S. Government’s zero-tolerance policy regarding trafficking in persons, exploitation, sexual abuse, child abuse, and child neglect by government contractors and award recipients, as set out in the Trafficking Victims Protection Act of 2000 (TVPA) 22 U.S.C. 7102, Executive Order 13627 “Strengthening Protections Against Trafficking in Persons in Federal Contracts” and National Defense Authorization Act for Fiscal Year 2013, title XVII “Ending Trafficking in Government Contracting” and the implementing regulations FAR 52.222-50 Combatting Trafficking in Persons, FAR 52.222-56 Certification Regarding Trafficking in Persons Compliance Plan, ADS 303 Mandatory Standard Provision on Trafficking in Persons (April 2016) (“USAID Anti-Trafficking Provisions”) and Safeguarding against Exploitation, Sexual Abuse, Child Abuse, and Child Neglect (October 2023).

### **Purpose**

The purpose of this Plan is to set out SCUS’s policies and procedures for: (1) making employees aware of the conduct prohibited under SCUS’s Policy on Safeguarding and Counter-Human Trafficking and USAID Anti-Trafficking and Safeguarding Provisions and the actions that may be taken against employees for violations; (2) reporting activity inconsistent with the Safeguarding and Anti-Human Trafficking and/or USAID Anti-Trafficking and Safeguarding Provisions; (3) mitigating safeguarding and human trafficking risks in our programs and operations; (4) employing fair recruitment and wage practices; (5) employing housing plans; and, (5) preventing prohibited activity by subrecipients, subcontractors, and suppliers, and detecting and terminating those who engage in such activities.

### **Applicability**

This Plan sets out SCUS’s baseline standards for safeguarding and anti-trafficking compliance and applies presumptively to all U.S. Government awards, subawards, contracts, and subcontracts, although the specific rules for contracts are still pending finalization by USAID. It may need to be adapted or modified for projects that are larger, more complex, or involve greater safeguarding and trafficking risks. For all awards and contracts with an estimated value of \$500,000 or more, and involve activities outside the U.S., project staff must examine each award and contract individually to assess the SEAH, child safeguarding, and human trafficking risks, based on factors such as the number of non-U.S. citizens to be employed and whether the award or contract will involve services or supplies susceptible to exploitation, sexual abuse, child abuse and neglect, and trafficking in persons.

## Policy and Procedures

SCUS has adopted comprehensive Safeguarding and Counter-Human Trafficking Policy (“Policy”) which outline our zero tolerance approach to any form of sexual exploitation and abuse, child physical and emotional abuse, child neglect, exploitation, and human trafficking. It also sets forth our policy for preventing human trafficking related to SCUS activities and procedures for complying with regulations pertaining to human trafficking in U.S. Government awards and contracts. It includes prohibited activities and actions that may be taken against employees for violations. This Policy is aligned with the IASC Six Core Principles Relating to Sexual Exploitation and Abuse and the Keeping Children Safe Standards and establishes the Best Interest of the Child and a Survivor-Centered Approach as guiding principles for responding to all safeguarding concerns. Additionally, SCUS has established Safeguarding and Counter-Human Trafficking Procedures which establish mandatory requirements across the organization to ensure full implementation of the Policy.

SCUS’s zero tolerance for exploitation, sexual abuse, child abuse and neglect, and human trafficking is also enshrined in the SCUS’s [Code of Ethics](#) as the first of five ethical principles “Safeguarding is at the Core of Every Decision We Make.” It provides:

Save the Children has zero tolerance for human trafficking, child abuse, neglect, exploitation of any kind or any other form of abuse. Any employee or representative of Save the Children found to have engaged in such behavior will be subject to discipline, up to and including termination of employment and referral to relevant criminal authorities as appropriate. The Child Safeguarding Policy and prohibitions on sexual exploitation and abuse apply at all times, in both personal and professional lives.

Each and everyone of us has an obligation to commit to safeguarding the children and families we work with. Through effective design of our programs, we reduce opportunities for neglect, abuse, and exploitation. By having robust reporting mechanisms that are safe and confidential, we commit to ensuring that survivors of sexual exploitation and abuse, child abuse, neglect, or human trafficking are not exposed to further harm. Finally, by striving to be survivor-focused in our responses, we commit to constantly improving Save the Children and to doing no harm.

SCUS’ Safeguarding and Counter-Human Trafficking Policy and Procedures are also supported by the following policies and protocols which establish additional requirements to ensure that safeguarding and counter-trafficking measures are incorporated into all areas of our work:

- Safeguarding Behavior and Conduct Guidelines
- Global Child Safeguarding Protocol
- Reporting and Resolving Policy violations or Other Concerns Policy
- Background Check and Employee Disclosure Policy
- Alcohol and Drugs Policy
- Social Media Policy
- Save the Children Disability and Inclusion Policy

- Personal Information Protection Policy
- Workplace Culture Policy

## Reporting

All SCUS employees, subrecipients, subcontractors, and suppliers are required to report any activity they suspect may violate the Policy and/or USAID Safeguarding and Anti-Trafficking Provisions. Reports may be made to direct supervisors, HR Business Partners, safeguarding staff, and the following confidential internal email addresses: [hotline@savechildren.org](mailto:hotline@savechildren.org) or [safeguardingscus@savechildren.org](mailto:safeguardingscus@savechildren.org), an anonymous third-party hotline online at [SavetheChildren.EthicsPoint.com](https://www.savethechildren.org/ethics), or anonymously via phone 1-844-287-1892. There is a full listing of contact numbers by country available at [SavetheChildren.EthicsPoint.com](https://www.savethechildren.org/ethics). EthicsPoint's online and phone reporting platforms are also publicly available to program participants and community members and have robust confidentiality and PII protection measures in place. Anonymous reports related to human trafficking may also be sent to the Global Human Trafficking Hotline at 1-844-888-FREE or [help@befree.org](mailto:help@befree.org).

Per SCUS' Reporting and Resolving Policy Violations or Other Concerns Policy, SCUS has zero tolerance for retaliation. SCUS will protect any person who raises a concern in good faith or who participates in an investigation relating to a concern from any negative impact on their work at Save the Children.

## Awareness Raising

All SCUS Representatives are required to sign an acknowledgment of receipt and understanding of the Safeguarding and Counter-Human Trafficking Policy within 45 days of hire. Additionally, SCUS staff are required to take a mandatory safeguarding e-learning within 45 days of hire and a refresher training every two years. Staff are also required to attend training on the Code of Ethics annually and sign an annual pledge to abide by the ethical principles.

The Policy and Procedures are posted on SCUS's intranet, SaveNet, where it can be accessed by all employees at any time. Additional training and awareness raising materials, and FAQs are also available on SaveNet and via another Save the Children intranet, OneNet.

SCUS Representatives and Program Visitors will review and adhere to the Safeguarding Behavioral and Conduct Guidelines in all their interactions with children and adults, including program participants and community members.

The Safeguarding and Counter-Human Trafficking Procedures require that developmentally appropriate awareness raising materials are given to program participants to support their understanding of the Policy and how to report concerns. Visual awareness raising materials should be posted in program sites. The Procedures also require programs to ensure that children and families are verbally informed of the Policy and reporting mechanisms. This should be done in a manner that is culturally sensitive, context appropriate, and takes into account other factors such as language, ability, children's ages and developmental levels.

## **Risk Assessment and Mitigation**

SCUS has established a Safeguarding Risk Mitigation Framework, which outlines key mitigation measures for agency-wide safeguarding and human trafficking risks. Additionally, the Safeguarding and Counter-Human Trafficking Procedures require that safeguarding risk assessments are carried out before initiating a new project or activity or any significant change to an existing project or activity. At a minimum, these risk assessments must ensure mitigation measures are in place for the following:

- Obtaining informed consent from guardians and child assent;
- Managing sensitive data on program participants;
- Mitigating risks of exploitation, abuse, and neglect;
- Ensuring no child or adult is excluded from program or service activity because of discrimination, including, without limitation, discrimination on the basis of disability, racial & ethnic heritage, national status, tribal affiliations, religious beliefs, languages, gender or gender association, LGBTI+ identity, and/or medical/physical conditions; and
- Appropriate staffing ratios of adults to children.

## **Recruitment and Wage Plan**

SCUS has policies and procedures in place to prevent the use of misleading or fraudulent recruitment practices during the recruitment of employees or offering of employment to employees. To ensure a fair and open recruitment process, SCUS will generally advertise all open positions on its external website, as well as other relevant job boards. Positions for recruitment must be approved by a divisional lead. All interested applicants must complete an application prior to being interviewed for an open position. All offers of employment must be approved by the head of human resources or their designee. Offers of employment must be extended to candidates by human resources staff. All candidates to whom an offer is made must sign an offer letter. No employment can begin without successfully completing references and background checks. Unless otherwise required by law, employment with SCUS is “at will.”

SCUS requires that if an external recruiter is used (a company or an individual), the recruiter is (a) appropriately qualified; (b) conducts its business in compliance with local labor laws and the highest ethical standards; (c) does not charge prospective staff recruitment fees; and (d) does not prevent the workers from accessing their travel documentation. Human resources confirms that the appropriate due diligence checks on the recruiter have been completed and a contract entered into with the recruiter.

## **Housing Plan**

In situations where SCUS provides housing to employees, the housing will meet host country housing and safety standards.

## **Flow Downs**

All SCUS contractors, consultants, vendors, suppliers, subcontractors and subrecipients (“Partners”) must agree to comply with all applicable USAID Safeguarding and Anti-Trafficking Provisions. SCUS will include language to that effect in all Partner contracts, consultancy

agreements, vendor agreements, supplier agreement, subcontracts, and subawards (“Partner Contracts”), including inserting FAR 52.222-50, FAR 52.222-56, and USAID Standard Provisions, where applicable.

When applicable, SCUS Partners must have a compliance plan to prevent prohibited activities and to monitor, detect and terminate any of its contractors, consultants, suppliers, subcontractors or subrecipients engaging in prohibited activities, and provide a copy of its plan to SCUS. The Partner’s compliance plan must meet the minimum requirements outlined in the USAID Safeguarding and Anti-Trafficking Provisions and be appropriate to the size and complexity of the contract, subcontract or subagreement with SCUS and the nature of the activities to be performed under it.

Prior to the award of any applicable Partner Contract<sup>1</sup>, and on an annual basis thereafter, all SCUS Partners must submit a certification to SCUS that: (1) the Partner has implemented and complied with its anti-trafficking compliance plan; and (2) after conducting due diligence, to the best of the Partner’s knowledge and belief, neither it nor any of its employees, or its contractors, consultants, suppliers, subcontractors, subrecipients or their employees, have engaged in any prohibited trafficking-related activities, or if any abuses relating to prohibited activities have been found, Partner has taken appropriate remedial and referral actions.

If any Partner fails to comply with the Policy or applicable USAID Safeguarding and Anti-Trafficking Provisions, SCUS will take appropriate action to remediate the violation and prevent future violations.

## Investigations

If SCUS receives credible information alleging human trafficking-related activity, SCUS will, as required, notify the USAID agreement officer or contractor officer and USAID Office of Inspector General. If SCUS receives credible information alleging exploitation, sexual abuse, child abuse or child neglect, SCUS will, as required, notify in writing, the Bureau for Management, Office of Management Policy, Budget, and Performance, Responsibility, Safeguarding, and Compliance Division (M/MPBP/RSC) at [disclosures@usaid.gov](mailto:disclosures@usaid.gov), with a copy to the Agreement Officer, and the USAID Office of Inspector General (OIG) of the allegation, investigate, and, if substantiated, determine what remedial action is appropriate. For any credible allegations received, SCUS will investigate, and, if substantiated, determine what remedial action is appropriate. Investigations are carried out by trained safeguarding investigators with the Best Interest of the Child and a Survivor-Centered Approach as central considerations. Survivors will be referred to survivor support services as needed and desired and with their informed consent. All substantiated allegations of exploitation, sexual abuse, child abuse, child neglect, or human trafficking will result in disciplinary measures, up to and including termination of employment or cooperative agreement. SCUS will notify USAID of the resulting findings and action <sup>2</sup>[\(OIG\)](#).

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<sup>1</sup> For all Partner Contracts involving activities outside the U.S. with an estimated value of \$500,000 or more.

<sup>2</sup> This Model Safeguarding and Anti-Human Trafficking Plan has been created in response to the U.S. government requirements identified in the Background section above, but this Investigations section describes SCUS’s practice with other donors and offices of inspector general as well.

SCUS will cooperate fully with any U.S. Government agencies responsible for any investigations, audits or corrective actions relating to trafficking in persons.

### **Save the Children International**

Save the Children is a global movement, made up of 30 Save the Children Members, of which SCUS is one. SCUS and other Members lead on activities within their home territories and work with donors to develop programs abroad, which are delivered primarily by the movement's implementing body, Save the Children International ("SCI") via in-country teams working in 75 geographical territories around the world. SCUS and SCI have aligned anti-trafficking and safeguarding policies and procedures. SCUS' Safeguarding and Counter-Human Trafficking Policy is available publicly [here](#) and SCI's safeguarding policy framework is publicly available [here](#). SCI also publishes an anti-trafficking statement annually that is available [here](#).

### **Posting**

SCUS will post this Model Safeguarding and Anti-Human Trafficking Plan on its external website and individual award-specific compliance plans on its internal Award Management System, a repository of award related documents available to SCUS and SCI staff.