



# Human Trafficking Policy

POLICY NO.

**010**

Centre de Recherche sur l'Anti-Corruption (CERC)

CERC policies and procedures

## Purpose

This policy sets out the guiding principles of the Centre de Recherche sur l'Anti-Corruption (CERC) on combating trafficking in persons.



CERC opposes all forms of trafficking in persons and is committed to mitigating this risk in its operations and programmes.

CERC is committed to full compliance with the laws, regulations and policies of the Congolese government and of the international community that prohibit trafficking in persons, including Executive Order 13627, "Strengthening Protections Against Trafficking in Persons in Federal Contracts"; FAR Subpart 22.17; FAR 52.222-50; FAR 52.222-56; the USAID standard provisions on trafficking in persons; the UK government's Modern Slavery Act; and any other regulations of other agencies and governments, as applicable.

CERC's Executive Management understands the importance of combating trafficking in persons and has committed resources to promoting compliance.

- using misleading or fraudulent recruitment practices;
- charging job applicants recruitment fees for employment;
- failing to pay the contractually agreed return transport costs for certain employees who have completed their employment away from their place of residence;
- providing or arranging housing that does not meet the host country's housing and safety standards;
- failing to provide written proof of employment or a similar work document before the employee leaves their place of residence.

## Policy implementation

CERC implements this policy through:

1. employees' acknowledgement of the policy and related training;
2. compliance plans;
3. incident reports.

If required by a donor or by local law, CERC may adapt the related resources listed at the end of this policy to ensure that they suit the local context.

## Applicability

This policy applies to:

- CERC staff and volunteers, including the Board of Directors;
- CERC suppliers: subcontractors (their employees and volunteers), independent contractors, and suppliers and their employees.

## General guidelines

CERC prohibits itself from:

- engaging in any form of trafficking in human beings;
- engaging in commercial sex acts that may be directly associated with CERC, which includes working hours, attendance at off-site functions and any time spent on official travel;
- using forced labour of any kind, for any reason;
- destroying, concealing, confiscating or otherwise denying an employee access to their identity or immigration documents;

## Acknowledgement of the policy and training

All CERC staff acknowledge receipt and understanding of the anti-trafficking in persons policy and related resources when they are hired and every year when they take the code of ethics training. CERC employees are required to comply with this policy and to complete any related training required, as a condition of continued engagement with the organisation.

When engaging external parties, CERC staff ensure that the requirements of this policy are communicated to CERC's sub-recipients, independent contractors and suppliers.

## Incident reporting

All CERC staff are required to use their best judgement to report any suspected trafficking activity to the Executive Director or another appropriate authority, or to the Global Human Trafficking Hotline on 1-844-888-FREE or at [help@befree.org](mailto:help@befree.org).

## Enforcement

Any violation of this policy will result in disciplinary action, which may include, but is not limited to, dismissal of the CERC employee and, for a non-employee, termination of their relationship with CERC.

CERC prohibits retaliation against any employee who reports a violation of this policy or who cooperates in any investigation of such reports. Employees who engage in retaliation or other violations will be subject to corrective action up to and including dismissal and reporting to the local authorities, where appropriate. Any supplier or supplier staff member who engages in prohibited activities, fails to report suspicious activities or engages in retaliation will be subject to action up to and including termination of the business relationship and reporting to the local authorities, where appropriate.

## Key definitions

- **Bonded labour or debt bondage:** the use of a debt or other threats of financial harm as a form of coercion. Some workers inherit a debt; others fall victim to traffickers or recruiters who unlawfully exploit an initial debt assumed as a condition of employment.
- **Commercial sex act:** any sex act on account of which anything of value is given to or received by any person.
- **Forced labour:** situations in which people are coerced into working through the use of violence or intimidation, or by more subtle means such as accumulated debt, retention of identity papers or threats of denunciation to the immigration authorities.
- **Trafficking in human beings:** the recruitment, harbouring, transportation, provision or obtaining of a person for labour or services through the use of force, fraud, coercion, abduction, deception, abuse of power or of a position of vulnerability, or 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. Exploitation includes involuntary servitude, peonage, debt bondage or slavery, the removal of organs, sex trafficking and other forms of exploitation.

## Anti-trafficking in persons compliance plan

CERC has a zero-tolerance policy towards any employee, consultant, volunteer or third party, or anyone working with us in any country and at any level, who engages in any form of trafficking in persons or forced labour.

This compliance plan meets the requirements of our donors and sets out CERC's procedures for preventing trafficking in persons through awareness raising, reporting, recruitment and wage plans, housing plans and compliance monitoring.

### Awareness-raising efforts

CERC's anti-trafficking in persons policy reflects all the requirements arising from our contractual and ethical obligations to the people we serve. It has been incorporated into CERC's code of ethics.

All CERC staff have been informed by e-mail of the prohibitions relating to trafficking in human beings and of the action that will be taken in the event of a violation. All CERC staff have access to our policy, plans and related documents on our intranet, as well as to posters and fact sheets in all field offices and at headquarters.

CERC provides compliance training for all its staff approximately once a year, and as new employees are hired throughout the year, as part of CERC's code of ethics training. This training certifies that staff understand the issues relating to trafficking in human beings and agree to comply with CERC's anti-trafficking in persons policies, procedures and principles, including by reporting any violation of which they become aware.

### Recruitment and wage plan

To the extent that CERC uses recruitment companies, only recruitment companies with trained employees may be used, no recruitment fees may be charged to employees, and all wages must meet the applicable legal requirements in the Democratic Republic of the Congo.

CERC prohibits destroying, concealing, confiscating or otherwise denying any employee access to their immigration documents.



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CERC is a registered non-governmental organisation (NGO) (Registration number: F.92/42579) and given Legal Personality by the Ministry of Justice: JUST/SG/20/21311/2021.

CERC holds Special Consultative Status with the United Nations Economic and Social Council (ECOSOC).