



Document Title : **Combatting Trafficking in Persons (CTP)**

Effective Date : **1-11-2021**

APPROVED BY:  _____

Date: **October 30, 2021** _____

Nkiru Nwadioke
Managing Director AHNI

REVIEWED BY:  _____

Date: **October 29, 2021**

Charles Ihaza
Director Of Finance & Admin AHNI

CONSOLIDATED BY:  _____

Date: **October 29, 2021,**

Kelechi Udenwa
Human Resources Manager AHNI

PURPOSE:

To set out AHNI’s guiding principles with respect to combating Trafficking in Persons.

SCOPE:

This policy applies to all AHNI Personnel nationwide, and to Suppliers and Supplier Personnel to the extent set out below.

DEFINITIONS:

1. *Commercial Sex Act* – Any sex act on account of which anything of value is given to or received by any person.
2. *AHNI Personnel* – AHNI employees, officers, members of its Board of Trustees, interns and fellows (paid or unpaid), volunteers, agents, and other individuals authorized to act on behalf of AHNI.
3. *Forced Labor* – Knowingly providing or obtaining the labor or services of a person by express or implied threats of serious harm to, or physical restraint against, that person or another person.
4. *Supplier* – Any AHNI contractor, consultant, vendor, supplier, subcontractor or subrecipient.
5. *Supplier Personnel* – A Supplier's employees, consultants, interns and fellows (paid or unpaid) volunteers, agents and other individuals authorized to act on Supplier’s behalf.
6. *Trafficking in Persons (TIP)* –
 - a. The recruitment, harboring, transportation, provision, obtaining, or receipt of a person through the use of force, fraud, coercion, or abuse of power for purposes of commercial sex acts, prostitution, or other forms of sexual exploitation.
 - b. The recruitment, harboring, transportation, provision, obtaining, or receipt of a person through the use of force, fraud, coercion, or abuse of power for the purpose of subjection to involuntary servitude, peonage, debt bondage, forced labor or services, slavery or practices similar to slavery.
 - c. The recruitment, harboring, transportation, provision, obtaining, or receipt of a person who has not yet attained the age of 18 for any of the purposes listed above, whether or not through the use of force, fraud, coercion, or abuse of power.

POLICY:

1. Statement of Policy

1.1. AHNI is opposed to all forms of TIP and is committed to mitigating the risk of TIP in connection with its operations and programs.

1.2. It is the policy of AHNI to comply fully with all national regulations prohibiting trafficking in persons.

2. Prohibited Activities

2.1. In accordance with the Trafficking in Persons Law Enforcement and Administration Act (TIPLEAA) and all other Nigeria's government policy, all AHNI Personnel, Suppliers and Supplier Personnel are strictly prohibited from:

2.1.1. Engaging in any form of Trafficking in Persons (as defined above);

2.1.2. Procuring a Commercial Sex Act under any guise during the period of the implementation of a cooperative agreement, or award;

2.1.3. Using Forced Labor in the performance of any national or U.S. government contract, cooperative agreement or award;

2.1.4. Destroying, concealing, confiscating, or otherwise denying any employee access to his or her identity or immigration documents, such as passports or drivers' licenses;

2.1.5. Using misleading or fraudulent recruiting practices during the recruitment of employees or offering of employment to employees, such as failing to disclose (in a format and language accessible to the employee) or making material misrepresentations about the key terms and conditions of employment, including wage and benefits, work location, living conditions, housing and associated costs (if provided or arranged by AHNI or the Supplier), significant costs to be charged to the employee, and the hazardous nature of the work (where applicable);

2.1.6. Using recruiters that do not comply with the labor laws of Nigeria;

2.1.7. Charging recruitment fees to employees;

2.1.8. If required by law or contract, failing to provide an employment contract, recruitment agreement or other required work document, written in a language the employee understands, that includes details about work description, wages, prohibition on charging recruitment fees, work location, living accommodations and associated costs, time off, roundtrip transportation arrangements, grievance process, and the content of applicable laws and regulations that prohibit trafficking in persons. If the employee must relocate to perform the work, the work document must be provided to the employee at least five days prior to relocation.

3. Reporting Requirements and Procedure

3.1. All AHNI Personnel, Suppliers and Supplier Personnel who observe, suspect, or receive allegations of trafficking-related activity, or any other conduct prohibited by this policy, are

required to report the conduct immediately, either orally or in writing, by contacting one of the following:

- 3.1.1. Their immediate supervisor, or, if the conduct involves the immediate supervisor, any other supervisor within their department;
 - 3.1.2. AHNi Human Resources (HR) representative at HRDesk@ahnigeria.org
 - 3.1.3. AHNi Compliance Unit at ComplianceDesk@ahnigeria.org
 - 3.1.4. AHNi's HR Unit Link for reporting complaints either with your name or anonymously <https://bit.ly/2UcE9eQ>
 - 3.1.5. AHNi's Compliance Unit link for reporting complaints either with your name or anonymously <https://bit.ly/3yQwzWA>
 - 3.1.5.1. Anonymous reports are generally more difficult to investigate due to limited information. AHNi Personnel are urged to provide as much detailed information as possible about the conduct, including, if possible, identifying people who were involved or who witnessed the conduct, so long as this will not put the persons identified at risk of immediate harm.
 - 3.2. AHNi Personnel who are HR staff, supervisors or hold a position at director level or above are required to promptly report, ideally within 24 hours or as soon as possible under the circumstances, to HR or AHNi's Compliance Unit, of any actual or suspected Trafficking in Persons or other violation of this policy that is reported to them, or that they observe or otherwise become aware of. Failure to do so is a violation of this policy and could lead to disciplinary action, up to and including immediate separation of employment.
 - 3.3. AHNi will investigate all reports of prohibited trafficking-related activity or violations of this policy, take appropriate action, and make any required notifications to government agencies.
4. Non-Retaliation
- 4.1. AHNi strictly prohibits any retaliation against AHNi Personnel who complain about TIP, trafficking-related activity, or other violations of this policy or related procedures, or who participate in any internal or government TIP investigation.
 - 4.2. Retaliation occurs when someone penalizes or threatens to penalize another person for reporting or expressing an intent to report what they believe in good faith to be TIP or any other violation of this policy, assisting others in reporting TIP or policy violations, or participating in investigations under this policy.
 - 4.3. Non-retaliation protection includes all Program Participants. No Program Participant or community member will be denied participation in a program or access to aid for reporting suspected or known trafficking-related activity or participating in a TIP investigation.
 - 4.4. Suspected retaliation should be promptly reported via the reporting mechanisms set out in Section 4.
 - 4.5. AHNi Personnel who engage in retaliation will be subject to disciplinary action up to and including separation of employment or other relationship with AHNi.
5. Supplier Obligations and Agreements
- 5.1. All Suppliers and Supplier Personnel must refrain from any conduct that violates this policy. AHNi requires that Suppliers uphold the principles of this policy and take steps to prevent Trafficking in Persons or any of the trafficking-related activities prohibited in Section 2 above by Supplier Personnel. Failure to do so may result in termination of Supplier's contractual relationship with AHNi.
 - 5.2. AHNi requires that all Suppliers and Supplier Personnel cooperate fully with investigations of

policy violations and provide truthful information to investigators.

Title

Combating Trafficking in Persons

Effective Date:

1-11-2021

Version:

1

6. Consequences of Violations

6.1. AHNI Personnel who engage in any of the prohibited activities listed above, fail to comply with any applicable compliance plan, fail to report suspected trafficking-related activity or forward a report of suspected trafficking-related activity, or otherwise violate this policy will be subject to disciplinary action, up to and including immediate termination of employment or other relationship with AHNI.

6.1.1 AHNI may take legal action when required, against AHNI Personnel who have been found to commit trafficking-related violations, including referral to the relevant authorities for appropriate action, including criminal prosecution, in all relevant jurisdictions.

6.2 If any Suppliers or Supplier Personnel engage in any of the prohibited activities listed above, fail to comply with any applicable contractual language or compliance plan, fail to report suspected trafficking-related activity, or otherwise violate this policy, AHNI will take corrective action, up to and including immediate termination of any Supplier contract with AHNI. Further, AHNI may pursue any contractual or other legal or equitable remedies that may be available.

RELATED DOCUMENTS:

1. Policies

- Code of Ethics & Conduct
- Harassment Policy

POLICY REVISION HISTORY:

POL#	Date Reviewed (DD MMM YYYY)	Summary of Changes