



## WBR Combatting Trafficking in Persons Policy

Effective date:	November 2020
Approved by:	Dave Neiswander, CEO

### Purpose

This policy describes World Bicycle Relief's guiding principles with respect to combating trafficking in persons.

World Bicycle Relief (WBR) 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. WBR is committed to full compliance with the U.S. Government's laws, regulations, and policies 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](#); [USAID's Standard Provisions regarding Trafficking in Persons](#); the U.K. Government's [Modern Slavery Act](#); and any other regulations from other agencies and governments, as applicable. WBR leadership understands the importance of anti-trafficking and has devoted resources to promote compliance.

### Applicability

This policy applies to:

- WBR staff and volunteers, including the Board of Directors  
WBR suppliers: Sub-awardees (and their staff and volunteers), independent contractors, and vendors and their employees

### General Guidelines

WBR prohibits:

- Engaging in any form of human trafficking
- Engaging in commercial sex acts that may be directly associated with WBR, which includes during work hours, while attending off-site functions, and any time in work travel status  
Using forced labor of any kind for any reason
- Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee's identity or immigration documents
- Using misleading or fraudulent recruiting practices
- Charging employee candidates recruitment fees for employment
- Failing to pay contractually agreed return transportation costs for certain employees who have finished employment outside that employee's nation of residence
- Providing or arranging housing that fails to meet the host country's housing and safety standards
- Failing to provide proof of employment or similar work document in writing prior to the employee departing from his or her country of origin



### **Policy Implementation**

WBR will implement this policy through employee acknowledgement of receipt of the policy and related training Incident reporting

As required by a funder or local law, country offices may edit the related resources listed at the end of this policy to ensure they are sensitive to the local context. In addition, country offices may translate the policy and any of the related resources in local languages as required.

### **Receipt of the Policy and Training**

All WBR staff will acknowledge receipt and understanding of WBR's Combating Trafficking in Persons Policy and accompanying resources upon hire and annually when they review and sign the Code of Conduct. WBR employees are responsible for complying with this policy as well as completing any associated training mandated as a condition of continued employment. When engaging outside parties, WBR staff will ensure that the requirements of this policy are communicated to WBR sub-awardees, independent contractors, and vendors.

### **Incident Reporting**

All WBR staff are required to use their best judgement to report any suspected trafficking activity to their country director, chief operating officer, Head of HR, or other appropriate authority; including WBR's whistleblower hotline at 1-855-FRAUD-HL or at [www.fraudhl.com](http://www.fraudhl.com) – Company ID: "WBRORG".

### **Enforcement**

Any violations of this policy will result in disciplinary action that may include but is not limited to termination of employment for WBR's employees and termination of the relationship with WBR's for non-employees.

WBR prohibits retaliation against any employee who reports any violation of this policy or who cooperates with any investigation of such reports. Employees who engage in any retaliation or other violation will be subject to corrective action up to and including termination of employment and reporting to local authorities as appropriate. Any supplier or supplier personnel engages in any prohibited activities, fails to report suspicious activities, or engages in retaliatory actions will be subject to action including termination of the business relationship and reporting as appropriate.

### **Related Resources**

- U.S. Presidential Executive Order 13627: <https://www.gpo.gov/fdsys/pkg/DCPD-201200750/pdf/DCPD-201200750.pdf>
- USAID ADS 303: <https://www.usaid.gov/sites/default/files/documents/1868/303maa.pdf>
- U.S. Government Combating Trafficking in Persons Regulations:
- FAR 55.17: <https://www.acquisition.gov/?q=/browse/far/22>
- FAR 52.222-50: <https://www.acquisition.gov/?q=/browse/far/52>
- FAR 52.222-56: <https://www.acquisition.gov/?q=/browse/far/52>



- USAID Counter Trafficking in Persons Field Guide: [https://www.usaid.gov/sites/default/files/documents/2496/C-TIP\\_Field\\_Guide\\_Final\\_April%205%202013.pdf](https://www.usaid.gov/sites/default/files/documents/2496/C-TIP_Field_Guide_Final_April%205%202013.pdf)
- U.K. Modern Slavery Act 2015: <http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>
- Key Definitions
- Bonded labor or debt bondage: The use of a debt or other threats of financial harm as a form of coercion. Some workers inherit debt, others fall victim to traffickers or recruiters who unlawfully exploit an initial debt assumed as a term of employment.
- Commercial sex act: Any sex act on account of which anything of value is given to or received by any person.
- Forced labor: Situations in which persons are coerced to work 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 immigration authorities.
- Human trafficking: Human trafficking means recruiting, harboring, transporting, providing, or obtaining a person for labor or services through the use of force, fraud, coercion, abduction, deception, the 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, and sex trafficking or other forms of exploitation.

## **ANTI-TRAFFICKING IN PERSONS COMPLIANCE PLAN**

WBR has a zero-tolerance policy regarding any WBR employees, consultants, volunteers, or third party or any person who works with WBR in any country and at any level engaging in any form of trafficking in persons or forced labor.

This compliance plan conforms to our funders' requirements and establishes WBR's procedures for preventing trafficking in persons through awareness, reporting, recruitment and wage plans, housing plans, and sub-award and Country Office compliance.

### **Awareness Efforts**

WBR's Combating Trafficking in Persons Policy (policy) reflects all of the requirements stemming from our contractual and ethical obligations to the people we serve. The policy includes all of USAID's Anti-Trafficking Provisions, the U.K. Government's Modern Slavery Act requirements, actions WBR may take against employees or others who violate the policy, and procedures for reporting and investigating violations. The policy has been incorporated into WBR's Code of Conduct

All WBR staff have been informed via email of the trafficking-related prohibitions and actions that will be taken for violations. All WBR staff have access to our policy, plans, and related materials through posters and informational sheets in all field and headquarters offices.

WBR conducts compliance training for all staff approximately annually and new staff are oriented to the policy within the Code of Conduct they are required to sign upon joining the organization. This training



certifies that staff understand trafficking issues and agree to comply with the policies, procedures, and principles of WBR's Combating Trafficking in Persons Policy, including the reporting any violations of which they are aware. Such compliance training is targeted and customized for various corporate and field offices as appropriate for the nature and scope of the activities to be performed.

### **Reporting Process**

All WBR staff have a responsibility to report, without fear of retaliation, any activity that violates the Combating Trafficking in Persons Policy to their country director, deputy director, chief of party, HR director, or other appropriate authority. In addition, staff may report through WBR's hotline at 1-855-FRAUD-HL or at [www.fraudhl.com](http://www.fraudhl.com) – Company ID: "WBRORG". WBR staff are encouraged to consult the above mentioned points of contact if they are uncertain whether a specific action would be in violation of the Combating Trafficking in Persons Policy.

### **Recruitment and Wage Plan**

To the extent that WBR 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 applicable cooperating country legal requirements.

WBR prohibits destroying, concealing, confiscating, or otherwise denying any employee access to her or his immigration documents.

### **Housing Plan**

WBR ensures that housing provided directly or through third-party entities for all staff or certified sub-awardee staff meet host country housing and safety standards.

### **Procedures for Sub-Awardees and Vendors**

All U.S. Government-funded sub-awards with an estimated value of US\$500,000 are required to complete an anti-trafficking compliance plan. The compliance plans may be adjusted based on risk factors for trafficking due to the location, beneficiary population, complexity, size of the program, or other variable deemed appropriate and relevant. WBR has incorporated this policy into its contractor procurement template.

Failure to comply with the requirements of the Combating Trafficking in Persons Policy or the anti-trafficking in persons compliance plan is grounds for WBR to take any and all appropriate actions, up to and including immediate termination of that vendor's award with WBR.

### **Country Office Plans**

Consistent with award requirements, WBR country offices will develop and implement country plans that address any USAID award-specific challenges and reflect any unique country context in combating trafficking in persons, as needed.



**Questions**

Questions regarding WBR's Combating Trafficking in Persons Policy and this compliance plan may be directed to WBR's hotline at 1-855-FRAUD-HL or at [www.fraudhl.com](http://www.fraudhl.com) – Company ID: "WBRORG" or to a Country Director or HR Director as appropriate.