



CARITAS UKRAINE
International Charitable Foundation

Approved by:

President of the
ICF "Caritas Ukra


(Signature)  *H. J. Skolich*
(Full name)

29 June 2020

Anti-human-trafficking policy

Purpose

This Policy sets out the anti-human-trafficking guidelines of the Caritas Ukraine network.

The terms in this document are used within the meaning set forth in the Law of Ukraine ‘On Anti-human-trafficking’.

The Caritas Ukraine opposes all forms of human trafficking and, based on its own actions and programs, is actively committed to reducing the risk of human trafficking. The Caritas Ukraine strictly adheres to the international laws and conventions, legal regulations of Ukraine and rules prohibiting trafficking in human beings.

The Caritas Ukraine management understands the importance of combating human trafficking and allocates resources to promote compliance with such norms.

The Caritas Ukraine applies a policy of absolute intolerance towards any employees, consultants, partners, volunteers or third parties in Caritas Ukraine, as well as to persons who cooperate with Caritas Ukraine in any country and who are involved at any level in any form of trafficking in human beings or coerced labour (subject to the entry into force and a court decision finding a person guilty of such a crime).

Scope

This Policy applies to:

- Caritas Ukraine staff and volunteers, including Board members, any partners and suppliers;
- Caritas Ukraine suppliers: contractors (their employees and volunteers), independent contractors and suppliers and their employees.

General guidelines

Caritas Ukraine prohibits:

- Involvement in human trafficking in any form.
- Involvement in sexual acts for commercial purposes, which can be directly related at any time to Caritas Ukraine.
- Use of coerced labour of any kind on any grounds.
- Destruction, concealment, confiscation or other denial of access by the employee to identity documents or immigration documents.
- Use of deceptive or fraudulent recruitment methods.
- Collection of fees for hiring candidates for job.
- Non-payment of contractual transport costs for the return of certain workers who have completed work outside the country of residence of the workers concerned.
- Providing or arranging housing that does not meet the standards of living and safety in the host country.
- Lack of written proof of employment or similar working document before the worker leaves his/her country of origin, both in case of cross-border employment and within the country of citizenship/stay/residence.

Policy implementation

The Caritas Ukraine implements this Policy through:

1. Receipt confirmation by the employee of document containing provisions of this Policy and passing the corresponding training.
2. Incident reporting.

Receipt of a document containing provisions of the Policy and training

All the Caritas Ukraine employees confirm the receipt of the document, their understanding of the Caritas Ukraine Anti-human-trafficking Policy and supporting documents during employment, as well as after completing a training course in the Safeguarding System. Caritas Ukraine employees are responsible for complying with the provisions of this Policy, as well as undergoing any related training provided for in the terms of further work. When involving external parties (contractors, subcontractors, suppliers), the Caritas Ukraine employees will ensure this Policy is communicated to their attention.

Incident reporting

All the Caritas Ukraine employees shall report on any suspicious activity in the field of human trafficking, using the established feedback channels.

Enforcement

Any violation of this Policy involves disciplinary measures, which may include termination of employment with the Caritas Ukraine employee and termination of contracts with supplier/contractor/subcontractor. This is a crime subject to reporting to the police/prosecutor's office.

The Caritas Ukraine prohibits using retaliation measures against any employee who reports violations of this Policy or cooperates in conducting any investigation into such reports. Corrective actions, including termination of employment and notification of local authorities, if necessary, shall be applied to employees involved in retaliation or other violations. Certain measures, including termination of employment, shall be applied to any supplier or employee of the supplier who participates in any prohibited activities and does not report on suspicious acts or retaliation actions.

Basic definitions

- **Bonded labour or debt burden:** the use of debt or other threats of financial harm as a form of coercion. Some workers are in debt, others are victims of traffickers or recruiters who illegally use the initial debt as a condition of work.
- **Sex for commercial purposes:** any sexual act through which any person is given or receives any value.
- **Coerced labour:** situations where people coerced to work through violence or intimidation, or through more disguised means, such as accumulated debt, possession of identity cards, or threats to disclose information to immigration authorities.
- **Human trafficking:** trafficking in human beings means recruiting, concealing, transporting, providing or obtaining a person for work or services through the use of force, fraud, coercion, abduction, deception, abuse of power or vulnerability, or granting or receiving payments or benefits to obtain consent of a person having control over another person, for the purpose of exploitation. Exploitation includes coerced labour, peonage, debt burden or slavery, removal of organs, sexual trafficking, or other forms of exploitation¹.

The workers and employees of Caritas Ukraine shall read, sign and adhere to the Caritas Ukraine Anti-human-trafficking Policy, which is a guiding principle in the field of combating trafficking in human beings, pursuant to the Statement.

¹ <https://zakon.rada.gov.ua/laws/show/3739-17#Text>

Statement

I understand and accept the Caritas Ukraine commitment to protect the rights and dignity of all the people by combating all forms of trafficking. I have read and understood the Caritas Ukraine Anti-human-trafficking policy. I also understand that in case of non-compliance with these provisions, I may be subjected to the disciplinary and legal measures.

Full name

Date, signature.....