

# Trafficking in Persons (TIP) Policy

Effective Date: December 1, 2024

Approved By: Vanja Sikirica, Country Director

### 1. Purpose

NPA is committed to promoting human rights and combating all forms of trafficking in persons (TIP). This policy outlines our commitment to preventing TIP, protecting victims, and ensuring compliance with international and national laws and standards.

### 2. Scope

This policy applies to all employees, contractors, sub-contractors, trainees, volunteers, and partners of NPA. It governs all activities and interactions related to our work, regardless of location.

#### 3. Definitions

- Trafficking in Persons (TIP): As defined by the UN Palermo Protocol, TIP involves the recruitment, transportation, transfer, harbouring, or receipt of persons by means of threat, force, coercion, abduction, fraud, deception, abuse of power, or payment to achieve control over another person for the purpose of exploitation.
- **Exploitation:** Includes but is not limited to sexual exploitation, forced labour, slavery, servitude, or the removal of organs.

### 4. Guiding Principles

NPA operates based on the following principles:

- **Zero Tolerance:** We have zero tolerance for TIP.
- Protection and Empowerment: We prioritize the rights, safety, and dignity of TIP survivors.
- **Accountability:** All employees, contractors, sub-contractors and partners are accountable for upholding this policy.
- Compliance: Adherence to national and international TIP laws is mandatory.

# 5. Policy Commitments

#### 5.1 Prevention

- Raise awareness among employees, partners, contractors, sub-contractors and beneficiaries about TIP and related risks.
- Integrate TIP risk assessment into program planning and implementation.

• Provide training for staff and partners on identifying and responding to TIP.

#### 5.2 Protection

- Establish confidential mechanisms for reporting suspected TIP cases.
- Ensure immediate assistance, including medical, psychological and legal support, for TIP survivors if employees of NPA.

## 5.3 Prosecution and Accountability

- Report all suspected TIP cases involving NPA staff, partners, contractors, sub-contractors to appropriate legal authorities, to NPA Head Office and donors.
- Investigate allegations of TIP involving employees or partners and take disciplinary action, including termination of contracts, if substantiated.
- Cooperate fully with law enforcement and judicial authorities.

## 5.4 Partnerships and Advocacy

- Collaborate with local and international organizations to strengthen anti-TIP efforts.
- Advocate for stronger TIP prevention and survivor support measures in policies and legislation.

# 6. Reporting Mechanisms

- Hot line: +380752982600
- Online forms: <u>WeCare</u> (in Ukrainian and English) <u>Whistleblow</u> (English and several other languages)
- In person: Country Director of NPA Ukraine, MAD Programme Manager of NPA Ukraine, DHC Programme Manager of NPA Ukraine
- All reports will be treated with confidentiality and handled in line with the principles of safety, security, and non-retaliation.

## 7. Roles and Responsibilities

- **Executive Leadership:** will ensure the implementation of this policy and allocate necessary resources and will nominate a TIP focal point.
- TIP Focal Person: Oversee TIP-related activities, training, and reporting.
- All Employees and Partners: Adhere to this policy and report any suspected TIP activities.

## 8. Monitoring and Evaluation

NPA will regularly review this policy and its implementation to ensure effectiveness and compliance with evolving legal and operational requirements.

### 9. Review and Amendments

This policy will be reviewed annually or as required due to changes in legislation or organizational priorities. Amendments will be approved by Country Director.