



HAMNASA Trafficking in Persons (TIP) Compliance Plan

Prepared for the USAID Hamoris Activity

December 2023

Trafficking in persons is a type of exploitation. Trafficking is defined as the recruitment, transportation, or receipt of persons by means of deception, coercion, threat, or force for the purpose of exploitation such as for labor or prostitution¹. HAMNASA’s current activities are considered **medium-risk** for human trafficking. Activities are not being implemented with groups of highly vulnerable people (refugees; asylum seekers; internally displaced people; people who use drugs; people who sell sex; LGBTQI+ people; prisoners; people who are homeless; or migrant workers). However, program activities are being implemented in some high-risk settings². These include program implementation in **schools** and **health facilities**. Even though Timor-Leste is not considered to be a high-risk setting by the most recent U.S. Trafficking in Persons Report or an area experiencing a current or recent disaster, disease outbreak, armed conflict, or other humanitarian crisis or emergency response, there is a **common practice of early or child marriage** (anyone under 18).

HAMNASA has an Anti-Trafficking Policy that is part of HAMNASA’s Ethics Policy. The policy provides that anyone involved in trafficking activities will be subject to disciplinary action, and such acts will be referred to legal authorities for their action. The purpose of this policy is to establish a clear standard for HAMNASA staff in relation to their moral and legal obligations to treat all people with respect and to actively prevent any form of human trafficking. HAMNASA has a responsibility to ensure that its programs do no harm in the communities where it works. Program staff at all levels have a responsibility to support systems which maintain this environment. HAMNASA employees are required to review and sign the TIP Policy (available in both English and Tetum) and Plan upon joining the organization. The policy is reviewed annually at all-staff meetings. This TIP Compliance Plan is also publicized on the HAMNASA website.

HAMNASA expects to employ approximately 50 non-US citizens in total, and approximately 32 non-US citizens under the USAID Hamoris Activity.

¹ United Nations. UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, especially Women and Children, 2000.

² High-risk settings include: schools, refugee or internally displaced persons camps, emergency shelters, youth/recreation centers, health facilities or mobile medical units



Requirement	HAMNASA Provision	Timeframe	Responsible Person
<p>An awareness program to inform employees about the trafficking related prohibitions included in this provision, the activities prohibited and the action that will be taken against the employee for violations.</p>	<p>HAMNASA has an anti-trafficking policy included in the HAMNASA Ethics Policy, that has been translated and socialized to all staff. The provision in the policy mirrors the provision in the USAID Hamoris Award.</p> <p>Refresher on all policies is done annually, per policy, at HAMNASA quarterly staff meetings (2 policies at each staff meeting).</p>	<p>Annual staff refresher of HAMNASA Ethics Policy, that includes the TIP provision that mirrors the provision in the USAID Hamoris Award. Refresher sessions on the TIP are scheduled and integrated into staff meetings quarterly in March, June, September and December.</p> <p>HAMNASA’s Ethics Policy that includes this provision will be included in annual policy refresher at the staff meeting scheduled for December 2023</p>	<p>Executive Director – to ensure that the awareness program is implemented via socialization of the policy and annual refresher sessions.</p>



<p>A reporting process for employees to report, without fear of retaliation, activity inconsistent with the policy prohibiting trafficking, including a means to make available to all employees the Global Human Trafficking Hotline at 1-844-888-FREE and its e-mail address at help@befree.org.</p>	<p>If an employee becomes aware of a violation, they are required to report to their immediate supervisor, or, if the conduct involves the immediate supervisor, or any other supervisor within their department, or if they feel uncomfortable reporting in person, they can report via the HR email address provided for in the policy.</p> <p>HAMNASA supervisors are required to report violations of the policy to the Executive Director immediately. The suspected violation does not have to be corroborated to report. The HAMNASA Executive Director must notify, within 24 hours of becoming aware of the</p>	<p>This policy is already in place. Requirements are ongoing</p>	<p>Executive Director – to ensure that the reporting processes in the policy and the whistleblower protections are followed.</p> <p>HAMNASA Board – for oversight of implementation of the procedures</p>
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	<p>suspected violation, its Board of Directors, and relevant funding bodies, including the Agreement Officer (AO) for USAID awards and the USAID Office of the Inspector General. HAMNASA will also cooperate with any US Federal agencies responsible for audits, investigations, or corrective actions relating to trafficking in persons.</p> <p>Personnel are asked 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.</p> <p>HAMNASA should also refer survivors of TIP to local medical, psychosocial, and legal services, through the existing Timor-Leste GBV referral network. Additional referral options include the Global Human Trafficking Hotline</p>		
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	<p>at +1-844-888-3733 or help@befree.org</p> <p>The anti-trafficking provision in HAMNASA’s Ethics Policy includes a whistleblower provision that strictly prohibits retaliation against anyone who reports trafficking activity or against anyone who cooperates with investigations about such activity. The policy also includes procedures for reporting of violations of the whistleblower policy.</p> <p>The annual review of the HAMNASA Ethics Policy scheduled for August 2023 will include information about the Global Human Trafficking Hotline and email address.</p>		
<p>A recruitment and wage plan that only permits the use of recruitment companies with</p>	<p>HAMNASA does not use recruitment agencies and does all recruitment internally.</p>	<p>Ongoing</p>	<p>Senior Admin Manager - to manage recruitment procedures</p>



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<p>trained employees, prohibits charging of recruitment fees to the employee, and ensures that wages meet applicable host-country legal requirements or explains any variance.</p>	<p>HAMNASA’s recruitment policies prohibit the use of any misleading or fraudulent recruitment practices during the recruitment of employees or offering of employment to employees. HAMNASA personnel involved in the selection of employees must disclose any conflicts of interest related to a candidate for recruitment. HAMNASA policies in fact prohibit recruitment of immediate family members of existing personnel. HAMNASA HR must fully and accurately disclose, in a format and language accessible to the employee, all key terms and conditions of employment including those written in the work contract such as job description, wages and benefits, work location, hours of work, applicable deductions and any other conditions. HAMNASA follows Timor-Leste law and will pay to all employee wages and benefits that are provided for by law.</p>		<p>Executive Director - to oversee implementation of processes according to policy</p>
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A housing plan, if the recipient or any sub-awardee intends to provide or arrange housing. The housing plan is required to meet any host-country housing and safety standards.	HAMNASA does not provide housing to employees	N/A	N/A
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<p>Procedures for the recipient to prevent any agents or sub-awardee at any tier and at any dollar value from engaging in trafficking in persons activities.</p>	<p>HAMNASA does not currently have any sub-awardees. If HAMNASA were to have sub-awardees in the future, an anti-trafficking provision would be included in the sub-awardee contract.</p> <p>An anti-trafficking provision is included in all HAMNASA contracts with contractors, vendors and suppliers.</p> <p>This provision requires that all contractors, consultants, vendors, subcontractors, and subrecipients of HAMNASA and their employees, consultants, interns, volunteers, and agents to not engage in prohibited trafficking or trafficking-related activity, or other such conduct. These entities must take steps to prevent trafficking or trafficking-related activity by their personnel, and they must promptly report suspected or known trafficking or trafficking-</p>	<p>HAMANSA to review all contracts with vendors and suppliers for compliance, and update those that do not have an anti-trafficking provision, with all those requiring update to be amended and signed when/if contract is renewed annually.</p>	<p>Senior Admin Manager - to manage inclusion of the provision in all contracts</p> <p>Executive Director - to ensure compliance</p>
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	<p>related activity either orally or in writing, ideally within 24 hours or as soon as possible under the circumstances.</p> <p>The provision in the contract includes the consequences for failure to comply with these requirements, including termination of contract, subcontract, subaward, or other partnership type. If any type of contractor fails to comply with the applicable requirements, HAMNASA will take action to remedy the violation and prevent future violations, including requiring the contractor to remove an employee or other type of agent from a project or terminate a relationship with an offending contractor or agent, suspending payments to a contractor until the violation is remedied.</p>		
<p>The recipient must also have procedures to monitor, detect, and terminate any agents or sub-awardee or sub-awardee</p>	<p>included in the sub-awardee contract. An anti-trafficking provision is included in all HAMNASA</p>	<p>HAMANSAs to review all contracts with vendors and suppliers for compliance, and update those that do not have an anti-</p>	<p>Senior Admin Manager - to manage inclusion of the provision in all contracts</p>



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<p>employees that have engaged in such activities.</p>	<p>contracts with contractors, vendors and suppliers.</p> <p>This provision requires that all contractors, consultants, vendors, subcontractors, and subrecipients of HAMNASA and their employees, consultants, interns, volunteers, and agents to not engage in prohibited trafficking or trafficking-related activity, or other such conduct. These entities must take steps to prevent trafficking or trafficking-related activity by their personnel, and they must promptly report suspected or known trafficking or trafficking-related activity either orally or in writing, ideally within 24 hours or as soon as possible under the circumstances.</p> <p>The provision in the contract includes the consequences for failure to comply with these</p>	<p>trafficking provision, with all those requiring update to be amended and signed when/if contract is renewed annually.</p>	<p>Executive Director - to ensure compliance</p>
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