



International Center for Journalists (ICFJ)

Anti Human Trafficking and Forced Labor Policy

Purpose

The purpose of this policy is to ensure that at all International Center for Journalists, program participants, and workers are safe and not exposed to any threat or acts of human trafficking or forced labor, prison labor, or child labor (collectively referenced as “forced labor”) and that the International Center for Journalists does not work with other organizations, vendors, or suppliers who may be involved in forced labor.

Applicability

This policy applies to ICFJ’s global staff, partner organizations, and participants who will be held accountable for following this policy.

General Guidance

“Human trafficking,” “worker exploitation,” “forced labor”, “prison labor,” “modern-day slavery,” and “child labor” are terms used to describe situations where one person is exploited by another person for profit. The person or child may be forced to involuntarily perform labor or engage in a commercial sex act. These are broad terms that cover many types of exploitation that use force, fraud, harassment, deceit, or abuse of power.

Forced labor involves three elements: 1) the perpetrator’s actions to obtain or maintain involuntary labor; 2) using force, deceit, or coercion over the victim; and 3) for the purpose of exploiting a person’s labor or services.

The use of force, deceit, or coercion over a victim may include preventing a victim from controlling their own freedom, safety, personal documents, working and living conditions, and wages. If a worker does not have control over any of these areas, it is a potential sign of forced labor.

The International Labour Association outlines [11 Indicators of Forced Labor](#):

- Abuse of vulnerability- e.g., charging recruitment fees
- Deception- e.g., Offering employment under false pretenses
- Restriction of movement – e.g., locking exit doors, failing to provide transportation to an employee working outside of the country from which they were recruited upon the end of employment.
- Isolation
- Physical and sexual violence – e.g., procuring a sex act
- Intimidation and threats- e.g., abusive language
- Retention of identity documents- e.g., Destroying, hiding, taking, or denying an employee access to their identity or immigration documents
- Withholding of wages – e.g., paying less than promised or paying less than the legal required minimum wage



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- Debt bondage- e.g., deducting wages to pay a debt to secure employment
- Abusive working and living conditions- e.g., providing housing that does not meet local housing and safety standards. ¹
- Excessive overtime

Mandatory Reporting

Please email communications@icfj.org Partners of Pact are able to use Pact's hotline at www.pactworld.ethicspoint.com, but please keep in mind that our ability to investigate another organization can be limited.

Reports may also be made through the Global Human Trafficking Hotline via telephone (1-844-888-FREE) or e-mail (help@befree.org).

The International Center for Journalists is required to report any violations of this policy to the funder or prime implementing partner.

Implementation

Training and Awareness

All ICFJ staff will read and acknowledge the policy. This policy will be saved in ICFJ's HR folder on SharePoint as part of the employee handbook. Questions about the policy can be addressed to the Director of Human Resources.

Subaward and Contractor Obligations

ICFJ must include the applicable prevention of human trafficking terms in any sub-awards and contracts. A sub-awardee's or subcontractor's failure to comply with the requirements may result in the termination of the subaward or contract (including subcontracts).

Human Resources

International Center for Journalists has an Anti-Trafficking Compliance Plan that outlines how it operationalizes the requirements of this policy, providing specific instructions on the appropriate implementation of recruitment and wage plans and non-salary benefits so that the International Center for Journalists does not engage in any acts that could be perceived as human trafficking.

Assessing Risks at the Project Level

The Vice President of Programs is responsible for identifying, mitigating, and monitoring specific trafficking risks in their programs related to programming and country challenges. This includes, but is not limited to, ICFJ employees, agents, contractors, subcontractors and their agents are forbidden from:

- Using forced labor

¹ ICFJ does not provide or arrange any housing for its employees in accordance with its Anti-Human Trafficking Compliance Plan.



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- Concealing, destroying or otherwise denying access to an employee to their identity or immigration documents, regardless of the issuing authority
- Using fraudulent or misleading recruitment practices or recruiters that do not comply with local labor laws and charge recruitment fees to the employees
- If required by law or contract, failing to provide an employment contract, recruitment arrangement or employment documents that detail the job description, wages and benefits

Any violations should be reported using <https://www.icfj.org/icfj-whistle-blower-policy>

Specific Obligations for USAID Projects

USAID-funded awards with an estimated value that exceeds \$500,000 are required to annually certify to USAID or the prime recipient that they have implemented a compliance plan and are not engaged in any trafficking-related activities. ICFJ has designated the Grant and Budget Officer as responsible for submitting these certifications. If ICFJ issues sub-awards or sub-contracts under USAID funding that exceed \$500,000, the sub-recipients and sub-contractors are required to annually certify to ICFJ that they have implemented a compliance plan and are not engaged in any trafficking-related activities.

Enforcement

Violation of this policy constitutes an act of serious misconduct and is grounds for disciplinary action, including termination of employment and referral to law enforcement.

Whistleblower policy: <https://www.icfj.org/icfj-whistle-blower-policy>

Any vendor/subrecipient or vendor/subrecipient personnel who 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.

Resources:

<https://humantraffickinghotline.org/en>



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Anti-Human Trafficking and Forced Labor Compliance Plan

Purpose

In accordance with the International Center for Journalists' Human Trafficking and Worker Exploitation Policy, the International Center for Journalists prohibits global staff, partner organizations, and participants from engaging in any form of human trafficking, forced labor, prison labor, or child labor (collectively referenced as "forced labor").

The International Center for Journalists is committed to protecting workers and responding promptly and appropriately to any allegations of forced labor incidents. This plan establishes the International Center for Journalists' procedures for preventing forced labor through awareness, reporting, recruitment and wage plans, housing plans, sub-award compliance, and investigations.

Awareness Efforts

The International Center for Journalists resources related to combatting human forced labor and worker exploitation are available below. This plan is posted on ICFJ's website and can be found <https://www.icfj.org/policies>

The names and link to the various resources:

- U.S. Department of State, Human Trafficking, available at: <https://www.state.gov/policy-issues/human-trafficking/>
- U.S. Department of Health & Human Services, Fact Sheet: Human Trafficking, available at: <https://www.acf.hhs.gov/otip/fact-sheet/resource/fshumantrafficking>.
- U.S. Department of Homeland Security, Blue Campaign Training, available at: <https://www.dhs.gov/blue-campaign/blue-campaign-training>.
- National Human Trafficking Hotline, available at: <https://humantraffickinghotline.org/en>.
- United Nations, Human Trafficking FAQs, available at: <https://www.unodc.org/unodc/en/human-trafficking/faqs.html>.
- Polaris, Human Trafficking, available at: <https://polarisproject.org/human-trafficking/>.
- ILO, Business and the Labour Dimension of human rights due diligence, available at: https://www.ilo.org/empent/areas/business-helpdesk/WCMS_867782/lang--en/index.htm.
- ILO, A self-assessment tool for enterprises based on the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy (MNE Declaration), available at: https://www.ilo.org/empent/units/multinational-enterprises/WCMS_837280/lang--en/index.htm.
- Due Diligence for Fair Recruitment, available at: <https://flbusiness.network/toolkit-fair-recruitment/story.html>.
- OECD Due Diligence Guidance for Responsible Business Conduct, available at: <https://www.oecd.org/investment/due-diligence-guidance-for-responsible-business-conduct.htm>.



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New employees are introduced to the organization's policies through the employee handbook and acknowledge and agree to abide by ICFJ's policies in the initial offer letter of employment. Any changes or new policies are communicated to all staff via email, Slack, and at staff meetings. The updated policies are added to the employee handbook and saved in the public folder in SharePoint. The contractors and consultants acknowledge adherence to relevant policies in their agreements "BY SIGNING BELOW CONSULTANT ACKNOWLEDGES THAT HE [SHE] HAS READ THE FOLLOWING ICFJ POLICIES AND AGREES TO ABIDE BY THEIR TERMS AND PROVISIONS"

ICFJ has the policies and rules-related materials published internally in its HR folder. Any new policies or changes to existing policies are made through email, Slack messages, and announcements at the staff meeting and the HR folder is updated appropriately.

Reporting Process

All International Center for Journalists global staff, partner organizations, and participants must report any suspicions or allegations of human forced labor or non-compliance with the Human Trafficking and Worker Exploitation Policy, which is incorporated by reference into this Compliance Plan, to <https://www.icfj.org/icfj-whistle-blower-policy>

Reports may also be made through the Global Human Trafficking Hotline via telephone (1-844-888-FREE) or e-mail (help@befree.org). If International Center for Journalists employees report incidents to these outside sources, they should also report internally so that appropriate action can be taken to address the incident for the organization.

Any violations of the Human Trafficking and Worker Exploitation Policy must be reported to the funder.

Implementation

Recruitment and Wage Plan

In all hiring practices...

- International Center for Journalists abides by local labor laws as well as the International Labour Organization Convention.
- International Center for Journalists workers are prohibited from charging recruitment fees to any candidate as a condition of their prospective employment at International Center for Journalists.
- International Center for Journalists workers should not solicit any candidate for purposes of employment using false or fraudulent pretenses, representations, or promises regarding that employment.
- International Center for Journalists workers are prohibited from keeping, concealing, or destroying an employee's identity or immigration documents.



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To the extent that ICFJ 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.

ICFJ workers must ensure that if transportation is offered to a staff member to work in an out-of-country work location, ICFJ or a sub-recipient will provide transportation back to their home country at the end of the employment period. A staff member who refuses to return home because they want to seek survivor services or legal redress in the host country is exempt from this requirement.

ICFJ does not provide or arrange any housing for employees.

Assessing Risks at the Project Level

Vice President, Programs is responsible for ensuring that the organization is regularly assessing risks related to forced labor.

Subrecipients' failure to comply with the requirements of our policy or compliance plan could result in immediate termination of their sub-award.

Specific Obligations for USAID Projects

The Grants and Budget Officer must keep in mind that for USAID-funded awards there is a requirement for annual certification. This requirement applies to USAID awards with performance outside of the United States and with an estimated value that exceeds \$500,000. The certification must be submitted to USAID or prime implementor and state that ICFJ has implemented this compliance plan and is not engaged in any forced labor-related activities. Likewise, USAID sub-recipients and subcontractors with a sub-award or subcontract value that exceeds \$500,000 are required to annually certify to ICFJ that they have implemented a compliance plan and are not engaged in any forced labor-related activities.

Questions

Questions regarding this plan or the Anti-Human Trafficking and Worker Exploitation should be addressed to the Director, Human Resources at ICFJ.