



USAID OVC North East Activity

Human Trafficking Compliance Plan

September 30, 2022 – September 29, 2027

1. Activity Summary Information

Mechanism Name:	USAID Orphans and Vulnerable Children (OVC) North East Activity
Prime Partner:	Uganda Women's Effort to Save Orphans
Start Date and End Date:	September 30, 2022, to September 29, 2027
Agreement Number:	72061722CA00004
Total Activity Budget:	\$ 9,901,234
Geographical Scope:	Six districts of Busia, Katakwi, Kotido, Mbale, Soroti and Tororo; and 2 cities of Mbale and Soroti

2. Organizational and Activity overview

Uganda Women's Effort to Save Orphans (UWESO) is an indigenous, non-governmental, inter-denominational, and non-political development organisation (NGO) founded in 1986 by a group of women volunteers who were mobilised and led by the First Lady, Hon. Janet Kataaha Museveni – the Founder/Patron of the organisation. UWESO was initially established as a relief organisation to respond to the needs of destitute and disadvantaged children who were orphaned as a result of the civil strife of the early 1980s and the HIV/AIDS pandemic. Over the years, the organisation has evolved from providing relief into a broad-based child rights organisation, identifying interventions that are strategic for addressing the needs of Orphans and Vulnerable Children (OVC) nationally.

The organisation works in partnership with relevant government agencies, Civil Society Organisations (CSOs), development partners and the private sector to advance the rights of children, with a Vision to have; *'Healthy children living in a peaceful world of opportunity'* and Mission: *'To Improve the quality of life of vulnerable children and youth for them to survive and thrive'*, working with children, women, communities, government and partners.

Over the years, UWESO has successfully implemented several foreign and local funded child rights programs across the country. Among other programs, the organisation is currently implementing a five-year USAID-funded cooperative agreement Activity (The USAID OVC North East Activity) in six (6) districts of Busia, Katakwi, Kotido, Mbale, Soroti and Tororo; and two (2) cities of Mbale and Soroti in Eastern Uganda. The Activity Goal is *'To prevent new HIV infections and reduce vulnerability among OVC and Adolescent Girls and Young Women (AGYW)'*. This is aimed at ensuring improved well-being of children and youth through comprehensive interventions that enhance sustainable prevention of new HIV infections and continued care for OVC and their caregivers and expand the reach of OVC core activities in North Eastern Uganda.

The Activity is hinged on three (3) Intermediate Result (IR) areas, all of which are intended to contribute towards HIV epidemic control in Uganda. These include:

IR 1: Strengthened and sustained identification, retention, and viral suppression of children and adolescents with HIV, along with their caregivers through i) socioeconomic strengthening of the family and ii) appropriate linkages to other service providers.

IR 2: Improved health, prospects, and reduced risk of violence and HIV for highly vulnerable adolescents.

IR 3: Strengthened prevention and response to violence against children and youth.

SR 1.1: Increased and sustained linkages with facility-based treatment and decentralized drug distribution, promoting access to essential services, and increasing uptake and service utilization, early diagnosis and treatment and retention in care.

SR 2.1: Improved high-impact HIV prevention interventions for vulnerable adolescents

SR 3.1: Increased access to HIV and violence prevention among vulnerable young adolescents

SR 1.2: Improved household socio-economic stability

SR 2.2: Increased access to education, business development and entrepreneurship skills among high risk adolescents

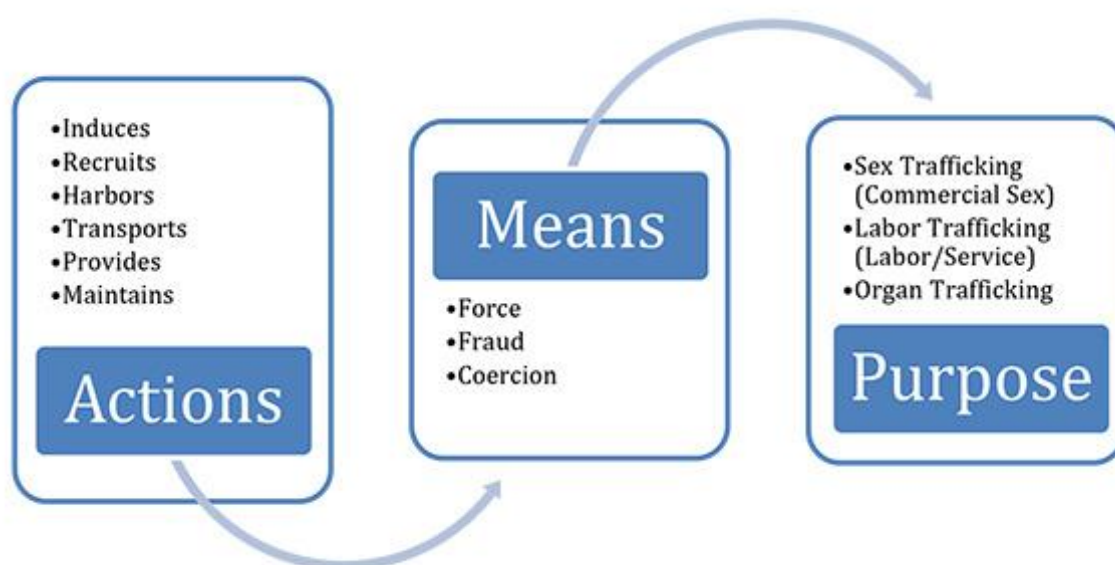
SR 3.2: Strengthened community-based systems for the prevention and response to children and families affected by HIV and violence

The Activity targets the following sub-populations:

- 1) Children and adolescents (0-17) living with HIV (CALHIV).
- 2) HIV-exposed infants (HEI), especially those of young HIV+ mothers (<19years).
- 3) SVAC: Children who have experienced sexual or other forms of violence and girls at risk of or involved in transactional sex.
- 4) CFSW: Children of key populations (e.g. female sex workers).
- 5) Pregnant adolescent girls and those with infants.
- 6) Children of HIV Positive caregivers: Biological children of mothers living with HIV (and children of biological fathers living with HIV if mother's status is unknown) – especially non-suppressing caregivers.
- 7) Out-of-school adolescent girls.
- 8) Adolescents living without adequate adult supervision (child-headed).
- 9) Adolescents (10 -14-years) at heightened risk of HIV infection or violence (Targeted with No Means No & MoH Journeys).

3. Background

Trafficking in Persons, also known as Human Trafficking, is the unlawful act of transporting or coercing people for the purpose of work or service, typically in form of forced labour or sexual exploitation. Human trafficking is currently one of the leading global, national and local challenges experienced by mankind. The perpetrators are usually driven by self-interests, particularly to satisfy their bodily desires and/or financial gains. Human trafficking presents devastating effects on individuals, communities and nations with emotional, mental, physical, social and economic consequences. Men, women and children can become victims of human trafficking, particularly those from vulnerable communities.



It is therefore imperative to prevent and respond to human trafficking everywhere and at all times; and UWESO is committed to this cause.

UWESO abides by the duty of care to safeguard and promote the welfare of children, adolescent and youth and is strongly committed to safeguarding practices that preserve the dignity of human life and align with both global and national statutory obligations and guidelines. UWESO recognizes that prevention of and response to human trafficking is everyone's responsibility, and that it's her duty to put in place reasonable measures to protect its employees, volunteers, partners, beneficiaries and communities from human trafficking.

The following are the specific measures that will be put into place to prevent and respond to trafficking of persons:

4. Implementation Plan

#	Potential Risk	Planned Preventive and Remedial Actions	Lead Person(s)
1.	Increased Activity Participants' Vulnerability.	To reduce the vulnerability of the Activity participants, UWESO will carry out the following initiatives: i. Activity participants will be sensitized on their rights against exploitation and abuse, particularly human trafficking. This will be done through community conversations, public events including the International Days celebrations, print media (including newspapers, billboards and posters) and electronic media particularly the radio and television. ii. Socio-economic empowerment of the children, adolescents and youth, and their caregivers through peer support systems such as the Young Adolescents Peer Supports (YAPS); skilling and provision of start-up capital to increase personal and household income; training in agricultural food production; supporting Village Savings and Loan Associations (VSLA), among others.	Chief of Party Deputy Chief of Party/Head of Programs Economic Strengthening and Youth Inclusion Manager
2.	Unfavorable Policy Environment.	UWESO has developed the Child Safeguarding Policy that includes the prohibition of human trafficking and the measures that should be taken to prevent and respond to the vice. The Policy is augmented by the Human Resource Policy and the Employee Code of Conduct. UWESO will ensure that the Child Safeguarding Policy, and other related policies, are effectively implemented. All employees will be required to sign on the Child Safeguarding Policy and the Code of Conduct as a sign of commitment to the human trafficking prohibition principles and practices.	Chief of Party Human Resource Officer
3.	Unfavorable Social and Physical Environment.	UWESO will at all times ensure a safe social and physical environment free from the risk of human trafficking for all Activity employees, volunteers and participants especially from the people they interact with during their routine operations. Provisions in the UWESO child safeguarding policy such as the prohibition of the any employee to stay in the same house with the child participant without the permission of the parents/caregivers, will be enforced.	Chief of Party Human Resource Officer Gender and Social Protection Manager

#	Potential Risk	Planned Preventive and Remedial Actions	Lead Person(s)
4.	Inappropriate Human Resource Structure.	To ensure that the human trafficking prohibition activities are well executed and coordinated, the Activity Chief of Party (COP) will assign the current Gender and Social Protection Manager (GSPM) as the designated safeguarding (including human trafficking prevention and response) officer. She will work with COP in planning, capacity strengthening, coordination, monitoring, review, evaluation, reporting of human trafficking prohibition activities and on following up on investigations for the reported cases up to their conclusion. It is noteworthy, the COP will continue to be fully responsible and accountable for prevention of and response to human trafficking.	Chief of Party Gender and Social Protection Manager Human Resource Officer
5.	Inappropriate Staff Recruitment and Wage Plan.	UWESO will ensure that it engages only recruitment companies with professional staff. In addition the charging of recruitment fees to the job applicants will be forbidden. UWESO will also ascertain that the hiring procedures align to the national legal requirements and standards, and that wages and salaries are reasonable to meet the basic living standards. However, in cases of any variance, a written rationale will be provided and put on file.	Chief of Party Director Finance and Operations Human Resource Officer
4.	Recruitment or Contracting Persons that are Potential Perpetuators of Human Trafficking.	UWESO will endeavor to recruit employees that are suited to work with children, adolescents and youth and that are committed to keep them safe at all times. The Activity will adopt 'safe' recruitment procedures to protect children, adolescents and youth from human trafficking including the following measures: i. Conducting comprehensive background check as part of the recruitment process including the respective candidates' past and current residences (using the local council system), past places of work and the police/judiciary for any criminal records. ii. Having all the Activity employees and volunteers to sign on and abide by the Safeguarding Policy and Code of Conduct (both documents entail prohibition of human trafficking) before they are given appointment letters.	Chief of Party Human Resource Officer

#	Potential Risk	Planned Preventive and Remedial Actions	Lead Person(s)
		iii. Training all new employees and volunteers on prohibition of human trafficking including the types and dangers of the Vice; how to recognize the signs of abuse; their roles and responsibilities in preventing and responding to any incidents (real or suspected) of human trafficking; and reporting procedures for human trafficking. iv. Monitoring/detecting and termination of employees, volunteers or partners that may be engaged in human trafficking activities.	
5.	Poor Housing Standards for Employees.	In the event the poor housing standards for employees may predispose them to human trafficking/abuse, efforts will be made to ensure that the newly recruited employees are facilitated by the Activity to get descent accommodation, and that meets the national housing and safety standards. Of particular consideration will be the location of the house and the security measures that are in place to reduce any potential harm to the employee. In addition, all new employees will get security briefs on the pertaining security situation and the required preventive and protective measures.	Chief of Party Director Finance and Operations Human Resource Officer
6.	Lack of Awareness among Employees and Volunteers Human Trafficking Prevention and Response.	UWESO will conduct awareness sessions to all its employees (staff, contractors and volunteers) and National Executive Committee (NEC) members during their induction period and at least on quarterly basis reminding them on the dangers and prohibition of human trafficking. Communication will also be made through regular monthly general staff meetings and through the regular weekly learning hour that take places every Thursday, 9:00 – 10:00 hrs. The following topics – to the minimum - will be covered during training/sensitization: i. Understanding human trafficking including the types, dangers and burden; and their roles and responsibilities in the prevention of and response to the Vice. ii. Understanding the significance of dignity and respect when working with children, adolescents and youth. iii. Acquiring knowledge on the available relevant human trafficking policies, including the UWESO Child Safeguarding policy and Human Resource Policy, UWESO Code of Conduct, and other related organizational rules, regulation, standards and procedures.	Chief of Party Human Resource Officer Gender and Social Protection Manager

#	Potential Risk	Planned Preventive and Remedial Actions	Lead Person(s)
		iv. Acquiring knowledge and skills on recognizing and screening participants at the risk of and in need of protection from human trafficking. v. Understanding how to report a human trafficking alert.	
7.	Poor Adherence to the Standards and Procedures for Prevention of and Response to Human Trafficking.	To ensure compliance of all the employees (staff and contractors), volunteers and partners to the standards and procedures for prevention of and response to human trafficking, UWESO will guarantee safety in all its operations, programs, research, monitoring, evaluation, campaigns, marketing and communications from human trafficking for Activity participants. Activity senior management will make it clear to the employees, volunteers and partners on the zero tolerance to human trafficking. Within all Activity departments (Operations and Finance, Case Management, Economic Strengthening and Social Protection), any existing or new practices, processes or systems will incorporate the human trafficking prohibition standards to ensure that the rights of the Activity participants are observed and any risks are adequately mitigated. In addition, the Standards will be reflected in all processes that define or determine how employees and volunteers carry out their work. This includes but not limited to: job descriptions, Terms of Reference (ToRs), codes of ethics, performance management systems and disciplinary procedures. Failure to adhere to the standards will be recognized a serious disciplinary breach and will result in proportionate personnel action. All the Activity staff in leadership positions (Chief of Party, Deputy Chief of Party, Director of Finance and Operations, Advisors, Managers, Human Resource Officer and District Program Coordinators/Officers) will be responsible for understanding and communicating to their respective staff on the functional responsibilities they hold to ensure that programs and operations are safe for beneficiaries/participants, mitigate foreseeable risks, and execute duty of care across all contexts. The costs of implementing the human trafficking prohibition standards will be reflected in all operational and programmatic plans, budgets and funding proposals.	Chief of Party Deputy Chief of Party Direct Finance & Operations MEL Advisor Case Management Advisor Gender and Social Protection Manager Economic Strengthening and Youth Inclusion Manager District Program Coordinators/ Officers

#	Potential Risk	Planned Preventive and Remedial Actions	Lead Person(s)
8.	Poor Organizational Risk Assessment and Management.	Risk Assessment for human trafficking will be performed across all the program activities including work planning, program implementation, monitoring, evaluation, research, new business development, information management, policy formulation, communication/campaigns, operations and budgeting. Efforts will be made to ensure that all the activities conform to the human trafficking safety standards irrespective of participants' racial or ethnic heritage, national status, tribal affiliations, religious beliefs, languages, gender or disability. Appropriate mitigation measures will be instituted for the identified risks and duly monitored during their implementation.	Chief of Party Deputy Chief of Party/ Head of Programs Director of Finance and Operations Monitoring, Evaluation and Learning Advisor Gender and Social Protection Manager
	Poor documentation and storage of human trafficking information.	Written records will be made on any issues concerning human trafficking. The documentation will include details on the person involved, the nature of concern and the actions taken, and decisions made and why they were made. All the records will be signed and dated, and securely and confidentially stores.	Chief of Party Human Resource Officer Gender and Social Protection Manager
9.	Failure to Report Cases of Human Trafficking.	UWESO will sensitize/train its employees, volunteers, beneficiaries (participants) and partners on their respective roles and responsibilities in prevention of and response to human trafficking including the reporting procedures, including whistleblowing. Measures for protection of survivors and reporters of human trafficking will be highlights. During the sensitization/training sessions, clarification will be made that it is not the responsibility of the reporter to conduct the investigations. Any suspected or actual incident of human trafficking with be reported to the following:	Chief of Party Human Resource Officer Gender and Social Protection Manager

#	Potential Risk	Planned Preventive and Remedial Actions	Lead Person(s)
		At Activity level: The Gender and Social Protection Manager Mbale Head Office, Plot 48, Wanale Road, Senior Quarters, Mbale City Telephone No: +256-782 371921; +256-702 025593 E-mail Address: Christine.offwono@uweso.org At USAID level: Telephone Numbers: +256-414 306694; +256-414 306695; and +256-414 306634 Email: IG.HOTLINE@USAID.GOV WhatsApp: +1-202-704-2160gov/report-fraud Web Link: https://oig.usaid Mail: USAID OIG Hotline P.O Box 657 Washington, DC 20044-0657 These contact details will be displayed in strategic places at the Mbale Activity Head Office and other Activity field offices in the six operational districts of Kotido, Busia, Tororo, Mbale, Soroti and Katakwi and the two cities of Soroti and Mbale. During the reporting process, emphasis will be put on protection of the survivor's privacy, identity, dignity and respect. The use of images or video of survivors and details about their lives for media advocacy or related purposes will not include images, video or information that would allow him/her to be identified. During investigations, relevant (police and judiciary) all efforts will be made to ensure the due process is according to the national law, and that protection and support are given to the survivors. All sensitive and personal data will be kept and shared on a strictly 'need to know basis', and only for the purpose of conducting one's official duties. In all suspected or actual human trafficking cases, the Chief of Party will be responsible for notifying the USAID Agreement Officer, through the Agreement Officer's Technical	

#	Potential Risk	Planned Preventive and Remedial Actions	Lead Person(s)
		Representative, and the USAID Office of the Inspector General providing the details on the incident, and on the responsive actions and plans. He or She will ensure that full cooperation with any Federal agencies responsible for any investigations and/or corrective actions relating to the incident.	