

TRAFFICKING IN PERSONS

PLAN

(Updated May 2026)

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1. PURPOSE AND SCOPE

PADF's Trafficking in Persons (TIP) Plan is meant to complement the Trafficking in Persons (TIP) Policy [link] which is part of PADF's [Safeguarding Policy Framework](#), and PADF's Global Code of Conduct [link]. Those documents reinforce PADF's commitment to safeguarding individuals who work in or with our organization, as well as those whom we serve laying out key procedures and demonstrating our commitment to PADF's H.E.A.R.T. values, reflecting our organization's zero-tolerance policy towards these offenses.

As a prime recipient of U.S. Government federal funds, PADF must abide by the Code of Federal Regulations under any type of federal funding it receives, through a federal assistance award or a contract. PADF must follow guidance provided in [2 CFR Part 175](#) Award Term for Trafficking in Persons, including [Appendix A to Part 175, Title 2](#) contained in the Department of State's Standard Terms and Conditions. For contract, PADF must abide by the [FAR 52.222-50](#) Combating Trafficking in Persons and FAR 52.222-56 Certification Regarding Trafficking in Persons Compliance Plan.

A requirement of the U.S. Government regulations is that for any grant over \$500,000, outside the United States, PADF has a Trafficking in Persons Compliance plan appropriate to the size and complexity of the grant or cooperative agreement and to the nature and scope of its activities, including the number of non-United States citizens expected to be employed.

In compliance with this regulation, PADF will apply this Trafficking in Persons (TIP) Plan as a standardized framework for all of its programs, ensuring that each project adheres to the necessary procedures for raising awareness, monitoring, preventing, and reporting human trafficking.

As applicable, these provisions shall also be applicable to implementing partners and contractors. PADF is committed to take action when receiving a complaint and will respond to all reports, concerns, or allegations regarding abuse or harm by following an internal process guide to take action on any complaints it receives.

Our agreement templates also incorporate essential clauses to inform others about safeguarding against exploitation and abuse and TIP. Specific clauses bring awareness to Protection from Sexual Exploitation and Abuse (PSEA), Whistleblower Protections, mechanisms for reporting violations, and provisions for Safeguarding Children and Vulnerable Adults; and Anti-Prostitution and the Recipient's Responsibility to Prevent Trafficking in Persons (TIP).

For Award [X], [provide description of the award: amount, size and complexity of the grant or cooperative agreement, the nature and scope of its activities, including the number of non-United States citizens expected to be employed].

2. DEFINITIONS OF TRAFFICKING AND PROHIBITED BEHAVIORS

PADF adopts definitions aligned with the Trafficking Victims Protection Act (TVPA), as well as the Code of Federal Regulations found in [2 CFR 175](#) ([2 CFR 175.300](#)), and [FAR 52.222-50](#):

Trafficking in Persons

- The recruitment, harboring, transportation, provision, obtaining, patronizing, or soliciting of a person for labor or services, through force, fraud, or coercion, for the purpose of subjection to involuntary servitude, peonage, debt bondage, slavery, or for a commercial sex act; or

- Any commercial sex act involving a person under 18 years of age.

Severe Forms of Trafficking in Persons

- Sex trafficking where a commercial sex act is induced by force, fraud, or coercion, or where the person induced to perform such act is under 18; or
- The recruitment, harboring, transportation, provision, or obtaining of a person for labor/services through force, fraud, or coercion for servitude, peonage, debt bondage, or slavery.

Sex Trafficking

- The recruitment, harboring, transportation, provision, obtaining, patronizing, or soliciting of a person for the purpose of a commercial sex act, including clarified coverage of patronizing/soliciting in the 2024–2025 FAR rulemaking.

Commercial Sex Act

- Any sex act on account of which anything of value is given to or received by any person.

Forced Labor

- Knowingly providing or obtaining the labor or services of a person by:
 - Threats of serious harm or physical restraint;
 - Schemes, plans, or patterns intended to cause a person to believe that failure to perform would result in serious harm or physical restraint; or
 - Abuse or threatened abuse of law or legal process.

Recruitment Fee

- Any fee or cost imposed on workers/candidates for recruitment, selection, placement, or processing, including but not limited to: administrative costs, visa or work permits (where employer is legally responsible), travel/transport, medical exams (where employer is responsible), or any similar charge, consistent with U.S. guidance on fee prohibition.

Prohibited behaviors include:

- Engaging in trafficking in persons¹.
- Procuring commercial sex acts, including paying for remote interactive sexual activities.²
- Using forced labor³.
- Destroying, concealing, confiscating, or otherwise denying an employee access to their identity or immigration documents.⁴
- Failing to provide return transportation or pay return transportation costs to an employee from a country outside the U.S. to the country from which the employee was recruited upon the end of employment if the employee requests it.⁵

¹ In 2CFR175.105(1) and FAR22.1703(1)

² 175.105(2) and 22.1703(2)

³ 175.105(3) and 22.1703(3)

⁴ 175.105(4i) and 22.1703(4)

⁵ 175.105(4ii) and 22.1703(7)

- Soliciting a person for the purpose of employment, or offering employment, by means of materially false or fraudulent pretenses, representations, or promises regarding that employment.⁶
- Charging employees' recruitment fees.⁷
- Providing or arranging housing that fails to meet the host country's housing and safety standards.⁸
- If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing.⁹

3. GUIDELINES FOR PREVENTING, MONITORING AND DETECTING PROHIBITED ACTIVITIES

PADF's general guidelines taken from our [Safeguarding Policy Framework](#) are outlined below:

- 1) Make PADF employees and others **aware** of the conducts that are prohibited under PADF policy and the Federal Anti-Trafficking in Persons Provisions, and the actions that may be taken for violations;
- 2) **Prevent** prohibited trafficking activity by suppliers, subcontractors, and sub-recipients, and monitor, detect, and terminate those who engage in such activities;
- 3) Establish PADF reporting requirements and **remediation procedures**;
- 4) Inform PADF employees of available processes for them to **report**, without fear of retaliation, any activity inconsistent with PADF's anti-trafficking in persons policy;

Additional for USG Awards, to ensure safety of the program staff:

Recruitment and wage plan - For Awards which involve recruiting local staff, PADF has a Safer Recruitment Guidance it follows to assist the Talent Management to meet PADF Safeguarding core standard of safe people and skills.

Housing plan – For Awards in which PADF must provide or arrange housing for ex-pats or TCNs, PADF has a Relocation Guide to ensure that the housing accommodations meets host-country housing and safety standards and that are within the Department of State maximum allowances for a specific location.

4. PROCEDURES FOR PREVENTING, MONITORING AND DETECTING PROHIBITED ACTIVITIES

This section covers the procedures on how PADF will ensure avoiding any activity related to TIP.

Preventing: PADF employees and all partners contractors need to be informed about the definitions of trafficking that are included in that agreement and whether these are based on US law or specific to the country where the agreement is made. PADF is responsible for ensuring partners and contractors are able to stay in compliance with this policy and that partners and contractors understand the implications of committing to these policy provisions. As a minimum include the following in partnership vetting:

- Regular risk assessment of PADF's and partners' physical locations and activities;

⁶ 175.105(4iii) and 22.1703(5).

⁷ 175.105(4iv) and 22.1703(6)

⁸ 175.105(4v) and 22.1703(8)

⁹ 22.1703(9)

- Request copy of safety policies and any anti-discrimination, anti-harassment, and abuse policies that organizations and companies have in place;
- Identify where there are concerns for potential partners' working practices or capacity to work to the provisions of this policy and use this to inform decisions on whether to engage in the partnership arrangement;
- Staff and partners with responsibility for designing and delivering programs should consider as part of the risk assessments conducted, the risks arising from convening program participants in places that might be subject to external recruitment to trafficking. Examples to consider include:
 - What situational security PADF provides in and around the physical spaces.
 - Risks to organizations with whom PADF works which are targets for recruiters and traffickers.
 - Risks associated with access to services that PADF is supporting where recruiters and traffickers might operate.
 - Risks associated with differing power within participant groups where individuals are survivors of trafficking.

Monitoring: PADF will monitor Partner and Contractor activities in order to detect any suspicious activity by having Focal Points in every country office where we have projects. These Focal Points will be able to monitor and periodically review any unusual travel patterns or unverified or suspicious transactions or and may consult with Talent Management regarding unusual or unexplained changes in employee behavior or performance.

Detecting: Based in monitoring, PADF will provide continuous training and create awareness to its employees, and any contractors or subcontractors if they request it, on how to identify the signs of human trafficking, how to recognize suspicious and prohibited activities and how to report them. Any detected activity should be reported through any of the methods described in section X of this Policy.

Terminating: PADF is required to include in each Agreement a condition that authorizes PADF to terminate the Agreement or take remedial actions if an entity receiving funds under the prime award as a recipient or subrecipient engage in any of the prohibited activities described in this Plan. Under Contracts, PADF shall notify its employees and agents that actions will be taken, including termination.

Failure of partners and service providers to comply with the provisions of FAR 52.222-50 Combatting Trafficking in Persons or 2 CFR Part 175- Award Term for Trafficking in Persons (2 CFR 175.105 Statutory requirement (a)), or DOS Standard Terms and Conditions regarding Trafficking In Persons, Appendix 3, may result in suspension or termination of the contract or subaward if any prohibited activities occur.

5. REPORTING

Any violation of this policy by a PADF employee or other person such as by PADF's implementing partners and contractors should be immediately reported through the reporting routes detailed below. It is the duty and responsibility of all staff to report suspicions and incidents of labor and sexual exploitation and trafficking through the reporting routes.

All reports or concerns raised will be treated confidentially.

PADF's reporting routes include:

- Report to a “Safeguarding Focal Point” designated for a project or country. The list of current Focal Points can be found [here](#). Reports received by Focal Points or Managers must be reported immediately to PADF’s hotline, providing as much information as obtained from the disclosure/report made.
- Approach the project Manager or a Supervisor.
- Approach a member of the Talent Management team.
- Text the PADF WhatsApp line at +1(703) 953 – 9241.
- Report online using PADF’s hotline managed by **Safecall**, a third-party whistleblowing service provider. When calling or reporting online, you may remain anonymous. Service will be provided in the language of the country where the report originates:
 - Safecall’s toll-free number is 0 (800) 915 1571, or
 - Report on-line via <https://www.safecall.co.uk/file-a-report/>.

Based on PADF’s Safe Programming Toolkit, projects and programs that are assessed as high risk will trigger a decision on establishing Community-Based Reporting Mechanisms (CBRMs). Decisions on establishing these will include designating responsibility for handling reports arising through CBRMs to appropriate employees. All safeguarding reports which arise through CBRMs must be reported to PADF’s hotline.

Reports of criminal nature will be reported to the local authorities ensuring that it is safe to do so.

There is no time limit on when someone can raise a concern about something they have experienced. There may be limitations to how a historical concern can be addressed, but PADF will take every reasonable measure to address the concern.

PADF prohibits any act of retaliation against an employee who makes a report or raises a concern in good faith.

If under a U.S. Government assistance funding, PADF must inform the Federal donor agency and the Inspector General of that agency immediately of any information received from any source alleging a violation of the prohibited activities.

PADF shall cooperate fully in any Inspector General or agency investigation regarding allegations of human trafficking, including timely and complete responses to auditors’ and investigators’ requests for documents and access to its facilities and staff.