



USAID
FROM THE AMERICAN PEOPLE



U.S. AGENCY FOR INTERNATIONAL DEVELOPMENT POLICY ON COUNTERING TRAFFICKING IN PERSONS

JANUARY 2021

On the cover: (left) Charimaya Tamang was sex trafficked in Nepal at age 16. She was alone cutting grass in the forest when she was ambushed by four men. After being drugged and losing consciousness, she was transported to the brothels in the Kamathipura red light district in Mumbai, India, where she was forced to be a sex worker for the next 22 months. At her lowest moment, she tried hanging herself. However, Charimaya emerged from her trafficking ordeal a stronger woman. She has dedicated her life to helping other trafficking survivors find hope. United by the painful days they faced together, Charimaya and 15 of her fellow survivors banded together and formed USAID-supported Shakti Samuha, which translates as “power collective” in Nepali. As the first organization in Nepal established and operated by survivors of human trafficking, Shakti Samuha provides shelter, legal aid, and vocational training and counseling to other survivors. Photo courtesy of Jessica Benton Cooney, USAID.

(Top right) A trafficking survivor from the Kyrgyz Republic working in his small business with start-up capital provided by USAID. Photo by Danil Usmanov.

(Bottom right) Asiya works with her new sewing machine as part of her small business with start-up capital provided by USAID/Tajikistan’s vulnerable migrant program aimed at preventing human trafficking. Photo courtesy of Jessica Benton Cooney, USAID.

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Executive Message



In 2020, we celebrated the 20th anniversary of the bedrock Trafficking Victims Protection Act, which laid the foundation for the U.S. response to modern slavery around the world. Human trafficking continues to be the second largest criminal industry worldwide, affecting at least 25 million victims who are primarily women and girls. Ranging from organized crime in Libya and the Federal Republic of Nigeria to alleged state-sponsored trafficking in Cuba, human trafficking harms the most vulnerable in our societies. Its horrific practices undermine global security, corrupt international commerce, exacerbate gender inequality, and subvert the rule of law.

The mission and work of the U.S. Agency for International Development (USAID) in more than 120 countries bring a comparative advantage to address human trafficking in communities in the most dire of circumstances. Since 2001, USAID has invested more than \$340 million to combat modern slavery in more than 88 countries and regions. Over the last 20 years, we have achieved valuable progress in strengthening anti-trafficking legislation, policies, and practices to better support survivors, prosecute human traffickers, and prevent human trafficking from occurring in the first place.

To build on this record, I am pleased to announce our revised Policy on Countering Trafficking in Persons (C-TIP). Coupled with our existing [Code of Conduct](#) and [Field Guide](#), the Policy lays out our commitment to end human trafficking and uphold the dignity, safety, and well-being of all survivors.

The revised Policy also highlights the importance of close collaboration within USAID to integrate approaches to C-TIP across sectors such as democracy, human rights, and governance; education; the prevention of conflict and violence; economic growth; and humanitarian assistance. Beyond USAID, we will deepen our coordination with colleagues across the U.S. Government, implementing partners, civil society, faith-based organizations, the private sector, and host-country governments to build national commitment, address corruption, and boost capacity to address the root causes and conditions that allow human trafficking to take place.

Survivors of human trafficking are key partners for USAID. Their input and leadership are essential to develop programs that prioritize their needs and to advance policies that elevate their voices. We are deeply grateful to the survivors who reviewed and provided feedback on the revised Policy, which is now even stronger because of them. Throughout the Policy, we feature survivors who benefited from USAID-funded programs; they provide messages of hope, empowerment, and inspiration.

While we are proud of our milestones and progress over the past several years, we look forward to the day when modern slavery ends once and for all.

John Barsa
Acting Deputy Administrator
U.S. Agency for International Development

Executive Summary

The Policy on Countering Trafficking in Persons (C-TIP) of the United States Agency for International Development (USAID) strengthens our ability to combat modern slavery¹— a massive humanitarian and development challenge that affects millions of men, women, and children. This Policy adopts a collaborative and inclusive approach to the “4Ps” paradigm of Prevention, Protection, Prosecution, and Partnerships. USAID deems trafficking in persons and the protection and empowerment of survivors a high priority. All USAID staff must play an active role in countering trafficking in persons, whether through integrating C-TIP into their sectoral programming, abiding by the Agency’s C-TIP Code of Conduct, or educating and enforcing C-TIP provisions in awards with implementing partners.

In addition to laying out seven principles and five objectives that guide USAID’s work to eliminate modern slavery, this Policy provides practical guidance to assist our Operating Units (OUs) to implement them.

These seven principles will guide USAID’s approach to implementing this Policy:

1. Promote Victim-Centered Approaches in C-TIP Programming;
2. Employ a Whole-of-Agency Approach to Combat Modern Slavery;
3. Deploy the Comparative Advantage of USAID;
4. Measure Impact and Bring Successful Programs to Scale;
5. Promote Strategic Partnerships;
6. Invest in Innovation and Technology; and
7. Advance High Ethical Standards.

This Policy has five programming objectives:

1. Increased Integration of C-TIP into USAID’s Initiatives and Programs;
2. Enhanced Technical Support and Coordination to Combat Modern Slavery;
3. Improved Application of Learning, Evaluation, and Research in C-TIP;
4. Increased Impact on Host-Government Partners; Civil Society, including Faith-Based Organizations; the Private Sector; and Beneficiaries; and
5. Strategic C-TIP Investments in Targeted Countries.

Since the publication of the last USAID C-TIP Policy in 2012, the U.S. Government has bolstered its efforts to eliminate modern slavery through many initiatives, including a National Action Plan and revised legislation.² These actions include expanding coordination with the U.S. Government interagency to leverage resources, working with trafficking survivors to develop government policy and programs, and promoting partnerships with foreign governments to build local capacity.³ Similarly, USAID has developed our *Policy on Protection from Sexual Exploitation and Abuse* (PSEA), *Policy on Child Safeguarding*, and other Agency-wide policies and requirements designed to protect vulnerable populations as part of the framework of the Journey to Self-Reliance.⁴ Through this Policy, USAID aims to achieve these outcomes:

- Improve our understanding and use of victim-centered approaches to ensure the dignity, well-being, and empowerment of beneficiaries;
- Work with host-country governments; civil society, including faith-based organizations; and the private sector to build their capacity to combat modern slavery;

- Enhance coordination within USAID and with the U.S. Government interagency;
- Draw on the best available evidence; and
- Provide clear roles and responsibilities for staff across USAID to implement effective C-TIP programming.

Global Context and Definitions

USAID is one of several U.S. Government Departments and Agencies mandated by the Trafficking Victims Protection Act of 2000 (TVPA), Division A of Public Law (P.L.) 106-386, to implement C-TIP activities, and we are committed to playing a vital role in the international effort to counter modern slavery.

Globally, human trafficking is a low-risk, high-reward crime for perpetrators, who profit extensively from the exploitation of others with relatively minimal risk of prosecution. Demand

for cheap labor and commercial sexual exploitation creates conditions that facilitate modern slavery, particularly when coupled with mass displacement, conflict, corruption, weak governance and rule of law, socioeconomic and structural inequalities, the absence of proactive efforts to protect human rights or respond to abuses, natural disasters, and practices that discriminate against the most-marginalized groups in society. On the supply side, inequality between women and men, deception by brokers, the complicity of authorities, a lack of monitoring of employers, high costs of education, and the lack of job opportunities and basic social services create conditions that supply traffickers with vulnerable adults and children. Likewise, desperate families who face economic hardship, a lack of livelihood opportunities, conflict, and natural disasters sometimes, wittingly or unwittingly, give or sell their children to traffickers, while local or global criminal networks lure adolescents and young adults into the trade under various pretenses.

TRAFFICKING IN PERSONS (TIP) DEFINED

TIP is a crime that uses force, fraud, or coercion for the purpose of exploiting an individual for profit through forced labor or sexual exploitation. The annual [U.S. Trafficking in Persons Report](#) published by the U.S. Department of State recognizes all major forms of human trafficking, to include forced labor, sex trafficking, bonded labor, debt bondage, involuntary domestic servitude, forced child labor, the recruitment and deployment of child soldiers, and child sex trafficking. A victim need not be transported from one location to another for a crime to fall within this definition.

The TVPA defines “severe forms of trafficking in persons” as the following:

- A. Sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; or
- B. The recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage,⁵ debt bondage, or slavery.⁶

The Child Soldiers Prevention Act of 2008 (CSPA), Title IV of P.L. 110-457, as amended, requires publication in the annual *TIP Report* of instances of children below the age of 15 recruited into an armed group and children below the age of 18 engaged in active combat as part of an armed group. They count as trafficking victims even in the absence of force, fraud, threats, or coercion.⁷

Beyond its immediate victims, trafficking impedes efforts to achieve gender equality and empower women, promote public health, and increase economic growth, and generally poses a threat to the lifetime prospects of young people. Likewise, TIP is a gross affront to human dignity that involves the violation of multiple human rights, including the right to life, liberty, and security; and the right to be free from torture and/or cruel, inhumane, degrading treatment or punishment.

The systemic challenges associated with collecting data on human trafficking make it difficult to capture the magnitude of the crime, which leads researchers to rely on estimates.⁸ The International Labour Organization (ILO) estimates that 24.9 million people are victims of human trafficking globally: approximately 16 million in private-sector areas such as domestic

work, construction, and/or agriculture; 4.8 million sexually exploited, including children; and four million people subjected to forced labor by state authorities.⁹ Women and girls account for 99 percent of victims identified in the commercial sex industry and 58 percent in other sectors.¹⁰ Men and boys, on the other hand, are disproportionately subject to forced labor in sectors that involve manual labor, such as mining, fishing, agriculture, construction, and manufacturing,¹¹ but also can be victims of sexual exploitation.¹² Altogether, about 83 million people have experienced some form of human trafficking for periods of time that range from a few days to five years.¹³

Children hold lighted candles during a prayer for Justice and Protection Against Sex Trafficking of Children and Young People in Quezon City, suburban Manila, on December 12, 2010, as part of the annual observance of the International Day against Human Trafficking. Cybersex dens are a growing problem in the Republic of the Philippines, which has long struggled to curb child sex trafficking, according to law enforcers and social workers. AFP PHOTO/JAY DIRECTO



SNAPSHOT OF CHILD TRAFFICKING

- Of the households surveyed in communities in and around Lake Volta in the **Republic of Ghana**, more than a third contained a victim of child trafficking or slavery-like conditions.¹⁴
- In the **Islamic Republic of Afghanistan**, trafficking activities are pervasive nationwide. They include the recruitment and use of child soldiers and the abhorrent practice of the exploitation of boys as young as nine by government and military officials in *bacha bazi*.¹⁵ Survivors of *bacha bazi* reported to non-governmental organizations (NGOs) an “overwhelming understanding that *bacha bazi* is committed by the powerful,” including military commanders and community leaders. International organizations reported cases of *bacha bazi* by nearly all ethnic groups.¹⁶
- In the **Republic of The Philippines**, the government and NGOs estimate that 60,000 to 100,000 children are trafficked annually.¹⁷ A recent study found that the estimated prevalence rate of online sexual exploitation of children (OSEC) and the development of child sexually explicit materials (CSEM) had more than tripled within three years: the estimated number of Internet Protocol addresses in The Philippines used for child sexual exploitation rose to 81,723 in 2017, from 23,333 in 2014.¹⁸
- In the **Republic of Haïti**, at least 30,000 children live in institutions, most of them in so-called orphanages, where they are often subject to trafficking and poor living conditions. The majority have at least one living parent, whom traffickers working at these institutions often have deceived. Traffickers promise to give children education, health care, and other opportunities and support. Instead, traffickers exploit the children for donations, or subject them to sexual exploitation, begging, and labor trafficking.¹⁹

While the TVPA and the *Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime* (also known as the Palermo Protocol) have been in place for 20 years, efforts to identify more victims, increase access to support programs for more survivors, and refine the victim-centered approach are continually evolving.²⁰ For nearly a decade, the U.S. Government has been identifying and developing promising practices to incorporate into anti-trafficking programs in order to ensure they are victim-centered and survivor-informed and take trauma into account. The [2020 U.S. National Action Plan \(NAP\) to Combat Human Trafficking](#) has identified these approaches under protection and prosecution pillars related to applying a victim-centered approach; safeguarding victims from inappropriate

penalization; improving access to immigration benefits and options; expanding and improving assistance to victims associated with Federal law enforcement; seeking financial remedies for victims; and offering or connecting survivors to social services.

Consistent application of victim-centered, trauma-informed strategies helps people who have been trafficked feel safer in coming forward, reporting to law enforcement, and participating as witnesses in investigations and prosecutions.²¹ Through the inclusion of the principles of the NAP in this Policy, USAID is contributing to the U.S. Government’s commitment to ensure the consistent implementation of best practices across the humanitarian and development work paid for by American taxpayers.

DEFINITIONS OF KEY TERMS

TERM	DEFINITION
Potential victim	A person not yet trafficked but considered at higher risk because of his/her vulnerability or other circumstances. ²²
Victim vs. survivor	The term “victim” has legal implications within the criminal justice process and generally means an individual who suffered harm as a result of criminal conduct. An individual identified as a victim also has particular rights within the criminal-justice process. “Survivor” is a term used to refer to an individual who is going through the recovery process, and it acknowledges the strength required to continue on a journey toward healing in the aftermath of a traumatic experience. ²³ In common parlance, “victim” can have a connotation of passivity or helplessness. This Policy uses “victim” primarily in connection to the legal aspects of combating trafficking in persons and seeking justice, and in no way by doing so do we diminish the courage and dignity of those who have survived human slavery.
Victim-centered approach	An approach that involves placing victims’ priorities, needs, and interests at the center of programming; providing an emphasis on their self-determination; assisting them in making informed choices; prioritizing efforts to restore their feelings of safety and security; and safeguarding against policies and practices that might inadvertently retraumatize them. A victim-centered approach should also be trauma-informed, survivor-informed, and culturally competent. ²⁴ Successful programs are tailored, contextually appropriate, and reinforce victims’ dignity and well-being.
Trauma	<i>Physical trauma</i> is a serious injury to the body, usually because of blunt force or penetrating trauma. ²⁵ Typical injuries for trafficking victims can include broken bones, concussions, or burns, as well as other injuries consistent with physical and sexual assault. ²⁶ <i>Psychological trauma</i> is a distress response that follows the exposure to an upsetting event, series of events, or set of circumstances that exceed one’s ability to cope. An individual experiences it as physically or emotionally harmful or life-threatening, and it has lasting adverse effects on the individual’s functioning and mental, physical, social, emotional, or spiritual well-being. ²⁷
Trauma-informed approach	An approach that considers the various ways that potentially traumatic experiences affect individuals, reduces the risk of retraumatizing them, and helps promote healing through its policies, procedures, practices, and settings. An understanding of the vulnerabilities and experiences of trauma survivors is key, including the prevalence and physical, social, and emotional impact of trauma. Such an approach places priority on restoring the survivor’s feelings of safety and empowerment. Programs, services, agencies, and communities can all be trauma-informed. ²⁸
Survivor-informed approach	A program, policy, intervention, or product designed, implemented, and evaluated with intentional leadership, expertise, and input from a diverse community of survivors to ensure that the program, policy, intervention, or product accurately represents their needs, interests, and perceptions. ²⁹

To combat the drivers and mitigate the impact of TIP effectively through our development and humanitarian assistance, USAID uses the “4Ps” framework—Prevention, Protection, Prosecution, and Partnerships—which serves as a complementary means to achieve progress across the others and to enlist all segments of society in the fight against modern slavery.³⁰ Across the “4Ps,” USAID enhances our bilateral

efforts through regional approaches that engage U.S. Embassies and improve coordination across countries via information-sharing, the harmonization of laws and policies, and joint law enforcement and other training. In doing so, USAID follows the requirements and standards reflected in the TVPA and the Palermo Protocol.³¹

“4Ps” PARADIGM

Prevention	Prevention activities make it riskier for traffickers to operate and decrease the vulnerability of potential victims. USAID-funded programs increase public awareness of modern slavery; its dangers; and how to report it in source, transit, and destination countries (<i>e.g.</i> , posters that warn traffickers and alert the public and victims how to report TIP and how to seek help). USAID’s programs also promote social and behavioral change to address harmful social norms and behaviors. Other USAID-funded programs aim to strengthen families and communities to prevent the trafficking of children or their placement in institutions; eliminate or reduce recruitment fees; and improve democracy, citizen-responsive governance, and the rule of law in partner countries combined with the implementation of strong national action plans to counter trafficking. USAID’s development approach aligns with Situational Crime Prevention, which examines the circumstances (or “ecosystems”) that allow particular types of crime to take root and grow. By gaining an understanding of these ecosystems, interventions can change the relevant ecosystems, reduce the opportunities for crime, and protect potential victims.
Protection	Protection is the cornerstone of a victim-centered approach. USAID aims to strengthen judicial and non-judicial measures to provide redress to victims of human-rights abuses, combat impunity and seek accountability for perpetrators, and potentially deter future violations. Thus, protection programs focus on identifying victims; reporting the crime; and developing national and regional referral mechanisms that ensure survivors are safe and receive shelter, food, counseling, health care, and legal assistance, as well as repatriation and reintegration services. They also include providing victim-centered training to law-enforcement officers, prosecutors, civil-society organizations, and judges, and strengthening international frameworks and cooperation in the maritime domain. ³² USAID’s programs utilize victim-centered approaches that include trauma- and survivor-informed approaches that seek recovery, resilience, and empowerment for victims. ³³ As a result of these programs, survivors of trafficking can become agents of change, and potential victims can learn to protect themselves and their communities.
Prosecution	The stubbornly low rate of TIP prosecutions and convictions worldwide indicates a need for increased anti-corruption and law-enforcement efforts and resources. USAID-funded programs advance anti-corruption and prosecution efforts, including by assisting with the development of anti-trafficking laws with strong criminal penalties; providing technical assistance and victim-centered training to law-enforcement officers, prosecutors, providers of legal aid, and judges; ensuring protections for survivors; and promoting efforts to provide them with restitution.
Partnerships	Successful efforts to combat TIP require effective coordination across a broad range of stakeholders. Partnerships and coordinating bodies focus on bringing together local, national, regional, and global networks; survivors and their communities; and representatives of civil society, government, the private sector, labor unions, and other types of worker organizations, media, and faith-based organizations.

Ensuring USAID’s staff understand their roles and responsibilities, and providing them with the necessary tools and resources for their successful execution, are key factors in achieving effective C-TIP programming. The most critical tool is the C-TIP Code of Conduct, which includes online training for our staff and clauses and provisions for our awards.

USAID'S CODE OF CONDUCT CONCERNING COUNTER-TRAFFICKING IN PERSONS³⁴

USAID recognizes its responsibility to demonstrate leadership in opposing any activities that could contribute to human trafficking, including the use of forced labor and the procurement of commercial sex acts or material that involves the sexual exploitation of children, including online images. The Agency therefore prohibits our employees, contractors, subcontractors, grantees, and subgrantees from engaging in behaviors that facilitate or support TIP. All USAID staff members must complete online training on this Code of Conduct within their first month of employment and repeat it, at minimum, every three years thereafter. Staff also should seek additional training and support by contacting the C-TIP Team within the Center on Democracy, Human Rights, and Governance (DRG) of the Bureau for Development, Democracy, and Innovations (DDI) and the Office of Acquisition and Assistance (OAA) within the Bureau for Management (M).

In February 2011, USAID adopted the C-TIP Code of Conduct, by which we pledge to do the following:

1. Prohibit USAID contractors, sub-contractors, grantees, and sub-grantees during the period of performance of their contracts or awards from engaging in trafficking in persons, procuring commercial sex acts, or using forced labor;
2. Sensitize USAID personnel to human trafficking and the ethical conduct requirements that prohibit the procurement of commercial sex and the use of trafficked labor;
3. Equip USAID personnel with the necessary knowledge and tools to recognize, report, and address human-trafficking offenses;
4. Require USAID personnel to report suspected cases of misconduct by USAID's employees, as well as waste, fraud, and abuse in USAID's programs related to human trafficking; and
5. Designate a Coordinator for Countering Trafficking in Persons at all Missions to serve as the primary point of contact for this issue, disseminate information, respond to inquiries, and liaise with appropriate staff in developing strategies against human trafficking.

Since 2001, USAID has provided more than \$340 million in assistance in 88 countries and regions to fight human trafficking. We integrate our counter-trafficking efforts across multiple Bureaus and sectors, and in coordination with the U.S. Government interagency and multiple external stakeholders.

Figure I. Map of USAID C-TIP Programming Presence for Fiscal Years (FY) 2001–2020

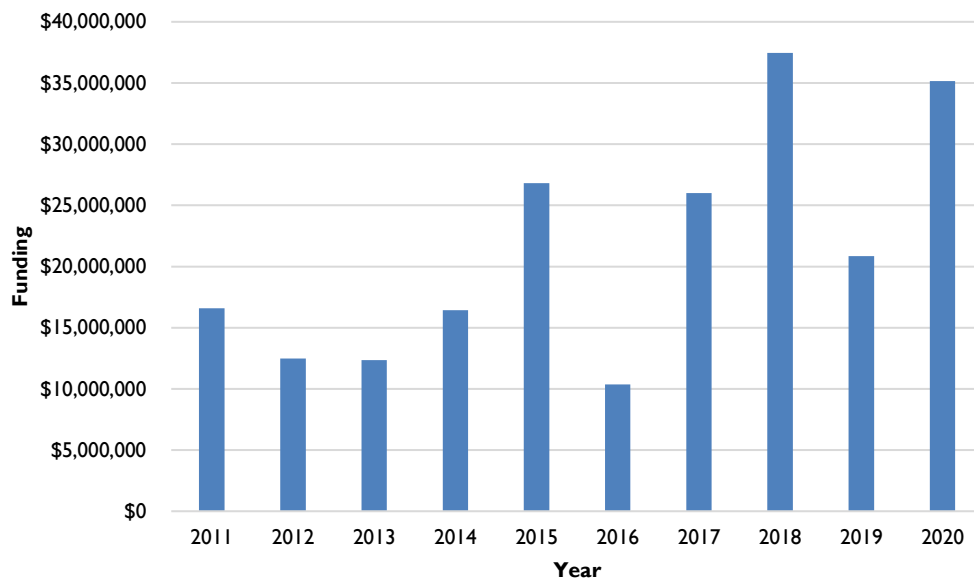


Map of USAID C-TIP programming presence by region and country for FY 2001-2020. The Global Labor Program (GLP) is not indicated on the map but has provided C-TIP programming in all five regions.

USAID OBLIGATIONS TO COUNTER TRAFFICKING IN PERSONS (C-TIP) BY REGION FOR FISCAL YEARS (FY) 2001–2020³⁵

USAID REGIONS	AMOUNT OF C-TIP FUNDING \$	# OF COUNTRY/ REGIONAL MISSIONS WITH C-TIP PROGRAMS	% OF OVERALL USAID C-TIP FUNDING
Asia	\$163,989,403	20	48
Europe & Eurasia	\$71,370,610	19	21
Africa	\$41,774,034	25	12
Latin America and Caribbean	\$41,406,531	16	12
Middle East	\$5,350,000	3	2
Global/DC ³⁶	\$17,057,128	5	5
Total	\$340,947,706	88	100

Figure 2. USAID C-TIP Annual Funding Trends for Fiscal Years (FY) 2011–2020



Bar chart showing USAID C-TIP funding trends from FY2011 to FY2020 and includes the Global Labor Program. Information compiled from the Department of Justice Attorney General's Trafficking in Persons reports from FY 2011-2020.

Rankings in the Annual *Trafficking in Persons Report*

Even 20 years after the passage of the TVPA and the adoption of the Palermo Protocol, many countries still struggle to meet the minimum standards for eliminating TIP. While most national legislatures have passed laws to criminalize TIP and established victim-assistance mechanisms, the numbers of victims identified and assisted, and traffickers convicted, remain low, including in many of USAID's partner countries. Governments' efforts to strengthen prosecution and protection are key factors in determining the rankings in the U.S. Department of State's annual *Trafficking in Persons Report* (*TIP Report*).

THE TIER RANKING SYSTEM OF THE DEPARTMENT OF STATE'S *TRAFFICKING IN PERSONS REPORT*

The annual *TIP Report* published by the Department of State classifies countries into tiers based on their governments' efforts to comply with the TVPA's "minimum standards for the elimination of trafficking."³⁷

- **Tier 1** represents countries that are meeting the TVPA's minimum standards.³⁸
- **Tier 2** represents countries that do not fully comply with the TVPA's minimum standards, but are making significant efforts to do so.
- **The Tier 2 Watch List** serves as a warning to governments that their statuses might be in decline for a variety of reasons, including a significant increase in TIP victims or a lack of evidence of increased efforts to combat the problem. Countries that remain on the Tier 2 Watch List have a limited time before the Department of State must either upgrade them to Tier 2 or downgrade them to Tier 3.³⁹
- **Tier 3**, the lowest level, represents countries with governments that neither fully comply with the minimum standards nor are making efforts to do so. Countries on Tier 3 could be subject to the TVPA's restrictions on U.S. foreign assistance.⁴⁰

Countries ranked Tier 3 (T3) in the Department of State's *TIP Report* are at risk of having all or part of their U.S. foreign assistance restricted, in an effort to encourage the governments of these countries to prioritize putting an end to trafficking. Supporting the efforts of governments of countries on T3 and the Tier 2 Watch List (T2WL) to strengthen their capacity to meet the TVPA's minimum standards for eliminating trafficking is a priority of U.S. foreign policy. Likewise, development assistance that fortifies anti-trafficking laws and programs in countries on Tiers 1 and 2 can help avoid backsliding.

USAID's C-TIP programming is locally informed, data-driven, and responds both to the annual *TIP Report* and input from our Missions. To the greatest extent possible, USAID's Missions and centrally funded programs should make addressing the recommendations of the *TIP Report* a central focus of their C-TIP investments. We acknowledge, however, that USAID's C-TIP programming and the annual *TIP*

Report do not always operate on the same timeline. USAID's C-TIP programming involves multi-year awards based on the U.S. Government's Fiscal Year and takes a longer-term approach to address TIP in the context of challenging development problems. Each June, the Department of State publishes the *TIP Report*, which provides a snapshot of countries' efforts to address TIP over the past year.

I. Guiding Principles

The following principles reinforce USAID’s mission of promoting and demonstrating democratic values abroad and advancing a free, peaceful, and prosperous world through partnerships and investments that save lives, reduce poverty, strengthen democratic governance, and help people emerge from humanitarian crises and progress beyond assistance. Achieving this mission requires USAID and our implementing partners first and foremost to “do no harm,”⁴¹ and to integrate effective safeguarding measures throughout our operations and programming to protect beneficiaries and prevent exploitation and abuse.⁴² Implementing this Policy and our C-TIP Code of Conduct are key elements to fulfilling our mission.

Promote Victim-Centered Approaches in Programming to C-TIP

USAID is committed to protecting victims and survivors through accessible, victim-centered programs that “do no harm.” Trafficking survivors often suffer lasting physical and emotional stress and might have limited exposure to opportunities that can facilitate healing and recovery.⁴³ To uphold the principle of “do no harm” and ensure programmatic effectiveness, a victim-centered approach also should incorporate a trauma-informed, survivor-informed, and culturally competent approach.⁴⁴

Adverse health outcomes are common for survivors of trafficking, and many continue to experience longer-term, sometimes disabling, physical and psychological harm.⁴⁵ These can include work-related injuries or accidents, sexual and physical assault, sexually transmitted infections including HIV/AIDS, infertility, forced

A Cambodian man is reunited with his sister after being enslaved on fishing boats for six years without any contact. Photo courtesy of CENTRAL.



abortions, chronic untreated medical conditions, malnutrition, and other afflictions.⁴⁶

Survivors of trafficking often experience mental-health consequences, such as anxiety disorders, mood disorders, suicidality, post-traumatic stress disorder, and substance abuse, among many others.⁴⁷ Trafficked minors are exposed to adverse childhood experiences, including violence, abuse, and neglect; and they are at increased risk of injury, future victimization and perpetration of violence, substance abuse, sexually transmitted infections, delayed brain development, lower educational attainment, and limited lifetime employment opportunities.⁴⁸ For these reasons, a majority of trafficking victims seek medical care, which provides a unique opportunity for identifying those who are in danger, and for supporting those who have been freed or have otherwise escaped.⁴⁹

Unfortunately, there is a limited availability of evidence-based, culturally competent mental-health and psychosocial support (MHPSS) for survivors. A victim-centered approach that integrates MHPSS into USAID’s programming will prioritize victims, ensure psychological safety, and avoid inadvertently retriggering traumatic experiences.⁵⁰ USAID believes that a victim-centered approach is essential to ensure our C-TIP programming is tailored and contextually appropriate to preserve the dignity, safety, and well-being of beneficiaries.

DEFINING MENTAL HEALTH AND PSYCHOSOCIAL SUPPORT IN THE CONTEXT OF TIP

Mental health	An individual's psychological and emotional well-being. It can be influenced by a variety of social and economic factors, including poverty, violence, lack of safety, employment, housing, and discrimination or stigma. Mental health interventions aim to improve psychological well-being by reducing levels of psychological stress, improving daily functioning, and promoting the use of healthy coping strategies.
Psychosocial support	Improving the connection between the individual and their environment, relationships with others, community and/or culture (i.e., their social context). Psychosocial support is essential for maintaining good physical and mental health. Psychosocial interventions provide an important coping mechanism for people during difficult times.
Mental health and psychosocial support (MHPSS)	A composite term that refers to a broad spectrum of interventions utilized to protect or promote individual and community psychosocial well-being and to treat mental health conditions.

Employ a Whole-of-Agency Approach to Combat Modern Slavery

USAID employs a whole-of-Agency approach through integrated and leveraged investments that have the greatest potential to holistically address the root causes, enabling factors, and impact of trafficking. Likewise, aligning our C-TIP principles and objectives with our broader humanitarian and development priorities and programs will make our efforts sustainable. In addition, compliance with our C-TIP Code of Conduct and award provisions ensures that both USAID's staff and our implementing partners

participate in the "4Ps" to combat modern slavery.

This Policy positions USAID's C-TIP portfolio for greater impact through coordination with our Missions and sectors such as agriculture, democracy, human rights, citizen-responsive governance, environment, education, economic growth, health, and humanitarian assistance. Our Missions' budget attributions to C-TIP programming ensure compliance with the annual C-TIP Congressional appropriations directive.⁵¹

IN FOCUS: WHOLE-OF-AGENCY APPROACH TO ADDRESS C-TIP

The Global Labor Program (GLP) Prevents TIP: The GLP, administered by the DRG Center within DDI, aims to increase the capacity of workers' organizations to promote basic human rights, increase access to justice for employees, and increase decent work worldwide. Part of these efforts includes promoting gender equality for women and girls and ensuring the rights of vulnerable populations, such as labor migrants.

For example, in Asia, the GLP promotes the empowerment of migrant workers, especially women, in both their countries of origin (*e.g.*, the Republic of Indonesia and the Kingdom of Cambodia) and destination (*e.g.*, the Kingdom of Thailand and Malaysia). The program's partners include national unions with affiliates in multiple sectors. These unions and other migrant workers' organizations work together to engage governments and businesses in the monitoring and oversight of labor recruiters to help reduce abuse and TIP. The project also conducts advocacy work, in concert with employers, to implement ethical labor-recruitment standards, such as the elimination of recruitment fees.

Analytic Activity Examines Efforts to Combat Transnational Organized Crime (TOC), Including TIP: The analytic agenda of USAID's Bureau for Africa seeks to increase the understanding of key development dynamics of TOC, including TIP, and funds programmatic responses in a variety of sectors. The current activity strengthens the rule of law through technical assistance to judicial systems, legal training, and capacity-building, including a series of roundtable discussions and white papers to inform donors and practitioners. For example, one roundtable examined private-sector engagement in countering organized crime and TIP by promoting crime-free supply-chains and crime-sensitive business practices through legislation and enforcement. Multi-stakeholder partnerships among the private sector, government, and civil society are instrumental to the effective implementation of such approaches to counter TIP and other forms of TOC.

Deploy the Comparative Advantage of USAID

USAID's role as the U.S. Government's lead for development and humanitarian efforts uniquely positions the Agency to work in countries vulnerable to the drivers of TIP because of political, security, and economic instability. USAID can foster national commitment and capacity to combat TIP as part of the Journey to Self-Reliance. USAID invests in strengthening state and non-state actors, as well as in building the capacity of individuals, organizations, and coalitions that are working to advance rights. USAID's activities to strengthen the rule of law promote judicial and non-judicial measures to provide redress to victims of human-rights abuses, combat impunity and seek accountability for perpetrators, and potentially deter future violations. Our social and behavioral-change activities also can reduce the demand for trafficking by modifying the behaviors and social norms behind exploitation and abuse. Together, these investments help lay a stronger foundation for democratic and citizen-responsive governance.

USAID's on-the-ground presence and the extensive country and institutional knowledge of our staff and implementing partners allow the Agency to design, implement, and monitor well-evidenced interventions informed by local and regional context, and to catalyze other development actors to do the same within the U.S. Government and broader international donor and partner communities.

Measure Impact and Bring Successful Programs to Scale

USAID is committed to increasing our positive impact on survivors, civil society, the private sector, and governments and adapting successful models to other Mission-funded programs through the use of geographically tailored evidence-based interventions. USAID collects

data through standard and custom indicators on C-TIP, assessments, performance and impact evaluations, research, and other analyses, which improve our understanding of our impact on TIP and inform our current and future programming. USAID also incorporates C-TIP approaches into our Country Development Cooperation Strategies (CDCSs), Regional Development Cooperation Strategies (RDCSs), and Missions' integrated learning agendas.

The systematic collection of programming data helps create meaningful baseline and comparative data to measure USAID's impact on survivors and national progress in commitment and capacity-building related to C-TIP,⁵² as does the expertise and funding support of the C-TIP research mechanism managed by the DRG Center within DDI. These efforts contribute to the collective action by the U.S. Government, implementing partners, researchers, and others to fill gaps in data and develop the evidence base needed to achieve effective and sustainable outcomes.

IN FOCUS: USING EVIDENCE TO SCALE UP A SUCCESSFUL PILOT PROGRAM

The USAID-funded activity "Combating Forced Child Begging in Dakar Municipalities" began in 2014 in two areas of Dakar, the capital of the Republic of Sénégal, to help address the problem of child begging by working with resident *daaras* (traditional Quranic schools). A 2017 evaluation of the first phase of the activity demonstrated the effectiveness of these interventions, which resulted in a reduction of more than 50 percent in the number of children begging in the target municipalities. Based on this evidence, USAID launched a second phase from 2018 to 2020 that replicated the approach in two additional municipalities, which achieved at least a 25 percent reduction.

PRESIDENT'S INTERAGENCY TASK FORCE TO MONITOR AND COMBAT TRAFFICKING IN PERSONS (PITF) AND SENIOR POLICY OPERATING GROUP (SPOG)

The PITF is a Cabinet-level entity created by the TVPA, which consists of 20 Departments and Agencies across the Federal Government responsible for coordinating U.S. Government-wide efforts to combat trafficking in persons.⁵³ USAID's participation in the PITF helps strengthen a whole-of-Government approach in the humanitarian and development contexts, which addresses the enforcement of criminal and labor laws; the identification and protection of victims; education and public awareness; international trade and development; enhanced partnerships and research opportunities; and international engagement and diplomacy.

A 2003 amendment to the TVPA established the SPOG with five standing committees that continue to advance the PITF's substantive areas of work. The committees' areas of focus are research and data; grant-making; public awareness and outreach; victims services; and procurement and supply-chains. Chaired by the U.S. Department of State's Office to Monitor and Combat Trafficking in Persons, the SPOG meets quarterly. USAID co-chairs the SPOG Grant-Making committee.

Promote Strategic Partnerships

USAID's strong partnerships with other U.S. Government Departments and Agencies, foreign governments, the private sector, public international organizations, civil-society and faith-based organizations, media, and survivors enable it to carry out the "4Ps" approach through collaborative efforts that increase efficiency and accountability.⁵⁴ These partnerships help increase government responsiveness, support knowledge-sharing and community mobilization, strengthen civil society, and engage the business community to support local solutions that address the vulnerability and enabling conditions of trafficking.

USAID is one of numerous U.S. Departments and Agencies the TVPA requires to participate in a whole-of-Government approach to combat trafficking in persons, through the President's Interagency Task Force (PITF) and Senior Policy Operating Group (SPOG). This approach requires USAID's headquarters to play a strategic role in linking our field Missions to the robust interagency efforts in Washington, D.C., by routinely participating in interagency grant-

making, research, and policymaking meetings and contributing to related taskers. Continuing collaboration with our interagency partners in both Washington and the field ensures a holistic and accountable approach to combating TIP.

USAID also works with foreign governments to combat TIP at both the national and local levels. Our Missions lead the planning and implementation of joint initiatives with governments that encourage open governance, inclusive development, and economic and legal reforms, among other initiatives.

USAID's strong in-country presence also provides access to an extensive network of local partners in the non-profit and private sectors. Our Missions' in-country relationships are key to the implementation of C-TIP programming that is contextually appropriate and sustainable. Partnerships with local faith-based groups, for example, can be critical to the success of C-TIP programming in areas where faith plays a strong role in the local culture and institutions.⁵⁵ Our Missions also can help the private sector make locally informed plans for market-entry, collaboration, and co-investment, which can play

constructive roles in combating TIP by advocating for better governance, economic growth, and the protection of human rights. As laid out in USAID's [Private-Sector Engagement Policy](#), commercial firms can contribute meaningfully to country development through open and transparent procurement and penalties to deter forced child labor. Governments, in turn, can improve the efficiency and legitimacy of procedures for private-sector actors through regulations around registering businesses and recruiting agencies.

USAID coordinates with interagency U.S. Government partners (e.g., the U.S. Departments of Homeland Security and Labor) to develop initiatives to provide information to private-sector partners on forced labor in their

product supply-chains, including discussions with business leaders to address specific challenges and opportunities in different industries.⁵⁶ USAID continues to share existing Federal resources, such as the annual *TIP Report* and the U.S. Department of Labor's [List of Goods Produced by Child Labor or Forced Labor](#), with private-sector partners. USAID's Missions and headquarters Bureaus also convene industry leaders to discuss these issues and provide presentations and webinars. In line with our [New Partnerships Initiative](#), our C-TIP efforts seek out partnerships with new and/or underutilized local partners to promote local leadership, create innovative approaches to foster self-reliance, and identify new sources of funding to scale up impact sustainably.

IN FOCUS: PRIVATE-SECTOR PARTNERSHIPS

Ukraine

USAID/Ukraine's private-sector engagement supports activities to prevent trafficking and protect survivors, through a national trafficking hotline, and networking and educational activities for small entrepreneurs and start-ups. The national trafficking hotline assists more than 20,000 callers annually by giving them access to information and facilitating referrals to services. Between 2014 and 2017, the Mission's networking and educational activities helped more than 800 victims of trafficking, 90 percent of whom became employed or returned to school; 35 survivor-led microenterprises received grant funding to start small businesses; and communities received grants to help employ survivors.

Kingdom of Thailand

USAID/Thailand's partnership with Mars Petcare demonstrates how private-sector engagement can prevent forced labor and human trafficking in the fishing/seafood industry. The goal of this partnership is to reduce the vulnerability of fishermen by leveraging communication technology. The pilot partnership began in March 2020 and involves the use of "plotter" equipment to track fishing boats in addition to the Vessel Monitoring System (VMS) required for every Thai vessel. By installing this plotter on board and using a mobile chat application specific to the plotter, fishing crews and workers have enhanced connectivity at sea through two-way real-time text communication, by using a combination of satellite broadband, satellite tracking, and affordable equipment. Approximately 50 people and 20 vessels in Phuket are participating in this pilot with an average of two to four accounts per boat. This communication technology helps protect some of the most isolated and vulnerable workers in Asia from exploitation.



A homeless man stops to read the personal stories of victims of trafficking featured within the USAID-funded art installation "Invisible in Plain Sight," produced by the International Organization of Migration (IOM) in Odessa, Ukraine. USAID has been countering human trafficking in Ukraine through victim-centered reintegration assistance and prevention initiatives targeted at vulnerable groups and the general population. Photo courtesy of IOM, Vladyslav Dobzhanskyi.



Installation of plotter equipment on fishing vessels in Thailand as part of USAID's C-TIP Private Sector Partnership program.

Invest in Innovation and Technology

USAID is increasingly relying on innovation and technology to develop a more targeted and creative approach to understand and reduce the prevalence of human trafficking. Through such tools, USAID can target human trafficking by exploring the enabling conditions that drive it.

IN FOCUS: RESEARCH, INNOVATION, AND TECHNOLOGY

In South and Southeast Asia, USAID is studying TIP in the People's Republic of Bangladesh, the Republic of The Philippines, and the Lao People's Democratic Republic. Researchers funded by USAID are applying an ecosystem model that uses "Weak-Signal Analysis" in combination with geospatial analysis and artificial intelligence to recommend cost-efficient, effective, and geographically targeted interventions to reduce, and ultimately prevent, TIP. The research will assist our Missions with interventions tailored to the specific needs of vulnerable populations.

By applying innovative research and technology, USAID can learn more about how traffickers operate, uncover local factors that increase individuals' vulnerability, and develop novel ways to disrupt and prevent trafficking. These tools also can provide further information on the factors that increase demand for trafficked persons and their labor and services (e.g., weak legal accountability, unethical business practices, and global and local consumer demand and buying practices), and the factors that erode a country's capacity to combat trafficking (e.g., armed conflict, organized crime, corruption, political instability, natural disasters, insufficient law enforcement, and a lack of rule of law or weak legal protections).⁵⁷

These innovative technologies also are likely to prove useful in increasing country capacity to manage crises like pandemics.⁵⁸ However, there are risks that accompany digital technologies, and it is critical that USAID expand awareness and protections from digital harm, especially to protect children from the pervasive growth of OSEC and the development of CSEM. The DRG Center within DDI will promote technological

sustainability by empowering local innovators to address problems in their own communities and work with partners, including the Innovation, Technology, and Research Hub within DDI and private innovators, to find creative ways to use technology safely to combat trafficking.

Advance High Ethical Standards

Complicity by the international community in human trafficking, whether by host governments, international organizations, NGOs, or contractors, is well-documented, especially in conflict and disaster regions.⁵⁹ Through USAID's [Code of Conduct](#), the Agency seeks to advance the highest ethical standards of our personnel, contractors, grantees, and subgrantees as a leader among donor organizations. USAID ensures the incorporation of the requisite C-TIP provisions and clauses into all our USAID grants, cooperative agreements, and contracts.⁶⁰ Contracting Officers and Agreement Officers (COs/AOs) ensure our partners submit certifications (and a compliance plan when requested by the CO/AO). The Agency takes exploitation and abuse of staff and beneficiaries very seriously.

USAID's safeguarding provisions, [Policy on PSEA](#) and [Partner Toolkit](#), and [Gender Equality and Women's Empowerment Policy](#) also contribute to anti-trafficking activities directed toward all vulnerable populations, especially women and girls, demographics reported as most vulnerable to trafficking and sexual exploitation.⁶¹ Although all populations and demographics can be vulnerable to trafficking, certain ones are especially at risk and in need of protection because of local challenges in protecting them. For this reason, USAID specifically tailors our C-TIP programming to local and regional contexts so it serves the vulnerable and marginalized populations who are most susceptible to trafficking.⁶²

EXAMPLES OF POPULATIONS VULNERABLE TO TIP

Indigenous Peoples: Worldwide, Indigenous Peoples are often economically and politically marginalized and disproportionately hurt by environmental degradation and armed conflict. Some lack citizenship and access to basic social services, even education. These factors make Indigenous Peoples particularly vulnerable to both sex trafficking and forced labor. For example, children from hill tribes in Northern Thailand who seek employment opportunities have been found in commercial sexual exploitation in bars in major cities within the country. In Latin America, members of Indigenous communities are often more vulnerable to both sex and labor trafficking than other segments of local society; in both the Republics of Perú and Colombia, illegal armed groups have recruited them by force. In remote areas of the Democratic Republic of Congo, members of Batwa, or pygmy groups, are subjected to conditions of forced labor in agriculture, mining, mechanics, and domestic service. San women and boys in the Republic of Namibia are exploited in domestic servitude and forced cattle-herding, while San girls are vulnerable to sex trafficking.⁶³ The Department of State's [TIP Report](#) for 2020 mentions the unique vulnerabilities of Indigenous Peoples in 17 countries.

Lesbian, Gay, Bisexual, Transgender, and Intersex (LGBTI) People: Violence, discrimination, stigma, and criminalization negatively affect the lives of millions of LGBTI people around the world. Thirty-six countries⁶⁴ identified trafficking vulnerabilities for LGBTI people. However, they face criminalization in approximately 73 countries⁶⁵—courts in several can impose the death penalty. Even when not routinely enforced, these criminalization laws stigmatize LGBTI people, validate discrimination against them, and can lead to harassment and life-threatening violence. In countries with high levels of anti-LGBTI violence, discrimination, stigma, and criminalization, authorities might not act to protect LGBTI people from trafficking, or they might fail to investigate and prosecute their traffickers. As a result, authorities might penalize LGBTI people for acts committed while being trafficked and therefore, LGBTI people can be less likely to report their exploitation to local authorities and/or to access needed services. In the Union of Burma and the Republic of Indonesia, for instance, LGBTI people face higher risk of extortion and psychological coercion by law enforcement, as well as discriminatory hiring practices, which complicate access to employment in the formal sector.⁶⁶

Migrants, Refugees, and Internally Displaced Persons: Crisis and displacement can exacerbate pre-existing TIP trends, or give rise to new ones, which makes migrants, refugees, and internally displaced persons (IDPs) especially vulnerable. Acute risk factors include having to rely on others for basic needs, shelter, resources, or transit. In the Republic of South Sudan, for example, traffickers who promise employment ensnare IDPs.⁶⁷ Traffickers also capitalize on social and economic losses common for those far from home, such as separation from family and the loss of land or livestock needed for income. In the Islamic Republic of Afghanistan, for instance, organizations have documented the sale of IDP children by their parents to pay off family debts.⁶⁸ Such losses also could cause families to make decisions that put women and children at risk, such as early or forced child marriage, which increases the risk of trafficking. Migrants, refugees, and IDPs are further likely to lack the documentation and/or information needed to gain access to support services or law enforcement.⁶⁹ Disasters, which can cause the breakdown of legal systems and support services, multiply these risks, particularly for women and girls.

EXAMPLES OF POPULATIONS VULNERABLE TO TIP (CONT.)

Persons with Disabilities: Persons with disabilities are especially vulnerable to the risks of human trafficking. Traffickers have targeted children with disabilities and forced them to beg for money because their disabilities—especially if highly visible—draw sympathy and charity from the public. In societies where children with disabilities often do not attend school, communities might be less likely to question why a disabled child is begging. Many communities regard persons with disabilities as undesirable, and their own families might traffic them.

Children with less-visible disabilities, such as cognitive or behavioral issues, are similarly at risk, as their families and communities might stigmatize them. They might not be in school because of bias or lack of understanding of how to provide reasonable accommodations. Children with disabilities who do not participate fully in social or academic settings are more likely to be isolated from their communities, which can make them more vulnerable to trafficking. Even in loving and supportive families, persons with disabilities can be susceptible to trafficking because of perceptions that they will not resist or identify those responsible. For example, persons with cognitive disabilities have been abducted and subjected to forced labor in brick kiln factories and other industries in the People's Republic of China without their families' awareness.

Persons with disabilities also face many barriers to justice. Lack of training for police, prosecutors, and judges on how to accommodate persons with disabilities—for example, on providing physical access or sign-language interpreters—can leave victims unable to report their abuse or participate effectively in the criminal-justice system. Lack of accessible information about judicial procedures and rights also might preclude them from approaching law enforcement or courts to report abuse; those who do can encounter social biases against the credibility of their statements and evidence. Some governments actually have codified prohibitions against allowing persons with disabilities to testify in court. Diminished access to the justice system and limited avenues of recourse to address abuse can empower traffickers to target persons with disabilities with a sense of impunity.

Religious and Ethnic Minorities: In many societies, members of religious and ethnic minority groups have a heightened vulnerability to trafficking. Traffickers target women and girls from these groups and force them into religious conversions and subsequent marriages, in which they might be subjected to domestic and/or sexual servitude. The Yazidi people in the Republic of Iraq have long suffered discrimination. The so-called Islamic State in Iraq and Syria or Islamic State in the Levant targeted Yazidi women and girls for sex trafficking to incite fear, generate revenue, and sustain its membership numbers.⁷⁰ Religious and ethnic minorities are also frequently discriminated against in job markets, especially in societies that formally restrict the exercise of rights by members of certain religions. These restrictions make them more susceptible to traffickers' fraudulent employment offers or other forms of abuse, including forced labor and other forms of labor oppression. For example, the People's Republic of China has subjected the Uyghurs, a Muslim minority group native to Xinjiang Province in Northwest China, to many forms of religious persecution and forced labor.

2. Programmatic Objectives

These programming objectives will enable USAID to achieve measurable positive impact on survivors and on the Journey to Self-Reliance in our partner countries. The Agency will manage the related planning, design, learning, and resource requests critical to the success of this Policy through the processes described in USAID's Program Cycle, including CDCSs, RDCSs, the design and management of projects and activities, and monitoring and evaluation. Reporting tools such as Performance Plans and Reports (PPRs) and internal and external evaluations will also measure the effectiveness of our programs.

Increased Integration of C-TIP into USAID's Initiatives and Programs

C-TIP projects should endeavor to demonstrate a linkage to, or be integrated into, specific sector portfolios, especially in agriculture, democracy, human rights, governance, economic growth, education, health, environmental and natural-resource management, humanitarian assistance, the rule of law, transnational organized crime, transition initiatives, and security reform.⁷¹ The TVPA requires USAID's Missions in countries on T2WL and T3 of the *TIP Report* to incorporate C-TIP approaches across development sectors into their CDCSs, such as "metrics and indicators to monitor progress to prevent, address, and end violence against children and youth globally in post-conflict and post-disaster areas."⁷² The Bureau for Humanitarian Assistance also can help mitigate risks in crisis

IN FOCUS: INTEGRATED PROGRAMS

USAID/Burma's Promoting the Rule of Law Program supports the training of prosecutor and judiciary officials in the Attorney General's Office to strengthen the capacity of the national criminal justice system to prosecute human traffickers. The project runs between 2018 and 2023. USAID/Burma provides technical assistance, training, and equipment to an independent organization to develop, design, and administer a public legal-aid service in Burma. The project funds civil-society organizations to provide representation for vulnerable communities; promotes human-rights standards and restorative-justice services in communities affected by conflict; and supports paralegal networks, public legal-literacy campaigns, and victims of human trafficking. The project aims to increase collaboration between justice-sector institutions, the Assembly of the Union, and civil society on legal reforms to strengthen the rule of law and bring the justice sector and human-rights institutions in Burma into compliance with international norms.

USAID/Ghana's Sustainable Fisheries-Management Project is designed to assess and address child labor in the coastal fisheries sector in Ghana. The project runs between 2014 and 2021. USAID/Ghana is working with community leaders and local governments to develop and adopt two anti-child labor and trafficking community actions plans to align with Ghana's new national anti-trafficking strategy. The project also spurred the formation of child-protection committees to identify potential victims to assist. Committee members receive training to provide counseling and advisory support and provide house-to-house education on the dangers faced by trafficked children. The project relies on analysis of data that guided the design and implementation of activities to combat harmful child labor and trafficking through behavior-change communication interventions, the development of policies, and livelihood funding in target areas.

settings by continuing to prioritize safe programming requirements for partners and by coordinating our humanitarian Trafficking in Emergency efforts with the Global Protection Cluster’s Anti-Trafficking Task Team.⁷³ Moreover, USAID’s Missions in countries ranked on Tiers 1 and 2 in the *TIP Report* should still incorporate C-TIP activities in their programming, especially where TIP prevalence is high.

The DRG Center within DDI has a C-TIP Team available to provide support to all the Agency’s OUs. The C-TIP Team works with Missions, Bureaus, and program and sector leads to integrate C-TIP approaches into as many programs as possible, with a sharper focus on segments of the local population that are particularly at-risk. Together they identify opportunities to collaborate with partners, and on programs and research.

Enhanced Technical Support and Coordination to Combat Modern Slavery

In collaboration with regional C-TIP POCs, the C-TIP Team in the DRG Center within DDI provides [field support](#) to USAID’s Missions to design interventions that consider vulnerable populations and the larger context or ecosystem in which they are operating. This could include short-term technical assistance on C-TIP assessments or the design of activities; briefings on the *TIP Report* and legislative updates to the TVPA (such as the TVPRA of 2019); workshops to strengthen interagency collaboration; coordinating joint proposal reviews with the Department of State; and the development of tools and training to help Missions with integrating C-TIP into their other programming.

USAID’s approach to inclusive development views all people, including vulnerable and marginalized populations, as playing instrumental roles in their societies’ Journeys to Self-Reliance. This is particularly true for survivors of

trafficking, who are more likely to face social and legal discrimination, which places them at higher risk of harassment or violence.⁷⁴ A survivor-informed approach ensures input from survivors is part of the design of programs and policies that affect them. To that end, the C-TIP Team in the DRG Center within DDI facilitates opportunities for trauma- and survivor-informed training for USAID’s Bureaus and Missions to prepare them to engage with victims and survivors of trafficking during co-creations, evaluation and selection committees, site visits, and other potential scenarios.⁷⁵

In accordance with recommendations from the U.S. Advisory Council on Human Trafficking, USAID supports increasing opportunities for survivors to lead in the design and implementation of policies and programs that affect them.⁷⁶ Survivors of trafficking are subject matter experts and can help strengthen these policies and programs by making them more effective at addressing the “4Ps.” Beginning in FY 2021, USAID will invite trafficking survivors to provide feedback on design documents, solicitations, and statements of interest as well as invite them to co-create and join Technical Evaluation Committees (TECs) and Selection Committees (SCs), consistent with applicable law and USAID’s policy.

To provide enhanced support to our Missions, in FY 2021 USAID will also create a network of trafficking survivor consultants to review solicitations and applications and help design programs and policies in accordance with applicable laws and policy.⁷⁷ USAID will encourage our implementing partners and host governments to invite trafficking survivors and their allies as members of their panels, task forces, and policymaking bodies, wherever possible. Lastly, in compliance with the U.S. National Action Plan to Combat Human Trafficking, within the first year of this Policy’s implementation USAID will designate a Senior Accountable Official (SAO) to ensure effective

coordination between the Agency’s TIP procurement Point of Contact and the Agency’s TIP expert, as outlined in the [Anti-Trafficking Risk-Management Best Practices and Mitigation Considerations Memorandum](#).⁷⁸

Improved Application of Learning, Evaluation, and Research to C-TIP

USAID in Washington supports our Missions’ efforts to increase the use of standard indicators to measure the performance and impact of our C-TIP programs, improve the monitoring and evaluation of them, and increase research into what can reduce trafficking. Our Missions will ensure our implementing partners apply systematic approaches to monitoring, evaluation, and learning (MEL) and use contracts, grants, and cooperative agreements that promote learning. Drawing on past practices, USAID will incorporate into new projects’ explicit methodologies—and where possible, quantitative approaches—to capture the impact of our C-TIP interventions and guide future designs. USAID also will regularly collaborate with the Offices of Foreign Assistance (F) and Monitoring and Combating Trafficking in Persons at the Department of State (J/TIP) and USAID’s Bureau for Policy, Planning, and Learning (PPL) to create and/or update standard and custom C-TIP indicators, as appropriate.⁷⁹

Through research and partnerships with the U.S. Government interagency, academic institutions, the private sector, and the Innovation, Technology, and Research Hub within DDI, USAID has access to innovative studies, evaluations, literature, and evidence reviews to inform our C-TIP programming.⁸⁰ USAID in Washington also uses existing funding mechanisms (*e.g.*, through the Learning Division of the DRG Center within DDI) to fund Missions’ requests to assess the local TIP problem in their countries and identify effective interventions and activities to address it. USAID shares lessons learned with other donors and

partners to amplify the impact of our programs. Using evidence and applying learning in these ways helps to ensure the accountability of USAID’s investments so they are as effective as possible in countering TIP.

To ensure that evidence informs our programming, staff from DRG Center within DDI will continue to collaborate with USAID’s Missions, Bureaus, U.S. Government interagency colleagues, and implementing partners to share and implement best practices in C-TIP, including by continuing to co-lead or participate in evidence summits. To increase the up-take of learning by our field Missions, we will employ virtual events and disseminate and post materials on our [Development Experience Clearinghouse](#).

Increased Impact on Host-Government Partners; Civil Society, including Faith-Based Organizations; the Private Sector; and Beneficiaries

USAID’s Missions work with host governments committed to fighting modern slavery, by assisting them with efforts to create, improve, and implement legislation effectively to combat it. This approach enables USAID to achieve our objective of fostering stable, resilient, prosperous, inclusive, and self-reliant countries. A government can demonstrate its commitment to C-TIP through adopting and implementing a national C-TIP strategy that targets the “4Ps.” Government planning and policymaking efforts that consider key stakeholders as well as groups vulnerable to TIP will enable governance and criminal-justice reforms that are targeted and inclusive. For example, a government task force that invites the participation of local survivors of trafficking and their allies will create or improve laws and policies that affect their communities.

USAID’s funding for new, underutilized, and local partners also can promote self-reliance through local capacity-building. As a result, the improved performance of local actors and local institutions

and networks, including faith-based and community organizations, assist in achieving positive outcomes for survivor beneficiaries through programming aimed at their recovery, economic empowerment, and participation in the design of related policies and programs.

USAID also works with the private sector, which is a key part of the solution to ending modern slavery, particularly for labor trafficking. Our Missions should collaborate closely with industry associations to educate their members, and the

consumers that buy their products, and help put pressure on unscrupulous firms that benefit from slave labor. USAID's cooperation in this area extends to multilateral organizations, such as the Asia Pacific Economic Cooperation forum and the Association of Southeast Asian Nations (ASEAN), which are critical to stamping out human trafficking in illegal, unreported, and unregulated fishing and other cross-border industries.



After Aditi was rescued from traffickers, she spent time at a shelter run by a local partner of USAID's Bangladesh Counter Trafficking-in-Persons (BC/TIP) project. More than 800 trafficking survivors like Aditi have found a place to heal and start a new life through BC/TIP. Photo courtesy of Misty Keasler, Winrock International.

IN FOCUS: THE IMPACT OF USAID'S PROGRAMS ON SURVIVORS OF TRAFFICKING

From Victims to Survivors: Countering Human Trafficking in the People's Republic of Bangladesh

When Aditi Begum of Bahadurpur, Jessore, was 19 years old, she fell into the hands of sex traffickers. She thought she was getting a factory job in her country's capital city, Dhaka. Luckily, she was rescued before being sent to a brothel in India, but the experience changed her forever.

More than a million and a half Bangladeshis could be victims and survivors of trafficking. Aditi is one of the lucky ones: she returned home. But that is often just the beginning. Victims lack money and job skills, and many find their family and neighbors shun them.

After her rescue, Aditi spent time at a shelter home run by a USAID-funded project. She received health care, trauma counseling, and life-skills training. The project works with the families of trafficking victims, and helps them understand there is no shame in being trafficked—which helps to promote healing and family reintegration.

As survivors grow stronger, they take entrepreneurship classes and receive job training. They gain skills they need to be financially independent. Step by step, survivors resume daily life, find new occupations, and gain confidence and purpose. Aditi went back to school, graduated from college, and got an office job. She also found her purpose in the project-affiliated survivor's group *ANIRBAN*, which means "the flame that never dies" in Bengali. *ANIRBAN*'s members support one another and speak out against trafficking. Aditi now leads a 30-person *ANIRBAN* team and speaks at schools and community meetings, to explain the basics of safe migration, the need for passports, visas, and work permits.

"I was a victim," Aditi says. "It is my duty to help others."



After four months in servitude, Vepa was able to return home. With USAID's assistance, he successfully completed a professional welding course and received a welding machine to help him start an income-generating business. Photo courtesy of USAID/Central Asia.

IN FOCUS: THE IMPACT OF USAID'S PROGRAMS ON SURVIVORS OF TRAFFICKING

Restoring Hope: A Trafficked Survivor Rebuilds His Life in the Republic of Turkmenistan

Vepa, from Lebap in the Northeast of Turkmenistan, struggled to make ends meet to feed his family. When an acquaintance offered him a job in the Republic of Turkey, he did not hesitate to accept it. After he arrived in Turkey, his employer confiscated his passport on the pretext of needing it for local registrations, and put him to work at a construction site.

"We lived in a house that was under construction, slept on cardboard boxes, worked 17 hours a day, and only got bread and water for sustenance," Vepa said.

After four months in slave labor, his employers dumped him at the airport, and he was able to return home. Through an information campaign by USAID's [Dignity and Rights project](#), implemented by the International Organization for Migration (IOM), Vepa learned about resources that helped him to reintegrate into society. With USAID's assistance, he completed a professional welding course successfully and received a welding machine to help him start an income-generating business. USAID is helping survivors of human trafficking like Vepa to restart their lives and become productive members of their communities.

Strategic C-TIP Investments in Targeted Countries

In accordance with the TVPA and the Congressional directive for C-TIP, USAID prioritizes investments in countries where the Agency's assistance can have the most impact. Restrictions on foreign assistance in countries on T3 in the *TIP Report* are important considerations for USAID's C-TIP investments by our Missions in countries on the T2WL and T3. Other important factors include a given country's prevalence of TIP, the U.S. Government's interagency programming efforts in the same location, the increased risk of TIP during and after a crisis (*e.g.*, conflict, disaster, pandemic, and other unforeseen events), opportunities for integrating C-TIP activities into existing programs, our Missions' budgets, the extent of USAID's regional and country

presence, and the commitment of Missions' leadership, host governments, and the private sector to address TIP.⁸¹ To the greatest extent possible, USAID's Missions and centrally funded programs should make addressing the recommendations of the *TIP Report* a central focus of their C-TIP investments.

To ensure strategic investments, our Missions will also invite our colleagues at U.S. Embassies to provide feedback on design documents, solicitations, and statements of interest; and to join TECs and SCs.⁸² Missions also will continue collaboration with U.S. Embassies to contribute to the *TIP Report* and to assist in diplomatic engagements with partner governments to urge them to address the *Report's* top priority

recommendations. The efforts by host governments could include in-kind and financial contributions to USAID-funded C-TIP activities related to prevention, protection, and prosecution.⁸³

IN FOCUS: SUCCESS STORIES FROM THE *TIP REPORT*

Democratic Republic of Congo (DRC): T3 in 2019; upgraded to the T2WL in 2020. Under a new President in 2019, the Government of the DRC established the Agency for the Prevention and Fight Against Trafficking in Persons (APFTP). To support the newly created national agency and its strategy, USAID launched an activity in 2020 to promote a more effective and coordinated response to combat TIP in the country.

People's Republic of Bangladesh: T2WL in 2019; upgraded to Tier 2 in 2020. The Government of Bangladesh (GOB) is making significant efforts to combat trafficking, including through the establishment of seven special Anti-Human Trafficking Tribunals. USAID/Bangladesh's C-TIP program actively works to assist the GOB to eradicate trafficking by increasing the responsiveness of criminal-justice actors to assist victims of trafficking, helping communities identify and assist more effectively populations at-risk of being trafficked, improving access by trafficking survivors to assistance, and facilitating key partnerships between multiple stakeholders.

Republic of Liberia: T2WL in 2019; upgraded to Tier 2 in 2020. After three years on the T2WL, Liberia's ranking improved because of efforts by the Government of Liberia (GOL) to significantly increase investigations, fund its Anti-Trafficking Task Force, and increase the identification of victims. To support these reforms, USAID and the Department of State coordinated a whole-of-Government approach to assist the GOL in addressing its C-TIP challenges. USAID also conducted a Mission-wide work-planning session to identify opportunities to incorporate C-TIP programming throughout our portfolio in the country. USAID/Liberia intends to replicate this approach annually, following the release of the *TIP Report*.

3. Implementing the USAID Policy on C-TIP

All USAID employees should play an active role in countering trafficking in persons. DDI will lead the implementation of the Agency's C-TIP Policy, supported by our Regional and Pillar Bureaus, and in collaboration with Washington OUs and Missions. The C-TIP core team works in the DRG Center within DDI, while collaborating with extended C-TIP team members and Points of Contact (POCs) in each Regional Bureau and Mission, each with varying levels of responsibility based on their roles in implementing the C-TIP Policy and Code of Conduct.⁸⁴

All Agency Employees⁸⁵

All Agency employees must complete the online training titled "C-TIP Code of Conduct: Accountability and Action," found at USAID University, within their first month of employment, and repeat it, at minimum, every three years thereafter. USAID's employees must report any suspected cases of TIP or the procurement of commercial sex that involve USAID personnel or implementing partners to the Office of the USAID Inspector General and the relevant CO/AO for implementing partners. USAID personnel should also be cognizant of the risk that projects funded under contracts, sub-contracts, assistance awards, and sub-awards funded by USAID could use trafficked labor, especially in sectors such as construction, catering, or other areas that produce goods and services.

USAID's staff also have a responsibility to ensure safeguarding measures to protect beneficiaries from exploitation and abuse (as articulated in the policies on C-TIP, Preventing Sexual Exploitation and Abuse, and Child Safeguarding) are in place for their relevant portfolios. Likewise, our staff should identify and explore potential areas in their portfolios for integrating C-TIP

interventions and coordinate with the C-TIP Team in the DRG Center within DDI and appropriate C-TIP POCs for the design. The C-TIP Policy, Code of Conduct, and Field Guide are resources to help our staff carry out their roles and responsibilities. The C-TIP Team in the DRG Center is available to assist staff with understanding how to use these resources effectively and gain access to additional ones.

The Office of the Administrator

USAID's leadership will continue to highlight the importance of C-TIP and ensure appropriate oversight of the implementation and enforcement of the Agency's C-TIP Policy and Code of Conduct. Similarly, they will ensure sufficient resources are available to staff the C-TIP portfolio and carry out programming and learning, evaluation, and research. They will also ensure appropriate staff representation for the Agency in key U.S. Government and international discussions on human trafficking, and the appropriate review of multilateral documents that touch on the issue.

The USAID Administrator will designate an SAO to ensure effective coordination between the procurement TIP POC and the Agency's TIP expert, as outlined in the [Anti-Trafficking Risk Management Best Practices and Mitigation Considerations Memorandum](#).⁸⁶ The SAO will ensure that USAID's C-TIP awards involving direct services and/or health care for the survivors of trafficking are victim-centered, trauma-informed, and culturally competent.⁸⁷

Office of Human Capital and Talent Management (HCTM)

HCTM ensures that USAID's vacancy announcements mention our C-TIP Code of Conduct to inform potential applicants of the Agency's expectations.⁸⁸ During new employee orientation, HCTM informs new employees of the requirement to complete the online training

on the C-TIP Code of Conduct within their first month of employment. HCTM's Center for Professional Development adds the C-TIP Code of Conduct online training to the new employee's USAID University account with an expiration date of two weeks.

Office of Acquisition and Assistance within the Bureau for Management (M/OAA)⁸⁹

COs/AOs have a special role in ensuring our partners' compliance with award clauses and provisions. According to [Part 22.1704 of the FAR](#) and [ADS Chapter 303](#), if a CO/AO receives credible information from any source that a contractor, contractor employee, sub-contractor, employee of a sub-contractor, recipient, sub-recipient, or any agent of the above, is engaged in prohibited activities related to TIP, he or she must immediately notify both the Office of Inspector General and USAID's Suspending and Debarring Official, and consult with the Labor Compliance Advisor. The CO/AO may direct the partner to take steps to abate the alleged violation or enforce the requirements of its compliance plan.

Office of Management Policy, Budget, and Performance within the Bureau for Management (M/MPBP)

If the OIG provides a report to USAID that supports TIP allegations, the Agency may conduct administrative proceedings and make final determinations about the suitability of the organization to continue to receive Federal funds. USAID must ensure the prudent use of our funds. As such, the Agency's Suspending and Debarring Official may determine suspension and debarment proceedings are necessary to address misconduct, including TIP allegations.⁹⁰

Office of Inspector General (OIG)⁹¹

The OIG investigates allegations of misconduct or mismanagement by USAID personnel;

violations of law, rules, or regulations by employees of the Agency or our partners, or by participants in the programs we fund; and fraud, waste, and abuse in USAID-financed programs, including those related to human trafficking.

Office of the General Counsel (GC) and Resident Legal Officers (RLOs)⁹²

GC and RLOs provide advice and assistance to USAID personnel on all TIP-related legal matters, including reviewing all proposed C-TIP policies, regulations, directives, and instructions.

DRG Center in DDI

The C-TIP Team in the DRG Center within DDI oversees USAID's C-TIP efforts and investments. The team prioritizes three core areas of work: field support; interagency coordination and reporting; and learning, evaluation, and research.

The key responsibilities of the C-TIP team include the following:

- Advising the Agency's leadership on implementing USAID's C-TIP Policy and Code of Conduct, including programming, training, staffing, funding, Mission budget attributions, and the process for contributing to the annual *TIP Report*;
- Aligning the Agency's efforts with the TVPA's requirements, such as the inclusion of child-protection strategies in the CDCSs of our Missions in countries on the T2WL and T3 in the *TIP Report*;
- Assessing C-TIP needs across the Agency and providing support for the integration of C-TIP into various sector portfolios;
- Co-leading or participating in evidence summits with stakeholders;

- Collaborating with U.S. Government interagency partners to ensure the complementarity of their programming, research, and media efforts; co-lead committees; share training and event opportunities; develop promising practices; contribute to policies and reports; and update the standard indicators on C-TIP as necessary;
- Creating a network of trafficking survivor consultants to assist in the design and implementation of policies and programs that affect them (a process that will begin in FY 2021);
- Facilitating opportunities for trauma- and survivor-informed training for Bureau and Mission C-TIP staff; and
- Tracking the implementation and enforcement of the Agency's C-TIP Policy and Code of Conduct.

USAID's Regional and Pillar Bureaus⁹³

Regional and Pillar Bureaus must support the implementation of the Agency's C-TIP Code of Conduct and identify opportunities to strengthen C-TIP efforts in their respective portfolios. Regional Bureaus each must identify a C-TIP POC and update this person's contact information in the database of Regional C-TIP POCs. Regional Bureaus with large numbers of countries on the T2WL and T3 in the annual *TIP Report*, or with a high prevalence of TIP, should ensure the Position Descriptions and annual work objectives for the relevant staff include their responsibilities as C-TIP POCs.

C-TIP POCs in USAID's Regional Bureaus

The C-TIP POCs in the Regional Bureaus collaborate regularly with our field Missions and the C-TIP Team in the DRG Center within DDI to help meet reporting and coordination

requirements and implement effective C-TIP programming.

Their key responsibilities include the following:

- Contributing to, and clearing, taskers related to C-TIP;
- Coordinating with counterparts from the Department of State, USAID's Office of Budget and Resource Management, and the C-TIP Team in the DRG Center within DDI, as appropriate, on taskers related to the Technical Budget Review; the preparation of the annual report on how C-TIP allocations will meet the requirements and directives within the annual Appropriations Act, as required by Section 653(a) of the Foreign Assistance Act, as amended; input into the annual *TIP Report*; and the process of requesting waivers from the TVPA's restrictions;
- Encouraging their colleagues in their Bureaus to complete the online training on USAID's C-TIP Code of Conduct;
- Ensuring that USAID's Missions in countries on the T2WL and T3 in the *TIP Report* incorporate strategies to protect children and reduce trafficking, in compliance with Section 204(b) of the TVPRA;
- Facilitating our Missions' responses to data calls from the DRG Center within DDI for reports and audits;
- Informing USAID's Missions of funding opportunities from headquarters;
- Providing technical assistance and tracking our Missions' C-TIP programming;

- Reminding our Missions to update the program database and contact information for their C-TIP POCs, draft Key Issue Narratives, and report on C-TIP indicators in PPRs, as appropriate; and
- Working with the Department of State and other interagency counterparts to ensure field coordination (e.g., through preparing for meetings of the SPOG, reviewing proposals for funding, attending strategic roundtables and meetings of the Child Protection Compact hosted by the Department of State).

USAID's Mission Directors⁹⁴

Mission Directors must lead by example, ensure they and their staff are abiding by the Agency's C-TIP Code of Conduct, and identify opportunities to strengthen C-TIP efforts in their respective Missions. Mission Directors each must name a C-TIP POC and update the database of Mission C-TIP POCs with the correct contact information. Missions in countries on the T2WL and T3 in the *TIP Report* should develop C-TIP strategies across all technical areas and integrate C-TIP components into their ongoing programming. To the greatest extent possible, USAID's Missions and centrally funded programs should make addressing the recommendations of the *TIP Report* a central focus of their C-TIP investments. Mission Directors in countries on the T2WL and T3 in the annual *TIP Report*, or with a high prevalence of TIP, should ensure the Position Descriptions and annual work objectives for the relevant staff include their responsibilities as C-TIP POCs.

C-TIP POCs in USAID's Missions

Mission C-TIP POCs and Program Officers collaborate with the relevant CORs/AORs to

develop programs; design projects and activities; report against relevant standard and custom indicators; and monitor and evaluate the Agency's investments in C-TIP, in consultation with their Regional Bureaus, DDI, PPL, F, and J/TIP.

Their key responsibilities include the following:

- Assessing the C-TIP needs in the country or region;
- Coordinating with C-TIP POCs in their Regional Bureaus for the SPOG requirements, Technical Budget Review, input into the annual *TIP Report*, and the process of requesting waivers from the TVPA's restrictions;
- Encouraging their Mission colleagues to complete the online training on USAID's C-TIP Code of Conduct;
- Reporting on TIP Key Issues and C-TIP indicators through the submission of Mission Operating Plans and PPRs;
- Identifying potential C-TIP attributions to meet the annual Congressional directive;
- Inviting colleagues from the Department of State and survivors of trafficking to provide feedback on the design of documents, solicitations, and statements of interest, as well as to join TECs and SCs, consistent with applicable law and USAID's policy, starting in FY 2021;
- Procuring assistance from the C-TIP POCs in their Regional Bureaus and the C-TIP Team in the DRG Center within DDI, whenever necessary;
- Providing colleagues at U.S. Embassies and Consulates with input for the *TIP Report* on foreign governments'

contributions to USAID-funded C-TIP activities;

- Responding to data calls and clearing reports and documents related to C-TIP from the DRG Center within DDI and the C-TIP POCs in their Regional Bureaus;
- Reviewing and providing feedback on proposals for funding from the Department of State for C-TIP activities in their countries; and
- Updating information in the database of C-TIP programs and their contact information in the database of Mission C-TIP POCs.

Conclusion

This Policy provides the foundation and guidance for USAID's approach to ending modern slavery. It also contributes to the Agency's safeguarding efforts to protect beneficiaries from exploitation and abuse. USAID has a number of tools and resources available to ensure that our development and humanitarian investments achieve the greatest impact in combating TIP. Through adherence to the principles and objectives in this Policy, USAID is committed to working alongside governments, survivors, the U.S. Government interagency, NGOs, faith-based and community groups, and the private sector to build local, regional, and global capacity to end human trafficking and uphold the dignity of the human person.

Endnotes

¹ The U.S. Government considers “trafficking in persons,” “human trafficking,” and “modern slavery” to be interchangeable umbrella terms that refer to both sex and labor trafficking. Please see Page 3 of the Department of State’s [2020 Trafficking in Persons Report](#).

² This Policy aligns with the Priority Actions for the [2020 U.S. National Action Plan to Combat Human Trafficking](#), the goals of the [U.S. Department of State and USAID Joint Strategic Plan for 2018-2022](#), the [President’s National Security Strategy to Advance America’s Interests](#), [Executive Order 13773 on Enforcing Federal Law with Respect to Transnational Criminal Organizations and Preventing International Trafficking](#), and the [Frederick Douglass Trafficking Victims Prevention and Protection Reauthorization Act \(TVPPRA\) of 2019](#).

³ This Policy also incorporates the objectives and recommendations of the U.S. Government Strategic Objectives to Combat Trafficking in Persons and the [Annual Report of the U.S. Advisory Council on Human Trafficking](#).

⁴ The C-TIP Policy aligns with [USAID’s Mission, Vision, and Values](#). It also builds on and complements other Agency policies and requirements, including the following: [USAID’s Leadership Philosophy](#); [Policy on PSEA](#); [Policy on Gender Equality and Women’s Empowerment](#); [Policy/Guidance on the Implementation of USAID’s Child-Safeguarding Standards](#); [USAID Bureau for Humanitarian Assistance Emergency Application Guidelines Annex A](#); [Suggested Approaches for Integrating Inclusive Development Across the Program Cycle and in Mission Operations \(an Additional Help Document for Automated Directive System Chapter 201\)](#); [Disability Policy](#); [Policy on Promoting the Rights of Indigenous Peoples \(Pro-IP\)](#); [Policy on Youth in Development](#); [Strategy on Democracy, Human Rights, and Governance](#); [Policy on Non-Discrimination for Beneficiaries](#); and [Advancing Protection and Care for Children in Adversity: A U.S. Government Strategy for International Assistance](#).

⁵ Peonage is debt servitude.

⁶ Section 103 of the TVPA; Section 7102 of Title 22 of the United States Code (U.S.C.).

⁷ Section 402 of the CSPA (Section 2370c-2 of Title 22 of the U.S.C.).

⁸ Corinne Schwarz, Erik Unruh, Katie Cronin, Sarah Evans-Simpson, Hannah Britton, and Megha Ramaswamy, “Human Trafficking Identification and Service Provision in the Medical and Social Service Sectors,” *Health and Human Rights Journal*, 18(1) (June 2016):181–192, <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5070690/>.

⁹ ILO, Forced Labor, Modern Slavery and Human Trafficking. This statistic does not include forced marriage. Please see <https://www.ilo.org/global/topics/forced-labour/lang--en/index.htm>.

¹⁰ Ibid.

¹¹ U.S. Department of State, *Assisting Male Survivors of Human Trafficking*; Alliance 8.7, *Global Estimates of Modern Slavery*, 2017, p. 23, <https://www.state.gov/wp-content/uploads/2019/02/Assisting-Male-Survivors-of-Human-Trafficking.pdf>; International Labour Office (ILO), *Global estimates of modern slavery: Forced labour and forced marriage*, (Geneva, 2017), https://www.ilo.org/wcmsp5/groups/public/@dgreports/@dcomm/documents/publication/wcms_575479.pdf.

¹² Ibid.

¹³ Ibid.

¹⁴ Free the Slaves, “Trafficking’s Footprint: Two-Phase Baseline Study of Child Trafficking in 34 Communities in 6 Districts in Ghana,” (2017), <https://www.freetheslaves.net/wp-content/uploads/2018/04/Traffickings-Footprint-in-Ghana-April-2018.pdf>.

¹⁵ *Bacha bazi* is the sexual abuse of young adolescent males or boys by older men.

¹⁶ U.S. Department of State, “2020 Trafficking in Persons Report: Afghanistan: Afghanistan: Tier 3,” accessed January 7, 2021, <https://www.state.gov/reports/2020-trafficking-in-persons-report/afghanistan/>.

¹⁷ End Child Prostitution and Trafficking (ECPAT), United Nations (UN), and Children’s Fund (UNICEF), “Sex Trafficking of Children in The Philippines,” (2016), https://www.ecpat.org/wp-content/uploads/2016/04/Factsheet_Philippines.pdf.

¹⁸ International Justice Mission, “The State of Online Sexual Exploitation of Children in The Philippines,” 2020.

¹⁹ U.S. Embassy in Haiti, “USAID Awards New Agreement to Tackle Human Trafficking in Haiti,” July 31, 2019, <https://ht.usembassy.gov/usa-id-awards-new-agreement-to-tackle-human-trafficking-in-haiti/>.

²⁰ The White House, “The National Action Plan to Combat Human Trafficking,” (2020), <https://www.whitehouse.gov/wp-content/uploads/2020/10/NAP-to-Combat-Human-Trafficking.pdf>.

²¹ Ibid.

²² UN Office on Drugs and Crime (UNODC), “Trafficked Persons as Victims,” accessed January 7, 2021, <https://www.unodc.org/e4j/en/tip-and-som/module-8/key-issues/trafficked-persons-as-victims.html#:~:text=Persons%20may%20also%20be%20termed,at%20risk%20of%20being%20trafficked>.

²³ Office for Victims of Crime, “Victim-Centered Approach,” accessed January 7, 2021, <https://www.ovcttac.gov/taskforceguide/eguide/1-understanding-human-trafficking/13-victim-centered-approach/>.

²⁴ The term “victim-centered” is a standard term used in the U.S. Government’s approach to C-TIP. This Policy uses the term “victim” in connection to the legal aspects of TIP and seeking justice, and by doing so in no way do we diminish the courage and dignity of those who have survived human trafficking. Please see the [National Action Plan to Combat Human Trafficking](#).

²⁵ National Institute of General Medical Sciences, “Physical Trauma,” accessed January 7, 2021, <https://www.nigms.nih.gov/education/fact-sheets/Pages/physical-trauma.aspx#:~:text=Physical%20trauma%20is%20a%20serious,usually%20creating%20an%20open%20wound>.

²⁶ Tiffany Dovydaitis, “Human Trafficking: The Role of the Health Care Provider,” *J Midwifery Womens Health*, 55(5) (2010): 462–467, <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3125713/>.

²⁷ SAMHSA’s Trauma and Justice Strategic Initiative, “SAMHSA’s Concept of Trauma and Guidance for a Trauma-Informed Approach,” (2014), https://ncsacw.samhsa.gov/userfiles/files/SAMHSA_Trauma.pdf.

²⁸ The White House, “The National Action Plan to Combat Human Trafficking,” (2020), <https://www.whitehouse.gov/wp-content/uploads/2020/10/NAP-to-Combat-Human-Trafficking.pdf>.

²⁹ Ibid.

³⁰ The Department of State added the “4th P” of Partnership in 2009. See [Remarks on the Release of the 10th Annual Trafficking in Persons Report](#).

³¹ The *Foreign Affairs Manual* states that the TVPA guides the U.S. Government’s approach to C-TIP and expands on the Palermo Protocol, found in [14 FAH-2 H-524 Preventing Trafficking in Persons \(TIP\)](#). The Palermo Protocol is one of the three accompanying Protocols of the UN Convention Against Transnational Organized Crime. The Palermo Protocol is an international multilateral treaty, which the United States has ratified. The United States implements our obligations under the treaty in large part through the [TVPA of 2000](#), as amended.

³² The White House, “The National Action Plan to Combat Human Trafficking,” (2020), <https://www.whitehouse.gov/wp-content/uploads/2020/10/NAP-to-Combat-Human-Trafficking.pdf>.

³³ Please see promising practices listed on Page 30 of [Trafficking in Persons Report 20th Edition](#).

³⁴ The C-TIP Code of Conduct is a mandatory reference for USAID [ADS Chapters 109, 201, 485, and 487](#).

³⁵ Data collected from the [U.S. Attorney General’s TIP Report](#). This table reflects the U.S. Government’s Fiscal Years. Funding provided toward C-TIP activities by USAID’s Bureau for Humanitarian Assistance does not appear here.

³⁶ This includes funds from the Global Labor Program and Human Rights Grant Program administered by the DRG Center within DDI.

³⁷ Section 110 of the TVPA (Section 7107 of Title 22 of the U.S.C.).

³⁸ Section 108 of the TVPA (Section 7106 of Title 22 of the U.S.C.) identifies the four minimum standards for the elimination of trafficking, which governments are expected to achieve: 1) Governments should prohibit severe forms of trafficking in persons and punish such acts; 2) Governments should prescribe punishment commensurate with that of grave crimes for the knowing commission of any act involving sex trafficking induced by force, fraud, or coercion; sex trafficking involving a child; or any act that includes rape, kidnapping, or which causes death; 3) Governments should prescribe punishment for the knowing commission of any severe form of trafficking in persons that is sufficiently stringent to deter future acts and adequately reflect the heinous nature of the offense; and 4) Governments should make serious and sustained efforts to eliminate severe forms of trafficking in persons.

³⁹ The Department of State will downgrade a country ranked on the T2WL for two consecutive years to T3 in the third year (if it were to be ranked on the T2WL again). The Secretary of State may waive this downgrade for the third year if the host government provides a written C-TIP plan that would constitute significant efforts to comply with the minimum standards and proof of commitment of resources to implement it. (Section 7107 of Title 22 of the U.S.C.)

⁴⁰ A country on T3 could be subject to restrictions on non-humanitarian, non-trade-related foreign assistance to, or that benefits, the government, unless the President grants a waiver. Foreign assistance that does not benefit the government is not subject to the TVPA's restrictions. The law allows for a waiver where necessary to avoid significant adverse effects on vulnerable populations if it is in the U.S. national interest to provide a waiver or if it would promote the broader purpose of the TVPA. Section 110 of the TVPA, (Section 7107 of Title 22 of the U.S.C.)

⁴¹ “Do no harm” is a principle applied by USAID to help ensure our assistance does not harm or endanger beneficiary populations because of negative unintended consequences.

⁴² Please see USAID's C-TIP Code of Conduct, [Policy on Protection from Sexual Exploitation and Abuse](#) (PSEA), and [Policy/Guidance on the Implementation of USAID Child-Safeguarding Standards](#).

⁴³ Rochelle Rollins, Anna Gribble, and Sharon E. Barrett, “Who Is in Your Waiting Room? Health Care Professionals as Culturally Responsive and Trauma-Informed First Responders to Human Trafficking,” *AMA Journal of Ethics: Policy Forum* (Jan 2017), <https://journalofethics.ama-assn.org/article/who-your-waiting-room-health-care-professionals-culturally-responsive-and-trauma-informed-first/2017-01>.

⁴⁴ The White House, “The National Action Plan to Combat Human Trafficking,” (2020), <https://www.whitehouse.gov/wp-content/uploads/2020/10/NAP-to-Combat-Human-Trafficking.pdf>.

⁴⁵ Cathy Zimmerman and Ligia Kiss, “Human trafficking and exploitation: A global health concern,” *PLoS Med*, 14(11): e1002437 (Nov 2017), <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5699819/>.

⁴⁶ Jordan Greenbaum and Hanni Stoklosa, “The healthcare response to human trafficking: A need for globally harmonized ICD codes,” *PLoS Med*, 16(5): 1002799 (May 2019), <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6497219/#pmed.1002799.ref008>; Cathy Zimmerman and Ligia Kiss, “Human trafficking and exploitation: A global health concern,” *PLoS Med*, 14(11): e1002437 (Nov 2017), <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5699819/>.

⁴⁷ Cathy Zimmerman and Ligia Kiss, “Human trafficking and exploitation: A global health concern,” *PLoS Med*, 14(11): e1002437 (Nov 2017), <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5699819/>.

⁴⁸ Centers for Disease Control and Prevention, U.S. Department of Health and Human Services, “Violence Prevention,” accessed January 7, 2021, <https://www.cdc.gov/violenceprevention/childabuseandneglect/fastfact.html>.

⁴⁹ Makini Chisolm-Straker, Susie Baldwin, Bertille Gaïgbé-Togbé, Nneka Ndukwe, Pauline N Johnson, and Lynne D Richardson, “Health care and human trafficking: We are seeing the unseen,” *Journal of Health Care for the Poor and Underserved*, 27(3) (2016): 1220–33, <https://pubmed.ncbi.nlm.nih.gov/27524764/>.

⁵⁰ See promising practices listed on page 30 of [Trafficking in Persons Report 20th Edition](#).

⁵¹ Congress requires USAID to contribute not less than \$22 million of the \$67 million annual earmark for C-TIP activities. See Section 7060(f) of [H.R. 1865, the Further Consolidated Appropriations Act, 2020](#).

⁵² The U.S. Government’s Strategic Objectives to Combat TIP include innovation, data-collection, and research. President’s Interagency Task Force, “Report on U.S. Government Efforts to Combat Trafficking in Persons,” (Oct 2019), <https://www.state.gov/2019-report-on-u-s-government-efforts-to-combat-trafficking-in-persons>.

⁵³ The Federal Departments and Agencies that comprise the PITF appear in the [Report on U.S. Government Efforts to Combat Trafficking in Persons](#).

⁵⁴ Key interagency partners include the U.S. Department of State (the Office to Monitor and Combat Trafficking in Persons; the Bureau for Democracy, Human Rights, and Labor; and the Bureau for International Narcotics and Law Enforcement Affairs) and the U.S. Department of Labor (Bureau of International Labor Affairs). USAID also coordinates with interagency partners through the SPOG to share our C-TIP plans before and after making final decision—including research, program plans, solicitations, and awards—to receive feedback and maximize coordination.

⁵⁵ USAID, “U.S. National Strategy on Religious Leader and Faith Community Engagement,” last modified September 4, 2020, <https://www.usaid.gov/faith-and-opportunity-initiatives/us-strategy>. DDI’s Local, Faith Based, and Transformative Partnerships (LFT) Hub can support our Missions on these strategic religious engagements.

⁵⁶ See Priority Action 1.3.2. The White House, “The National Action Plan to Combat Human Trafficking,” (2020), <https://www.whitehouse.gov/wp-content/uploads/2020/10/NAP-to-Combat-Human-Trafficking.pdf>.

⁵⁷ UNODC, “E4J University Module Series: Trafficking in Persons & Smuggling of Migrants,” last modified March 2019, <https://www.unodc.org/e4j/en/tip-and-som/module-7/key-issues/root-causes.html>.

⁵⁸ USAID, *Digital Strategy 2020–2024*,

https://www.usaid.gov/sites/default/files/documents/15396/USAID_Digital_Strategy.pdf.

⁵⁹ Sam R. Bell, Michael E. Flynn, and Carla Martinez Machain, “U.N. Peacekeeping Forces and the Demand for Sex Trafficking,” *International Studies Quarterly*, Volume 62, Issue 3 (Sept 2018): 643–655, <https://doi.org/10.1093/isq/sqy017>.

⁶⁰ The Federal Acquisitions Regulation (FAR) also requires the inclusion of Clause 52.222-50, Combating Trafficking in Persons, in all solicitations and contracts. C-TIP Contractor/Recipient Compliance: Agency-wide Standard Operating Procedures are available at https://2012-2017.usaid.gov/sites/default/files/documents/1866/C-TIP_SOP.pdf.

⁶¹ International Labour Organization, “Forced labour, modern slavery, and human trafficking,” accessed January 7, 2021, <https://www.ilo.org/global/topics/forced-labour/lang-en/index.htm#:~:text=Out%20of%20the%2024.9%20million,labour%20imposed%20by%20state%20authorities>.

⁶² USAID’s Congressional directives for marginalized populations can also help fund programs aimed at reducing vulnerability to TIP. Marginalized populations might include, but are not limited to, women and girls, persons with disabilities, LGBTI people, displaced persons, migrants, Indigenous Peoples, youth and the elderly, religious minorities, and ethnic minorities. This Policy also might describe them as “underrepresented,” “at-risk,” or “vulnerable.”

⁶³ Understanding Trauma and Trauma-Informed Practices, Training for the U.S. Department of State, Office to Monitor and Combat Trafficking in Persons. The National Action Plan to Combat Human Trafficking, Priority Action 2.1.3, available at <https://www.whitehouse.gov/wp-content/uploads/2020/10/NAP-to-Combat-Human-Trafficking.pdf>.

⁶⁴ U.S. Department of State, Trafficking in Persons Report 20th Edition, (June 2020), <https://www.state.gov/wp-content/uploads/2020/06/2020-TIP-Report-Complete-062420-FINAL.pdf>.

⁶⁵ U.S. Department of State, “The Vulnerability of LGBTI Individuals to Human Trafficking,” (2017), <https://www.state.gov/the-vulnerability-of-lgbti-individuals-to-human-trafficking/>.

⁶⁶ U.S. Department of State, Trafficking in Persons Report 20th Edition, (June 2020), <https://www.state.gov/wp-content/uploads/2020/06/2020-TIP-Report-Complete-062420-FINAL.pdf>.

⁶⁷ Ibid.

⁶⁸ Ibid.

⁶⁹ International Organization for Migration (IOM), *Migrants and Their Vulnerability*, (2019), https://publications.iom.int/system/files/pdf/migrants_and_their_vulnerability.pdf.

⁷⁰ UNODC, “E4J University Module Series: Organized Crime / Counter-Terrorism,” last modified March 2019, <https://www.unodc.org/e4j/en/organized-crime/module-16/key-issues/trafficking-in-persons-and-terrorism.html>.

⁷¹ An example of programming in the security sector would be providing training for police to improve their understanding that victims of trafficking are not criminals.

⁷² Section 204(b) of the TVPRA of 2019, P.L. 115-425.

⁷³ Global Protection Cluster, *An Introductory Guide to Anti-Trafficking Action in Internal Displacement Contexts*, (UNHCR: 2020), <https://www.refworld.org/pdfid/5f8e80b54.pdf>.

⁷⁴ Cathy Zimmerman and Ligia Kiss, “Human trafficking and exploitation: A global health concern,” *PLoS Med*, 14(11): e1002437 (Nov 2017), <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5699819/>.

⁷⁵ Understanding Trauma and Trauma-Informed Practices, Training for the U.S. Department of State, Office to Monitor and Combat Trafficking in Persons. The National Action Plan to Combat Human Trafficking, Priority Action 2.1.3, available at <https://www.whitehouse.gov/wp-content/uploads/2020/10/NAP-to-Combat-Human-Trafficking.pdf>.

⁷⁶ The U.S. Advisory Council on Human Trafficking includes eight survivor leaders who bring their expertise and experience to advise and provide recommendations to the PITF to improve Federal anti-trafficking policies. Section 115 of the Justice for Victims of Trafficking Act of 2015 (JVTA), P.L. 114-22, also known as the Survivors of Human Trafficking Empowerment Act, established the Council on May 29, 2015. The National Action Plan to Combat Human Trafficking, Priority Action 4.3.2, available at <https://www.whitehouse.gov/wp-content/uploads/2020/10/NAP-to-Combat-Human-Trafficking.pdf>.

⁷⁷ In FY 2021, USAID will begin the process to create the network of consultants. Local survivors of trafficking should inform implementing partners’ C-TIP programming, wherever and whenever possible.

⁷⁸ The U.S. National Action Plan to Combat Human Trafficking, Priority Action 1.3.1, available at <https://www.whitehouse.gov/wp-content/uploads/2020/10/NAP-to-Combat-Human-Trafficking.pdf>.

⁷⁹ The *Foreign Affairs Manual* required the inclusion of C-TIP standard or global indicators beginning in FY 2019.

⁸⁰ Some examples of recent C-TIP research include studies that examined the prevalence of human trafficking, recruitment patterns, and migration drivers for at-risk populations, and data recommendations for establishing baseline data as well as impact-evaluations, surveys of victims, and community-based research and pilot interventions into trauma healing.

⁸¹ U.S. Department of State, “Congressionally Mandated Report on Practices to Better Combat Trafficking in Persons to Reduce the Risk of Trafficking in Post-Conflict or Post-Disaster Areas,” (June 2020), <https://www.state.gov/2020-congressionally-mandated-report-on-practices-to-better-combat-trafficking-in-persons-to-reduce-the-risk-of-trafficking-in-post-conflict-or-post-disaster-areas/>.

⁸² Missions should make a reasonable effort to invite their Embassy colleagues and document when and why they cannot collaborate on such documents and committees. Some embassies might not have C-TIP-related technical experts and might need to reach out to colleagues at the State Department in Washington to determine how they can effectively participate in TECs and SCs.

⁸³ A country’s ranking in the Department of State’s *TIP Report* does not depend on the size of a country’s problem but on the extent of its government’s efforts to meet the TVPA’s minimum standards for the elimination of human trafficking (Pages 45-46 of the [TIP Report](#)), which are generally consistent with the Palermo Protocol (Page 39 of the [TIP Report](#)).

⁸⁴ USAID, “Counter Trafficking in Persons (C-TIP) Code of Conduct Guidance,” accessed January 7, 2021, <https://www.usaid.gov/sites/default/files/documents/1866/201mas.pdf>.

⁸⁵ The training timeline and integration into portfolios are part of the Policy’s new revisions. Ibid.

⁸⁶ The U.S. National Action Plan to Combat Human Trafficking, Priority Action 1.3.1, available at <https://www.whitehouse.gov/wp-content/uploads/2020/10/NAP-to-Combat-Human-Trafficking.pdf>.

⁸⁷ Ibid.

⁸⁸ USAID, “Counter Trafficking in Persons (C-TIP) Code of Conduct Guidance,” accessed January 7, 2021, <https://www.usaid.gov/sites/default/files/documents/1866/201mas.pdf>.

⁸⁹ USAID, Counter-Trafficking in Persons and Contractor/Recipient Compliance: Agency-Wide Standard Operating Procedure,” (June 2021), https://2012-2017.usaid.gov/sites/default/files/documents/1866/C-TIP_SOP.pdf.

⁹⁰ USAID, ADS Chapter 313: Eligibility of Suppliers, Contractors, and Recipients,” (2011), <https://www.usaid.gov/sites/default/files/documents/1876/313.pdf>.

⁹¹ Ibid.

⁹² Ibid.

⁹³ USAID, “Counter Trafficking in Persons (C-TIP) Code of Conduct Guidance,” accessed January 7, 2021, <https://www.usaid.gov/sites/default/files/documents/1866/201mas.pdf>.

⁹⁴ Ibid.



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