



MILLENNIUM CHILD SUPPORT GROUP

Anti-Human Trafficking and Exploitation Policy

**Revised
@2024**

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FUNDING PARTNERS



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MILLENNIUM CHILD SUPPORT GROUP

"Save the child, Save the future, Save the world"

Millennium Child Support Group (MCSG)

Anti- Human Trafficking and Exploitation Policy

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ACKNOWLEDGMENT OF SUPPORT AND COLLABORATION

Millennium Child Support Group (MCSG) extends its sincere gratitude to the **Economic Community of West African States (ECOWAS) Commission, the Spanish Cooperation, the Africa Soccer Stars Network, UN Women, the United Nations Economic and Social Council (ECOSOC)**, and all our esteemed stakeholders for their unwavering support, commitment, and invaluable collaboration in advancing our shared vision of a **healthier, child rights-centered, women-empowered, and inclusive, violence-free world in Africa.**

Your steadfast partnership has been instrumental in strengthening our programs—particularly in the areas of school feeding, gender equality, women’s health, and child protection. Through these strategic collaborations, we have been able to reach and positively impact countless children, women, and families living in underserved communities in **Ghana and Nigeria**. Together, we are promoting sustainable development and delivering hope and opportunity to those who need it most.

As we continue to work toward equity, justice, and empowerment for all, we reaffirm our dedication to the collective values and goals that unite us. We look forward to building on our shared successes and deepening our collaboration to drive lasting, transformative change across the region.

Thank you for standing with us.

Together, we are building a future where every woman and child can thrive.

Millennium Child Support Group

Date: 09/09/2024

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1. PURPOSE

This policy forms a critical component of Millennium Child Support Group's (MCSG) commitment to upholding the highest standards of ethical conduct, safeguarding, and protection. It supports our mission of promoting social justice and protecting vulnerable children, women, and communities from abuse, exploitation, and trafficking.

The purpose of this Anti-Human Trafficking and Exploitation Policy is to:

- Prevent any form of trafficking in persons and exploitation in all MCSG operations and programs.
- Educate and empower staff, partners, and beneficiaries on recognizing, preventing, and reporting incidents of trafficking.
- Ensure strict compliance with Ghanaian national laws, ECOWAS protocols, and international standards including the United Nations Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children (Palermo Protocol).
- Provide clear procedures for prevention, detection, reporting, and response to human trafficking.

2. SCOPE

This policy applies to all individuals and organizations engaged with MCSG, including but not limited to:

- Full-time and part-time employees
- Board members
- Volunteers and interns
- Consultants and fellows
- Contractors, subcontractors, and suppliers
- Partner organizations and sub-recipients

Compliance with this policy is mandatory, and each individual or entity is expected to uphold its principles.

3. DEFINITIONS

Trafficking in Persons:

- a. The recruitment, transportation, transfer, harboring, or receipt of persons, by means of threat, coercion, deception, or abuse of power for the purpose of exploitation.

- b. Exploitation: Includes sexual exploitation, forced labor, slavery, servitude, and organ removal.
- c. Commercial Sex Act: Any sex act where something of value is exchanged.
- d. Forced Labour: Work obtained through threat or coercion without the person's voluntary consent.
- e. Bonded Labour/Debt Bondage: Labour or services demanded as repayment for a debt under exploitative terms.
- f. Involuntary Servitude: Compelled labor due to psychological coercion or legal threats.
- g. Coercion: Includes threats of harm, abuse of legal processes, or manipulation to force action.
- h. Child Trafficking: The recruitment, transportation, transfer, harboring, or receipt of a person under the age of 18 for the purpose of exploitation.

4. POLICY STATEMENT

Millennium Child Support Group enforces a zero-tolerance policy on human trafficking and all forms of exploitation. This policy explicitly prohibits:

- Engaging in, facilitating, or supporting trafficking in persons.
- Soliciting or engaging in commercial sex acts in connection with MCSG operations.
- Using any form of forced, bonded, or child labor.
- Withholding or destroying identity documents.
- Charging recruitment or placement fees to job applicants
- Exploiting children or vulnerable adults in any capacity.
- Facilitating trafficking through online or digital platforms.

MCSG is committed to ethical labor practices and ensures that working conditions across our programs and projects reflect fairness, dignity, and legality.

5. COMPLIANCE PLAN

A. Awareness and Training MCSG will:

- Provide training on trafficking awareness and prevention to all employees, volunteers, and contractors.
- Include this policy in all staff inductions and orientation materials.
- Post anti-trafficking awareness posters and reporting channels at all sites.
- Conduct awareness-raising in communities where MCSG operates.

B. Ethical Recruitment and Employment MCSG will:

- Employ transparent, fair recruitment processes without charging any fees to candidates.
- Provide written employment contracts outlining terms in English and/or local languages.
- Pay staff wages in accordance with national laws and the MCSG Remuneration Policy.
- Not retain or destroy personal identity or immigration documents.
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C. Housing and Relocation Support Where housing is provided by MCSG, it must meet national safety and health standards.

- When employees relocate for work, MCSG will provide a relocation package and ensure written agreements prior to departure.

D. Supplier and Partner Compliance

- All suppliers and sub-recipients must:
- Comply with this policy and applicable anti-trafficking laws.
- Submit a compliance plan outlining how they prevent, detect, and respond to trafficking.
- Cooperate with MCSG audits and investigations.
- Face contract termination for violations.

6. REPORTING HUMAN TRAFFICKING

Reports can be made confidentially to:

MCSG Safeguarding Officer:

Email: info@millenniumchildsupport.org / millenniumchildghana@gmail.com

WhatsApp +233 540 673712

Hotline: +233 246 502504

National Human Trafficking Hotline: 0800 100 100

Anyone affiliated with MCSG or the public can report trafficking-related concerns.

Whistleblowers are protected under this policy from any form of retaliation

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7. ROLES AND RESPONSIBILITIES

- Board and CEO: Provide oversight and enforce the policy across MCSG.
- Safeguarding Officer: Lead implementation, monitoring, and investigations.

- Operations and HR Teams: Ensure recruitment and working conditions meet standards.
- All Staff and Partners: Adhere to the policy, complete required training, and report concerns.

8. INVESTIGATIONS AND ACCOUNTABILITY

- ❖ Investigations will be handled by MCSG HR and Safeguarding Units
- ❖ MCSG will cooperate fully with national authorities.
- ❖ Violations will result in internal disciplinary action and, where applicable, legal referral.
- ❖ Confidentiality and fairness will be maintained throughout.

9. CONSEQUENCES OF NON-COMPLIANCE

Violators will face:

- Termination of employment or partnership
- Legal action under Ghanaian or international law
- Financial penalties or restitution
- Prohibition from future engagement with MCSG

10. RISK MITIGATION STRATEGY MCSG will proactively:

- a. Conduct risk assessments in high-risk program areas
- b. Include trafficking clauses in all contracts
- c. Use due diligence tools when hiring or partnering
- d. Monitor supply chains for compliance

11. POLICY IMPLEMENTATION STRATEGY

- Step-by-step rollout through training and communication
- Development of monitoring indicators
- Annual refresher training sessions
- Integration into operational handbooks

12. STAKEHOLDER ENGAGEMENT AND COLLABORATION

MCSG Collaborates with:

- ❖ Ghanaian Ministry of Gender, Children and Social Protection
- ❖ Ghana Police Service Anti-Trafficking Unit
- ❖ ECOWAS and UN agencies
- ❖ Local chiefs, community leaders, and NGOs

13. MONITORING, EVALUATION AND LEARNING (MEL)

- Quarterly reporting of cases and compliance
- Annual review of the policy and its impact
- Feedback loops from staff and community
- Documentation of lessons learned and best practices

14. DATA PROTECTION AND CONFIDENTIALITY

- ❖ All reports and investigations are confidential
- ❖ Personal data is handled in line with data protection laws
- ❖ Consent is sought before sharing survivor information
- ❖ Secure storage of files and limited access protocols

15. POLICY APPROVAL AND REVIEW

Approved by:

Victoria Thompson, Board Chairperson

Godfrey Ato Parker, Chief Executive Officer

Date of Approval: September, 2024

16. References:

Related Policies:

MCSG Code of Ethics and Conduct

Child Protection Policy

Whistleblower Policy

Gender-Based Violence Prevention Strategy

Sources Referenced:

UN Palermo Protocol (2000)

Ghana Human Trafficking Act (2005)

U.S. Government TIP Standard Provisions

ECOWAS Policy on Trafficking in Persons