Introduction

Kenya is a signatory to the United Nation's Protocol Against the Smuggling of Migrants by Land, Sea, and Air and one of the ICAO member States. In its role as the specialized agency of the United Nations, ICAO recognizes its potential to initiate global action. It actively contributes to the achievement of the United Nations Sustainable Development Goals adopted under the 2030 Agenda for Sustainable Development, which includes a focus on combating trafficking in persons.

Trafficking in persons for labour exploitation is a grave violation of human rights and represents a serious risk for businesses. Kenya Airways has taken lead to mitigate the risk, through strengthening its policies, Standard Operating Procedures, Codes of conduct and implementing due diligence measures that specifically address trafficking in persons' risk indicators. Multi-stakeholder and industry driven initiatives also play a role in supporting business' transparency efforts and in addressing human trafficking challenges.

Background

In December 2021, United Nation Office on Drugs & Crime (UNODC) combined the expertise of two of its programmes – the Better Migration Management (BMM) and the Airport Communication Project (AIRCOP) to organise a specialised inter-agency workshop on combatting Trafficking in Persons at Jomo Kenyatta International Airport (JKIA). This was the first ever workshop of its kind in the region!

This workshop brought together officers based at Jomo Kenyatta International Airport (Nairobi) from police, immigration Services, Kenya Airport Authority, customs personnel, prosecutors, Directorate of Criminal Investigations, Port Health, National Central Bureau, Interpol and representatives of Kenya Airways.

After four days of interactive sessions, the participants adopted actions including developing recommendations for Kenya Airways to prevent and combat Trafficking In Person by Air.

UNODC & KQ Cooperation

On **10th May 2022 –** UNODC hosted Kenya Airways – The Head of Corporate Security – Maj(Rtd) Bernard Oganga and Manager Quality Control & Integrity Mrs. Adelaide Amaro to the United Nations Office of Nairobi (UNON) to discuss comprehensive strategies, policies and protocols required for a successful implementation plan to combat Trafficking in Persons (TIP) by air in Kenya.

https://www.unodc.org/easternafrica/en/Stories/unodc-and-kenya-airways-cooperating-to-counter-trafficking-in-persons-by-air.html

Kenya Airways Policy

Kenya Airways (KQ) has zero-tolerance for human trafficking and has in place a fully endorsed Policy on Trafficking in Persons which came into effect on 1st January 2023. As KQ, We are committed to acting ethically within our business dealings and ensuring that human trafficking is not tolerated in our organization or supply chains, and expect our partners, contractors, and suppliers to uphold the same standards. We also commit to helping to reduce the probability that our properties will be used as a transit point for traffickers and their victims.

Our Policy on Trafficking in Persons is not only a reflection of our values but also an integral component of our broader commitment to ethical business practices. It is part of our implementation of Recommendation Practice 8.49 in *Annex 9 – Facilitation*, and is deeply rooted in the principles of the Comprehensive Strategy to Combat Human Trafficking in the Aviation Sector (ICAO Doc 10171).

TRAFFICKING IN PERSONS POLICY

Human trafficking is a crime and a violation of fundamental human rights which involves the exploitation of vulnerable individuals. This exploitation can take various forms, such as slavery and servitude, forced and compulsory labour, sexual exploitation, and the removal of organs, all of which have in common the open or subtle control of the victims.

Scope:

This policy applies to all Kenya Airways' operations and establishments company-wide, including all activities carried out on behalf of Kenya Airways Plc and its subsidiaries. Management at all levels are responsible for ensuring those reporting to them are aware of the issue of modern slavery and human trafficking and understand and comply with this policy.

Key Principles:

1. Kenya Airways Plc condemns all forms of human trafficking, fully supports the elimination of the exploitation of human beings and modern slavery and will not condone human trafficking in any part of our organization. Our policies and procedures reflect a strong commitment to upholding the belief that every person has the right to life, safety and security.

2. Kenya Airways Plc has zero tolerance approach to human trafficking and modern slavery and is committed to acting ethically and with integrity in all of our business dealings and relationships and to implementing effective systems and controls to ensure modern slavery is not tolerated in our own business.

3. Kenya Airways Plc strictly complies with all applicable laws and regulations regarding the prevention of human trafficking, including the Counter Trafficking in Persons Act and cooperates with law enforcement authorities to address instances of human trafficking which the organization or its employees have witnessed or become exposed to.

4. Kenya Airways Plc is joining with our partners across the aviation industry to stop the flow of human trafficking and will not allow our airline system to be an enabler in such unlawful human atrocities.

5. In keeping with our mission, morals and ideals, we pledge to educate all staff, with an emphasis on those who interact with the general public, about the different forms of human trafficking and its indicators with a view of identifying victims or those at risk.

6. Kenya Airways Plc aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

7. Employees must notify their manager or report it in line with the applicable whistleblowing procedures as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future.

8. Any employee who breaches this policy shall face disciplinary action, which could result in dismissal for gross misconduct.

9. Kenya Airways Plc shall terminate its relationship with other individuals and organisations working on our behalf if they breach this policy.

10. Violation of this policy shall result in criminal prosecution of responsible individuals.

Allan Kilavuka
Accountable Executive
Group Managing Director/Chief Executive Officer
Effective: 1st January 2023

Kenya Airways
The Pride of Africa

Policy Launch & Public Awareness

On 6th March 2023, Kenya Airways in collaboration with the United Nations Office on Drugs & Crime (UNODC) officially launched the Trafficking in Persons (TIP) policy, to outline our stand and action plan against Human Trafficking. The event was graced by, among other distinguished guests, **Hon. Kipchumba Murkomen**-the Cabinet Secretary Ministry of Roads and Transport who was the Chief Guest; **Hon. Florence Bore**, Cabinet Secretary for Labour and Social Protection; **Ms. Maria Temesvari** Deputy Regional Representative at **United** Nations Office on Drugs and Crime (UNODC), **Ms. Claire Thomas,** Political Officer – US Embassy - Kenya; representatives from Kenya Civil Aviation Authority, and other multi- agencies at Jomo Kenyatta International Airport.

As the National carrier, Kenya Airways understands that it has a responsibility to prevent and combat trafficking in persons by air and to protect and assist victims of such trafficking with full respect for their human dignity. As an airline we cannot do this on our own. We stand united in our commitment to #StopTraffickingInPersons and ensure safe skies for all.

Leadership Commitment

Counter-trafficking strategies, policies and protocols require leadership support to be successful as their decisions are critical in allocating resources, implementing programmes, measuring impact, and engaging with stakeholders (*ICAO Doc 10171).*

On **16th August 2023,** Kenya Airways Board Audit and Risk Committee held a Risk Management workshop where the issue of Trafficking in Persons by Air formed part of the agenda as a new high-risk area of focus.

This was the first time TIP was introduced in Kenya Airways Risk Register as a High-Risk Factor. The Board was requested to prioritize future discussions related to trafficking in persons and consider having it as a standing agenda in Board Committee meetings. The Board committed to support TIP strategy development and supervision in implementing the TIP work plan.

Partnership with Government

Guided by the globally agreed action plan of ***Prevention, Protection, Prosecution and Partnership,*** through the CEO'S Office, Kenya Airways secured a high-level consultative meeting on **31st August 2023** for partnership with government for a multi-agency approach to discuss an effective strategic framework that complements Kenya Airways initiative especially on protection and prosecution aspects of the plan.

The multi-agency consultative meeting was critical because the Kenya Airways action plan will require to be underpinned by a multi-agency approach to achieve the goal of combating human trafficking in the local aviation sector.

Collaboration with Kenyan Multi-agencies to maximize collective impact in human trafficking in the aviation sector.

- Internal Security and National Administration
- Kenya Civil Aviation Authority
- Kenya Airports Authority
- State Department for Transport
- State Department for Labour
- State Department for Social Protection
- State Department for Diaspora Affairs
- State Department Immigration & Citizen Services
- Kenya Airports Police Unit
- National Employment Authority
- National Intelligence Service – Frontier
- National Police Service - Directorate of Criminal Investigation
- Kenya Airways

Kenya Airways and Jambojet Workshop

On **7th September 2023**, Kenya Airways, in collaboration with HAART Kenya https://haartkenya.org and survivor advocates, organized a workshop for the top management of Kenya Airways and JamboJet, (a subsidiary of Kenya Airways and the first low-cost airline in Kenya.)

The workshop's goal was to provide insights to the KQ and JamboJet senior management to enhance knowledge and skills to combat human trafficking within the aviation sector. This also ensures proper systems and tools are mainstreamed across the two airlines to ensure traffickers minimize the use of their platforms to facilitate trafficking.

The workshop had participation from more than 40 managers including the CEO's of KQ and JamboJet, saw different specialization areas including victim assistance, investigation, reporting and referral being addressed. Experts from **UNODC** Kenya, **INTERPOL** – *Human Trafficking and Smuggling of Migrants Unit,*

Awareness Against Human Trafficking **(HAART**) Kenya, Transnational Organized Crime Unit **(TOCU)**, Joint Operations Center **(JOC-JKIA**) and the **Emirates Airline** took lead in guiding the discussion by sharing their experiences and expertise including recommendations to be considered by the two airlines.

https://www.linkedin.com/posts/kenya-airways_stoptraffickinginpersons-activity-7106891372984463360-Z4pN?utm_source=share&utm_medium=member_desktop

At the end of the workshop, Allan Kilavuka, Group Managing Director and Chief Executive Officer at Kenya Airways read the proclamation to demonstrate Kenya Airways commitment to combatting human trafficking.

PROCLAMATION TO COMBAT HUMAN TRAFFICKING BY CHIEF EXECUTIVE OFFICER - KENYA AIRWAYS

Human trafficking is one of the greatest atrocities of the 21st century. With as many as 24.9 million men, women and children sold into prostitution, domestic servitude or other forced labour in dark corners around the globe, it may seem like a problem beyond our borders. But the truth is, it's happening right here in our communities across Kenya.

The Government of Kenya has enacted comprehensive counter-human trafficking laws, with a focus on criminal prosecution and victim support.

Kenya Airways recognizes the considerable moral and economic harm of human trafficking in our communities and the nation and recognizes that bringing greater awareness to this problem will help victims.

By bringing awareness to human trafficking within the aviation sector, we bring the victims hope and the natural born freedoms all human beings should enjoy;

- Kenya Airways recognizes that increased public awareness and education within our organizations will provide more opportunities to identify and aid in the fight against modern slavery.
- In keeping with our mission, morals and ideals, we pledge to educate all staff, with an emphasis on those who interact with the general public, about human trafficking.
- Kenya Airways will establish reporting mechanisms through which staff can report human trafficking and ensure all employees are trained on the reporting protocol.
- Kenya Airways supports increased public awareness, stronger laws, and the promotion of justice to reduce the exploitation of all people.
- Kenya Airways will track and share key data points with the Kenya Civil Aviation Authority to support measuring the collective impact of aviation-related counter-trafficking efforts.
- Kenya Airways supports the inclusion of zero-tolerance clauses within procurement contracts with private businesses regarding contractors engaging in any form of human trafficking.

We invite you to join us in the fight to end modern slavery. Learn the primary indicators of human trafficking and be alert when you travel in and around airports and on aeroplanes. Your simple act of calling in a tip could save lives and help us move closer to a world without slavery.

You can file a confidential anonymous report via
Tel: **0800-211-220** or visit **www.kenyaairways.ethicspoint.com**

Adopted by Kenya Airways on 7th September 2023

Allan Kilavuka
Group Managing Director & Chief Executive Officer

Kenya Airways
The Pride of Africa

Kenya Airways partnered with Better Migration Management (BMM) as a NEW partner in a workshop held on **18-19 October 2023**. The objective was to confirm Annual Work Plan 2024, Review national partner priorities for remaining programme period and celebrate partnerships and achievements in combatting human trafficking.

BMM focuses on three components: migration governance, strengthening effective institutions to address trafficking and smuggling and the protection of vulnerable migrants. Jointly implemented by CIVIPOL, GIZ, IOM and UNODC, BMM maximises the impact through expertise and integrated and comprehensive solutions. Kenya Airways activities with UNODC in combatting trafficking in persons by air are complementary to BMM programme.

In Kenya, BMM partners with a number of stakeholders such as the National Coordination Mechanism on Migration (NCM), the Counter Trafficking in Persons Advisory Committee, the Directorate of Criminal Investigations and Civil Society Organisations (CSO).

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Better Migration Management
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Update from the private sector

Adelaide Amaro from Kenya Airways recently partnered with BMM to train Kenya Airways staff, particularly cabin crew and pilots, on anti-trafficking. The aim of the trainings, which were supported by UNODC and the civil society organisation (CSO) HAART through BMM, is to equip staff to detect potential cases of trafficking in planes and refer potential victims of trafficking (VoTs) to receive assistance. The airline also included a passenger risk assessment and abnormal behavior detection module in their staff onboarding. NPs and IPs welcomed the initiative and suggested to link this with other activities within BMM such as the document fraud detection lab which is part of the Kenya Institute of Migration Studies and with the CSOs implementing the communication strategy with transport sector actors (TSAs).

Next Steps

Kenya Airways is committed to acting ethically within our business dealings and ensuring that human trafficking is not tolerated in our organization or supply chains, and expect our partners, contractors, and suppliers to uphold the same standards. Future initiatives include: -

- Continuous training of staff and business partners on detection and reporting protocols
- training for our frontline, customer-facing team members, including flight attendants, pilots and airport customer service representatives, as well as for team members with international purchasing responsibilities.
- Seminars on preventing human trafficking.
- Create awareness internally. Effective measures will include i-learn platform, banners, posters in every office flyer, wallet cards, signage, email messages, videos messages on screens, blogs, social media, to keep the information fresh.
- Mandatory KQ Integrity Code training on i-learn platform for all staff.
- Conduct a risk assessment of suppliers and third parties by implementing strong procurement policies and procedures.
- Identify community groups and victim advocates.
- Work closely with law enforcement and government agencies on high-risk flights