

# Purdue University Anti-Trafficking Guidelines

Human trafficking is defined as the act of recruiting, harboring, transporting, providing, or obtaining a person for labor services or commercial sex acts through force, fraud, or coercion, for the purpose of exploitation, involuntary servitude, peonage, debt bondage or slavery. It includes any commercial sex involving a minor.

On January 29, 2015, the U.S. Government released a final rule amending the Federal Acquisition Regulations (FAR). The final rule reflects changes to proposed amendments originally released in September 2013. The final rule is intended to implement Executive Order 13627 (“Strengthening Protections Against Trafficking in Persons in Federal Contracts”) and Title XVII of the National Defense Authorization Act for Fiscal Year 2013 (“Ending Trafficking in Government Contracting”). The stated purpose of the new regulation is to create a stronger framework for compliance by imposing additional requirements for awareness, compliance and enforcement.

Purdue University complies with the Federal Acquisition Regulation (FAR) for Combating Trafficking in Persons, Subpart 22.1703(a), in which “the United States Government has adopted a zero tolerance policy regarding trafficking in persons.”

Purdue University, in accordance with Federal and State laws prohibits human trafficking and has a zero tolerance policy as stated in Purdue’s [Anti-Trafficking Policy \(III.C.3\)](#). In all contract and subcontract activities funded by the federal government with the FAR Subpart 22.1703, Combating Trafficking in Persons clause to which Purdue University is a party, and the estimated value of the supplies acquired or services required to be performed outside the United States exceeds \$500,000, it is required by federal law that an anti-trafficking compliance program be in place for the university and any subcontractors or subawardees to prevent the activities described above.

The compliance plan must be appropriate to the size and complexity of the award and to the nature and scope of the activities, including the number of non-United States citizens expected to be employed. The plan must include at minimum, the following:

- *An awareness program to inform employees about the trafficking related prohibitions included in this provision, the activities prohibited and the action that will be taken against the employee for violations.*
- *A reporting process for employees to report, without fear of retaliation, activity inconsistent with the anti-trafficking policy, including means to make available to all employees the Global Human Trafficking Hotline at **1-844-888-FREE** and its e-mail address at [help@befree.org](mailto:help@befree.org).*
- *A recruitment and wage plan that only permits the use of recruitment companies with trained employees, prohibits charging of recruitment fees to the employee, and ensures that wages meet applicable host-country legal requirements or explain any variance.*

- *A housing plan, if Purdue University or any subawardee intends to provide or arrange housing. The housing plan is required to meet any host-country housing and safety standards.*
- *Procedures for Purdue University to prevent any agents or subawardee at any tier and at any dollar value from engaging in trafficking in persons activities. Purdue University must also have procedures to monitor, detect, and terminate any agents or subawardee or subawardee employees that have engaged in such activities.*

Any subawardees, their employers, labor recruiters, brokers, or other agents, are prohibited from engaging in any trafficking-related activities referenced in [FAR 22.1703\(a\)](#).

## **Procedures**

Purdue University employees, subawardees at any tier, or their employers, labor recruiters, brokers, or other agents shall cooperate fully in providing reasonable access to allow contracting agencies and other responsible enforcement agencies to conduct audits, investigations, or other actions to ascertain compliance with the Trafficking Victims Protection Act (TVPA), Executive Order 13627, or any other applicable law or regulations establishing restrictions on trafficking in persons, the procurement of commercial sex acts, or the use of forced labor.

If you believe you have information about any potential trafficking situation or would like to request information, you can contact the National Human Trafficking Resource Center (NHTRC) via the toll-free hotline at 1-888-373-7888 or submit a tip online through the NHTRC anonymous online reporting form. Possible violations regarding trafficking in persons can also be reported to the Global Human Trafficking hotline at 1-844-888-FREE or by email at [help@befree.org](mailto:help@befree.org). You can also call Purdue University, Speak Up hotline at 1-866-818-2620.

The Principal Investigator (PI) of an award, where the above is applicable, will be notified via Sponsored Program Services (SPS) and with the assistance of Legal Counsel, will develop a compliance plan, if applicable. The PI is also responsible to assure that all applicable staff have completed the training identified under Reference Material below. Additional actions required by the PI will be outlined in the compliance plan, if applicable.

## **Sanctions**

Violations may include, but are not limited to, removal from the contract or grant, other disciplinary actions including termination of employment as well as remedies imposed pursuant to federal contracting regulations. Violations for activities funded by federally funded grants, contracts and agreements, may require additional reporting to and cooperation with federal sponsoring agency officials. Reports of potential and actual trafficking situations involving funding will also involve coordination with the Office of the Executive Vice President for Research and Partnerships to ensure compliance with grant and contract requirements.

## **Additional Resources**

### **Purdue University Contact**

Ken Sandel

Senior Director, Sponsored Program Services

765-494-1063

**State of Indiana Contact**

Office of the Indiana Attorney General has resources addressing human trafficking at:

<http://www.in.gov/attorneygeneral/2963.htm>

**Reference Material:**

[Purdue Anti-Trafficking Policy \(III.C.3\)](#)

Blue Campaign: [Human Trafficking 101 Information Sheet](#)

U.S. Department of Homeland Security: [Blue Campaign \(One Voice. One Mission. End Human Trafficking\) Awareness Videos](#)

Full text of the Act can be found at: <https://www.state.gov/j/tip/laws/113178.htm>