

Purdue University Anti-Trafficking Guidelines

Human trafficking is a grave violation of human rights and a serious crime that affects millions of people worldwide. It involves 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. This document aims to provide comprehensive guidelines to ensure compliance with federal and state regulations, including the Federal Acquisition Regulations (FAR) and the Uniform Guidance updates.

The purpose of this document is to outline the policies and procedures that Purdue University has implemented to combat human trafficking and to ensure that all employees, subcontractors, and sub-awardees are aware of their responsibilities in preventing and reporting trafficking activities. By adhering to these guidelines, we aim to create a safer and more ethical environment for all individuals involved in our operations.

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.”

In addition, in 2024, Uniform Guidance was updated to include sections 175.100, 175.105, 175.200, 175.205, 175.300, Appendix A to Part 175 related to Award Term for Trafficking in Persons.

- 175.100 Purpose of this part: This section establishes a Federal award term for grants and cooperative agreements to implement the requirements in 22 U.S.C. 7104(g), 22 U.S.C. 7104a, 22 U.S.C. 7104b, and 22 U.S.C. 7104c1.
- 175.105 Statutory requirement: This section requires Federal agencies to include in each Federal grant or cooperative agreement a condition that authorizes the Federal agency to terminate the award or take remedial actions if a private entity receiving funds engages in severe forms of trafficking in persons, procurement of commercial sex acts, use of forced labor, or acts that support trafficking in persons¹.
- 175.200 Use of award term: This section mandates that Federal agencies include the award term in Appendix A of this part for grants or cooperative agreements to private entities³.

- 175.205 Agency responsibilities: This section outlines the responsibilities of Federal agencies in ensuring compliance with the award term and taking appropriate actions if violations occur².
- 175.300 Definitions: This section provides definitions for terms used in Part 175, including "private entity" and other relevant terms².
- Appendix A to Part 175: This appendix contains the specific award term that must be included in Federal grants and cooperative agreements to address trafficking in persons².

Purdue University, in accordance with Federal and State laws and Uniform Guidance requirements, prohibits human trafficking and has a zero tolerance policy as stated in Purdue's [Anti-Trafficking Policy \(III.C.3\)](#). In all grant and subcontract activities funded by the federal government 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 sub awardees 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 **1-888-373-7888** and its e-mail address at help@humantraffickinghotline.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 sub awardee 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 sub awardee 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 sub awardee or sub awardee employees that have engaged in such activities.*

Any sub awardees, 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, sub awardees 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@humantraffickinghotline.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 for assuring 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. See [SPS Routing Flow Chart](#) for a visual of the entire process.

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

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Reference Material:

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

U.S. Department of Homeland Security: [Blue Campaign](#)

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: [IC 35-42-3.5 Chapter 3.5 Human and Sexual Trafficking](#)