

A&O Manual Section 1.28: Combating Trafficking in Persons
Effective Date: April 29, 2021
Refer questions to: The Office of the General Counsel

Statement

Gallaudet University (the “University”) opposes trafficking in persons and trafficking-related activities in any form. The University condemns such activities as contrary to the University’s core values, mission, and commitment to equity and belonging.

Policy

Trafficking in persons and trafficking-related activities are prohibited under federal and state laws and University policy. It is the University’s policy that no funds will be accepted or used in connection with any trafficking in persons and trafficking-related activities. All University staff, faculty, teachers, and students, as well as contractors, contractor employees, and their agents who do business with or on behalf of the University, shall not engage in or support such activities.

Prohibited trafficking in persons and trafficking-related activities include:

- engaging in severe forms of trafficking in persons, defined to mean forcing an individual, or when the individual is a minor, to perform a commercial sex act or forcing someone to work against their will;
- denying an individual access to their identification and/or immigration documents;
- lying or using deceit to recruit an individual for employment and/or using recruiters who are in violation of the local labor laws of the country where recruitment occurs;
- making recruited employees pay for their placement or recruitment fees;
- under certain circumstances, not providing or paying for the employee’s return home when employment has ended;
- providing or arranging housing for an employee that does not meet the host country housing and safety standards;
- when required by law or contract, not providing an employee with a legal agreement in writing in the employee’s native language at least five days prior to the employee’s departure from their point of origin; and
- any other activities identified by the Federal Acquisition Regulation Council as directly supporting or promoting any aspects of trafficking in persons.

Any activities observed or suspected to violate the prohibition on trafficking in persons should be reported to the [University’s Whistleblower Hotline](#) or by contacting the Global Human Trafficking Hotline at 1-844-888-FREE or by email at help@befree.org. It is the University’s

policy to [prohibit any acts of retaliation](#) against any individual making a whistleblower report in good faith.

Violations of this policy may result in disciplinary action, including but not limited to, removal from the applicable contract, reduction in benefits, or termination of employment.

Applicability

This policy applies to all divisions of the University and to University staff, faculty, teachers, and students, as well as contractors, contractor employees, and their agents who do business with or on behalf of the University.

Purpose

The purpose of this policy is to ensure the University's compliance with Federal Acquisition Regulation ("FAR") Subparts 22.17 and 52.222-50 regarding combating trafficking in persons by government contractors and federal award recipients.

Responsibilities

- The Office of the General Counsel provides general oversight of this policy.
- The Principal Investigator awarded a contract on behalf of the University that is federally funded must engage the Office of Sponsored Programs and Research Services for support.
- The Office of Sponsored Programs and Research Services:
 - maintains and administers a compliance plan that meets the requirements under FAR Subpart 52.222-50(h); and
 - reports violations involving a funded project to the funding agency and works with the funding agency to ensure compliance with grant and contractual requirements.
- All University staff, faculty, teachers, and students, as well as contractors, contractor employees, and their agents who do business with or on behalf of the University shall:
 - as applicable, cooperate with appropriate entities for the purpose of conducting audits, investigations or other actions related to compliance with anti-trafficking laws and regulations;
 - report any activities observed or suspected to violate the prohibition on trafficking in persons;
 - report to local law enforcement or Child Protective Services in the event they suspect a minor is a victim of trafficking in persons activities; and
 - complete all mandatory training as required by any applicable compliance plan.

Related Resources, Forms, and Tools

<https://www.acquisition.gov/far/subpart-22.17> (last checked February 21, 2021)

<https://www.acquisition.gov/far/52.222-50> (last checked February 21, 2021)

<https://oag.dc.gov/public-safety/human-trafficking-initiatives/human-trafficking-fact-sheet> (last checked February 21, 2021)

<https://www.acf.hhs.gov/otip/training/nhttac> (last checked February 21, 2021)

[A&O Manual Section 1.15: Policy on Reporting Suspected Misconduct \(Whistleblower Policy\)](#)

Approved by: Gallaudet University Administration and the Clerc Center Administration

History

April 29, 2021: First version approved