

## **Compliance Plan for Combating Trafficking In Persons**

The University of Florida (“UF”) opposes human trafficking, sex trafficking, forced labor in any form and all trafficking-related activities. These activities are inherently harmful, contrary to the University’s core values, and may violate applicable foreign, United States, state, and/or local laws.

The U.S. government has adopted a policy prohibiting trafficking in persons, which includes sex trafficking, forced labor, and trafficking-related activities. Trafficking in persons (or human trafficking), includes the recruitment, harboring, transportation, provision, or obtaining of persons for labor or services through the use of force, fraud, or coercion, for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery. It also includes sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform a commercial sex act is under 18 years old.

As a recipient of federal funds from grants, cooperative agreements, and contracts (collectively, “awards”), UF is required to comply with the US policy regarding Combating Trafficking in Persons and must inform its employees and agents of the U.S. government’s policy and UF’s responsibilities under the policy.

The US policy regarding Combating Trafficking in Persons is implemented through Federal Acquisition Regulations (FAR) and Defense Federal Acquisition Regulations Supplement (DFARS) provisions, which accompany certain Federally funded grants and contracts to UF. Specifically FAR 52.222-50, Combating Trafficking in Persons, requires that a Compliance Plan must be maintained for the duration of the performance of the contract, for any portion of the contract that (a) Is for supplies, other than commercially available off-the-shelf items, acquired outside the United States, or services to be performed outside the United States; **and** (b) Has an estimated value that exceeds \$550,000.

The Principal Investigator, listed below, is responsible for the implementation of this Compliance Plan, which Plan is effective (‘Effective Date’) as of the date of final signature below.

### **UF Awareness Program:**

Pursuant to the FAR 52.222-50 and similar DFARS clauses, UF, its employees, and its agents shall not:

1. Engage in severe forms of trafficking in persons during the period of performance of the contract;
2. Procure commercial sex acts during the period of performance of the contract;
3. Use forced or trafficked labor in the performance of the contract;
4. Destroy, conceal, confiscate, or otherwise deny access by an employee to the employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
5. Use misleading or fraudulent practices during the recruitment of employees or offering of employment, such as failing to disclose, in a format and language accessible to the employee, basic information or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if employer or agent provided or arranged), any significant cost to be charged to the employee, and, if applicable, the hazardous nature of the work;
6. Use recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
7. Charge employees recruitment fees (as defined by FAR52.222-50);

8. Fail to provide return transportation or pay for the cost of return transportation upon the end of employment -
  - a. For an employee who is not a national of the country in which the work is taking place and who was brought into that country for the purpose of working on a U.S. Government contract or subcontract (for portions of contracts performed outside the U.S.); or
  - b. For an employee who is not a U.S. national and who was brought into the U.S. for the purpose of working on a U.S. Government contract or subcontract, if the payment of such costs is required under existing temporary worker programs or pursuant to a written agreement with the employee (for portions of contracts performed inside the United States).

The provisions of this paragraph 8 will not apply to:

- an employee who is legally permitted to remain in the country of employment and who chooses to do so; or
  - when exempted by an authorized official of UF from the requirement to provide return transportation or pay for the cost of return transportation. Requests for such authorizations from the contracting agency shall be coordinated by the UF Division of Sponsored Programs and Research Compliance.
  - a victim of trafficking in persons who is seeking victim services or legal redress in the country of employment, or for a witness in an enforcement action related to trafficking in persons. UF will provide the return transportation or pay the cost of return transportation in a way that does not obstruct the victim services, legal redress, or witness activity. This paragraph does not apply when the preceding exceptions above apply.
9. Provide or arrange housing that fails to meet the host country housing and safety standards; or
  10. If required by law or contract, fail to provide an employment contract, recruitment agreement, or other legally required work document in writing in a language the employee understands. If the employee must relocate to perform the work, the work document must be provided to the employee at least five (5) days prior to the employee relocating. The employee's work document shall include, but is not limited to, details about work description, wages, prohibition on charging recruitment fees, work location(s), living accommodations and associated costs, time off, roundtrip transportation arrangements, grievance process, and the content of applicable laws and regulations that prohibit trafficking in persons.

## **Compliance Plan:**

### **1. Notification**

- a. To provide the required awareness program for individuals working on projects subject to the Combating Trafficking in Persons policy, the Principal Investigator must distribute this Compliance Plan to all employees, consultants, and vendors working on the referenced project prior to the performance of the project. Additional information about Trafficking in Persons and associated laws and regulations can be found at the U.S. State Department's Office to Monitor and Combat Trafficking in Persons website: <http://www.state.gov/j/tip/>, and the National Human Trafficking Resource Center website: <https://traffickingresourcecenter.org/>.
- b. Violations of this Compliance Plan and applicable laws may result in disciplinary actions, including but not

limited to, removal from the contract up to termination of employment.

- c. Principal Investigators must immediately report any information they received from any source that alleges an employee or subcontractor employee has violated the policy by calling (1-844-599-8786) or making a report to UF's Division of Sponsored Programs ([ufawards@ufl.edu](mailto:ufawards@ufl.edu)), and by calling the Global Human Trafficking Hotline at 1-888-373-FREE or sending an email to [help@befree.org](mailto:help@befree.org).
- d. Employees are expected to report any credible information of violations of this Compliance Plan and/or FAR 52.222-50(b), without fear of retaliation, by calling (1-844-599-8786) or making a report to UF's Division of Sponsored Programs ([ufawards@ufl.edu](mailto:ufawards@ufl.edu)) or the Global Human Trafficking Hotline at 1-888-373-FREE or sending an email to [help@befree.org](mailto:help@befree.org). Always contact 911 or local law enforcement if you or someone else is in immediate danger.
- e. UF will take the necessary remedial actions and inform the US Contracting Officer and the responsible agency Inspector General as required.

## **2. Subrecipient or Vendor**

- a. All Subrecipients and Vendors will have the FAR/DFARS clauses incorporated into their subawards or purchase orders.
- b. Subrecipients must flow down the Combating Trafficking in Persons clauses to any of their subcontractors.
- c. Subrecipients and Vendors will receive a copy of this Compliance Plan and be bound to the same requirements as UF. Violations of this Compliance Plan and/or US Combatting Trafficking in Persons may result in subaward termination.
- d. All Subrecipients and Vendors will be required to certify compliance with this Plan.

## **3. Recruitment and Wage Plan**

To the extent that UF uses a recruitment company during the course of the project, only recruitment companies with trained employees may be used, who prohibit charging recruitment fees to the employee, and who ensure that wages meet applicable host-country legal requirements.

## **4. Housing Plan**

To the extent that UF will provide or arrange housing during the course of the project, UF must receive documentation or other supporting information that ensures the housing meets host-country safety standards.

## **5. Principal Investigator Certification**

Principal Investigator:  
Department/Unit Name:  
Sponsor Name:  
UF Agreement Number:  
Project Title:

**Certification**

The undersigned, as Principal Investigator and an employee of UF, working on the above referenced project, acknowledge the following:

- a. I have reviewed and understand this Compliance Plan for Combating Trafficking in Persons and agree to comply with the requirements contained therein.
- b. I understand that I cannot begin work on this project until I sign and submit this agreement.
- c. UF Division of Sponsored Programs will furnish this Compliance Plan to the Contracting Officer upon request.
- d. Annually, as of the Effective Date, I will certify to UF’s Division of Sponsored Programs and Research Compliance one of the following compliance statuses:
  - i. To the best of the my knowledge and belief, neither I nor any UF employees working on this project, or the subcontractors or their agents on this project, have been engaged in human trafficking; or
  - ii. If abuses relating to any of the prohibited activities identified in FAR 52.222-50(b) have occurred, appropriate remedial and referral actions have been taken.

Certified by:

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Principal Investigator Signature

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Date

6. Subrecipient Certification

Subrecipient Name:

Subrecipient Principal Investigator:

Agreement Number:

Project Title:

I, \_\_\_\_\_, as Principal Investigator and an employee or agent of Subrecipient, working on the above referenced project, certify the following:

- a. Subrecipient's policies and practices prohibit engaging in the trafficking of persons, the use of forced labor, or the procuring of a commercial sex acts in the country or countries in which it conducts business; and
- b. If applicable, it has implemented a compliance plan to prevent any prohibited activities identified in FAR 52.222-50 (b) and to monitor, detect, and terminate any subcontract, subcontractor employee or agent engaging in prohibited activities; and
- c. After conducted due diligence, either
  - iii. To the best of the its knowledge and belief, neither it nor any of its subcontractors, agents have been engaged in human trafficking; or
  - iv. If abuses relating to any of the prohibited activities identified in FAR 52.222-50(b) have occurred, appropriate remedial and referral actions have been taken.

Certified by:

\_\_\_\_\_  
Subrecipient Principal Investigator Signature

\_\_\_\_\_  
Date