

## Human Trafficking Compliance Plan

The U.S. government has adopted a policy prohibiting trafficking in persons (“human trafficking”), sex trafficking, forced labor, and any other trafficking-related activities. As a recipient of federal funds, both directly from the U.S. government and from subcontracts and subawards, the University of Florida (“University”) is required to inform its employees and contractors regarding the U.S. government’s policy. The U.S. government’s regulations related to Human Trafficking are available at [2 C.F.R. §175.15](#) and [48 C.F.R. §52.222-50](#).

### *Prohibited Activities:*

In accordance with these policies, while performing work on any federal award, the University prohibits its employees, agents, contractors, subrecipients, and anyone working on their behalf from engaging in any prohibited activities outlined in either of the above-reference regulations, including, but not limited to:

- 1) Engaging in forms of human trafficking or procuring commercial sex acts;
- 2) Using of forced labor to perform any act under the contract;
- 3) Confiscating or denying access to an employee’s identity or immigration documents;
- 4) Using misleading or fraudulent practices to recruit employees or offer them employment;
- 5) Charging employees or potential employees recruitment fees;
- 6) Failing to provide return transportation for certain employees who are travelling to another country to work (although some exceptions apply);
- 7) Providing housing to employees that fails to meet the host country housing and safety standards;  
and
- 8) Failing to provide employment contracts, recruitment agreements, or other required documents, when required by law or contract.

Additional information about Trafficking in Persons and examples of awareness programs can be found at the website for the Department of State’s Office to Monitor and Combat Trafficking in Persons at <http://www.state.gov/i/tip/>.

### *Consequences of Engaging in Prohibited Activities:*

The University prohibits human trafficking, procurements of a commercial sex act, or the use of forced labor in the performance of a federal award. The consequence for engaging in these activities is termination of employment and criminal prosecution. The consequences for engaging in other trafficking-related activities prohibited by the regulations is discipline up to and including termination of employment and/or removal from the federal award, depending on the seriousness of the offense and the totality of the circumstances.

### *Reporting Allegations of Prohibited Activities:*

In addition to the University’s options for [reporting concerns and filing complaints](#), including the online [UF Compliance Hotline](#), members of the university community may report concerning conduct that may

constitute prohibited trafficking activities to the Global Human Trafficking Hotline at 1-844-888-FREE and its email address at [help@befree.org](mailto:help@befree.org).

The University of Florida strictly prohibits retaliation, as described on the [Employee Inquiry and Compliant Procedures](#) page, including retaliation for reporting concerns regarding prohibited human trafficking, procurements of commercial sex acts, and the use of forced labor and related trafficking activities in the performance of a federal award.

### *General Compliance Structures*

In an effort to prevent agents and subcontractors from engaging in prohibited activities, the University monitors activities through controls, performs audits, maintains a compliance hotline for allegations, and performs investigations when warranted.