



Policy/Procedure

Section 1. ANTI-HUMAN TRAFFICKING IN PERSONS POLICY

1a. Purpose

The Trustees of Clark University (Clark University) and the United States Government prohibit trafficking in persons. The U.S. Government's policy prohibiting trafficking in persons is available at 48 CFR § 52.222-50 and is summarized below under the heading: "Summary of U.S. Government Policy of Prohibiting Trafficking in Persons."

Clark University is committed to a work environment that is free from human trafficking and slavery, which for purposes of this policy includes forced labor and unlawful child labor. Clark University will not tolerate or condone human trafficking or slavery in any part of our global organization.

Clark University employees, subsidiaries, contractors, subcontractors, vendors, suppliers, partners and others through whom Clark University conducts business must avoid complicity in any practice that constitutes trafficking in persons or slavery.

1b. Scope

This policy applies to all personnel employed by or engaged to provide services to Clark University, including, but not limited to, employees, officers, and temporary employees of Clark University and Clark University's U.S. and international subsidiaries, and independent contractors (for ease of reference throughout this policy, "employees").

Every employee is responsible for reading, understanding and complying with this policy. Clark University supervisors are responsible for ensuring that employees who report to them, directly or indirectly, comply with this policy. If you have any questions or concerns relating to this policy, consult Clark University's General Counsel or Human Resources/Title IX Department.

Section 2. Definitions

Human Trafficking – A modern-day form of slavery involving the illegal trade of people for exploitation or commercial gain. A victim need not be physically transported from one location to another for the crime to fall within this definition.



Labor Trafficking – The recruitment, harboring, transportation, provision, or obtaining of a person 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.

Sex Trafficking – The recruitment, enticement, harboring, transportation, provision, obtaining, advertising, maintaining, patronizing, or soliciting by any means of a person of 18 years and older, through force, threats of force, fraud, coercion or any combination of such means that will be used to cause the person to engage in a commercial sex act. In the case of a person who has not attained the age of 18 years, sex trafficking occurs when that person will be caused to engage in a commercial sex act.

Section 3. Procedures and Enforcement

Report any conduct that you believe to be a violation of this policy to Clark University's General Counsel or Human Resources Department. Reports may be made anonymously as permitted by applicable law.

Employees who fail to report actual or suspected misconduct may be deemed in violation of this policy.

Disciplinary Actions

Clark University will not tolerate retaliation against an employee for reporting a concern in good faith or for cooperating with a compliance investigation, even when no evidence is found to substantiate the report.

Any violation of this policy may be grounds for disciplinary action, up to and including termination. Clark University and its subsidiaries have the exclusive right to interpret this policy regarding their respective employees.

Violation of the U.S. Government's policy against human trafficking may also result in criminal prosecution of responsible individuals.

Related Policies and Regulations

Summary of U.S. Government Policy of Prohibiting Trafficking in Persons

U.S. Government policy prohibits trafficking in persons and slavery. Government contractors and their employees, subcontractors, subcontractor employees, and agents must not engage in any practice that constitutes trafficking in persons or slavery. This includes, but is not limited to, the following activities:



- Engaging in any form of trafficking in persons.
- Procuring commercial sex acts.
- Using forced labor in the performance of any work.
- Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority.
- Using misleading or fraudulent practices during the recruitment of employees or offering of employment/contract positions, such as failing to disclose, in a format and language understood by the employee or applicant, 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 provided by the employer or agent), any significant cost to be charged to the employee or applicant, and, if applicable, the hazardous nature of the work.
- Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place.
- Charging applicants recruitment fees.
- If required by law or contract, failing to provide return transportation or failing to pay for the cost of return transportation upon the end of employment.
- If required by law or contract, failing to provide or arrange housing that meets the host country housing and safety standards.
- If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing with legally required information and in a language the employee understands.

History/Revision Information

Responsible Office/Division: Office of Sponsored Programs and Research

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