

## **Notice Regarding U.S. Government's Policy Against Human Trafficking and Forced Labor**

Rowan University opposes human trafficking, sex trafficking, forced labor, and all trafficking-related activities. These activities are inherently harmful and contrary to the University's core values, and may violate applicable foreign, U.S., 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. As a recipient of federal funds from grants, cooperative agreements, and contracts (collectively, "awards"), Rowan must inform its employees and agents of the U.S. government's policy and Rowan's responsibilities under the policy.

### **What is Human Trafficking?**

Under the U.S. policy, 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.

Definitions of other relevant terms used in the policy are set forth in the U.S. government's regulations available at 2 C.F.R. § 175.15 for grants and cooperative agreements and 48 C.F.R. § 52.222-50 for contracts.

### **Prohibitions & Requirements**

As the recipient of active awards, and pursuant to the government's policy, Rowan and its employees, agents, and subrecipients are prohibited from doing the following:

- Engaging in human trafficking or sex trafficking, or procuring commercial sex acts during the period of performance of the award
- Using forced labor in the performance of awards or subawards
- Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee's identity or immigration documents
- Using misleading or fraudulent practices during the recruitment of employees, such as failing to disclose key terms and conditions of employment (e.g., wages and fringe benefits, location of work, living conditions, housing and associated costs)
- Using recruiters that do not comply with local labor laws in the countries in which the recruiting takes place
- Charging employees to the individuals recruited to work on the award
- Providing or arranging housing that fails to meet applicable 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 and that meets certain requirements in the regulations
- Under certain circumstances, failing to provide return transportation or pay for the cost of return transportation upon the end of employment for certain employees specified in the regulations, which includes employees who are not nationals of the United States and who came to the U.S. to work on a Rowan contract

### **Reporting Incidents or Policy Violations**

Always contact 911 or local law enforcement if you or someone else is in immediate danger. Rowan employees must report any credible information regarding human trafficking incidents to Rowan by contacting the Office of Sponsored Projects or the Integrity Hotline at 855-431-9667.

Rowan employees may contact the Global Human Trafficking Hotline at 1-844-888-FREE or [help@befree.org](mailto:help@befree.org).

Rowan prohibits retaliation against an individual who makes a good faith report of suspected wrongful conduct pursuant to this notice.

Rowan and its employees must cooperate in responding to requests from contracting agencies and other responsible enforcement agencies to conduct audits, investigations, or other actions to ascertain compliance with the policy, the Traffic Victim Protection Act (TVPA), Executive Order 13627 (“Strengthening Protections Against Trafficking in Persons in Federal Contracts”), or any other applicable law or regulations establishing restrictions on trafficking in persons.

### **Violations**

If Rowan determines that any Rowan employee, agent, or subrecipient has violated the Government’s policy on trafficking in persons, Rowan will take appropriate disciplinary or administrative action pursuant to law and Rowan’s policies and procedures. Such action could include removal from the award or termination of employment.

Rowan will immediately inform the relevant funding agency of any credible evidence it receives that alleges that a Rowan employee, agent, or subrecipient has engaged in conduct that violates the government’s policy, as well as any actions Rowan takes as a result. The funding agency may take additional actions or impose sanctions for any violations of the policy.

### **Compliance Plans**

Federal regulation requires that an anti-trafficking compliance plan be in place for any federal contract and subcontract where supplies are acquired outside the United States, or services will be performed outside the United States, and the estimated value of the supplies and/or services outside of the United States exceeds \$550,000. For such contracts and subcontracts, the Principal Investigator (PI), with assistance from the University’s Office of Sponsored Programs, is responsible for creating a compliance plan specific to the project and local circumstances that complies with the federal requirements listed at 48 CFR 52.222-50(h).

### **Human Trafficking regulations resources**

- [National Human Trafficking Resource Center](#) – resources for human trafficking victims
- [FAR 52.222-50 Combating Trafficking in Persons](#) – federal contracting requirements regarding human trafficking
- [2 CFR part 175: Award Terms for Trafficking in Persons](#) – federal award terms
- [22 USC Chapter 78: Trafficking Victims Protection](#) – federal protections for trafficking victims
- [Executive Order 13627: Strengthening Protections against Trafficking In Persons In Federal Contracts](#) – executive order strengthening human trafficking protections
- [U.S. Department of Homeland Security](#)– human trafficking awareness training