



Combatting Trafficking in Person Compliance Plan **Pursuant to FAR § 52.222-50**

Policy

UW–Madison prohibits trafficking in persons. The university, its employees, agents, and subcontractors are prohibited from engaging in any of the following types of trafficking-related activities:

- A. Engaging in severe forms of trafficking (defined in UW-Madison’s full policy) in persons during the period of performance of the contract;
- B. Procuring commercial sex acts during the period of performance of the contract;
- C. Using forced labor in the performance of the contract;
- D. Destroying, concealing, confiscating, or otherwise denying access to an individual’s identity or immigration documents (i.e., passport or drivers’ license) regardless of issuing authority;
- E. Using misleading or fraudulent practices about the employee recruitment or offer processes, such as failing to disclose, in a format and language accessible to the employee or potential employee, key terms and conditions of the engagement, such as wages and fringe benefits, work location, living conditions, housing costs and other significant costs incurred by the employee or potential employee, and any hazardous nature of the work;
- F. Using recruiters that do not comply with local labor laws of the countries in which recruiting takes place;
- G. Charging recruitment fees to the individuals recruited to perform the work;
- H. Under certain circumstances, failing to supply return transportation, or payment for return transportation, at the conclusion of the work, if the worker is not a national of the country in which the work occurs and was brought into the country to work on a federal contract;
- I. Providing or arranging housing that fails to meet host country housing and safety standards; and
- J. If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work documents, in writing, in the employee’s native language, and at least five days prior to the employee departing from their country of origin to work on the contract in another country.

UW-Madison’s full *Combatting Trafficking in Persons Policy* can be found [here](#).

Compliance Plan Application

This plan shall be utilized for any portion of a U.S. Government contract that:

- 1. is for supplies, other than commercially available off-the-shelf (COTS) items, acquired outside the United States, or is for services performed outside of the United States; and

2. has an estimated value that exceeds \$550,000

Compliance Plan Certification

Annually after receiving an award, the Principal Investigator (PI) and Research and Sponsored Programs (RSP) award staff, or the person entering into the contract of behalf of UW-Madison or their designee shall certify the following:

1. It has implemented this compliance plan to prevent any prohibited activities identified in the FAR and to monitor, detect, and terminate any agent, subcontract or subcontractor employee engaging in prohibited activities; and
2. After having conducted due diligence, either
 - a. to the best of the UW-Madison's knowledge and belief, neither it nor any of its agents, subcontractors, or their agents are engaged in any such activities; or
 - b. if abuses relating to any of the prohibited activities have been found, the PI or the person entering into contract of behalf of UW-Madison or their designee has taken the appropriate remedial and referral actions.

Compliance Plan

I. Awareness Program

UW-Madison has developed and implemented an awareness program to inform all employees about the FAR's prohibitions against trafficking-related activities described in FAR 52.222-50(b), the activities prohibited, and the actions that will be taken against the employee for violations. When applicable under FAR, PIs or the person entering into the contract of behalf of UW-Madison or their designee distribute to employees engaged in the performance of the contract the Combating Trafficking in Persons Awareness Information document and UW-Madison's Combating Trafficking in Persons Policy which includes:

1. information about the Government's policy prohibiting trafficking-related activities, the activities prohibited, and the actions that will be taken against an employee for violations
2. information on how to report violations of the policy, including the option to report to the Global Human Trafficking Hotline at 1-844-888-FREE and/or via email to help@befree.org.
3. where to locate the information above

This information is also publicly available on UW-Madison webpages including but not limited to:

4. [UW-Madison Policy Library](#)
5. [UW-Madison Research and Sponsored Programs in the Office of the Vice Chancellor for Research and Graduate Education](#)
6. [UW-Madison Office of Human Resources](#)
7. [UW-Madison Office of Compliance](#)

II. Reporting Process

Employees, agents and subcontractors can report, without fear of retaliation, activity inconsistent with the policy prohibiting trafficking in persons to the following UW-Madison office:

1. Office of Human Resources – Workforce Relations
 - a. Email: wr@ohr.wisc.edu

- b. Phone: (608) 265-2257
- c. Web: hr.wisc.edu/about/workforce-relations/

Per UW-Madison's *Combating Trafficking in Persons Policy*, PI and all employees engaged in the performance of the contract **must** notify UW-Madison's Office of Human Resources – Workforce Relations immediately of any credible information, from any source, that alleges an employee, agent, or subcontractor has engaged in conduct that violates any part of the policy. Additional, optional reporting offices include: UW-Madison Police Department; Dean or Director of the relevant School, College or Division; UW-Madison Research and Sponsored Programs; UW-Madison Office of the Vice Chancellor for Research and Graduate Education.

Employees, agents and subcontractors can also report, without fear of retaliation, activity inconsistent with the policy prohibiting trafficking in persons to the Global Human Trafficking Hotline at 1-844-888-FREE and/or via email to help@befree.org.

III. Recruitment and Wage Plan

UW-Madison does not charge recruitment fees to employees or potential employees. UW-Madison ensures that wages meet applicable host country legal requirements or will explain any variances. To ensure that wages meet applicable host country requirements, PIs or the person entering into the contract on behalf of UW-Madison or their designee should consult with their RSP award staff and the Office of Human Resources.

IV. Housing Plan

If the PI intends to provide or arrange housing, the PI or the person entering into the contract on behalf of UW-Madison or their designee should consult with Research and Sponsored Programs to ensure that the housing meets host-country housing and safety standards. Research and Sponsored Programs may consult with the Office of Legal Affairs and the Office of Risk Management, as necessary.

V. Procedures to Prevent Trafficking in Persons

To prevent agents and subcontractors at any tier and at any dollar value from engaging in trafficking in persons and to monitor, detect, and terminate any agents, subcontracts, or subcontractor employees that have engaged in such activities, UW-Madison has enacted several processes:

1. Creating, publishing, and distributing the Combating Trafficking in Persons Policy
2. Creating mandatory reporting obligations for all employees, agents and subcontractors engaged in the performance of the federal contract and notifying them of the requirement to report any suspected violations to UW-Madison
3. Ensuring existing disciplinary policies are sufficient to address any policy violations
4. In the event of the receipt of credible information alleging violation of FAR 52.222-50(b), UW-Madison will immediately notify Contracting Officer and the agency Inspector General of the specific nature of the activity, including specific remedial action taken and will take appropriate corrective and preventive action, up to and including the dismissal of employees and termination of contracts with subcontractors, suppliers and agents.