



Compliance Plan to Combat Human Trafficking

Southwestern Community College (“College”) is opposed to human trafficking, sex trafficking, forced labor in any form. These activities are inherently harmful, and contrary to the College’s core values and may violate applicable United States, state, local and/or foreign laws.

Furthermore, federal law mandates that federal contractors and subcontractors maintain an anti-trafficking compliance program to qualify for certain federal funds and grants. For this purpose, the College’s Combating Human Trafficking Policy authorizes the Vice President for Financial and Administrative Services to provide a Compliance Plan to Combat Human Trafficking.

What is Human Trafficking?

Human trafficking is the recruitment, harboring, transportation, provision or obtaining of a person for labor or services using force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage or slavery, and sex trafficking.

How is this relevant to the College’s Federal Contracts and Awards?

Federal Acquisition Regulations (“FAR”) and other grant or award terms may require additional safeguards against Human Trafficking.

FAR 52.222-50 expressly prohibits:

- Engaging in all forms of forced labor and human trafficking
- Procurement of a commercial sex act
- Obstruction of identity of immigration documents
- Illegal recruiting fees, failure to provide return transportation, and providing unsafe housing

Prohibition on Human Trafficking Related to the College’s federal contracts and grants.

This document outlines the College’s standard Compliance Plan to Combat Human Trafficking and assigns responsibilities to different research and finance personnel. Due to the scope or breadth of work, projects (such as large, global projects) may require additional measures to combat human trafficking. In these instances, the Vice President for Financial and Administrative Services partners with project teams to personalize a compliance plan with additional safeguards against human trafficking.

This compliance plan assigns roles and responsibilities to personnel to combat human trafficking across the College’s enterprise.

The principal investigator must:

- **Notify all project personnel and volunteers** working under the award of the U.S. Government’s zero tolerance policy regarding human trafficking and of the College’s Combating Human Trafficking Policy.

- Immediately notify the Title IX Coordinator, the College's Human Resources Office, and law enforcement of any information received from any source that alleges human trafficking related activities, *and*
- of the actions that will be taken against employees, subcontractors, subrecipients and vendors for violation of applicable anti-trafficking prohibitions.
- **Immediately report any information** they received from any source that alleges an employee, subcontractor/subrecipient, vendor, or subcontractor/subrecipient or vendor employee has violated applicable anti-trafficking laws.
- **Coordinate with the College's administration** to take any appropriate actions up to and including termination of employees, subrecipients/subcontractors, or vendors that violate applicable anti-trafficking laws.
- **Tailor a compliance plan to the project** as part of the proposal package, if the Compliance Plan to Combat Human Trafficking is insufficient based on the size and complexity of the award of the activities to be performed thereunder.
- **Certify the annual compliance plan** with the report.

The Office of Institutional Advancement (OIA) will:

- **Trigger an email notification** to the Principal Investigator before the award is set up.
- **Notify** subrecipients/subcontractors in subrecipient/subcontract agreements of **anti-trafficking requirements**.
- For funded grants and cooperative agreements, **include a provision** in subawards allowing the College **to terminate the agreement** in the event of a human trafficking violation.

Purchasing:

Purchasing must:

- When applicable, **notify vendors** by including the relevant anti-trafficking requirements in purchase agreements, as needed.
- **Include a provision** allowing the College to terminate the agreement in the event of a human trafficking violation, for funded grants and cooperative agreements, in agreements under the award.

Questions?

Contact: [Office of Institutional Advancement](#).



Project Team Certification

I certify that I have reviewed the Combating Human Trafficking Policy and will comply all measures intended to combat human trafficking.

Furthermore, I certify that: (select one):

☐ I will adopt these measures as the Compliance Plan to Combat Human Trafficking for this project. These measures are sufficient for the execution of this project.

☐ I will adopt these measures as the Compliance Plan to Combat Human Trafficking for this project. Due to the scope or breadth of this project, I am implementing additional measures to safeguard against the human trafficking. The additional responsibilities and safeguards are attached to this document.

Principal Investigator (Print Name): _____

Principal Investigator (Signature): _____

Date: _____

Co-Principal Investigator (Print Name): _____

Co-Principal Investigator (Signature): _____

Date: _____

Subrecipient/Subcontractor/Vendor/Student and/or other person completing work on behalf of the College (Print Name): _____

Signature: _____

Date: _____

Subrecipient/Subcontractor/Vendor/Student and/or other person completing work on behalf of the College (Print Name): _____

Signature: _____

Date: _____