

Combating Trafficking Policy

Chapman University's policy and notice regarding the U.S. government's policy prohibiting human trafficking, sex trafficking, forced labor, and trafficking-related activities.

POLICY STATEMENT

The U.S. government has adopted a policy prohibiting human trafficking, sex trafficking, forced labor, and trafficking-related activities. As a recipient of federal funds from grants, cooperative agreements, and contracts (collectively "awards"), Chapman University is obligated to inform its employees, agents, independent contractors and subrecipients performing awards, regarding the U.S. government's policy. Chapman University opposes human trafficking, sex trafficking, and forced labor, which are inherently harmful and contrary to Chapman University's core values and which may violate applicable foreign, U.S., state, and/or local laws.

REASON FOR THE POLICY

As a recipient of federal awards, Chapman University is obligated to inform its employees, agents, independent contractors and subrecipients performing awards, regarding the U.S. government's policy.

POLICY

Human Trafficking (or "trafficking in persons" as used in the U.S. government policy) includes the recruitment, harboring, transportation, provision, or obtaining of persons 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, and inducing a commercial sex act 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 implementing its policy, available at 2 CFR §175.15 for grants and cooperative agreements and 48 CFR §52.222-50 for federally funded contracts).

Chapman University, its employees, agents, independent contractors, and subrecipients of federal funds (and their respective employees), are prohibited from the following:

- Engaging in human trafficking or sex trafficking, or procuring commercial sex acts, during the award period;
- Using forced labor to perform the award;
- Destroying, concealing, confiscating, or otherwise denying access to an individual's identity or immigration documents;
- Using misleading or fraudulent practices about the recruitment process for work on a project outside the U.S., such as failing to disclose, in a format and language accessible to the potential worker, key terms and conditions of the engagement, such as wages and fringe benefits, work location, living conditions, housing costs, and any hazardous nature of the work;
- Using recruiters that do not comply with local labor laws in the countries in which recruiting takes place;

- Charging recruitment fees to the individuals recruited to work on the award;
- Providing or arranging housing that fails to meet host country housing and safety standards;
- If required by law or contract, failing to provide an employment contract, recruitment agreement, or similar work paper in writing in the employee's native language prior to the employee departing from his or her country of origin to work on the contract in another country; and
- 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 the federal award.

REPORTING RESOURCES

Always contact 911 or local law enforcement if you or someone else is in immediate danger. In addition, all Chapman University employees, agents and independent contractors must notify one of the following, if they become aware of any credible information alleging human trafficking, sex trafficking, forced labor, or other violations of the policy:

Ethics Anonymous Reporting Hotline:

1-888-493-1870 or <https://www.chapman.edu/campus-services/institutional-compliance-and-internal-audit/index.aspx>

Office of Research - Research Integrity:

(714) 628-7201

Chapman University prohibits retaliation against an individual who makes a good faith report of suspected wrongful conduct pursuant to this policy and notice

FOR MORE INFORMATION

Individuals may contact the Global Human Trafficking Hotline at 1-844-888-FREE or help@befree.org. To read more about the U.S. government policy applicable to individuals working on grants and cooperative agreements, please review 22 USC §7104(g) and 2 CFR §175.15. To read more about the U.S. government policy applicable to individuals working on a federal contract, please review 48 CFR 52.222-50.

OFFICE RESPONSIBLE FOR POLICY

Name of Office(s): Human Resources, Research, Institutional Compliance, Legal Affairs

WEBSITE ADDRESS FOR THIS POLICY

<https://www.chapman.edu/campus-services/legal-affairs/policy/index.aspx>

WHO APPROVED THIS POLICY

[Signed]

Daniele C. Struppa

President, Chapman University

PUBLICATION DATES

Effective: July 2, 2019