

Kansas State University's Feed the Future Innovation Lab for Collaborative Research on
Sustainable Intensification (SIIL)
Anti-Trafficking Compliance Plan

Background and Purpose

The Sustainable Intensification Innovation Lab (SIIL) has developed this Anti-Trafficking Compliance Plan ("Plan") in accordance with the U.S. Government's zero-tolerance policy regarding trafficking in persons by government contractors and award recipients, as set out in the Federal Acquisition Regulation (FAR) Subpart 22.1703(a) and 52.222-50(h), and in USAID Standard Provision C20 Trafficking in Persons for U.S. Nongovernmental Organizations. The compliance plan is designed to prevent any prohibited activities identified in the FAR and to monitor, detect, and terminate any subcontract or subcontractor employee engaging in prohibited activities.

The purpose of the Plan is to comply with Kansas State University's (K-State) policies and outline SIIL's procedures for:

- 1) informing SIIL employees of the conduct prohibited under K-State's Anti-Trafficking Policy and the Protections Against Trafficking in Persons provisions and the actions that may be taken against employees for violations;
- 2) employing fair recruitment, wage, and housing practices; and
- 3) preventing prohibited trafficking activity by suppliers, subcontractors and sub-recipients, and monitoring, detecting, and terminating those who engage in such activities.

Applicability

This plan sets out SIIL's baseline standards for anti-trafficking compliance and applies presumptively to all U.S. Government contracts, subcontracts, cooperative agreements, awards and subawards associated with SIIL. However, it may need to be adapted or modified for projects that are larger, more complex, or involve greater risk of trafficking activity. For all contracts and awards with an estimated value of \$500,000 or more and that involve activities outside the U.S. (a "Qualifying Program"), project staff must examine each one individually to assess the risk of trafficking activity, based on factors such as the number of non-U.S. citizens to be employed and whether the contract or award will involve services or supplies susceptible to trafficking in persons. Project staff must adapt or modify the Plan as necessary to ensure that it is appropriate to the size and complexity of the contract or award and the nature and scope of the activities to be performed.

The scope of the Plan includes the operations and activities of SIIL as well as those subawards and agents performing on this award. The subawards included in this Plan are below:

<u>Subaward Title</u>	<u>Institution</u>	<u>Lead</u>	<u>Contact</u>
Geospatial & Farming Systems Research Consortium	University of California, Davis	Robert Hijmans	rhijmans@usdavis.edu
Appropriate Scale Mechanization Consortium	University of Illinois at Urbana-Champaign	Alan Hansen	achansen@illinois.edu
Developing Indicators for Sustainable Intensification	Michigan State University and Columbia University	Sieglinde Snapp and Cheryl Palm	snapp@msu.edu and cplam@ei.columbia
Unlocking the production potential of "polder communities" in coastal Bangladesh	Kansas State University	Krishna Jagadish	kjagadish@ksu.edu

Subaward Title	Institution	Lead	Contact
SI - integration of crop and livestock production systems in the Sahelian zone of Burkina Faso	International Livestock Research Institute	Augustine Ayantunde	a.ayantunde@cgiar.org
Women in Agriculture Network (WAgN) Cambodia: Gender- & Ecologically-Sensitive Ag	Pennsylvania State University	Ricky M. Bates	Rmb30@psu.edu
Evaluation of the Relationship between SI Production Systems & Nutritional Outcomes	Texas A&M University	Neville Clarke	Neville.clarke@ag.tamu.edu
Adoption of SI in dual-purpose millet – leguminous crops – livestock systems to improve food & nutritional security & natural resources management for rural smallholder farmers in Senegal	Kansas State University	Doohong Min	dmin@ksu.edu
Raising crop response: bidirectional learning to catalyze SI at multiple scales	Michigan State University	Sieglinde Snapp	snapp@msu.edu

Employee Awareness Program

SIIL has adopted the Kansas State University Anti-Trafficking Policy (“Policy”) that reflects the provisions prohibiting trafficking-related activities, describes the actions SIIL may take against employees and agents who violate the Policy, and sets out the procedure for reporting and investigating Policy violations.

SIIL posts the Policy on its website (<http://www.k-state.edu/siil/>) for external purposes and in the SIIL Reporting Hub, where it can be accessed by all SIIL personnel at any time.

Upon initial adoption, all SIIL personnel will be notified of the Policy via an institution-wide email containing a link to the Policy with instructions to access and review it. Thereafter, SIIL will send annual email reminders to all personnel directing them to review the Policy on the SIIL Reporting Hub and summarizing any Policy updates.

All new personnel are required to read and acknowledge the Policy at the time of hire and must also complete an on-line training program that includes the anti-trafficking provisions provided on the Homeland Security Website.

SIIL also will conduct specialized training on the Anti-Trafficking Provisions, the Policy, and the Compliance Plan on an as-needed basis.

Recruitment and Wage Plan

SIIL strictly prohibits the use of any misleading or fraudulent recruitment practices during the recruitment of employees or offering of employment to employees. SIIL employees must fully and accurately disclose, in a format and language accessible to the employee, all key terms and conditions of employment, including wages and benefits, work location, living conditions, housing and associated costs (where provided or arranged by SIIL), significant costs to be charged to the employee, and, if applicable, the hazardous nature of the work.

SIIL prohibits the use of recruiters that do not have trained employees, or that do not comply with all labor laws of the country where the recruitment takes place.

SIIL prohibits charging recruitment fees to any employee.

SIIL will pay to all employees, associated with its award and subawards, wages that meet applicable host-country legal requirements, or will explain any variance.

Where required by law or contract, SIIL will provide to every employee an employment contract, recruitment agreement or other required work document, written in a language the employee understands, containing all required information about the terms of conditions of employment, which may include, by way of example, the work description, wages, work location, living accommodations and associated costs, time off, transportation arrangements, grievance process, the content of applicable laws and regulations prohibiting trafficking in persons, and the prohibition on recruitment fees. If the employee must relocate to perform the work, SIIL will provide the required work document at least five (5) days prior to relocation.

SIIL prohibits destroying, concealing, confiscating or otherwise denying any employee access to his or her identity or immigration documents.

SIIL will provide or pay the cost of return transportation at the end of employment for any employee who is not a national of the country where the work took place and was brought into that country by SIIL for purposes of working on a covered U.S. Government contract or award.

SIIL will provide or pay the cost of return transportation at the end of employment for any employee who is not a U.S. national and was brought into the U.S. for purposes of working on a covered U.S. Government contract or award, if payment of such costs is required under existing temporary work programs or pursuant to a written agreement with the Worker for portions of contracts and awards performed outside the U.S.

Housing Plan

In situations where SIIL provides housing to employees, the housing will meet host country housing and safety standards.

Reporting Requirements and Procedure

All SIIL personnel are required to report any suspected trafficking-related activity or violation of the Kansas State University Anti-Trafficking Policy, without fear of retaliation, to the Kansas State University Office of Institutional Equity (OIE), which can be contacted at 785-532-6220 or equity@ksu.edu.

SIIL personnel and subcontractor personnel who believe they or others have been subjected to prohibited trafficking-related activities must report the activity as outlined above, and may also contact the Global Human Trafficking Hotline at 1-844-888-FREE or help@befree.org.

SIIL strictly prohibits retaliation against any SIIL employee who reports prohibited trafficking-related activity or other violations of this policy, or who cooperates with any internal or government investigations of such reports. SIIL personnel who engage in any form of retaliation against those who report prohibited trafficking-related activities or other violations of this policy are subject to disciplinary action, up to and including termination of employment and/or termination of the subawardee or contractor relationship.

SIIL has also established a performance monitoring, detection, and remediation program to identify and address on an ongoing basis, any violations of the requirements of FAR 22.1703(a) and the Kansas State

University Anti-Trafficking Policy. This will include an approval process for all SIIL related expenditures for subawards before expenditures are made, and every 180 days SIIL will spot check several past expenditures to detect any questionable activities and/or irregularities. If any are found, SIIL will notify OIE and conduct appropriate remediation actions. In addition to notifying OIE, in the event of the receipt of credible information alleging violation of FAR 22.1703(a), SIIL will:

- notify SIIL's USAID Agreement Officer Representative (AOR) and the agency Inspector General of the specific nature of the activity, including specific remedial actions taken, and
- take appropriate corrective and preventive action, up to and including dismissal of SIIL employees and terminations of contracts with subcontractors, suppliers, and agents.

Investigations

Upon receiving a report, OIE will conduct a timely investigation, to the extent practicable, to determine whether a violation of the Policy has occurred. In consultation with the Office of General Counsel, OIE will prepare a report of its findings and will provide that report to appropriate University and SIIL personnel for further decision making.

If OIE determines at any time that there is credible information indicating that FAR 22.1703(a) may have been violated, OIE will inform the Vice President for Research. The Vice President for Research will take appropriate steps to comply with federal law, including, but not limited to, notify SIIL's USAID AOR and the agency Inspector General.

SIIL personnel will cooperate fully with any U.S. Government agencies responsible for any investigations, audits, or corrective actions relating to trafficking in persons, including, but not limited to, providing timely and complete responses to document requests, and providing reasonable access to SIIL facilities and staff.

SIIL will protect all employees suspected of being victims of or witnesses to prohibited activities, prior to returning to the country from which the employee was recruited, and will not prevent or hinder these employees from cooperating fully with U.S. Government authorities.

Posting

SIIL will post this Plan on its external website, <http://www.k-state.edu/siil/>. SIIL will also post this Plan at all workplaces, except where the work is being performed in the field or not otherwise at a fixed location.