



American Councils for International Education Anti-Trafficking in Persons Policy and Compliance Plan

Introduction

American Councils for International Education: ACTR/ACCELS (American Councils) is committed to upholding the highest ethical standards in all our operations and ensuring full compliance with U.S. and international laws prohibiting trafficking in persons. American Councils recognizes the critical importance of adhering to stringent compliance standards set forth by U.S. government agencies, including the United States Agency for International Development (USAID), the Millennium Challenge Corporation (MCC), and the U.S. Department of State. This Anti-Trafficking Policy and Compliance Plan outlines the organization's zero-tolerance policy towards any form of trafficking, details prohibited activities, ensures that all members of American Councils are fully aware of their responsibilities in preventing and combating human trafficking, and establishes clear procedures for reporting, training, and enforcement. Through this plan, American Councils reaffirms its unwavering dedication to ethical conduct and its role in promoting human dignity across all its programs and initiatives worldwide. This document is consistent with American Councils' zero tolerance for corruption or unethical behavior, as described in the organization's [Code of Conduct](#).

Scope

This Anti-Trafficking in Persons Policy and Compliance Plan incorporates requirements that apply to American Councils' current and possible future U.S. government funding. This policy complies with the requirements set forth in USAID Standard Provision M20, MCC's Counter-Trafficking in Persons Policy, the Federal Acquisition Regulation (FAR) 52.222-50, and Title 2 of the Code of Federal Regulations part 175 (2 CFR 175), which govern anti-trafficking measures for U.S. government contracts. It also aligns with the U.S. Department of State Standard Terms and Conditions for Federal Awards, as applicable to federal contracts and assistance agreements.

It is mandatory for all contracts, subcontracts, and awards that:

- Involve the acquisition of services or supplies outside the United States.
- Have an estimated value exceeding \$500,000.

Projects that are larger, more complex, or involve a higher risk of trafficking activity may require additional measures documented in supplemental plans tailored to the specifics of those projects.

Definitions

To ensure clarity, the following terms are defined within the scope of this policy:

- **Trafficking in Persons:** The recruitment, transportation, transfer, harboring, or receipt of persons by means of force, fraud, or coercion for the purpose of exploitation.
- **Forced Labor:** Work or services obtained from a person under threat, fraud, or coercion.
- **Sex Trafficking:** Engaging in or supporting the recruitment or procurement of individuals for commercial sex acts, often involving coercion.
- **Debt Bondage:** Holding a person in servitude as a method of repayment for a debt.

Prohibited Activities

American Councils strictly prohibits the following activities, in compliance with U.S. government regulations:

- Engaging in trafficking in persons.
- Procuring commercial sex acts.

- Using forced labor in the performance of a U.S. Government contract or award.
- Destroying, concealing, or confiscating an employee's identity or immigration documents.
- Engaging in misleading or fraudulent recruitment practices, such as failing to disclose key terms of employment in a language the employee understands.
- Charging employees recruitment fees.
- Failing to provide return transportation for employees who are recruited to work outside their home country.
- Providing housing that does not meet host country housing and safety standards.

Requirements

A. Awareness Program

All employees are provided with a copy of this Anti-Trafficking Policy and Compliance Plan. The policy is also available on American Councils' internal platform and external website. Employees are required to complete a mandatory anti-trafficking awareness program, which includes steps to counter trafficking in persons. They are instructed on how to access additional resources and seek clarification on the policy.

B. Subaward Compliance

American Councils requires all subawards for U.S. government contracts over \$500,000 to:

- Refrain from engaging in prohibited trafficking-related activities.
- Implement procedures to prevent trafficking and trafficking-related activities.
- Cooperate fully with any investigations into trafficking violations.

If they meet the threshold criteria, those subawardees must maintain compliance with anti-trafficking in persons requirements.

C. Recruitment, Wage, and Housing Plans

American Councils is committed to fair and transparent recruitment practices. All key terms and conditions of employment, including wages, benefits, work location, and living conditions, will be provided to employees in a language they understand before the start of employment. Under no circumstances will potential employees be charged recruitment fees. All employment contracts will comply with local and international labor laws. When American Councils provides or arranges housing for employees, the housing will meet local housing and safety standards. Regular inspections will be conducted to ensure compliance with these standards.

D. Reporting Mechanisms

It is each employee's obligation to report known or suspected violations of the American Councils Code of Conduct or policies in the organization's Anti-Trafficking in Persons Policy and Compliance Plan. American Councils will report prohibited activities and any actions taken against an employee, agent, subawardee, vendor or supplier to the Contracting/Agreement Officer and the agency Inspector General, as required by applicable regulations and award provisions and fully cooperate with any Federal agencies and law enforcement responsible for audits, investigations, or corrective actions relating to trafficking in persons.

All employees, contractors, and partners must report any suspected trafficking activity. Reports can be made through the following channels:

- **In-Person:** Directly to supervisors or HR
- **Email:** Human Resources (see SharePoint for contact) or the Ombudsperson (see SharePoint)
- **Anonymously via EthicsPoint:** americancouncils.ethicspoint.com
- **Phone:** Call (+1) 202-833-7522 and ask for Human Resources Department



American Councils will promptly investigate all reports and take appropriate action. Employees can also report trafficking concerns to the **Global Human Trafficking Hotline** at 1-844-888-FREE or email help@befree.org

E. Remediation and Disciplinary Action

Violations of this policy will result in disciplinary action, which may include termination of employment or contracts.

Documentation and Record-Keeping

All training, reports, investigations, and audits will be documented and securely stored for compliance purposes. American Councils will ensure that records are available for review by U.S. Government auditors if requested.

Monitoring and Audits

In line with its practices, American Councils conducts checks of adherence to CTIP requirements stipulated by federal provisions. American Councils will fully cooperate with the government and enforcement agencies to conduct audits and investigations on anti-trafficking compliance.

Commitment to Review

This Anti-Trafficking Policy and Compliance Plan will be reviewed and updated every two years, or as needed, to remain in alignment with U.S. regulations and evolving best practices.

Posting

American Councils will post this plan on its internal SharePoint site and on its website.

Conclusion

American Councils for International Education reaffirms its strong commitment to combatting trafficking in persons. This combined policy and compliance plan ensures that all employees, contractors, and partners understand their responsibilities and the steps necessary to maintain compliance with U.S. Government regulations.