

# Combating Trafficking in Persons

## Checklist to Prevent Trafficking in Government Contracting

**Contract Number:**

**Place of Performance:**

**Name of Auditor:**

**Appointed COR/SME:** (name, e-mail, redeployment date)

**Date of Audit:**

**Date of previous Audit:**

**Number of Non-Conformances:**

**Number of Repeat Non-Conformances:**

**Out-brief with Contractor Supervisor:** Yes No (Name, e-mail)

**Contractor QA/QC:** (name, e-mail)

**Follow-up required:** Yes No

**Audit Summary:**

**Concerns:**

**Non-Conformances: (list specific part of contract not in compliance with) FAR 52.222-50, CTIP**

- ☐ Has the contractor informed employees of the U.S. Government's Zero Tolerance CTIP policy to include actions taken against them for violations of CTIP policy? FAR 52.222-50(c)(1).
- ☐ Do employees understand what TIP is? FAR 52.222-50(c)(1)
- ☐ Does the contractor maintain a CTIP Compliance plan? FAR 52.222-50(h)
- ☐ Does the CTIP Compliance Plan have all the mandatory information? FAR 52.222-50(h)
- ☐ Are employees charged a recruitment fee? FAR 52.222-50(b)(6)
- ☐ Do employees maintain their own identity and immigration documents? FAR 52.222-50(b)(4)
- ☐ Does the contractor provide housing that meets the host county's housing and safety standards? FAR 52.222-50(b)(8) (check for cleanliness, overcrowding, fire/safety issues)
- ☐ Have employees been provided a copy of their employment contract in a language that they can read? FAR 52.222-50(b)(9)
- ☐ Has the contractor informed the contracting officer of any information that it receives (including Host Nation law enforcement) that alleges a contractor employee or subcontractor employee has engaged in conduct violating CTIP policy? FAR 52.222-50(d)(1)
- ☐ Does the contractor provide return transportation for employees upon end of employment? FAR 52.222-50(b)(7)

**FAR 252.225-7995 Contractor Personnel Performing in the USCENTCOM AOR (Deviation 2017-O0004)**

- ☐ Have employees been paid? FAR 252.225-7995 (Deviation 2017-O0004) (d)(8)(ii)
- ☐ Have employees received the agreed upon wage on-time? FAR 252.225-7995 (Deviation 2017-O0004) (d)(8)(ii)

**General Observations. During the review, did you see any indicators of TIP:**

- Signs of physical abuse (i.e., bruises, cuts, and/or broken bones)
- Serious communicable diseases
- Injuries from violence or hazardous work conditions
- Escorted or closely monitored at all times
- Someone speaks for them
- Live at or are confined to their worksite – doors locked from outside, fenced-in work site/housing
- Exposure to toxic or hazardous materials
- Evidence of a sexually explicit online advertisement, especially of minors

**List all examples. Provide pictures if possible.**