



U.S. General Service Administration (GSA)

GSA Order: Anti-Human Trafficking Code of Conduct

HRM 1000.1

Office of Human Resources Management

Office of Mission Assurance

Purpose:

This Order sets forth the General Services Administration's (GSA's) policy on preventing Human Trafficking. The Anti-Human Trafficking Code of Conduct implements the Federal law cited in the "Reference" section of this Order.

Background:

On January 5, 2023, the Trafficking Victims Prevention and Protection Reauthorization Act of 2022 ("the Act"), Public Law 117-348, was signed into law requiring the Government to make certain efforts to prevent human trafficking. Human trafficking, also known as trafficking in persons, involves the exploitation of someone for the purpose of compelled labor or a commercial sex act using force, fraud, or coercion. Human trafficking happens everywhere and is a violation of human rights and Federal law. GSA's Anti-Human Trafficking Code of Conduct supports the Government's efforts under the Act to deter activities that will facilitate and support trafficking in persons. The Act prohibits employees from engaging in human trafficking while employed by the Government in a full-time or part-time capacity. It also requires executive branch employees to receive human trafficking training and be equipped with the necessary knowledge and tools to prevent, recognize, report, and address human trafficking. Employees are required to report any suspected cases of misconduct, waste, fraud, or abuse relating to trafficking in persons to the Inspector General and GSA's agency trafficking in persons point of contact.

Applicability:

This Order applies to:

1. All GSA employees, including temporary employees, persons stationed abroad while working for the United States, and detailees from other Government agencies.

2. The Office of Inspector General (OIG) only to the extent that the OIG determines it is consistent with the OIG’s independent authority under the IG Act, and it does not conflict with other OIG policies or the OIG mission.
3. The Civilian Board of Contract Appeals (CBCA) only to the extent that the CBCA determines it is consistent with the CBCA’s independent authority under the Contract Disputes Act, and it does not conflict with other CBCA policies or the CBCA mission.

Summary of Changes: Not Applicable

Cancellation:

This Order does not cancel or supersede any previous Order.

Roles and Responsibilities:

1. The Office of the General Counsel is responsible for providing advice and counsel to ensure the Order is carried out in accordance with applicable laws.
2. The Office of Human Resources Management is responsible for ensuring the training and certification tracking requirements related to this Order are carried out in accordance with applicable laws and bargaining unit obligations.
3. The Office of Mission Assurance serves as the agency trafficking in persons point of contact for any suspected cases of misconduct, waste, fraud, or abuse relating to trafficking in persons.
4. The OIG is responsible for investigating any suspected cases of misconduct, waste, fraud, or abuse relating to trafficking in persons. The OIG is also required, in consultation with the Administrator, to submit an annual report to Congress, which shall be publicly accessible, containing (1) the number of suspected violations reported; (2) the number of investigations; (3) the status and outcomes of such investigations; and (4) any recommended actions to improve the program and operations.

Signatures

/S/

/S/

 Jeff Lau
 Chief Human Capital Management
 Office of Human Capital Management

 Robert Carter
 Associate Administrator
 Office of Mission Assurance

June 25, 2024

June 25, 2024

 Date

 Date

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1. References

1.1. [Section 122 of Public Law 117–348 of January 5, 2023 \(Trafficking Victims Prevention and Protection Reauthorization Act of 2022\)](#)

2. Responsibilities

The following officials and components are responsible for administering this policy in accordance with the appropriate statutes and regulations:

2.1. The Office of the General Counsel (OGC) will:

2.1.1. Provide advice and counsel regarding the Trafficking Victims Prevention and Protection Reauthorization Act of 2022.

2.2. The Office of Human Resources Management (OHRM) will:

2.2.1. Inform all candidates for federal employment about the provisions in the Anti-Human Trafficking Code of Conduct.

2.2.2. Conduct mandatory Anti-Human Trafficking Training for new employees as well as biennial mandatory Anti-Human Trafficking Training for current employees that includes Code of Conduct certification.

2.2.3. Ensure that all employees sign acknowledgment of the agency's Code of Conduct, which should be kept in the employee's file.

2.3. The Office of Mission Assurance (OMA) will:

2.3.1. Serve as the agency trafficking in persons point of contact for any suspected cases of misconduct, waste, fraud, or abuse relating to trafficking in persons.

2.3.2. Establish and maintain a website for reporting any suspected cases of misconduct, waste, fraud, or abuse related to trafficking in persons.

2.4. GSA employees will:

2.4.1. Refrain from engaging in human trafficking while employed by the Government in a full-time or part-time capacity.

2.4.2. Report any suspected cases of misconduct, waste, fraud, or abuse related to trafficking in persons to the Office of Inspector General (OIG) and the OMA trafficking in persons point of contact.

2.4.3. Complete Anti-Human Trafficking training as new GSA employees and then every two (2) years thereafter that outlines how to prevent, identify, and report human trafficking offenses and acknowledge/sign the

GSA Anti-Human Trafficking Code of Conduct at the completion of the training.

2.4.4. Sign acknowledgement of GSA's Anti-Human Trafficking Code of Conduct, which will be kept in the employee's file.

2.5. The Office of Inspector General will, in consultation with the Administrator:

2.5.1 Submit an annual report to Congress, which shall be publicly accessible, containing (a) the number of suspected violations reported; (b) the number of investigations; (c) the status and outcomes of such investigations; and (d) any recommended actions to improve the program and operations.

3. Training

3.1. GSA employees are required to receive Anti-Human Trafficking Training initially and a refresher every two (2) years thereafter that outlines how to prevent, identify, and report human trafficking offenses.

3.2. All newly-hired employees shall receive Anti-Human Trafficking Training as part of the new employee mandatory training curriculum and biennially thereafter, through a refresher course.

3.3. Anti-Human Trafficking Training will be provided through GSA's online training platform.

4. Code of Conduct

4.1.1 All employees are required to sign acknowledgment of the agency's Anti-Human Trafficking Code of Conduct, which will be kept in the employee's file.

5. Appendix

Anti-Human Trafficking Code of Conduct

All employees (including temporary employees, persons stationed abroad while working for the United States, and detailees from other Government agencies) are prohibited from engaging in human trafficking while employed by the Government in a full-time or part-time capacity. All employees must also be sensitized to human trafficking and the federal requirements that prohibit the procurement of trafficking in persons.

Anti-Human Trafficking Training

All employees are required to complete human trafficking training every two (2) years that outlines how to prevent, identify, and report human trafficking offenses. All newly hired employees must receive human trafficking training as part of the New Employee Orientation curriculum and biannually thereafter, through a refresher course.

Reporting Anti-Human Trafficking

Any suspected cases of misconduct, waste, fraud, or abuse relating to trafficking in persons by GSA employees must be reported to the Office of Inspector General (OIG) and the agency's Office of Mission Assurance (OMA) trafficking in persons point of contact.

Acknowledgement of the Code of Conduct

All employees are required to sign acknowledgment of this Code of Conduct and it shall be kept in the file of the employee.

A violation of this Code of Conduct may result in disciplinary action, up to and including, removal from the Federal Service.

I acknowledge that I have received and read the agency's Code of Conduct on Anti-Human Trafficking.

Name of Employee

Date