

# **Slavery and Human Trafficking Statement**

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Sightsavers to prevent modern slavery and human trafficking throughout its business during the financial year ending 31 December 2017.

## Introduction

Sightsavers is committed to improving practices to combat slavery and human trafficking. We have a zero-tolerance approach to modern slavery within our operations, and strive to act ethically and with integrity to ensure modern slavery is not taking place in any part of our organisation.

## Our organisation

Sightsavers is the working name of the Royal Commonwealth Society for the Blind, an international organisation that supports the development of health systems in low- and middle-income countries, and aims to advance the rights and improve the quality of life of people with disabilities. Our programmes include health, education and social inclusion projects in more than 30 countries, working with government, non-governmental organisations and the private sector.

We have a governing Council of non-executive trustees, who are committed to maintaining a high standard of corporate governance. They oversee the CEO and senior management team, who manage more than 500 staff across the organisation, both in the UK and overseas.

## Our policies on slavery and human trafficking

We require all staff, subsidiaries and affiliates to comply with Sightsavers' **Global Anti-Slavery Policy**. The policy's objectives are:

- Not to directly support any organisation, initiative or activity that causes, promotes or contributes to modern slavery or human trafficking.
- Not to knowingly engage, contract or work with any entity or organisation that causes, promotes or contributes to modern slavery or human trafficking.
- To maintain risk-assessed and transparent supply chains.
- To remain aligned and co-operate with activities of the UK Anti-Slavery Commissioner.

Our **Global Anti-Slavery Policy** has been reviewed and updated to underscore the rights of workers and provide access to redress for any victims. We are working to develop Key Performance Indicator (KPI) measurements, which will enable us to report on our performance against areas of this policy.

We require all staff, representatives and partner organisations to comply with Sightsavers' **Child Safeguarding Policy**, which ensures that Sightsavers' activities are implemented in a safe and protective environment where abuse, exploitation and violence against children are prevented, as far as reasonably possible.

As part of our **Fundraising Policy**, we follow the UK Institute of Fundraising codes of practice with regards to dealing with vulnerable people, and follow similar approaches in other countries. We are developing an **Adults at Risk Safeguarding Framework** scheduled to be launched in the coming year. This will support the policy aims of the Fundraising and Global Anti-Slavery policies.

In the past year we have reviewed and updated our internal HR policies to ensure human trafficking and slavery is not taking place in our business. If any employee believes malpractice, unethical conduct or illegal practices are taking place, our **Global Whistleblowing Policy** provides a confidential way to report, investigate and remedy any wrongdoing. Likewise, the **Global Grievance Policy** enables employees to raise concerns, problems or complaints relating to the terms of their employment, health and safety, work environment or working practices.

Our **Global Leave Policy** encourages all staff to take the annual leave to which they are entitled. If any staff are required to work more than their contractual hours, the **Global Time Off in Lieu and Overtime Policy** entitles them to take an equal amount of time off in lieu.

### **Suppliers' and partners' adherence to our values and ethics**

Sightsavers believes that change can only come from working closely with our partners. We have continued to build on from the work done in the 2016/2017 financial year, identifying ways to further support Sightsavers and its partners in the fight against modern slavery and human trafficking.

Our **Programme Partnership Policy** requires Sightsavers and its partners to remain fair and ethical in all business matters, and states that Sightsavers will not enter into partnership with any organisation that exposes people to abuse and exploitation, or is involved in any illegal activity.

Before entering into any partnership, Sightsavers carries out a **due diligence assessment** to build a complete picture of each potential partner. If any risks or weaknesses are revealed, they are analysed and an action plan is drawn up to address them, which could include offering additional support to the partner, putting in place closer monitoring processes, or establishing more rigorous controls. If the risks or weaknesses are too severe, we will not work with the organisation. This due diligence assessment is being reviewed to ensure that we only choose to work with those who meet our standards.

Sightsavers is a member of the International Agency for the Prevention of Blindness (IAPB) and has adopted the **IAPB Code of Conduct for IAPB Suppliers and Manufacturers**. The Code ensures that goods and services are produced and delivered under conditions where there is no abuse or exploitation of any people, including children. It ensures that pay complies with local law, that working conditions are safe and hygienic, and that working hours are not excessive. It also prohibits discrimination and harsh or inhumane treatment of staff.

These requirements are stated in **Sightsavers' Supplier Code of Conduct**. All suppliers are required to sign the code, and we assume that by signing, our

suppliers agree to adhere to the conditions of the code and will reasonably enforce the same with their contractors.

We may remove suppliers from our approved supplier list where companies in the supply chain are found to be involved in violation of human rights and there is no willingness to address the situation within a reasonable time if requested to do so.

## **Training and awareness**

All policies are promoted and enforced across our business. During the coming year we will develop and implement a training package to ensure staff are familiar with these policies and understand how their implementation is essential to combat modern slavery and human trafficking.

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes Sightsavers' slavery and human trafficking statement for the current financial year.

**Caroline Harper**  
Chief executive  
20 April 2018



[www.sightsavers.org](http://www.sightsavers.org)

Registered charity numbers 207544 and SC038110

