



Sightsavers Global Anti-Slavery Policy

Document Control

Document Title	Sightsavers Global Anti-Slavery Policy
Document Author(s)	Mark Ramsden
Document Owner	Finance and Planning
Document Classification	INTERNAL
Document Status	Approved
This version number	1.3

Document Amendment History

Version Number	Date	Amendment Summary	Approved by
0.1	10/02/2017	Initial Draft	n/a
0.2	03/04/2017	Revised Draft	n/a
1.0	06/07/2017	Final	Council
1.1	28/11/2018	Addition of support for victims Minor amendment to Country Risk	Approved by management
1.2	05/03/2019	Minor amendment to policy objectives	Approved by management
1.3	01/10/2019	Updated annex and document location	n/a
1.4	16/04/2021	Added new Speak Up reporting mechanism	Document owner

Table of Contents.

1. Introduction
2. Policy Objectives
3. Relationship to External Standards
4. Policy Owner

5. Target Audience
6. Scope and Terms
7. Risk Environment
8. Processes and Related Policies
9. Policy Review Period

Incorporated under Royal Charter Registered Charity Nos. 207544 & SC038110 Royal Commonwealth Society for the Blind

1. Introduction

This document can be found at:

<https://myportal.sightsavers.org/sites/teams/Policy%20Library/Global%20AntiSlavery%20Policy.pdf>

1.1 Purpose of Document

The purpose of this document is to outline the Global Anti-Slavery Policy for Sightsavers, which conforms to the requirements set down in the UK Modern Slavery Act 2015 (MSA).

2. Policy Objectives

As this is a global Sightsavers policy, it will be binding for Sightsavers and its subsidiaries and affiliates. This policy is supported by the MSA 2015 and its Schedules; HMG's Modern Slavery Strategy 2014 and Transparency In Supply Chains – A Practical Guide.

The policy objectives are:

- Not to directly support any organisation, initiative or activity that causes, promotes or contributes to modern slavery or human trafficking.
- Not to engage, contract or work with any entity or organisation that causes, promotes or contributes to modern slavery or human trafficking.
- To ensure victims have access to remediation and justice.
- To maintain risk assessed and transparent supply chains.
- To publish and maintain Sightsavers Statement on compliance with the requirements of MSA 2015.
- To remain aligned as appropriate and co-operate with the activities of the UK Anti-Slavery Commissioner

3. Relationship to external standards

This policy is based on statute and accepted sector and industry values and standards:

- Comply specifically with section 54 of the MSA 2015

4. Policy owner

The Policy owner on the Management Team (MT) is Ken Moon. The executive sponsor for this Policy is Caroline Harper.

Significant Policy changes require prior approval from the executive sponsor or MT, whereas minor and cosmetic changes can be approved by the Policy Owner.

5. Target audience

This policy applies group wide, to personnel in any part of Sightsavers.

6. Scope and terms

This Policy applies to all Sightsavers staff and all other parties with access to Sightsavers' corporate assets in any capacity.

The term "staff" includes (but is not limited to) directors, full-time, part-time or fixed term employees, trainees, contracted staff, temporary staff, consultants, agency and homeworkers. Sightsavers will not partner with or procure from organisations that engage in slavery or human trafficking.

The term "assets" means any and all Sightsavers' funds, systems, data, information assets and any other system or documentation that is the property of Sightsavers.

The term "access ... in any capacity" means any and all interfaces or points of contact that any person this Policy applies to has with the assets described above. This includes all access by Sightsavers' subsidiaries.

7. Risk Environment

Sightsavers' approach toward and risk appetite in respect of slavery and human trafficking is founded on the following overarching assessment:

Country Risk

- Country Offices – all staff employed by Sightsavers are afforded the full protection of the law, including employment law, in their respective country. In addition Sightsavers has a fully developed and embedded suite of Human Resource policies and procedures, including on Whistleblowing, which comply with UK and International law as appropriate, and to which all staff have unrestricted access. Staff are free to terminate employment and are not subject to bonded labour, debt bondage, threats of violence or forced overtime as disciplinary action.

Sector

- The nature of Sightsavers work does not in the ordinary course of events lend itself to practices that might be deemed as connected with slavery or Human trafficking. Our objectives centre on the delivery of improved Eye Health, Social inclusion and Education. As such our delivery partners, in the main, include national Ministries of Health and International Non-governmental Organisations that in our assessment represent minimal risk in respect of the MSA 2015. We have robust policies in place regarding child safeguarding and the protection of vulnerable people in a fundraising context. These are underpinned by the Partnership Management and Due Diligence Tools

Transaction

- A rigorous control framework is in place to ensure that our processes for both financial management and programme delivery comply with our objectives and agreed policies. Our activities are subject to detailed planning and approval and an on-going mechanism for review, reassessment and audit. This ensures that our resources are appropriately targeted and used for specific purposes and there is an appropriate escalation mechanism in place to address issues should the need arise. There is limited scope for Sightsavers resources to be used to facilitate slavery or human trafficking.

Business Partnership risk

- Our Partners delivering programmatic activity are vetted and subject to due diligence reviews. Our Partnership Framework process is kept under on-going review and was most recently updated and launched in the business in 2016.
- All our suppliers are required to sign and abide by the Sightsavers Supplier Code of Conduct (See Annex 1) as pre requisite of doing business with any part of the organisation. The code of conduct specifically refers to the requirements of MSA 2015 and ensures we do not partner with organisations that would be in breach of the requirements laid down in the Act. Compliance by a supplier to this code is a condition of being listed on the Sightsavers approved supplier lists.
- In the case of non-standard list procurement suppliers are reviewed on the basis of a formal risk assessment.

8. Process and Related Policies

The level of Sightsavers' risk exposure will be reviewed periodically by the Head of Assurance to ensure that adequate mitigation is in place to ensure that any risks are minimised. If any serious risks emerge or gaps in the control framework occur, these will be escalated for consideration by the MT.

An annual statement will be prepared and published to comply with section 54(4) MSA 2015 setting out those steps Sightsavers has taken during the financial year to ensure slavery and human trafficking is not taking place internally in any part of our business or in our supply chains.

In line with section 54(6) the annual statement will be subject to Board approval before publication on Sightsavers' website as prescribed by section 54(7) MSA 2015.

Appropriate training and guidance will be provided to staff via Sightsavers e-learning platform on slavery and human trafficking in accordance with section 54(5)(f).

Sightsavers will act responsibly towards any victims should it become aware of a contravention of the MSA 2015. This includes providing reasonable support in accessing remediation and compensation, which may include aid with claims in an employment tribunal or cases filed with the Criminal Injuries Compensation Authority (CICA). Such actions assist with the recovery and rehabilitation of victims by providing a sense of closure and justice.

This policy must be read and understood in conjunction with the following related policies:

- Global Procurement Policy
- Global Safeguarding Policy
- Fraud and Anti-corruption Policy
- Fundraising Policy
- Whistleblowing Policy

Should any staff become aware of any suspected or actual slavery or human-trafficking they are able to report it through the dedicated Sightsavers **Speak Up platform**. The platform can be accessed from anywhere in the world and reports can be made through the web portal or through a hotline available 24 hours a day 365 days per year. There is an option to send a report anonymously.

9. Policy Review

This policy is subject to a 36 month review period.

Annex 1 - Sightsavers Supplier Code of Conduct

1.0 Background

Sightsavers' Supplier Code of Conduct outlines the principles and approaches that the organisation has agreed are fundamental to its work. This document, as an expression of our values as an organisation, outlines the key principles and requirements which we expect our suppliers to adhere to. With transparency being a key value of ours, Sightsavers is committed to ensuring that all suppliers agree with the framework set out below. As members of the International Aid Transparency Initiative (IATI) and INGO Accountable Now, we are dedicated to ensuring that our programmes and processes (both internal and external) are open and honest about their practices.

1.1 Scope

Sightsavers expects suppliers, including agencies, contractors and delivery companies, to protect the rights and safety of their employees and beneficiaries.

1.2 Modern Slavery Act 2015

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. We have identified ways to support Sightsavers and its partners in the fight against slavery and human trafficking. Sightsavers will not enter into partnership with any organisation that exposes people to abuse and exploitation and prohibits discrimination and harsh or inhumane treatment of staff.

We therefore require all suppliers 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.

1.3 Origin of Goods / Services and Certifications

All suppliers must be able to certify the origin of goods or services that they provide on request

All suppliers, where relevant, need to be able to supply us with drugs certifications, Good Distribution/Manufacturing Practice (GDP/GMP) licences, quality certifications (ISO) etc.

Steps must also be taken to ensure that procurement process do as little harm to the environment as possible.

1.4 Tax Avoidance, Corruption, Bribery and Fraud

Signatories will not commit tax avoidance, corruption, bribery or fraud and they will notify us immediately if they identify any of these issues related to their work with Sightsavers.

They should be aware that they can report all suspicions or allegations of aid diversion, fraud, money laundering or counter terrorism finance to the Counter Fraud and Whistleblowing Unit (CFWU) at fraud@dfid.gov.uk or on +44(0)1355 843551

They must notify Sightsavers if they, their staff or beneficial owners are on any 'black lists'. Further information on this can be found in the footnote.¹

1.5 Terrorist Financing

Signatories will not engage in terrorist financing or work with any other organisation that engages in terrorist financing.

1.6 Conflict of Interest

Signatories will notify us of any conflicts of interests relating to their arrangements with Sightsavers by email to audit@sightsavers.org.

1.7 Data Protection

Any supplier handling Sightsavers data will adhere to applicable local data protection laws and employee technical and organisational measures to safeguard personal data. They are to report any possible or actual breaches of Sightsavers data to us immediately.

1.8 UN Compact Guiding Principles

All suppliers must operate in line with the UN Global Compact Guiding Principles 1 & 2 on business and human rights which call on companies to respect and support

¹ System for Award Management (SAM) (<https://www.sam.gov>)

internationally-proclaimed human rights, and to ensure they are not complicit in human rights abuses:

- Principle 1 states that businesses should take voluntary action to make a positive contribution towards the protection and fulfilment of human rights by:
 - Providing safe and healthy working conditions
 - By guaranteeing freedom of association
 - By ensuring non-discrimination in personnel practices
 - By ensuring that they do not use directly or indirectly forced labour or child labour
 - by providing access to basic health, education and housing for the workers and their families, if these are not provided elsewhere
 - by having an affirmative action programme to hire victims of domestic violence, and
 - by making reasonable accommodations for all employees' religious observance and practices
- Principle 2 states that business should make sure that they are not complicit in human rights abuses meaning they are not implicated in a human rights abuse that another company, government, individual or other group is causing.

2.0 Signatures and Dates

We assume that by signing this code, our suppliers agree to adhere to the conditions of the code and will reasonably enforce the same with their subcontractors. If the code cannot be adhered to, or there are instances of this code being breached by the supplier, we would expect immediate notification of such an incident and a formal review of the relationship would be initiated.

We understand that this document is valid for 12 months from signing and that it supersedes any previous codes that may have been signed by our suppliers.

I/we the undersigned agree to adhere to Sightsavers' Code of Conduct for suppliers:

Entity: _____

Signature: _____

Name and position: _____

Note: If a company or organisation, the applicant must be an authorised representative of that entity.

Date: _____

Sightsavers reserves the right to terminate any partnership should they:

- Have insufficient safeguarding policies or procedures in place, or have no willingness to work with Sightsavers to develop one and/or strengthen them within a reasonable timeframe;
- Demonstrably violate anyone's basic human rights, or if there is no willingness to address the situation within a reasonable timeframe if requested to do so;
- Be involved in the manufacture of arms or the sale of arms to governments, which systematically violate the human rights of their own or others' citizens;
- Be involved in pornography, prostitution, or gambling (other than legal governmentsanctioned lotteries).