

Global anti-slavery policy

2021



Document control

Document owner	Sightsavers global board
Document administrator	Director of governance, legal and assurance
Document status	Draft
Review period	Two years
Version number	1.6

Document amendment history

Version number	Date	Amendment summary	Approved by
1.0	06/07/2017	Policy introduced	Global board
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	16/05/2021	Addition of Speak up reporting mechanism	Approved by management
1.5	23/08/2021	Addition of befree.org reporting mechanism	Approved by management
1.6	27/10/2021	New document template Addition of introduction, policy statements, investigation and supply chain risk Update of scope statement, risk profile and Annex 1: Code of Conduct	Council

Contents

1. Introduction	5
1.1 What is modern slavery?.....	5
1.2 Purpose of document.....	5
1.3 Related documents	5
2. Scope and terms	6
2.1 Process and related policies	6
2.2 Communication and awareness of the policy	7
3. Policy statements	7
3.1 Policy objectives.....	7
3.2 Policy statements	7
3.3 Relationship to external standards.....	8
4. Risk environment.....	8
4.1 Country risk.....	8
4.2 Sector.....	8
4.3 Transaction	8
4.4 Business partnership and supplier risk.....	9
4.5 Generating a risk profile in the supply chain	9
5. Reporting and investigation.....	9
5.1 Reporting concerns	9
5.2 Investigation.....	10
6. Policy review	10
Annex 1: Sightsavers' Code of Conduct.....	11
1.0 Background.....	11
1.1 Scope.....	11
1.2 Safeguarding.....	11
1.3 Business is conducted lawfully and ethically	11
1.4 Tax avoidance, bribery, corruption and fraud.....	11
1.5 Origin of goods: documentation and certifications	11
1.6 Modern slavery	12
1.7 Data protection.....	12

1.8 Anti-terrorism	13
1.9 Whistleblowing	13
2.0 Environment.....	13
2.1 Value for money.....	13
2.2 Conflict of interest	13
2.3 Speak Up reporting platform	14

1. Introduction

1.1 What is modern slavery?

Modern slavery is the trafficking, harbouring or recruitment of people through force, coercion, abuse and deception for the purpose of exploitation. Modern slavery takes various forms, such as slavery, servitude, forced and compulsory labour, and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

An estimated 40.3 million people worldwide are living in modern slavery. As of 2018, it is estimated that 71 per cent of modern slaves are female, with one in four also being children.

The Modern Slavery Act 2015 (UK) makes it illegal for UK businesses to engage in any form of modern slavery and makes them accountable for any such abuse in their supply chain. It also requires larger organisations to publish an annual statement on the steps taken to combat slavery.

A copy of Sightsavers' annual statement can be found here:

www.sightsavers.org/slavery-statement

1.2 Purpose of document

The purpose of this document is to outline the Global Anti-Slavery Policy for Sightsavers. Sightsavers is committed to acting ethically and with integrity in all its business dealings and relationships, and maintains effective systems and controls to enforce this policy, ensuring modern slavery is not taking place anywhere in the business or in any of its supply chains.

Sightsavers will not knowingly enter into a partnership or conduct business with any individual or organisation that either exposes people to abuse and exploitation; or tolerates discrimination, harsh or inhumane treatment of its employees or agents.

1.3 Related documents

This policy must be read and understood in conjunction with the policies detailed below:

- Global Procurement Policy
- Safeguarding Policy
- Anti-Fraud and Corruption Policy
- Anti-Terrorism Financing Policy
- Global Discrimination Bullying and Harassment Policy and Procedure
- Fundraising Policy
- Global Whistleblowing Policy and Procedures
- Sightsavers' Supplier Code of Conduct

Sightsavers' Modern Slavery statement, published in accordance with Section 54 of the Modern Slavery Act 2015, can be accessed at www.sightsavers.org/slavery-statement

2. Scope and terms

This policy applies to all Sightsavers staff across the Sightsavers Group and other parties with access to Sightsavers' corporate assets in any capacity.

The term "staff" includes (but is not limited to) directors, trustees, 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.

2.1 Process and related policies

An annual statement will be prepared and published to comply with section 54 (4) of the Modern Slavery Act 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 supply chains.

In line with section 54 (6), the annual statement will be subject to board approval before publication on the Sightsavers website, as prescribed by section 54 (7) of the Modern Slavery Act 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) of the Modern Slavery Act 2015.

Sightsavers will act responsibly towards any party involved should it become aware of a contravention of the Modern Slavery Act 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) in the United Kingdom. Such actions assist with the recovery and rehabilitation of victims by providing a sense of closure and justice.

Training on this policy and the risks of modern slavery in our supply chain will be delivered where needed. Sightsavers' approach to modern slavery will be communicated to all suppliers, contractors and partners at the outset of our relationship with them and reinforced as appropriate thereafter.

2.2 Communication and awareness of the policy

A notification will be shared with the whole organisation to remind all staff of the provisions of the policy and training delivered where applicable.

3. Policy statements

3.1 Policy objectives

This global policy will apply to Sightsavers and its subsidiaries and affiliates. This policy is supported by the Modern Slavery Act 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 the Modern Slavery Act 2015
- To remain aligned as appropriate and co-operate with the activities of the UK's independent anti-slavery commissioner

3.2 Policy statements

Sightsavers has a zero-tolerance approach to modern slavery and human trafficking. The policy requires that all individuals and organisations covered ensure that:

- They adhere to local and national laws
- Workers have the freedom of movement, association and right to terminate employment
- Any threat of violence, harassment and intimidation are prohibited
- Workers are not subject to compulsory overtime, worker-paid recruitment fees, discrimination or confiscation of original identification documents
- Child labour is prohibited
- They provide access to remedy, compensation and justice for victims of modern slavery

3.3 Relationship to external standards

All Sightsavers suppliers and partners must operate in line with the UN Global Compact Guiding Principles 1, 2 and 3 on business, human rights and labour, which call on organisations to respect and support internationally proclaimed human rights, and to ensure they are not complicit in human rights abuses. More information regarding the principles can be found at www.unglobalcompact.org/what-is-gc/mission/principles

4. Risk environment

The level of Sightsavers' risk exposure will be reviewed periodically by the director of governance, legal and assurance in conjunction with the chief operating officer 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 management team.

4.1 Country risk

All members of 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.

4.2 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 modern slavery and human trafficking. We have robust policies in place regarding safeguarding and the protection of vulnerable people in a fundraising context. These are underpinned by the partnership management and due diligence tools.

4.3 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 ongoing 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.

4.4 Business partnership and supplier risk

Our partners delivering programmatic activity are vetted and subject to due diligence reviews. Our partnership framework process is kept under ongoing review and was launched in the business in 2016 and subsequently updated in 2019.

All Sightsavers partners and programme supply chain are required to sign and abide by the Sightsavers Code of Conduct (see Annex 1) as a prerequisite of doing business with any part of the organisation. The Code of Conduct specifically refers to the requirements of the Modern Slavery Act 2015 and ensures we do not partner with organisations that would be in breach of its requirements. Compliance 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 the risk presented.

4.5 Generating a risk profile in the supply chain

Sightsavers has developed an assessment process to identify risks presented by supply chain partners who have a significant impact on the business.

Our assessment of the overall risk of modern slavery in our supply chain is low, however the impact of the risk is high.

We continue to address these risks by deploying a series of mitigation activities.

These include:

- The development of enhanced training for staff and partners working directly with our supply chain and additional due diligence and audits, both at global and community levels. Key performance indicators (KPI) allow for greater visibility into the risks.
- Using leverage to influence the practices of partners and suppliers using collaborative engagement. Implanting controls and identifying weaknesses in the systems of business partners/suppliers, and to apply targeted contractual requirements to implement safeguards, training, grievance management systems and monitoring processes.
- Periodic risk assessment of suppliers, establishing risk profiles for all elements of the supply chain, and monitoring and internal reporting to ensure that key issues are not going undetected and that commitments are being met.

5. Reporting and investigation

5.1 Reporting concerns

Sightsavers will ensure that reporting and incident management procedures to address modern slavery concerns are in place and effectively used to enable an appropriate and swift investigation of any given case.

Concerns to report can include:

- Suspicion or knowledge that Sightsavers, a partner organisation or a supplier is engaging the use of modern slaves
- Suspicion or knowledge that modern slaves are being engaged by local businesses
- Suspicion that services or products used by Sightsavers are produced under the conditions of modern slavery

The following channels should be used by all staff to report concerns.

1. Staff are advised to report immediately any concerns of suspected or actual slavery or human trafficking. Sightsavers has a dedicated 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.
2. Any Sightsavers representative who has a concern or suspicion regarding harm, exploitation or abuse by someone representing another agency must report such concerns to the safeguarding manager or to your designated safeguarding lead or focal person by emailing safeguarding@sightsavers.org or via the Speak Up platform at www.sightsavers.org/speakup
3. Concerns relating to modern slavery, either within Sightsavers' operations or the wider supply chain, can be escalated by emailing audit@sightsavers.org
4. Staff can also report concerns to the Global Human Trafficking Hotline at 1-844-888-FREE and via its email address at help@befree.org

5.2 Investigation

Should a suspicion of modern slavery, human trafficking, exploitation or abuse be reported to Sightsavers, it will be thoroughly investigated to determine the value and extent of Sightsavers' exposure. This investigation will be led by the director of legal, governance and assurance.

Sightsavers will take action as a result of reports and investigations, which may include, but not limited to, informing local and national law enforcement, regulators, donors and external auditors, terminating the partnership/supplier contract, and terminating the contract of employment. In taking these actions, Sightsavers will comply with local legislation and conduct an audit where appropriate.

6. Policy review

Sightsavers will periodically review this policy and thoroughly assess trends with guidance on the indicators, updated legislations on modern slavery, and implement mechanisms and put controls in place to mitigate risk within our own operations both nationally and internationally.

The policy will be reviewed at least every two years to ensure it remains up-to-date and compliant with all relevant legalisation.

Annex 1: Sightsavers' Code of Conduct

1.0 Background

Sightsavers' 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 anyone we work with to adhere to.

Sightsavers is therefore committed to ensuring that all suppliers, partners and anyone working on behalf of Sightsavers, agree with the framework set out below. As members of the International Aid Transparency Initiative (IATI) and INGO Accountable Now, we maintain open and honest processes (both internal and external).

1.1 Scope

Sightsavers expects all partners and suppliers, including agencies and delivery companies, and those that provide goods and services (collectively referred to as 'signatories' herein), to protect the rights and safety of their employees and beneficiaries.

1.2 Safeguarding

Safeguarding, social responsibility and respect for human rights are central to the expectations we have of those with whom we work. Signatories must ensure that they have robust procedures in place in order to identify harmful practice and mitigate the risks faced by staff, representatives and beneficiaries (where applicable). These practices include the prevention of sexual exploitation, abuse and harassment, all forms of child abuse and inequality or discrimination on the basis of race, gender, age, religion, sexuality, culture or disability.

1.3 Business is conducted lawfully and ethically

Sightsavers expects signatories to comply with laws and regulations in the countries in which they operate. All other applicable international laws and regulations must also be complied with, including those relating to international trade (such as those concerning sanctions, export controls and reporting obligations) and privacy and data protection.

1.4 Tax avoidance, bribery, corruption and fraud

Signatories must not commit tax evasion, corruption, bribery or fraud, and they will notify us immediately if they identify any of these issues related to their work with Sightsavers. Likewise, Sightsavers must be notified if any staff, volunteers or representatives of the signatory organisation are subject to government financial sanctions.

1.5 Origin of goods: documentation and certifications

All suppliers of medicinal products must supply us with certification or evidence of compliance with the legal and administrative provisions of the country within which they

operate. WDA(H) licencing, good distribution/manufacturing practice (GDP/GMP), quality certifications (ISO) and product certifications (analysis, conformity) etc, are essential from suppliers within the EEA and they, or their equivalent, are desirable in all other countries. All suppliers must be able to certify the origin of goods or services that they provide upon request.

All partners are subject to Sightsavers' minimum partnership criteria and due diligence assessment. Partners who are to receive medicinal products from Sightsavers must hold appropriate national authorisations to receive and distribute such products, as specified in Sightsavers' partner due diligence and/or good distribution/manufacturing practice assessment tools.

1.6 Modern slavery

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 supply chain. We strive to act ethically and with integrity to ensure modern slavery is not taking place in any part of our work. Sightsavers will not enter into partnership or conduct business with any individual or organisation that exposes people to abuse and exploitation and or tolerates discrimination and harsh or inhumane treatment of staff.

We therefore require all signatories to have in place measures that ensure:

- There is no abuse or exploitation of any persons, including children
- Sexual exploitation and abuse by staff and representatives is prohibited
- Working pay and conditions comply with local law
- Employment is freely chosen
- The rights of staff to freedom of association and collective bargaining are respected
- Working conditions are safe and hygienic
- Working hours are not excessive
- No gender, racial or religious discrimination is practised
- Regular employment is provided, wherever possible
- No harsh or inhumane treatment of staff is allowed

All suppliers must operate in line with the UN Global Compact Guiding Principles 1, 2 and 3 on business, human rights and labour, which call on companies to respect and support internationally proclaimed human rights, and to ensure they are not complicit in human rights abuses. More information regarding the principles can be found at www.unglobalcompact.org/what-is-gc/mission/principles

1.7 Data protection

Any signatory handling personal data as part of their work with Sightsavers will adhere to applicable data protection laws and employ 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 Anti-terrorism

Signatories must never engage, either directly or indirectly, in terrorism or terrorist financing, or work with any other organisation that engages in terrorism. Signatories understand that Sightsavers is bound by the Terrorism Act 2000 in the United Kingdom, and will abide by the same and/or any other applicable law for the territory in which we are operating.

1.9 Whistleblowing

Signatories will have whistleblowing policies and procedures in place and promote an environment where people feel able to speak up. This should ensure that everyone that the organisation interacts with, including staff and supply chain, can raise concerns.

All disclosures should be treated fairly and consistently, with all reasonable steps being taken to maintain the confidentiality of the whistleblower, where requested and possible under the law. Whistleblowers should not face discrimination or victimisation for raising their concerns.

Whistleblowers can contact Sightsavers to make a disclosure by email to whistleblowing@sightsavers.org or on our dedicated **Speak Up** platform, which is available to all stakeholders.

2.0 Environment

Signatories will endeavour to take reasonable steps to safeguard the natural environment within their operations and supply chain. You are encouraged to develop and implement an environmental policy, where one does not already exist.

2.1 Value for money

Sightsavers expects all signatories to act in accordance with the principles of good value for money. At all stages of the programme cycle, economy, efficiency, effectiveness, equity and cost effectiveness should be considered. Value for money is integral to Sightsavers' operations, ensuring that the impact of funds is maximised.

2.2 Conflict of interest

Signatories will notify us, as soon as they become aware, of any potential or real conflicts of interests relating to their arrangements with Sightsavers. All such notices should be sent by email to compliance@sightsavers.org or on our dedicated Speak Up platform at www.sightsavers.org/speakup.

Sightsavers may take steps to terminate agreements with any organisation found to:

- Have insufficient safeguarding policies and procedures in place, if there is no willingness to work with Sightsavers to develop and/or strengthen these within a reasonable timeframe

- Demonstrably violated anyone's basic human rights, 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 either directly or indirectly in human trafficking, pornography or prostitution

2.3 Speak Up reporting platform

Sightsavers has in place a dedicated Speak Up reporting platform, which provides a single, global way of submitting concerns about fraud, misappropriation, sexual harassment, exploitation, abuse, support of terrorist funding or other improper conduct.

The platform offers support in over 100 languages, online or phone options, and the ability to submit a report anonymously. For more information, see www.sightsavers.org/speakup

You can also email your concern to speakup@sightsavers.org

Signature

If this code cannot be adhered to, or there are instances of this code being breached by the signatory, we expect notification within two days of such an incident and a formal review of the relationship will be initiated.

This document supersedes any previous codes of conduct that may have been signed.

I/we the undersigned agree to adhere to Sightsavers' Code of Conduct.

Organisation: _____

Signature and date (dd/mm/mm): _____

Name and position: _____

We work with partners in low and middle income countries to eliminate avoidable blindness and promote equal opportunities for people with disabilities.

www.sightsavers.org