

SCI POLICY: MODERN SLAVERY & HUMAN TRAFFICKING POLICY

PolicyTitle:	Modern Slavery & Human Trafficking Policy
Version:	2.0
Approved Date:	November 2019 (reviewed November 2020)
Approved by:	Clare Canning
Author:	Jenni Woolf
Review Date:	2 years after approved date

SECTION 1: POLICY STATEMENT

Save the Children International ("SCI") does not permit any of its employees, partners, suppliers, sub-contractors, agents or any other individual with which it contracts to engage in any aspect of modern slavery. The term "modern slavery" is widely defined and also includes human trafficking.

This policy applies to all persons working for SCI or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

SCI expects the same high standards from all of its contractors, suppliers and other business partners, and as part of our contracting processes, we may include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards. Contractors, suppliers and other business partners who may have questions regarding the application of this policy, should address such questions to their SCI representative.

SECTION 2: PRINCIPLES & APPROACH

2.1 PRINCIPLES

As set out in the UK Modern Slavery Act 2015 (the "Modern Slavery Act"), modern slavery, including human trafficking, is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking (as defined in Section 3.1 below), all of which have in common the deprivation of a person's liberty

by another in order to exploit them for personal or commercial gain. SCI has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in SCI's business or in its supply chains.

SCI is also committed to ensuring that there is transparency in its own business and in its approach to tackling modern slavery throughout its supply chains, consistent with its national and international disclosure obligations, and shall comply with all applicable laws, statutes, regulations and codes from time to time in force, including:

- a. Modern Slavery Act 2015;
- b. US Trafficking Victims Protection Act 2000;
- c. USAID ADS 303 Mandatory Standard Provision, Trafficking in Persons (April 2016);
- d. International Labour Standards on Child Labour and Forced Labour.

2.2. APPROACH

SCI is committed to preventing human trafficking and modern slavery, including through the following means:

Awareness: Ensuring that all staff and those who work with SCI are aware of the problem of human trafficking and modern slavery.

Prevention: Ensuring, through awareness and good practice, that staff and those who work with SCI minimise the risks of human trafficking and modern slavery.

Reporting: Ensuring that all staff and those who work with SCI are clear on what steps to take where concerns arise regarding allegations of human trafficking and modern slavery. Such concerns should be raised in line with the reporting steps set out in SCI's Whistleblowing Policy.

Responding: Ensuring that action is taken to identify and address cases of human trafficking and modern slavery.

To help you identify cases of human trafficking and modern slavery, the following are examples of prohibited categories of behaviour:

- a. <u>'chattel slavery'</u>, in which one person owns another person.
- b. 'Bonded labour' or 'debt bondage', which is when a person's work is the security for a debt effectively the person is on 'a long lease' which they cannot bring to an end, and so cannot leave their 'employer'. Often the conditions of employment can be such that the labourer can't pay off their debt and is stuck for life, because of low wages, deductions for food and lodging, and high interest rates.
- c. 'Serfdom', which is when a person has to live and work for another on the other's land.
- d. Other forms of forced labour, such as when passports are confiscated (sometimes by unscrupulous recruitment agencies) from migrant workers to keep them in bondage, or when a worker is 'kept in captivity' as a domestic servant. If a supplier or contractor appears to impose excessively harsh working conditions, or excessively poor wages, then you should

- always be alive to the possibility that a form of forced labour is occurring, and take care with your due diligence.
- e. 'Child slavery', which is the transfer of a young person (under 18) to another person so that the young person can be exploited. Child labour may, in fact, be a form of child slavery, and should not be tolerated. See the Save the Children Child Safeguarding Policy for further details.
- f. 'Marital and sexual slavery', including forced marriage, the purchase of women for marriage, forced prostitution, or other sexual exploitation of individuals through the use or threat of force or other penalty.

SECTION 3: DEFINITIONS

Word/Term	Definition
"Slavery"	Exercising powers of ownership over a person.
"Servitude"	The obligation to provide services is imposed by the use of coercion.
"Forced or compulsory labour"	Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily.
"Human trafficking"	Arranging or facilitating the travel of another person with a view to their exploitation.

SECTION 4: RELATED DOCUMENTS

Links to Supporting Documentation	
1.	UK Modern Slavery Act 2015