

Slavery and human trafficking statement

January 2022



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This statement has been published in accordance with 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 December 31, 2021.

Introduction

Sightsavers is committed to improving practices to combat modern 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 or supply chain.

The Covid-19 pandemic has caused conditions that may enable modern slavery and human trafficking to develop and go unchecked. We are committed to monitoring and adapting the work we do to combat these practices during these challenging times.

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 governments, 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 700 staff across the organisation, both in the UK and overseas.

Our policies on modern slavery and human trafficking

We require that all Sightsavers staff, subsidiaries and affiliates 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 engage, contract or work with any entity or organisation that causes, promotes or contributes to modern slavery or human trafficking.
- To ensure any 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 and co-operate with activities of the UK Anti-Slavery Commissioner.

Our **Global Anti-Slavery Policy** was updated in 2021 to reinforce new controls, process and other strengthening activities which were delivered throughout 2021 and those planned for 2022.

We also require all staff, representatives and partner organisations to comply with Sightsavers' **Global Safeguarding Policy**, which minimises the risk of harm, exploitation or abuse of children and adults from staff, operations and programme activities.

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.

Our internal HR policies address human trafficking and modern slavery to ensure that they are not taking place in our business. If any employee or any other stakeholder believes malpractice, unethical conduct or illegal practices are taking place, our **Global Speak Up platform** provides a confidential mechanism for reporting, investigating and remedying any wrongdoing. Our Global Whistleblowing Policy outlines processes and channels for internal reporting and 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

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

Sightsavers believes that change can only come from working closely with our suppliers and partners. Our highest risk suppliers have been identified as security services personnel, hotel and conferencing services personnel, cleaning agency services personnel and temporary and casual staffing agencies.

We continued to address these risks by deploying a series of mitigation activities, which will continue into 2022. 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. We will be developing new Key Performance Indicators (KPI's) in addition to those already in place, allowing us to have greater visibility into the risks.

In 2021 we introduced a Global 'Speak Up' platform whereby any stakeholders can make anonymous and confidential reports of misconduct, including reports of actual or suspected human trafficking or modern slavery. Reports can be made through an online portal, dedicated email address or via a telephone line available in over 100 languages.

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 has signed its support for the **United Nations Global Compact** and **The Ten Principles**. These principles include the protection of human rights, freedom of association and elimination of all forms of forced, compulsory and child labour.

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' **Code of Conduct**. All programmatic suppliers and partners are required to sign the code, and we assume that by signing, they 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 basic human rights and there is no willingness to address the situation within a reasonable timeframe if requested to do so.

Training and awareness

All policies are promoted and enforced across our business. Staff receive awareness and training to ensure that they are familiar with policies, processes and reporting lines outlined throughout this statement.

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes Sightsavers' slavery and human trafficking statement for period January to December 2021.



Caroline Harper

Chief executive

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