MODERN SLAVERY STATEMENT

Period January-December 2023

Sightsavers

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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.

This statement sets out the steps that we have taken to eliminate, as far as possible, the risk of modern slavery and human trafficking taking place in our organisation and supply chains. This explains how we have addressed the risks during 2023 and how we plan to further mitigate these going forward in 2024.

Modern Slavery Act 2015

The Modern Slavery Act 2015 requires large UK organisations to publish annual statements to report on the steps they are taking to ensure that modern slavery and human trafficking are not taking place in their operations and in the supply chains that provide their goods and services.

Modern slavery is an overarching term used to describe a wide range of exploitation of labour, including slavery, forced or compulsory labour, servitude and other types of bonded labour, human trafficking and child labour.

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 bodies, other non-governmental organisations and the private sector.

We have a governing board 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 800 staff across the organisation, both in the UK where the headquarters are based and overseas in more than 30 countries mainly across Africa and South East Asia.

You can find out more about our Governance and Structure, and about our UK and international activities, in our annual report at **https://www.sightsavers.org/how-were-run/annual-reports/**

Our policies on modern slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our framework of policies and procedures is

regularly reviewed which includes assessing and, where necessary, strengthening our existing policies to better address modern slavery issues.

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.

In addition to our Global Anti-Slavery Policy, our wider policy and process framework addresses risks regarding modern slavery as follows:

- **Global Safeguarding Policy** - which minimises the risk of harm, exploitation or abuse of children and adults from staff, operations and programme activities. All staff, representatives and partner organisations are required to comply with this Policy.
- **Fundraising Donation Acceptance 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 **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.
- Our **Ethical Content Policy –** In line with Sightsavers' Ethical content collection guidance, all programme participants must fully understand how, where and why we will use their content and understand any potential consequences of it being made public or used online.
- If an 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.

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 in 2023. These include; the deployment of enhanced training of staff working directly with our supply chain and additional due diligence and audits, both at global and community levels. We engaged more with our partners, running awareness training sessions with our local partners.

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.

Key Performance Indicators

Sightsavers uses Key Performance Indicators (KPIs) related to our work on combatting Modern Slavery, allowing us to have greater visibility of risks.

KPI 1 - All joiners to the supply chain, procurement, and resilience teams to undertake the course within one month of joining.

KPI 2 - Modern Slavery risk assessment to take place on all new partners where Sightsavers is a project lead.

KPI 3 - Code of conduct to be signed for all new suppliers with contracts worth over £10,000 which are assessed as high risk of Modern Slavery.

KPI 4 - Modern Slavery questionnaire to be incorporated into all the partner due diligence reviews.

KPI 5 - Monitoring, awareness raising and training provided to all partners determined to be higher risk of Modern Slavery and where contractually required.

Incidents

We have had no reports or incidences of modern slavery or human trafficking in our operations or supply chains in 2023.

Training and Awareness

All policies are promoted and enforced across our business. We updated our Global Anti-Slavery policy in 2023 making amendments to our KPIs and mitigating activities. We conducted in person training with our local partners in May 2023, improved on our communications in a quarterly internal newsletter and plan to roll out additional learning sessions for new staff in 2024.

Staff receive training through our e-learning platform to ensure that they are familiar with policies, processes and reporting lines outlined throughout this statement. Our modern slavery training is updated regularly and is now mandatory not just for supply chain staff but also for those working on programmatic activity and areas of resilience.

Further steps

We are committed to continuing to combat modern slavery, and to build on the steps already taken regarding the supply chains for our UK and international operations.

The issue of international supply chains is especially complicated, and we work alongside our colleagues to improve awareness and understanding of modern slavery issues. This includes training of staff members and (in some contexts where it is considered necessary) partners, due diligence on suppliers, and the procedures for identifying and reporting modern slavery incidents and concerns.

We have staff in the organisation with responsibility for Modern Slavery in their job description with a focus on training and awareness to staff globally. There are plans to enhance the modern slavery investigation process in 2024. We have staff in the organisation with responsibility for Modern Slavery in their job description, communications improvements will continue to be a priority with a focus on training and awareness to staff globally. There are plans to enhance the modern slavery investigation process in 2024.

Signature

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 2023.



Dr Caroline Harper

Chief executive