

Practical Action

MODERN DAY SLAVERY POLICY

Version V1
Date October 2022
Scope All employees, Trustees,
Consultants and others
acting on behalf of
Practical Action or its
subsidiaries

Approval required from	Name	Date approved
Policy Owner:	Head International Operations	
Responsible Director:	Chief Operating Officer	
Board approval		

Queries:	Contact the Policy Owner
Exceptions:	Contact the Responsible Director

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1. SCOPE AND ELIGIBILITY

This policy sets out Practical Action's approach to identifying, preventing, and responding to modern day slavery and human trafficking in our operations, implementing partners and supply chain.

This policy applies wherever Practical Action or its subsidiaries operates. It covers all Practical Action staff, trustees, volunteers, consultants, and other representatives.

Practical Action expects implementing partners and suppliers (our 'Supply Chain') to work to the principles outlined in this policy, along with the core values detailed in our Code of Conduct.

Practical Action commits to taking appropriate steps to assess the likelihood of implementing partners and suppliers not meeting the policy and to take remedial action.

Our goals are: not to be complicit in human rights abuses; the elimination of all forms of forced and compulsory labour; and the effective abolition of child labour. We will continue to improve our processes and procedures to continuously combat such acts.

2. BACKGROUND

There is a common perception that slavery is a thing of the past, but it is estimated that 40 million people are being held in modern slavery across the world.

Women and girls are disproportionately affected, comprising almost three quarters of those living in slavery today. The higher prevalence of poverty amongst women makes them relatively more vulnerable to becoming enslaved.

Modern slavery and human trafficking are complex and often hidden in plain sight. In many cases, perpetrators take extreme steps to hide illegal practices and survivors fear the implications of reporting their abuser.

Slavery today can manifest in various forms¹, including:

- work or service which the person did not voluntarily enter in to, or which is carried out under the threat of a penalty (forced labour).
- transforming a debt into a mechanism of control over a person and then forcing people to work to pay off that debt – often with unfair/unattainable terms for repayment (bonded labour).

¹ <https://www.antislavery.org/slavery-today/>

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- recruiting, harbouring or transporting people, using violence, deception or coercion to achieve control over another person, for the purpose of exploitation (trafficking in persons).
- child trafficking, which is the recruitment, transportation, transfer, harbouring or receipt of any person under the age of 18, for the purpose of exploitation. (By contrast to adults, children are defined as trafficked even if there has been no violence, deception, or coercion.)
- forced marriage, which refers to situations where persons have been forced to marry without their consent. A marriage can be forced through a range of different mechanisms, including physical, emotional, or financial duress; deception by family members, the spouse or others; or the use of force or threats or severe pressure.
- denying people who work in a home the freedom to leave the house, withholding wages or identity documents, limiting their contact with family (domestic servitude)
- descent based slavery also still exists (mainly in parts of Africa). This relates to when someone is born into a group or caste viewed as a 'slave class' by their society.
- child slavery is the enforced exploitation of any person under the age of 18 for their labour, used for someone else's gain.

3. THE POLICY

Practical Action is committed to the UK Modern Slavery Act of 2015². At Practical Action, we believe that everyone has the right to live their lives free from exploitation. We will not tolerate anyone associated with our work carrying out any form of modern slavery or human trafficking.

Practical Action has operations and supply chains which span multiple countries. The nature of the work we do, and the countries we source from and operate in, mean that despite our best efforts, there is a risk that various forms of modern slavery could exist in our supply chains.

Practical Action and its suppliers and partners are expected, as a minimum, to comply with all applicable international human rights standards, national legislation, statutory requirements, and existing policies.

We require any concerns to be reported, so that we can respond in a robust and timely manner. In any such responses, we will prioritise the protection of survivors but will, where possible, hold perpetrators to account, including referring incidents to local authorities.

² <https://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>. Similar legislation exists in many countries.

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Concerns may arise from the following issues (this is not an exhaustive list)

- Unfair terms of pay for workers, including compulsory deductions not mandated by law
- Workers having documents impounded and/or being forced to live in the workplace
- Unsafe or unhealthy working conditions which do not meet minimum standards
- Underage children working in the supply chain (whether forced or not)

We will terminate any contract where conduct demonstrably violates this policy, and there is no willingness to address the issues within a reasonable time.

4. ROLES AND RESPONSIBILITIES

Practical Action's Directors and Trustees hold overall accountability for this policy and its effectiveness in practice. All managers are responsible for integrating it into daily decisions, practices, and performance measurement across the organisation.

All staff, volunteers, implementing partners, suppliers and other representatives of Practical Action are required to adhere to this and other related policies such as listed in section 7 of this policy.

All Practical Action staff are obliged to report any suspicions of modern slavery or human trafficking. For the avoidance of doubt, no obligation is placed on any survivors to report any incident that has happened to them.

5. TAKING ACTION

The wishes and best interests of survivors are the primary concern for interventions in modern slavery cases. The consequences of non-compliance may in rare cases include immediate termination of a supplier or partner or removing a worker from the situation.

However, internationally, evidence has shown such actions may reduce the likelihood of an appropriate resolution for the survivor(s) and could cause more harm. Therefore, our approach will be case specific and will look for solutions that mitigate the survivors' current situation, and prevent the risk of further harm, by:

- Listening to survivors, taking into account their needs and considerations.
- Engaging specialist local NGOs, trade unions, community organisations or authorities where appropriate and safe.

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- Where appropriate and safe, involving the police, if there are suspicions of serious and/or organised criminal involvement.
- Ensuring the supplier/partner takes significant action to prevent any further cases.

Where the survivor is employed or recruited through a supplier or implementing partner, it will be the responsibility of that supplier or partner to provide remedy, with support from Practical Action.

6. HOW TO RAISE A COMPLAINT OR CONCERN

Anyone can raise a concern or make a complaint to Practical Action about something they have experienced or witnessed in line with our Global Complaints Policy. You can do this verbally or in writing to your Line Manager, HR, Safeguarding Focal Point, or the Global Safeguarding team. Complaints can also be made anonymously online through our dedicated reporting service, ethics point (www.ethicspoint.com)

7. RELATED POLICIES

- Practical Action Code of Conduct
- Safeguarding Policy
- Global Diversity and Dignity at Work Policy
- Global Complaints Policy
- Gender Policy

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