



# TRANSAID ANTI-TRAFFICKING AND MODERN SLAVERY POLICY

## **Introduction**

Transaid's Anti-Trafficking and Modern Slavery policy is in line with the Modern Slavery Act (MSA) 2015 which covers –

*Slavery – Exercising powers of ownership over a person.*

*Servitude – The obligation to provide services is imposed by the use of coercion.*

*Forced compulsory labour – work or services are extracted from a person under the threat 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.*

Modern slavery, including human trafficking, is a crime and a violation of a person's fundamental human rights. Transaid has a zero tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our operations.

## **Policy Aim**

This Policy sets out Transaid's stance and commitment to anti-trafficking and modern slavery.

## **Application**

This policy applies to all staff, volunteers, consultants, staff seconded from other organisations, and trustees of Transaid and it is a requirement that all of Transaid's partner organisations confirm compliance.

## **Practicalities**

### **Recruitment**

References are taken out for all new staff, volunteers, consultants, and staff seconded from other organisations before any confirmation of appointment is made. In addition to questions about specific skills required for a role, the referee is also asked to comment on conduct, behaviour and whether disciplinary action has been taken.



## **Code of Conduct and other policies**

All Transaid staff, volunteers, consultants, staff seconded from other organisations and trustees are required to sign and abide by the organisations Code of Conduct and all applicable policies.

## **Raising concerns**

Any person who has concerns about the behaviour of Transaid's staff, volunteers, consultants, trustees, partner organisations, staff seconded from other organisations are required to report it immediately via a senior manager in the organisation. If the concern is about the line manager then the next person in the line management hierarchy must be alerted. All information relating to the concerns raised must be kept confidential to the person raising the concern, to the person who this has been reported and any person involved in an investigation.

All claims will be fully investigated and will involve, where appropriate, senior manager, specialist HR and/or the Safeguarding Officer to ensure it is undertaken in the most sensitive and appropriate manner. Please see Transaid's Disciplinary and Grievance procedure for more information.

If an individual has concerns about the repercussions of reporting a modern slavery or trafficking issue, Transaid also has a Whistle Blowing policy that guarantees anonymity when raising concerns.

## **Employment terms and conditions**

Transaid employs staff based in the UK in line with UK legal requirements. It does not employ any staff locally in the countries in which it works. Where it uses consultants (either internationally or locally) the contracts are issued according to good practice terms of conditions and local legal requirements.

Staff are paid above the minimum wage and are provided with full terms and conditions as outlined in their contract of employment and Staff Handbook. They have the right to raise issues in the work place via the organisations Grievance Policy.

All costs associated with travel on behalf of Transaid staff are met by the organisation and full insurance and a legal duty of care is provided for staff. Consultants and others (e.g. people on secondment) are required to provide their own insurance cover.

Transaid also takes its responsibility seriously in fulfilling a duty of care to volunteers, consultants and staff seconded from other organisations and trustees.



Transaid will also provide safe and secure accommodation that meets the minimum health and safety standards in any given country.

### **Working with partner organisations**

Before entering into any partnership agreement, Transaid will undertake due diligence tests to determine whether the organisation has its own modern slavery/anti-trafficking policy and anti-bribery policy, its recruitment and staff employment practices, management approach to implementing projects with beneficiaries and how it deals with issues of misconduct.