



MODERN SLAVERY POLICY

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Introduction

This policy outlines Integrity's understanding of modern slavery and human trafficking and our response to it. This policy should be read in conjunction with the Whistleblowing Policy, Safeguarding Policy, the Integrity Code of Conduct and Supplier Code of Conduct.

Definitions of modern slavery and human trafficking are generally based on the foundation of Article 4 of the [Universal Declaration of Human Rights](#): "No one shall be held in slavery or servitude; slavery and the slave trade shall be prohibited in all their forms." Additional guidance and detail, particularly around different forms of slavery, can be found in the [Supplementary Convention on the Abolition of Slavery, the Slave Trade, and Institutions and Practices Similar to Slavery](#), for example: "debt bondage, serfdom, forced marriage and the delivery of a child for the exploitation of that child are all slavery-like practices and require criminalisation and abolishment."

More recently the [UK Modern Slavery Act 2015](#) categorises offences of: "Slavery, Servitude and Forced or Compulsory Labour and Human Trafficking... include[ing] holding a person in a position of slavery, servitude forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after... It is possible to be a victim even if consent has been given to be moved. Children cannot give consent to being exploited therefore the element of coercion or deception does not need to be present to prove an offence."

Integrity, as a values-based and law-abiding organisation, recognises its moral and legal obligations as outlined in the UK Modern Slavery Act 2015, *EU Directive 2011/36/EU* and the *US Trafficking Victims Protection Act 2000*. Integrity is committed to meeting the requirements of these relevant acts and directives and has also consulted [USAID's Counter Trafficking in Persons Policy](#) when writing this policy.

Integrity is committed to:

- Ensuring it does not inadvertently support, encourage or exacerbate modern slavery or human trafficking through its activities or supply chains.
- Reporting incidents or suspected incidents of modern slavery or human trafficking that we may encounter when delivering work.
- Supporting coordination efforts and voluntary initiatives to address modern slavery and human trafficking, such as the UN Global Compact, to which Integrity is a signatory.
- Ensuring that staff, consultants and partners understand and are adequately trained to meet our standards.
- Continuing to develop our systems and processes and ensuring staff awareness, so that we can identify and respond appropriately to modern slavery and human trafficking.

Integrity's Approach

A central principle of all Integrity programmes and operations is to "do no harm". This applies to our own staff, partners, beneficiaries of the programmes we run and the communities and individuals with whom we interact. A number of specialisms and processes underpin this principle.

- **Risk Management** – Integrity takes a detailed and active approach to risk management. Modern slavery, human trafficking, safeguarding and exploitation are specific categories of risk that must be considered during the risk management process on any project. Risks and mitigations are identified before any project begins and are actively managed throughout the project delivery.
- **Context sensitivity** – All of our work is built on a detailed contextual understanding that helps identify areas of actual or potential exploitation.
- **Supply and Delivery Chain Mapping** – During programme design, we map the required supply chain and partner delivery to identify areas of risk, be that fraud, delivery failure or the possibility of exploitation.
- **Due Diligence and vetting** – All employees, consultants and partners are vetted prior to contracting using a combination of our own investigations, US and UK vetting lists and subscription services, such as Thompson Reuters World-Check®, to ensure we are not working with compromised individuals.
- **Integrity Code of Conduct and Supplier Code of Conduct** – Expectations and requirements are clearly laid out in codes of conduct, which contractually oblige those who work for us to abide by our standards and requirements regardless of their own national law.
- **Reporting** – Integrity has well established reporting and referral mechanisms. The Whistleblowing Policy allows any member of staff, consultant or partner to alert senior management to practice, or suspected practice, that they believe contravenes any Integrity policy including this one. Our Safeguarding Policy outlines a specific mechanism for reporting exploitation or suspected exploitation of children or vulnerable adults whether related to Integrity activities or not. Staff are formally obliged to raise concerns related to instances of modern slavery either through the Project Director or directly to the Operations Team.
- **Training and capacity building** – Integrity’s Senior Operations Manager (SOM) is Integrity’s focal point for modern slavery and human trafficking issues. The SOM has completed Modern Slavery training from the Open University, supports the assessment of modern slavery and human trafficking issues within project design and management, and can advise on training to support project staff.



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