Vision Action Modern Slavery Policy

Vision Action is committed to preventing modern slavery and human trafficking in all its activities, partnerships, and supply chains.

Modern slavery, including forced labour and human trafficking, is a serious crime and a grave violation of fundamental human rights. As a UK-based organisation working across multiple African countries, Vision Action recognises that the risk of modern slavery may be heightened in certain contexts. We are therefore committed to taking proportionate, risk-based, and effective measures to prevent exploitation wherever we operate.

Vision Action has a zero-tolerance approach to modern slavery. We are committed to acting ethically, transparently, and with integrity in all aspects of our work, and to ensuring that these principles are embedded throughout our organisation and partnerships.

Tiwonge Mwase-Vuma **Jale Canlibalik**

Co-CEO **Co-CEO**

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Vision Action – Registered Charity No. 1081695 (England & Wales)
Companies House registration No. 4027804 (England & Wales)

Vision Action Modern Slavery Policy

1. Policy Statement and Commitment

Vision Action is committed to preventing **modern slavery, forced labour, human trafficking, child labour and all forms of exploitation** within its operations, programmes, partnerships and supply chains.

We recognise that modern slavery is a global issue and that risks may be higher in some contexts, particularly where informal labour markets, subcontracting arrangements or economic vulnerability are more prevalent. As a UK-based organisation working across several African countries, we take our responsibility seriously to uphold high ethical standards wherever we operate.

Vision Action has a zero-tolerance approach to modern slavery and is committed to acting ethically, transparently and responsibly in all its activities. We seek to identify, prevent and mitigate risks of exploitation and to promote respect for human rights throughout our work and relationships.

This policy aligns with:

- The UK Modern Slavery Act 2015
- Relevant International Labour Organization (ILO) conventions
- The UN Guiding Principles on Business and Human Rights

Risk Management

Vision Action applies a risk-based approach to the prevention of modern slavery. Risks will be assessed across countries, programmes, and supply chains, taking into account factors such as location, type of work, use of subcontractors, and vulnerability of individuals.

Where higher risks are identified, additional controls and monitoring will be put in place. Significant risks will be escalated to senior management and, where appropriate, included in the organisational risk register.

2. Scope

This policy applies to:

- All Vision Action staff (UK and overseas)
- Consultants, volunteers, trustees, and staff seconded from other organisations
- Partner organisations, suppliers, and contractors
- All countries in which Vision Action operates

Compliance with this policy is mandatory.

3. Definition of Modern Slavery

For the purposes of this policy, modern slavery includes any form of exploitation in which a person is controlled, coerced, or deprived of their freedom for another's benefit. This includes, but is not limited to:

- **Slavery** – the exercise of powers of ownership over a person

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- **Servitude** – the obligation to provide services imposed through coercion
- **Forced or compulsory labour** – work or services extracted under threat of penalty and for which a person has not offered themselves voluntarily
- **Human trafficking** – arranging or facilitating the travel of a person for the purpose of exploitation
- **Child labour** – work that deprives children of their childhood, potential, or dignity, or that is harmful to their development
- **Debt bondage** – a person's labour demanded as a means of repayment for a debt, often without clear terms or

4. Safer Recruitment and Employment Practices

Vision Action is committed to fair, transparent, and ethical recruitment.

- References are obtained for all new staff, consultants, volunteers, and staff seconded from other organisations before confirmation of appointment. Referees are asked to comment on conduct, behaviour, and any disciplinary history.
- Background checks (such as DBS checks in the UK, or equivalent locally appropriate checks overseas) are carried out where relevant and lawful.
- Vision Action prohibits the use of recruitment fees and any form of coercion, deception, or exploitation during recruitment.
- Staff are free to leave employment in accordance with their contract and applicable law.

5. Employment Terms and Conditions

- Vision Action employs staff in the UK in line with UK legal requirements.
- Staff employed in overseas countries are engaged in accordance with local labour legislation and good employment practice.
- Consultants (international or local) are contracted using fair and lawful terms and conditions.

All staff:

- Receive written contracts outlining terms and conditions
- Are paid at least the legal minimum wage, and where possible wages that meet basic living needs
- Have the right to raise concerns through the organisation's Grievance Policy provided within the staff handbook which is accessible to all staff

Vision Action does not:

- Retain identity documents
- Restrict freedom of movement
- Tolerate threats, intimidation, or exploitative working conditions

All work-related travel costs are met by the organisation. Appropriate insurance and duty of care are provided. Where accommodation is provided, it is safe, secure, and meets minimum health and safety standards in-country.

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6. Raising Concerns and Whistleblowing

Any person with concerns about modern slavery, forced labour, or human trafficking involving Vision Action staff, partners, or suppliers must report these concerns immediately.

Concerns may be reported to:

- Line manager or Country Director
- Senior Management Team
- Co-CEOs
- Via the Safeguarding or Whistleblowing reporting channels

If the concern involves a line manager, it must be escalated to the next appropriate level.

Reporting Timeframes:

- Immediate reporting is required where there is a risk of harm or exploitation
- All other concerns must be reported as soon as possible and within 24 hours

All reports will be:

- Taken seriously
- Assessed promptly
- Managed sensitively and confidentially

Vision Action provides:

- Access to its Whistleblowing Policy
- The option to report anonymously where possible
- Protection from retaliation for individuals raising concerns in good faith

Serious incidents involving modern slavery will be escalated in line with safeguarding and legal reporting requirements, including reporting to the Charity Commission where applicable.

7. Working with Partner Organisations and Suppliers

Vision Action takes a risk-based approach to preventing modern slavery within its partnerships and supply chains. Before entering into partnerships or contractual arrangements, Vision Action undertakes due diligence to assess risks related to modern slavery and trafficking. This includes consideration of:

- The partner's policies and commitments on modern slavery and safeguarding
- Recruitment and employment practices
- Use of subcontractors or informal labour
- Management and oversight arrangements
- Reporting and complaint mechanisms

Ongoing Monitoring:

- Vision Action will monitor modern slavery risks throughout partnerships and supplier relationships. This includes:
- Periodic review of partner safeguarding and labour practices
- Ongoing due diligence for higher-risk countries, sectors, or activities
- Requirement for partners to report any concerns or incidents

Partners and suppliers are expected to:

- Share Vision Action's zero-tolerance approach to modern slavery
- Comply with applicable labour laws and ethical standards
- Cascade these standards to subcontractors where relevant

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Where risks or breaches are identified, Vision Action will take proportionate action, which may include:

- Additional monitoring or support
- Suspension of activities
- Termination of contracts or partnerships

High-risk partners and supply chains must be reviewed at least annually.

8. Related Policies

This policy should be read in conjunction with:

- Bribery Act Policy
- Safeguarding Policy
- Gender Equality and EDI Policies
- Harassment and Misconduct Policy
- Disciplinary and Grievance Procedure (staff handbook)
- Whistle-Blowing Policy

9. Responsibility and Review

Overall responsibility for this policy lies with Vision Action's Trustees and Senior Management Team.

Senior management are responsible for:

- Implementing this policy across all operations
- Ensuring staff, partners, and suppliers understand their responsibilities
- Monitoring risks and performance against key indicators
- Escalating significant risks and incidents

The Board of Trustees has oversight responsibility and will:

- Receive regular updates on modern slavery risks and incidents
- Review performance through KPIs and assurance reporting
- Ensure appropriate action is taken where risks are identified

This policy will be reviewed annually, or sooner where risks, incidents, or changes in legislation require it.

Monitoring, Assurance and Key Performance Indicators

Vision Action monitors the effectiveness of this policy through key performance indicators and regular review. The following **KPIs** will be monitored and reported to senior management and Trustees:

- % of staff and relevant partners completing modern slavery awareness training
- Number of modern slavery concerns reported (by type and location)
- % of concerns reported and escalated within required timeframe
- Number of high-risk partners/suppliers identified and reviewed
- % of partners/suppliers completing due diligence or compliance checks
- Number of partnerships or contracts terminated due to modern slavery concerns
- % of countries/programmes completing modern slavery risk assessments

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ANNEX A: POLICY COMPLIANCE

I have received and read the Vision Action's global policy on Modern Slavery, Forced Labour and Human Trafficking and fully understand my responsibilities to comply with and promote the Policy.

Name	
Position within Vision Action	
Signature	
Date	

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