



OXFAM

INTERNAL POLICY
Anti-Slavery and Human Trafficking Policy 2018

Key Data

1.	Title of policy	Anti-Slavery and Human Trafficking Policy
2.	Author name	Sophie Brill, Corporate Responsibility Manager
3.	LT sponsor	Alison Hopkinson
4.	Area of governance	Corporate Responsibility
5.	Effective date	July 6 th 2018
6.	Date for review	July 2021
7.	Approved by	LT Date: June 18 th 2018 Council (consent paper) Date: July 6 th 2018
8.	Geographical scope	All countries where OGB operates
9.	Status	Public

Policy Statement

At Oxfam GB, we believe that everyone has the right to live their lives free from exploitation. Oxfam GB **will not tolerate** anyone associated with the delivery of its work carrying out any form of modern slavery or human trafficking. This includes employees, volunteers, consultants, or any other representatives.

We recognise that a zero-tolerance approach with suppliers and partners could undermine our ability to engage in the best interests of the survivor and to address the root causes of the issue. Therefore, with suppliers and partners we take an approach of **zero tolerance to inaction** on modern slavery, or human trafficking. Oxfam GB will terminate a contract where the conduct of suppliers or implementing partners demonstrably violates this policy, and there is no willingness to address any specific instances which arise or address underlying weaknesses in systems which led to the incident, within a reasonable time period. This is in line with Ethical Trading Initiative guidance ¹.

Oxfam GB Directors and ultimately Council hold overall accountability for this policy and it is the responsibility of all Oxfam GB managers to ensure the delivery of this policy. Any allegation of modern slavery or human trafficking will be dealt with in a robust and timely manner, being sensitive to the wishes of those affected.

This policy applies where Oxfam GB operates.

This policy does not form part of employees' terms and conditions of employment and may be subject to change at the discretion of management.

Associated Policies

- [Ethical and Environmental Policy](#)
- [Prevention of Sexual Exploitation and Abuse](#)
- [Safeguarding Children Policy](#)

¹(https://ethicaltrade.org/sites/default/files/shared_resources/eti_base_code_guidance_modern_slavery_web.pdf, p41)

- [Safeguarding Adults Policy](#)
- [Recruitment Policy](#)
- [Code of Conduct](#)
- [Non-staff Code of Conduct](#)
- [Disclosure of Malpractice in the Workplace Policy](#)
- [Anti-Bullying and Harassment Policy](#)
- [Complaints Policy](#)
- [Gender Equality Policy](#)
- [Employee Relations and Involvement Policy](#)
- [Reward Policies](#)

Purpose of this Policy

Oxfam GB is a complex organisation, with 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. This policy sets out Oxfam GB's approach to preventing modern slavery and human trafficking in our operations, implementing partners and supply chain. It includes:

- Our commitments to assess the risk and take preventative steps
- The principles upon which we will base our decision making and actions
- Our expectations of all who represent Oxfam GB, and
- Our commitments to ensure effective action is taken when problems occur.

All staff will be aware of this policy. It is accompanied by the Oxfam GB annual Modern Slavery statements which detail the actions we will take to addressing the risks of modern slavery in our operations, implementing partners and supply chains.

Context

In 2016, it was estimated that 40.3 million people were being held in modern slavery. It is pervasive across all sectors and countries.

Women and girls are disproportionately affected, comprising almost three quarters (71 per cent) of all those living in slavery today². The higher prevalence of poverty amongst women making them relatively more vulnerable to becoming enslaved.

Modern slavery and trafficking is complex and often hidden in plain sight. Perpetrators take extreme steps to hide this illegal practice and survivors fear the implications of reporting their abuser.

Scope

This policy applies where Oxfam GB operates (both as an executing and partner affiliate). This includes all Oxfam GB staff, volunteers and representatives.

Oxfam GB expects implementing partners and suppliers to work to this policy and will take appropriate steps to assess the risk of partners and suppliers not meeting the policy. Proactive checks will be put in place based on an assessment of the salient³ risks and the Oxfam's capacity and leverage to address them.

² https://www.alliance87.org/global_estimates_of_modern_slavery-forced_labour_and_forced_marriage.pdf

³ 'The human rights at risk of the most severe negative impact through the company's activities and business relationships'. UN Guiding principles on business and human rights (<https://www.ungpreporting.org/resources/salient-human-rights-issues/>)

Definitions

Slavery today can manifest in various forms⁴, including:

- work or service which the person did not voluntarily enter in to, or which is exacted under the menace 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**).
- 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** is the recruitment, transportation, transfer, harbouring or receipt of any person under the age of 18 years of age, for the purpose of exploitation. (I.e. by contrast to adults, children are defined as trafficked even if there has been no violence, deception or coercion.)
- **forced marriage** 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). When someone is born into a group or caste viewed as 'slave class' by their society.
- **child slavery** is the enforced exploitation of any person under the age of 18 years of age for their labour, used for someone else's gain.

Consent

It is irrelevant whether a person gives their consent. For example, a worker may not give their **voluntary consent** if they:

- Felt they have no other options to earn a living
- Feel under any menace of penalty
- Consent to terms and conditions that turn out to be untrue
- Are suffering from trauma

Standards

Oxfam GB **will not tolerate** anyone associated with the delivery of its work carrying out any form of modern slavery or human trafficking. Oxfam GB 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, including;

- Suppliers: [Oxfam Ethical and Environmental Policy](#)
- Staff: [Code of Conduct and Reward Policy](#)
- Partner Staff: [Non-Staff Code of Conduct](#)

In addition to the above, all staff, implementing partners and suppliers are expected to demonstrate commitment to meet the following standards;

Zero tolerance to inaction on exploitation, including all forms of modern slavery and human trafficking through robust prevention and response work, offering support to workers and holding those responsible to account.

Fair Payment

⁴ <https://www.antislavery.org/slavery-today/>

- No worker should pay for a job - the costs of recruitment should be borne, not by the worker, but by the employer ('employer pays' principle⁵)
- Wages should be paid directly to the worker, where Oxfam GB is not the direct employer, appropriate checks should be in place to ensure the worker receives the correct wage.
- No compulsory deductions from wages shall be made that aren't mandated by law and the worker should still have enough to live on after all deductions have been made. Where possible workers should freely give their consent for all deductions.
- Workers shall not be held in debt bondage or forced to work for an employer to pay off an incurred or inherited debt.

Freedom

- Coercion or force shall not be used to physically confine or imprison workers to the workplace, accommodation or related premises.
- Workers shall have the freedom to leave their employment within the terms of their contract and may not be prevented from doing so.
- Workers have the right to enter into employment voluntarily and freely, without the threat of a penalty.
- No worker has their identity or immigration documents destroyed, concealed, confiscated, or otherwise denied to them.

Working and Living Conditions

- Working conditions and accommodation are safe, clean, and protect workers' welfare and needs. In line with the host country housing and safety standards, or the ETI base code, whichever is higher.⁶
- All workers should have the option to choose not to live in accommodation provided by the employer.

Culture and Transparency

- No worker is solicited for the purpose of employment, on the basis of deception, coercion, or abuse of their position of vulnerability. No worker is to be offered employment, by means of materially false or fraudulent pretences, or representations or promises regarding that employment.
- There are multiple channels through which staff and other stakeholders can raise concerns which are accessible to all women and men. Appropriate steps are taken to raise awareness about these channels among stakeholders.
- All concerns or allegations of modern slavery or trafficking are responded to in a timely and appropriate manner.
- Disclosure in Oxfam GB's annual Modern Slavery Statement of any incidents of modern slavery or human trafficking occurring within Oxfam GB's operations, implementing partners and supply chains,

Principles to guide our anti-slavery and human trafficking policy

- Survivor focused: we are committed to listening to women and men working in our own operations, implementing partnerships and in our supply chain and being led by the wishes and best interests of survivors where possible and appropriate.
- Non-directive: we aim to empower survivors and complainants by helping them explore their options in safe ways without imposing our own opinions.

⁵ <https://www.ihrb.org/dhaka-principles>

⁶ Where the humanitarian imperative is applied, Oxfam will follow standards outlined in the Supply and Logistics Minimum Requirements for "First Phase" Humanitarian Response

- **Non-judgemental:** we never judge survivors or complainants for their actions or decisions. We aim to empower survivors and complainants by helping them explore their options in safe ways.
- **Confidentiality:** We are committed to ensuring confidentiality but some information will need to be shared with specialist teams outside the organisation to ensure safety and to prevent modern slavery.
- **Independent investigations:** through our Safeguarding team and working with local NGOs, trade unions, community organisations or authorities, we will carry out independent and discreet investigations, recognising the rights and duty of care to everyone involved, including the complainant or survivor, witnesses and the person accused.
- **Commitment to good practice:** we always strive to offer the best service possible, and are open to feedback and continual learning.
- **Conscious of gendered implications:** There are a number of ways that anyone can become enslaved and also different routes out of slavery, but there are notable particularities of experience that differ between women and girls compared with men and boys, therefore we are conscious of the gendered implications of effective identification, response and mitigation of modern slavery for women and for men.
- **A culture where women and men feel empowered and respected and able to raise concerns related to this policy.**
- **Open to learning and improving in order to drive wider change to tackle modern slavery and human trafficking in global supply chains.**

Oxfam GB will ensure that:

- a) All staff, volunteers, implementing partners and other representatives will have access to information about how to identify risks, report concerns or allegations of modern slavery and human trafficking.
- b) All managers, employees, volunteers and other representatives will have access to, and be aware of this policy and know the parameters of their responsibilities within it.
- c) Staff with specific responsibilities (e.g. managers, people who manage our suppliers and partners) will receive training on this policy.
- d) All managers are responsible for promoting awareness of this policy within their divisions, individual departments or teams and with suppliers and partners.
- e) Suppliers and implementing partners have demonstrated that they have sufficient checks and processes in place to ensure that they are in alignment with this policy.
- f) Concerns or allegations about modern slavery and human trafficking will always be taken seriously, investigated and where appropriate acted on.

This policy will be used in conjunction with employment/labour, duty of care and relevant criminal laws to make decisions about how to respond to complaints and concerns raised by staff, volunteers and other representatives and suppliers.

Roles and Responsibilities

Oxfam GB Directors and ultimately Council hold overall accountability for this policy and all Oxfam GB managers are responsible for its implementation.

The Corporate Responsibility Team is responsible for reviewing and updating this policy every three years and in line with good practice, legislative and organisational developments.

All staff, volunteers, implementing partners, suppliers and other representatives of Oxfam GB are required to adhere to this policy and Oxfam GB's Ethical and Environmental Policy at all times.

All Oxfam GB employees are obliged to report any suspicions of modern slavery or human trafficking. Where information has been shared in confidence, cases can be reported without disclosing personal information. This can be done without sharing details of cases.–Failure to report, to a relevant person, suspicion of modern slavery relating to someone else is a breach of Oxfam GB's policy and could lead to disciplinary action being taken. For the avoidance of doubt, there is no obligation placed on any survivors to report any incident that has happened to them.

Oxfam GB's Corporate Responsibility team and senior management teams can offer further support to help staff, volunteers and other representatives on implementing this policy.

Remediation

The wishes and best interests of survivors are the primary concern for interventions in modern slavery cases. Immediate termination of a supplier or partner or removing a worker from the situation may reduce the likelihood of an appropriate resolution for the survivor and could cause more harm. Therefore, our approach will be to look for solutions that mitigate the survivors' current situation, and prevent the risk of further harm, by:

- Listening to survivors directly taking into account their needs and considerations expressed directly by themselves are first considerations.
- Engaging specialist local NGOs, trade unions, community organisations or authorities (where appropriate and safe).
- Where appropriate and safe, involving the police, where there are suspicions of serious and organised criminal involvement.
- Looking beyond the individual case to identify contributing factors and poor practice.
- Providing or facilitating workers' safety, access to compensation and / or redress (for lost earnings or unpaid wages as well as for pain and suffering⁷).
- Exploring possible ways of helping workers to secure alternative jobs or income.
- Ensuring the supplier /partner takes significant action to prevent any further cases.

Where the survivor is employed/ recruited through a supplier/ implementing partner, it will be the responsibility of the supplier/ partner to provide remedy, with support from Oxfam GB to who will seek to ensure that remediation is in line with the above.

Oxfam GB commits to supporting and working with suppliers, and partners who have genuine difficulties in meeting these guidelines but demonstrate commitment to ensuring the best outcome for the survivors and show timebound progress.

Appendix 1

How to raise a Complaint or Concern

Anyone can raise a concern or make a complaint to Oxfam about something they have experienced or witnessed. You can do this verbally or in writing to your Line Manager, HR, or via Oxfam's Whistleblowing Service. Please refer to Oxfam's Dealing with Problems at work and [Oxfam's Grievance Procedures](#)

You can contact the Corporate Responsibility team confidentially on corporateresponsibilitysafeguarding@oxfam.org.uk or telephone +44 (0)1865 472515

⁷ <https://www.ethicaltrade.org/resources/base-code-guidance-modern-slavery>

Anyone can also raise a concern without fear of retribution to the confidential, 3rd party, independent Whistleblowing hotline, available online at www.oxfam.ethicspoint.com and by phone (UK number 0808 234 9797, country specific numbers all available online).

Please refer to Oxfam's [Disclosure of Malpractice in the Workplace \(Whistleblowing\) Policy](#) for further details.

If an allegation is made against you, then you must inform your manager immediately. You should create a signed and dated record of the details as you know them and send a copy of this to HR. All those accused will be treated with respect and all allegations are treated confidentially. You may wish to seek support from your Union or Staff Representative.