



International Initiative for Impact Evaluation

Anti-Human Trafficking and Anti-Modern Slavery Policy

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1. Introduction

Modern slavery encompasses slavery, forced and compulsory labour, and human trafficking whereby individuals are deprived of their freedom and are exploited for commercial or personal gain as defined in the Modern Slavery Act 2015. Consistent with 3ie's vision to improve lives through evidence-informed action in developing countries, 3ie is committed to a work environment and operations that are free from human trafficking, modern slavery and all forms of exploitation.

3ie also considers other related malpractice, including child labour, unsafe working conditions or excessive working hours, within this definition for the purposes of this policy.

3ie is committed to ensuring that there is no trafficking or modern slavery in our supply chains or any part of our business. We will comply with all laws and regulations prohibiting human trafficking or modern slavery and to operate in full support of all international conventions, agreements or initiatives relevant to preventing human trafficking, modern slavery and exploitation. The processes set out in this policy reflect our commitment to acting ethically and with integrity across the organisation.

2. Scope of policy

This policy applies to all 3ie staff and associated individuals, including but not limited to consultants, board members, agency workers, seconded workers, volunteers, agents, contractors and suppliers.

3ie strictly prohibits human trafficking or any form of enslavement in our business operations and supply chain. We expect that our suppliers will abide by our policy on the [Supplier Code of Conduct](#) and will in turn hold their own suppliers to the same high standards, which we monitor through our supplier's due diligence.

3. Definitions

• Human trafficking

Human trafficking means the recruitment, transportation (including failure to provide return transportation), transfer, harboring or receipt of persons, by means of the threat or use of force or other forms of coercion, abduction, fraud, deception, abuse of power or vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.

• Modern slavery

Modern slavery is the umbrella term used in the Modern Slavery Act 2015 to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking.

• Exploitation

Exploitation includes, at a minimum, the exploitation or the prostitution of others, sexual exploitation, forced or unpaid labour, domestic servitude or services where free movement pay is withheld, forced marriage, forced criminality, forced removal of human organs, slavery or practices similar to slavery or servitude. The recruitment, transportation, transfer, harbouring or receipt of someone under the age of 18 for the purposes of exploitation is considered human trafficking

4. Examples of human trafficking and modern slavery

- Examples of human trafficking, modern slavery and exploitation that would violate this policy include, but are not limited to the following:
- Procuring commercial sex acts
- Using forced labour in the performance of any contract, cooperative agreement or reward
- Concealing, destroying, confiscating or otherwise denying an individual access to their identity or immigration documents, such as passports or driving licences
- Using misleading or fraudulent recruitment practices or offering employment contracts that misrepresent terms and conditions, salary, benefits, location of work, housing conditions (if provided by 3ie) and hazardous conditions
- Using recruiters that do not comply with local labour laws
- Charging recruitment fees to applicants, candidates or employees
- If required by law, failing to provide transport to and from work, suitable housing and employment contract

5. Key Commitments

3ie expects everyone affiliated to us to support and uphold the following measures to safeguard against human trafficking and modern slavery:

- Follow a zero-tolerance approach to human trafficking and modern slavery in the organisation, including in our supply chains.
- **Procurement** – Ensure compliance to due diligence systems in place to identify and assess potential risk areas and to mitigate the risk of slavery and human trafficking occurring in its supply chains.
- **Risk Management** – Follow a risk-based approach within the contracting and supply chain processes and keep them under review. Accordingly, 3ie we may request the following evidence of sufficient anti-human trafficking and anti-modern slavery standards:
 - a. Employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Supplier Code of Conduct.
 - b. Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to 3ie codes of conduct where they do not have their own.
 - c. As part of our ongoing risk assessment and due diligence processes we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our conduct policies.
 - d. Individuals or organisations affiliated with 3ie who breach this policy will be subject to disciplinary action and criminal prosecution where appropriate. Affiliation or contracts with such individuals or organisations shall be terminated.
- **Recruitment and reward** – Ensure that people are paid appropriately for the work that they carry out for 3ie. The organizational policies on equal employment opportunities, recruitment and rewards support our efforts to combat modern slavery and human trafficking.
- **Engagement** - Engage with staff, associated individuals as well as stakeholders and suppliers

to address the risk of human trafficking and modern slavery in our operations and supply chain.

- **Raising concerns** - Encourage anyone to raise any concerns about modern slavery or human trafficking.
- **Action in the event of a breach** - Any breaches of this policy will result in 3ie taking disciplinary action against individual(s) and/or terminating its relationship with any organisation or supplier.

6. Raising a Concern

Individuals who have reasonable suspicion or evidence of non-compliance with the policy in connection with any 3ie employee or associated individuals or organizations including suppliers and partners, are encouraged to report their concerns either directly to their Unit Director/ Senior Safeguarding Officer or using the 3ie's Whistleblowing Policy.

Direct Reporting:

- **To the Unit Director:** One can report a concern directly to their unit director, who will be responsible for taking appropriate action.
- **To the 3ie Senior Safeguarding Officer:** One can report a concern confidentially by sending an email to safeguardingconcerns@3ieimpact.org

Whistleblower Form:

- **Anonymous Reporting:** One can anonymously raise a concern or report an incident using 3ie's [Whistleblower Reporting Form](#)

Supplier Reporting:

- Suppliers are required to report any suspected incidents to 3ie immediately. This can be done via the same methods listed above or through a designated contact provided by 3ie during the contracting process.

Suppliers and partner organizations must have their own policy on human trafficking and modern slavery including transparent processes for raising any concerns.

7. Anti-slavery and anti-trafficking statement

In accordance with the Modern Slavery Act 2015, 3ie prepares an anti-slavery and anti-trafficking statement for each financial year, setting out what steps it has taken to ensure that modern slavery is not taking place in its business or supply chains. This statement is published annually in line with government guidance and is available to view on the organisational website.

This policy will be reviewed once every two years to establish whether 3ie's approach continues to follow international best practice.
