



African Center for Economic Transformation

Modern Slavery & Human Trafficking Policy

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Purpose

The African Center for Economic Transformation (ACET) is against all forms of Modern Slavery and Human Trafficking, particularly in the delivery of our projects and in our operations.

Modern Slavery - an overarching term encompassing all forms of contemporary slavery including Human Trafficking, slavery, servitude, Descent-based Slavery, Forced Labour, Debt Bondage or Bonded Labour, Forced and early Marriage, and Child Labour. The 1926 Slavery Convention defines slavery as 'the status or condition of a person over whom any or all of the powers attaching to the right of ownership are exercised'.

Human Trafficking - the recruitment, transportation, transfer, harboring, or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, fraud, deception, the abuse of power, or a position of 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. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, Forced Labor or services, slavery or practices similar to slavery, servitude or the removal of organs.

Scope

This policy is applicable to all ACET Staff, Consultants, Board Members, and partners.

Principles

These Guidelines expand upon ACET's Code of Conduct which outlines the ethical standards and acceptable behavior that are applicable to the organization's operations. If you breach the Code of Conduct, you are liable to disciplinary action, including the possibility of dismissal. Further, if criminal activity is suspected, ACET will report to the relevant authorities as applicable.

ACET is committed to the principle that all humans have the right to be free from violence, abuse, and exploitation of any kind. Further, ACET embraces and respects the cultural and social diversity of the countries where we work and places great importance on operating with honesty and integrity. As such, the organization does not tolerate, condone or accept human rights abuses within its business operations. Regardless of the jurisdiction in which ACET is registered or doing work, any human rights abuses, including any form of Modern Slavery, are prohibited.

Duty to Comply

It is the responsibility of each staff to fully comply with this policy. Failure to comply may be subject to disciplinary action, including the possibility of dismissal.

Responsibilities

All ACET staff must report any past cases of being investigated, charged with, convicted, or otherwise implicated in criminal, corrupt, unethical, or unlawful conduct or any sanctions or violations of laws or regulations.

Staff are obliged to report any evidence, allegations, or suspicions of any conduct that might constitute Modern Slavery or Human Trafficking or might be in breach of ACET's Code of Conduct.

Reporting

Slavery is often hidden and can be difficult to identify, but there are signs that, if appearing together and taken in a broader context, might mean that someone is in slavery.¹

- The individual appears to be in the control of someone else and reluctant to interact with others
- The individual does not have personal identification on them
- The individual appears to have few personal belongings, wear the same clothes every day or wear unsuitable clothes for work
- The individual is not able to move around freely
- The individual is reluctant to talk to strangers or the authorities
- The individual appears frightened, withdrawn, or show signs of physical or psychological abuse
- The individual is dropped off and collected for work always in the same way, especially at unusual times, i.e. very early or late at night.

Staff must not try to intervene on their own as it might make the situation of that person worse, but should report any suspected case to their line manager, or the HR Manager.

All reports are to be made as soon as reasonably practicable and the matter will be dealt with pursuant to ACET's Code of Conduct.

ACET will take all such reports seriously and will follow the applicable policies and procedures to deal with the matter. All parties will be treated fairly and malicious or deliberately false allegations will be subject to disciplinary action, including termination.

¹ Anti-Slavery International, FAQs, <https://www.antislavery.org/slavery-today/frequently-asked-questions/>

Based on the allegation, where appropriate, the reports may be forwarded to relevant local law enforcement authorities, as available.

Types of Slavery

Child Labour - work that is mentally, physically, socially or morally dangerous and harmful to children and interferes with their schooling by: depriving them of the opportunity to attend school; obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work.

Debt Bondage or Bonded Labour - the status or condition arising from a pledge by a debtor of his personal services or of those of a person under his control as security for a debt, if the value of those services as reasonably assessed is not applied towards the liquidation of the debt or the length and nature of those services, are not respectively limited and defined.

Descent-based Slavery - the status or condition arising from a person being born into slavery because an ancestor was captured and enslaved; they remain in slavery by descent.

Due Diligence - the verifications, precautions, and background research required in order to identify and prevent foreseeable risks.

Forced and early Marriage - when someone is married against their will and cannot leave the marriage. Most child marriages can be considered slavery.

Forced Labor - means any work or services which people are forced to do against their will under the threat of some form of punishment.

Definitions

Partner - any contractor, subcontractor, grantee, sub-grantee, awardee, sub-awardee, law firm, vendor, supplier, property owner, or other individual or organization providing goods or services to ACET.