

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

1. POLICY STATEMENT

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, and human trafficking ("**modern slavery**"), all of which include the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.
- 1.2 Star ladies of hope have a zero-tolerance approach to modern slavery within its operations.
- 1.3 This policy applies to all persons:
- (a) working for the organization, or on our behalf, in any capacity, including employees at all levels and
 - (b) our contractors, external consultants, agencies, third-party representatives, and partners.
- 1.4 The Organization is committed to:
- (a) acting ethically and with integrity in all our operations and relationships;
 - (b) implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our organization or in any of our program levels; and
 - (c) ensuring there is transparency in our approach to tackling modern slavery in our organization and in our program levels consistent with our disclosure obligations under the Anti-human trafficking Act.

2. IDENTIFYING MODERN SLAVERY

2.1 Modern slavery may be found in:

- (a) our business, - sex workers

2.2 There is no typical victim of modern slavery, and some victims do not understand they have been exploited and are entitled to help and support. However, the following key signs could indicate that someone may be a victim of modern slavery or human trafficking:

- (a) The person is not in possession of their own passport, identification or travel documents.
- (b) The person is acting as though they are being instructed or coached by someone else.
- (c) The person allows others to speak for them when spoken to directly.
- (d) The person is dropped off and collected from work.
- (e) The person is withdrawn or appears frightened.
- (f) The person does not seem to be able to contact friends or family freely.
- (g) The person has limited social interaction or contact with people outside of their immediate environment.

The above list is not exhaustive. A person may display a number of the indicators set out above, but they may not necessarily be a victim of slavery or trafficking.

3. RESPONSIBILITY FOR THIS POLICY AND COMPLIANCE

3.1 The Executive Board has overall responsibility for ensuring this policy complies with the organizations legal and ethical obligations.

3.2 The Executive Team has primary and responsibility for implementing this policy, and dealing with any queries about it.

3.3 All members must comply with this policy.

3.4 All Partners must comply with this policy.

4. REPORTING MODERN SLAVERY

- 4.1 Organization Staff and partners must report any incidence or suspicion of modern slavery at the earliest possible stage to:
- (a) If you are a member, your Area Liaisons (Outreach coordinator); or
 - (b) If you are a Partner, your primary program manager or organization contact with the Star Ladies of Hope.

5. PUBLICATION OF THIS POLICY

- 5.1 This policy, is available to organization Staff and members at www.starladiesofhope.org .
- 5.2 This policy is available to partners on the website too.

6. BREACHES OF THIS POLICY

- 6.1 Any organization Staff and member who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 6.2 The relevant member of the organization may terminate its relationship with a Partner if it is in breach this policy

7. POLICY REVIEW

- 7.1 The Executive Team, in conjunction with Procurement and Human Resources, is responsible for reviewing this policy as necessary to ensure that it meets legal and ethical requirements and reflects best practice.
- 7.2 This policy does not form part of any contract of employment and may be amended at anytime.
- 7.3 Organization Staff and members are invited to comment on this policy and suggest ways in which it might be improved by emailing feedback to the Executive team info@starladiesofhope.org / eldoretsexworkersalliance@gmail.com