



Modern Slavery Statement 2022/23

Introduction

For over 76 years, Christian Aid has provided long-term development support and humanitarian relief worldwide. Christian Aid seeks to tackle the structural causes of poverty, inequality and injustice and to also work for sustainable and long-lasting change. Poverty, discrimination and marginalisation are some of the key factors why modern slavery exists and why addressing it is inextricably linked to our long-term development work. We also campaign for stronger regulation to prevent human rights abuses both at a national and international level. In the UK, our partner, the Corporate Justice Coalition, played a key role in the development of modern slavery legislation and is leading calls for the UK government to introduce a new legal requirement for UK-based companies and investors to carry out human rights and environmental due diligence of their operations and investments. Internationally, we support proposals for a new UN Binding Treaty on Business and Human Rights.

Christian Aid is committed to improving practices to minimise the risk of modern slavery in our organisation and supply chains. This is Christian Aid's seventh modern slavery statement published in accordance with the UK Modern Slavery Act 2015. In this statement, we outline the steps we are taking to identify and prevent modern slavery in our operations and supply chains. We also explain the progress we have made during 2022/23 and how we plan to further mitigate the risks going forward.

Our organisation

Christian Aid was established in 1945 to provide humanitarian assistance to refugees in Europe following the Second World War. Today Christian Aid delivers development and humanitarian work around the world including over 25 countries in Africa, Asia, the Middle East, Latin America and the Caribbean. We act as a global movement of people to respond in practical ways to alleviate suffering, to expose and eradicate misuses of power and to provide humanitarian support in crises and emergencies.

Christian Aid is a UK registered charitable company limited by guarantee. Our international programmes are mostly delivered through a network of country offices in the countries where we work and we also have a number of subsidiaries. A description of Christian Aid's corporate group structure and subsidiary undertakings is included in our most recent Annual Report for 2022/23. This statement is made on behalf of all companies and subsidiaries in the Christian Aid corporate group structure, and on behalf of Christian Aid Ireland, an independent charity sharing the same mission, vision and values as Christian Aid.

The Board of Trustees is responsible for the governance of Christian Aid. The Board delegates the day to day running of the charity to the Chief Executive but retains oversight of our operations through regular board and sub-committee meetings. Governance structures are designed to ensure the early identification and management of key risks. The Board, together with the Audit and Risk Committee, have oversight of the key areas relevant to modern slavery such as safeguarding, whistleblowing, fraud and financial crime. A cross-organisational Modern Slavery Working Group supports the implementation of our approach to managing modern slavery risk at an operational level.

Our supply chains

Christian Aid carries out procurement in the UK and internationally to support our operations. Most of our suppliers provide goods and services in connection with our office facilities, recruitment, fundraising, marketing, technology and other professional services. Christian Aid does not engage in any direct retail activities in the UK. Internationally Christian Aid generally works with local partners to deliver our programmes. Our partners are therefore responsible for most of the procurement required for our programmes, following the standards required by Christian Aid to minimise the risk of modern slavery. Christian Aid implements some of our large humanitarian programmes directly and we carry out the procurement for these. We are phasing out direct implementation by the end of 2023 following our commitment to decolonisation and localisation so that we prioritise working through our local partners.

The framework for supply chain management is set out in our Procurement Policy. All procurement decisions by Christian Aid or our partners valued at £50,000 or over require approval from the central Procurement team based in the UK, who will oversee and approve the selection process. Our larger country offices typically have a full-time procurement officer and the relevant officer or local team may approve smaller procurements and supplier relationships in accordance with delegated authority. Many partner procurements are small scale and below the £50,000 threshold and these are managed and monitored by the relevant Christian Aid country office. To support the implementation of the supply chain framework, the central Procurement team provide training and guidance. All our country offices are invited to join a quarterly community of practice where procurement best practice is discussed.

Policies

Christian Aid has a range of policies which help to ensure that the risk of modern slavery is minimised in our organisation and supply chains. Most of the policies summarised below are corporate policies which are reviewed regularly by the Board of Trustees or the relevant sub-committee. The policies relevant to modern slavery include:

- The **Procurement Policy** covers the risk of modern slavery and applies to all expenditure on goods and services purchased directly by the organisation or by our partners in Christian Aid funded projects. The Policy sets out the tendering, due diligence and approval levels required depending on the value of procurement. The Policy promotes ethical and sustainable procurement and includes a **Code of Conduct for Suppliers**, which sets out the ethical standards we expect such as the payment of living wages and safeguards to prevent human trafficking. Our Policy requires that our partners' procurement policies are reviewed to ensure that they are consistent with our principles and guidelines. Subject to any specific donor requirements, we may require partners to use our Policy if they do not have adequate policies. In larger programmes, we also require procurement plans from our partners.
- Our **Safeguarding Policy** applies to all Christian Aid staff, trustees, volunteers and consultants. Our Safeguarding Policy defines safeguarding abuses, to include modern slavery, and sets out our expectation of partners and consortium members to investigate safeguarding breaches. We also require all partners to have an appropriate Safeguarding Policy. Our Safeguarding Policy includes a confidential safeguarding email address which is publicly available on our corporate website. As alternatives, we also have confidential safeguarding trustee and

whistleblowing email addresses and we have recently introduced an internal reporting form for staff.

- Our **Code of Conduct** also applies to all Christian Aid staff, trustees, volunteers and consultants. We also require all partners to have an appropriate Code of Conduct.
- Our **Feedback and Complaints Policy** complements many of our existing policies which are relevant to modern slavery. The Feedback and Complaints Policy applies globally and covers our supporters and the communities we serve. It helps to strengthen Christian Aid's accountability ensuring that we are meeting sector standards around feedback and complaints.
- Related to the above is our **Whistleblowing Policy** which makes it clear how and when to raise concerns internally and externally. The Policy now sets out in detail the protection and support available to those raising concerns in line with our survivor-focused approach.
- Our **Volunteering Policy** prohibits introducing volunteers to replace paid staff. It is also our policy to offer mentoring and guidance to volunteers seeking a career in civil society.

One of our ongoing commitments is to transparency and we now publish many of our key policies on our website.

Identifying and addressing the risk of modern slavery

Our supply chains

At the tender stage, we carry out due diligence checks on prospective suppliers of high value. We also carry out enhanced due diligence on smaller value procurements in high-risk locations. This includes a check of their compliance with applicable laws including modern slavery and human trafficking. We adopt a risk-based approach to monitoring our key suppliers to minimise the risk of slavery and human trafficking in their business. This may include regular performance reviews depending on the duration and value of the supplier contracts. We also have a standard contract template which provides the default terms and conditions of contract for all significant supplier relationships and incorporates the Supplier Code of Conduct which the supplier is required to sign.

Our operations

For our UK operations, fundraising, and influencing work, we procure goods and services across a wide range of indirect categories such as marketing, media, research, facilities, finance, HR services, and IT. We do not have significant spend in the more vulnerable sectors of agriculture, construction, hospitality or manufacturing. In our international operations, we have identified three areas where there may be an increased risk of modern slavery because of the sectors involved including a warehouse and logistics provider, a temporary staffing agency and an IT equipment provider.

Our staff

We recognise that the responsibility to address modern slavery risk is a shared one. Christian Aid's Staff Code of Conduct requires all staff to commit to safeguarding anyone coming into contact with the charity in the course of our work and reporting any abuse. In terms of our employment practices, we seek to pay all our staff a living wage and in the UK we are accredited as a real Living Wage Employer by the Living Wage Foundation. Christian Aid's rigorous recruitment and selection guidelines mitigate against potential risks through the use of referencing, checking the right to work,

safeguarding and ensuring equal opportunities for everyone. New employee induction training includes a compulsory module on modern slavery. After the initial induction, there is role specific training covering modern slavery, amongst other risks, in key roles holding responsibility for procurement.

Our partners

Christian Aid mainly works through independent partners to deliver programmes, rather than implementing programmes directly. While we believe this is the most effective way to reduce poverty as independent partners are rooted in local communities, it is not without risk.

We have a range of practices and procedures in place to address the risk of modern slavery in working through partners including:

- We carry out **Partner Operational Capacity Risk Assessments (POCRAs)** at the start of a new funding relationship and then again at least once every three years or following any significant events such as major staff changes or the rapid onset of an emergency situation. The PO CRA includes a review of the partner's mission statements, strategy documents, code of conduct and working environment, observation during visits and meetings, desk review of documents and interviews with staff. This will cover a range of issues such as recruitment, safeguarding and procurement which are relevant to the risks of modern slavery.
- Our **Partnership Agreements** include sections on compliance with our Procurement Policy, Safeguarding Policy and the Modern Slavery Act 2015. Our agreements also require partners to have their own Codes of Conduct and relevant policies which are aligned to Christian Aid's policies. Based on the PO CRA assessment, guidance is given to partners on how to align better their policies and values with ours.
- We use a **risk-based approach** to support partners where appropriate with due diligence of their suppliers, particularly in challenging contexts where partners may lack capacity to monitor compliance of their own suppliers.
- We also **monitor** our funded projects and provide **feedback** to partners where issues are noted for future follow-up as agreed within the Partnership Agreement. We provide support to partners, where necessary, including guidance on meeting donor compliance requirements.
- Finally, we require partners working in the development and humanitarian area to agree to the **Core Humanitarian Standards (CHS)** which include fair and equitable treatment of staff in humanitarian situations and focus on accountability to the people we serve.

Developing a three-year action plan

Anti-Slavery International review

In 2023, we commissioned Anti-Slavery International to review how Christian Aid is currently addressing modern slavery risk and to make recommendations for strengthening how we identify and manage this risk in our operations and programmes. Anti-Slavery International carried out a high-level assessment of our governance structure for managing modern slavery risk, the contexts in which there is an increased risk of modern slavery and the current degree of understanding of modern slavery within Christian Aid. Anti-Slavery International's assessment included a review of our policy framework, interviews with key Christian Aid staff and some desk-based country level risk assessments. While our

decision to stop direct implementation decreases the risk of modern slavery in Christian Aid's operations, it is recognised that we need to work more effectively with our partners on this issue as well as strengthening our approach internally.

Modern Slavery Approach

Anti-Slavery International made a number of helpful recommendations and suggestions which have assisted in shaping our modern slavery strategy moving forward. We have considered these recommendations and internal priorities to shape our three-year plan. Some of these key areas which we are looking to address include:

- 1) Developing a specific **modern slavery policy** intended to be an overarching policy that draws together the commitments around modern slavery contained in our other policies.
- 2) Improving **transparency** and **communications** around our work to address modern slavery, including aligning our anti-modern slavery approach to our anti-poverty strategy.
- 3) Increasing **partner awareness** in our engagement with our partners, to include providing training and encouraging reporting of modern slavery.
- 4) Conducting a **further in-depth assessment** to identify more specifically which operations and programmes have a higher risk of modern slavery so that key indicators of modern slavery can be fully recognised and acted upon across our operations.
- 5) **Partnering with organisations** who work on labour rights or modern slavery, ideally in country, to provide a more nuanced understanding of workers' rights, specific risks and how to mitigate these in country.
- 6) Improving **due diligence** processes to flag suppliers that are high risk for modern slavery based on both on sector and country.
- 7) Developing **context specific guidance notes** through consultation to include local staff so that both international and local norms are reflected.
- 8) Reviewing **grievance mechanisms** to assess whether these are suitable mechanisms for the reporting of modern slavery, involving key stakeholders in the process, and recognising that the absence of reported incidents may be a reflection of the current reporting mechanisms.
- 9) Providing **staff training** on modern slavery to Christian Aid teams which reflects the specific role and contexts of staff members.
- 10) Developing a **global procurement management system** which monitors the ethical standards of global procurement in country programs and increases the visibility of supplier risk globally.

Year 1 commitments

Some of the above areas of focus are interlinked and should be progressed concurrently, while others are more sequential. In considering how to approach the above, we decided to prioritise the following measures over the first year:

- a) Drafting a Modern Slavery and Human Trafficking Policy
- b) Increasing partner awareness and ongoing engagement around modern slavery
- c) Conducting a further assessment of risk in our programmes
- d) Partnering with key organisations on the ground who work in these higher risk sectors and regions (as required/appropriate)
- e) Developing ongoing risk assessment criteria for procurement based on sector and country

Year 2 and 3 commitments

The steps outlined at (c) to (e) above are interlinked and we believe that these steps should be our primary focus in strengthening our approach to modern slavery. The outcome of these steps will help to inform which commitments we should prioritise in years 2 and 3. Following Anti-Slavery International's review we anticipate focusing on developing our due diligence processes, drafting guidance notes, training staff and partners and also reviewing our grievance and reporting mechanisms. While we agree that there is a clear benefit to having a global procurement system, this recommendation is dependent on our resources and other priorities.

Progress in 2022/23

As noted above, working with Anti-Slavery International was a key focus of our work during 2022/23 and their recommendations provide a helpful framework for our work going forwards. Some of the recommendations reflect some of the work in progress around developing risk assessments which we committed to in last year's statement.

During 2022/23 we also made progress around some of the commitments outlined in our 2021/22 statement. We amended our Internal Control Self-Assessment (ICSA) questionnaire to refer explicitly to the risk of modern slavery in our operations. The ICSA is an online assurance tool developed by Christian Aid and completed annually by delivery teams overseas, in the UK and Ireland to self-assess against all Christian Aid's policy commitments. Where teams are partially or non-compliant with any policy, the online assessment tool prompts the team to develop and complete action plans to increase their compliance to the required level. The ICSA is used as a basis for independent internal audit for further checking and evidence-based verification.

We have also recently reviewed our safeguarding eLearning module and strengthened the sections relating to modern slavery, reflecting the connections between these two topics. The revised module will go live by the end of September 2023. We will also be reviewing our modern slavery eLearning module over the coming months and making any further updates or changes as required.

Incidents

We have had no reports of modern slavery in our supply chains or operations in 2022/23.

Review and approval

This statement has been approved by the board of directors for Christian Aid and also on behalf of all of the connected and subsidiary entities forming part of the Christian Aid group:



Signed by Maggie Swinson, Interim Chair of the Christian Aid Board of Trustees and on behalf of Christian Aid Ireland.

Date: 27 September 2023