

Christian Aid Statement on Modern Slavery Act

November 2018



Christian Aid is a Christian organisation that insists the world can and must be swiftly changed to one where everyone can live a full life, free from poverty.

We work globally for profound change that eradicates the causes of poverty, striving to achieve equality, dignity and freedom for all, regardless of faith or nationality. We are part of a wider movement for social justice.

We provide urgent, practical and effective assistance where need is great, tackling the effects of poverty as well as its root causes.

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Cover: Cover photo: 'Garimpos' in Brazil are small-scale mines operated by individuals and worked by hand, rather than by large operators with technology and machinery. When large mining companies open gold or bauxite mine, a 'mining code' allows land the the company cannot exploit to be given over to 'garimpeiros'. These small-scale miners sift through piles of spoil for resources that are uneconomical for the mining company to collect. The legality of these zones is vague, labour practices are questionable and safety regulations are non-existent.

Photograph: Christian Aid

List of acronyms

ACT	Action by Churches Together
CA	Christian Aid
CCPAS	Churches Child Protection Advisory Service
CHS	Core Humanitarian Standards
CORE	Corporate Responsibility Coalition
HAP	Humanitarian Accountability Partnership
HQAI	Humanitarian Quality Assurance Initiative
POCRA	Partner Operational Capacity and Risk Assessment

Foreword

Dr. Rowan Williams, Chair of the Christian Aid Board of Trustees

In the year to March 2017, over 2,000 modern slavery crimes were recorded in the UK alone. The problem is much greater in developing countries, where many similar or worse crimes of modern slavery go unrecorded. The most recent estimates suggest that almost 25 million people are living in conditions of forced labour, working under threat or coercion.

Christian Aid's tireless mission to end poverty, throughout the world, is linked to the challenge of ending all forms of modern-day slavery. This is essential so that everyone can live a full life, free from poverty. And while Christian Aid provides assistance, engages in long-term development work, and advocates for changes in policies, we must also look at what we can do in our own supply chains to eradicate any possibility of modern slavery.

Over the past financial year, we have revisited our own procurement policies and practices, developed methods of due diligence to deal with potential risk of modern slavery in our partnerships and supply chain. We have also raised awareness and trained UK business on the issue of modern slavery, and created a staff portal for procurement policies and guidelines. There is still more to do, especially in terms of building best practice, staff training on the new policies and practices, further raising awareness and assessing risk more carefully.

This is the second time we have issued a Modern Slavery Statement. We have reviewed progress from our first statement in 2017-18, and set new targets and commitments for 2018-19 onwards. In particular, we look ahead to integrating the fight against modern slavery within a wider methodology of partner risk assessment and a human rights-focused supply chain.

This statement has been approved by the boards of directors of Christian Aid and the other entities below, and is authorised to be signed on behalf of each of them by:



Signed by Dr Rowan Williams, Chair of the Christian Aid Board of Trustees for itself and on behalf of: Christian Aid Ireland Limited (Northern Ireland), Christian Aid Ireland Ltd (Republic of Ireland), Christian Aid International (Spain), The British and Irish Churches Trust Ltd, Christian Aid Trading Ltd, and Change Alliance (India)

Date: 20 November 2018

Executive summary

Forced labour, debt bondage and human trafficking exploit people's powerlessness; by definition, vulnerable people are most at risk. Of the estimated 16 million people in forced labour in the private economy in 2016, the majority were women (57.6%) who were affected by privately imposed forced labour.¹ Around 18 per cent of those subject to forced labour exploitation were children. There are no reliable statistics on how forced labour affects ethnic minorities, minority religious groups or indigenous populations; however, there are indications that these groups are at greater risk.

Economic hardship is a major driver of modern slavery. Half of these men and women (51%) were in debt bondage, in which personal debt is used to forcibly obtain labour. This rises to over 70% for adults forced to work in agriculture, domestic service or manufacturing.

To tackle the root causes of modern slavery, therefore, is to tackle the root causes of economic and social inequality. This is something Christian Aid has done for many years, raising awareness and campaigning on issues - such as debt, trade and tax injustices - that are at the root of poverty and inequality.

We have also addressed issues linked to migration and refugees, the status of indigenous populations and gender equality, addressing harmful social norms that set back entire populations. Our work on the rights of Dalits in India has shown that they are particularly vulnerable to harmful labour practices and modern slavery – also linked to debt bondage² and forced labour³. We have partnered with organisations such as the Dalit Solidarity Network in the UK and the Asia Dalit Rights Forum to advocate for greater allocation of India's budget to Dalit groups, while highlighting supply chain malpractices in the UK that may perpetuate modern slavery.

Christian Aid has worked to promote inclusive development strategies in the Amazon region. We support Bolivia's indigenous people in local agriculture value chains, while in Brazil our partner Comissão Pró-Índio (Pro-Indigenous Commission) has been crucial in helping the community fight off threats, providing advice, legal skills and experience to the Afro-descendent Quilombolas. These communities see themselves as the guardians of a shared and common land. However, they continue to face threats, including eviction for road and dam building, and poor labour conditions in illicit logging, mining and fishing operations.

This statement outlines our continued work in our own supply chains, rooted in our programmatic and policy experience of these issues. The structure of the statement relating to our own operations follows the recommendations from the UK Modern Slavery Act, both in structure (Section 54, subsection 5), and responsibility for implementing the statement (subsection 6). In each substantive section of the statement, we include a final section which presents our own risk assessment and further commitments on which we will report in next year's financial statement.

Christian Aid, its operations and current work on modern slavery

Christian Aid is a charity headquartered in the UK which has offices in 37 countries in Asia, the Middle East, Latin America, the Caribbean and Africa. It works on both long-term development work and humanitarian response. A description of Christian Aid's corporate group structure and subsidiary undertakings where our work takes place is included in our Annual Accounts for 2017/18.⁴ This statement covers all of these entities. In 2017/18 we worked with 495 partners in 37 countries on long-term development issues. We have delivered 150 humanitarian projects in 26 countries in the financial year 2017/18, reaching an estimated 1 million people in need.⁵

In 2017/18 Christian Aid's total income was £117.9 million, composed primarily of institutional grants (56%) (eg, from the UN World Food Programme and the European Commission); donations (46%) including individual giving and legacies; and institutional contracts (4%). Our subsidiary, Christian Aid Trading Limited, is a trading for-profit company that pursues commercial fundraising opportunities in Britain and Ireland, and donates its profit to the charity.

Outside the UK and Ireland, Christian Aid has offices which work both through direct delivery and through local partner organisations. Grants to local partners accounted for 42% of Christian Aid's total expenditure. Therefore, as part of this statement, we examine our relationships with partners whose work we finance, as well as our own operations and supply and distribution chains.

Christian Aid's expenditure reflects our charitable mission as we continue campaigning, advocacy and education work to achieve long-term benefits for the communities with which we are involved. Fundraising costs in 2017/18 amounted to 14% of total expenditure (£15.3 million), while the remaining 86% (£95.8 million) was spent on charitable activities.

We are proud to work with a wide variety of partners, including those who responded to Typhoon Haiyan in the Philippines and the emerging food crises in Ethiopia, Malawi and Nigeria. Our humanitarian programme in northeast Nigeria, for internally displaced people fleeing the conflict caused by Boko Haram, has been supported by the UN World Food Programme and ICCO, a Dutch NGO. To date, it has reached 109,000 people with food aid, essential household items, and water and sanitation.

Our long-term development work includes supporting farmer-led enterprises and supply chains, promoting gender equality by improving the rights of women to health and education, and advocacy that promotes people's rights and access to health services.

In doing so, we seek to link this work to financing from both public and private sources. Grants are made within our agreed strategies, and grants for development programmes tend to be given on a three-year basis. Our partners' own policies and processes are used to monitor grants, while Christian Aid has oversight over key risk areas it has

Case study

Dalit rights in India

In India, people from marginalised communities (Dalit, Adivasi, religious or ethnic minorities) have limited bargaining power and very low incomes. This leaves them vulnerable to exploitation by middlemen or traders who force them into 'distress sales' of produce. This is exacerbated by a lack of supportive institutional structures, economies of scale, opportunities to improve marketing and productivity capacities, quality standards or in-situ value addition.

Common factors leading to bonded labour include high-interest loans to cover health, marriage or migration costs. A lack of access to finance leads to use of money lenders – often the borrower's employer, who then demands repayment through labour.

Farmers working on cash crops such as coffee and cotton, and workers in industries such as brick-making or textiles and clothing, are among the most exposed to the risk of exploitative practices. 70% of Indian farmers have monthly incomes that are not enough for their household expenditure, pushing them into debt and raising the risk of modern slavery.

One way of reducing the risk is Christian Aid's Inclusive Markets programmes. We work with gatherers of honey and other forest produce in Rajasthan and organic turmeric producers in Odisha to promote their successful inclusion in mainstream value chains. It has helped them to develop market linkages, reduce their vulnerability and enhance their productivity. The establishment of producer organisations linked to 'common interest groups' (collectors, manufacturers and marketing intermediaries) aims to increase their bargaining power and achieve economies of scale, helping to reverse age-old power structures.

identified, including anti-corruption issues. All projects are systematically monitored throughout, according to Christian Aid's partner financial monitoring frameworks, and all partners are assessed through our Partner Organisational Capacity Risk Assessment (POCRA).

As a founding member of the Ethical Trading Initiative and a member of the Corporate Responsibility Coalition, we have supported their implementation of the Modern Slavery Act.⁶ In 2017/18 we worked with the Christian Aid SALT Business Network to raise awareness about the risk of modern slavery through a business workshop, and a public event was organised with the London Institute for Contemporary Christianity on 21 June 2017; two speakers from SALT addressed an audience of approximately 60, along with other expert and executive-level speakers. The theme of progress towards tackling modern slavery was revisited during the SALT Network Annual Conference on 16 October 2017, where further members of the network shared their pledges and experiences in tackling the issue within their business and supply chains.

In the sections below, we summarise the steps that Christian Aid has taken since our statement in August 2017 to work on preventing slavery and human trafficking in our activities and supply chains, and the commitments we are making for 2018/19.

Policies in relation to slavery and human trafficking

This section outlines our existing policies that relate to slavery and human trafficking, in respect of our staff, partners and supply and distribution chains.

Upon starting at Christian Aid, all staff are required to read, and undergo training on, our policies to safeguard against any breach of conduct. Staff members must sign the Christian Aid Staff Code of Conduct⁷ to show their awareness of the requirements. The code includes a commitment, among other things, to ensure the safety, health and welfare of all Christian Aid employees, volunteers and contractors. Additionally, the Guidance on Whistleblowing applies to all staff, consultants, contractors or suppliers of services to Christian Aid.⁸

Supply chain management is covered in our Procurement Policy and Procedure, which is being refreshed and is due to be relaunched by the end of 2018. This applies to all expenditure on goods and services purchased directly by the organisation, regardless of the cost of such goods or services. The policy promotes ethical and sustainable procurement processes. It includes a Code of Conduct for Suppliers which (in addition to the more detailed terms and conditions in the supplier contract itself) requires that we look to work in partnership with suppliers according to our Ethical Standards to ensure that:

- employment is freely chosen
- freedom of association and the right to collective bargaining are respected
- working conditions are safe and hygienic

- no exploitation of children takes place
- living wages are paid
- working hours are not excessive
- no discrimination is practised
- regular employment is provided
- no harsh or inhumane treatment is allowed
- safeguards are sought to end the use of conflict minerals (Kimberley Process/EU Regulation)
- safeguards are in place to protect against human trafficking.

Specifically, we will not enter into any procurement relationship with companies that:

- have significant involvement in the arms trade
- extract harsh and inequitable debt payments from developing countries
- inhibit access to affordable medicine according to the World Health Organization Model Lists of Essential Medicines
- participate in tobacco marketing in developing countries
- have significant involvement in the alcohol industry
- have significant involvement in gambling
- have significant involvement in pornography
- are involved in terrorism.

We reviewed the following policies during the year to include issues relating to modern slavery, as reflected above:

- Supplier Code of Conduct
- Procurement Policy and Procedure

This update will be launched at the end of 2018. It identifies new areas of risk, including all offences linked to modern slavery, and areas that are relevant to Christian Aid's policies and practices.

All procurement decisions valued at £50,000 or over require approval from the Contracts & Procurement team at Christian Aid's head office, who will manage or oversee the selection process. Smaller procurements and supplier relationships may be approved by local teams in accordance with delegated authorities.

In July 2018 Christian Aid agreed a new Safeguarding Policy (previously the Child Protection Policy), which looks to protect children and adults at risk. This includes people who may be suffering from physical and emotional abuse and neglect, which could be as a result of trafficking or child labour – key crimes under the definition of modern slavery. A new role of safeguarding manager was established, reporting to Internal Audit, while the Audit & Risk Committee monitors safeguarding actions and reported cases; the committee has set up dedicated email addresses for safeguarding and whistleblowing (safeguarding@christian-aid.org; and whistleblowing@christian-aid.org). A Safeguarding Governance Group has been set up.

We work with thirtyone:eight (formerly CCPAS - the Churches Child Protection Advisory Service). Thirtyone:eight is an independent Christian charity providing professional advice, training, support and

resources in all areas of safeguarding children and adults at risk of harm. It works with churches and other organisations across the Christian spectrum and advises other faith groups including a variety of statutory and third-sector organisations. For Christian Aid, the charity provides a core safeguarding support service, which includes a 24-hour helpline, with additional elements on a consultancy basis.

In addition to the Safeguarding Policy, we identified the following policies for review, with the highlighted ones taking priority:

- **Recruitment policy**
- Social media policy
- **Whistleblowing policy**
- Communications guidelines
- Anti-bullying policy
- **Code of Conduct**
- Fundraising/collectors guidelines.

The review process has already started, with the recruitment policy being approved in October 2018. The full list of Christian Aid policies that relate to safeguarding against modern slavery is below. All the following policies are available on the Christian Aid intranet for staff; some are also available externally to other stakeholders.

- Christian Aid Staff Code of Conduct⁹
- Recruitment & Selection Policy and Procedure
- Recruitment Information for Candidates (UK and Ireland)¹⁰
- Guidance on Whistleblowing¹¹
- Fraud and Compliance Policy
- Child Protection Policy¹²
- Open Information Policy¹³
- Grievance Policy and Procedure – including staff complaints policy and procedures
- Employee Relations guidelines – dealing with problems policy
- Serious Incident Reporting Policy
- Safeguarding Policy¹⁴
- Bullying and Harassment Policy and Procedure
- Diversity and Inclusion Policy, including additional diversity and inclusion-related policies on the national level
- ACT Alliance Code of Conduct for the prevention of sexual exploitation and abuse, fraud and corruption and abuse of power - for all staff of ACT Alliance members and the ACT Alliance Secretariat
- Anti-Diversion and Abuse, Misuse of Funds, Anti-Bribery and Anti-Money Laundering policies
- Procurement Policy and Procedure
- Code of Conduct for Suppliers
- Core Humanitarian Standard (CHS)
- Partner Financial Monitoring Policy
- Volunteering Policy
- Christian Aid Standard Supplier Terms & Conditions – used for all significant UK spend

In our humanitarian work, we joined the Humanitarian Accountability Partnership (HAP) in 2006 and have been regularly audited to ensure that we maintain their standards. In 2015, HAP merged with People in Aid and evolved to become the Core Humanitarian Standard (CHS).

The Volunteering Policy recognises that volunteers contribute a huge amount of energy, enthusiasm, skills and commitment to our work, and we aim to include a wide diversity of volunteers. In addition to the thousands of people who raise funds for Christian Aid in their churches and local communities, we also benefit from the contribution of a team of specialist volunteers. In 2017/18, a total of 425 people in the UK offered their time and skills in roles such as speaking, teaching, administration and fundraising, contributing around 10,000 hours of their time. Christian Aid will not introduce volunteers to replace paid staff.

Central procurement can provide guidance and oversight to partner procurement, and encourage structured procurement plans. A significant amount of international procurement is conducted by partners. A £50,000 threshold applies to procurement by partners commissioned by Christian Aid. Many partner procurements are below this threshold and are managed locally, with oversight from the Christian Aid country office. In addition, we comply with institutional donor procurement rules, as these may provide more specific or detailed requirements than our policy. Our Procurement Policy is shared with partner organisations to guide their procurement decisions.

Due diligence processes in its activities and supply chains relevant to modern slavery

Managing risk effectively is integral to the achievement of our essential purpose: eradicating the causes of poverty, and striving to achieve equality, dignity and freedom for all, regardless of faith or nationality. Governance structures are in place to ensure the early identification and management of key risks and support the delivery of our strategy. The board of trustees is ultimately responsible for risk management and the effectiveness of Christian Aid's internal control systems. The board has considered and approved the risk management policy and risk appetite. Our Audit and Risk Committee carries out a regular and in-depth review of the risk management process. We 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.

One area of risk is that Christian Aid works with and through independent partners. In most cases, Christian Aid delivers its programme via local partners rather than directly to beneficiaries, communities and actors. We believe this is the most effective way to reduce poverty, as independent partners are rooted in local communities. However, it is not without risk, including modern slavery risk, as partners may lack capacity to monitor compliance of their own suppliers, especially in challenging contexts. Partner policies, processes and practices are critical to understanding the impact and risks associated with Christian Aid's impact.

We therefore conduct ongoing monitoring of partners. The Christian Aid Partner Financial Monitoring Policy (updated in June 2016) requires country programmes to carry out periodic Partner Operational Capacity Risk Assessments (POCRAs). The frequency of this assessment depends on the circumstances of the partner and the nature of the partnership. It is undertaken at the start of a new funded relationship and at least once every three years thereafter. It is also undertaken in response to significant events, including:

- major staff changes (e.g. a change of director)
- the rapid onset of an emergency situation in the country
- before inclusion of the partner in a project involving a large scale-up of activities
- when funding with a complex donor requires a specific reporting system to be put in place.

The assessment includes:

- a review of the partner's mission statements, strategy documents, code of ethics and working environment
- observation during visits and meetings
- desk review of documents
- interviews with staff.

This provides assurance that the partner's values and behaviours match Christian Aid's.

We additionally monitor our funded projects and provide feedback to partners where issues are noted for future follow-up as agreed within the partnership agreement. We support partners, where necessary, in building their capacity, including donor compliance requirements. Our Partnership Agreement requires partners to have codes of conduct which, like ours, provide that:

- staff must [...] ensure, where possible, that goods and services purchased are produced and delivered under conditions that do not involve the abuse or exploitation of any persons and have the least negative impact on the environment. (page 6)
- staff must never [...] Use illegal labour, child labour or forced labour. (page 7)

In 2017/18 we committed to including practices covered in the Modern Slavery Act in our policy covering periodic partner financial monitoring and in the risk matrix of the POCRA by using existing systems of risk assessment and mitigation. We have also updated our supplier standard terms and conditions to include modern slavery. The assessment showed that modern slavery risk can be assessed under a number of items, including:

- the partner's values and behaviours, providing indirect assurance regarding modern slavery

- the partner's procurement policies, by ensuring a compatible policy
- accountability and protection - partners must have compliant grievance, whistleblowing and other policies that protect against abuses of power that may include modern slavery
- policies that relate to gender, power and inclusion where assurances are made regarding the safeguarding policies of the partner organisation in these areas.

Based on the risk assessment, partners are given guidance on better aligning their policies and values with those of Christian Aid.

Finally, our partner agreement requires partners to have an internal staff code of conduct and to work to the Core Humanitarian Standards, which together include provisions on:

- anti-fraud and anti-corruption practice
- prevention of abuse of power, not exploiting and abusing people, including sexual exploitation and abuse
- the avoidance of unethical business practices.

The CHS requires organisations to identify and act upon potential or actual unintended negative effects in a timely and systematic manner, including in the areas of:

- people's safety, security, dignity and rights
- sexual exploitation and abuse by staff
- culture, gender, and social and political relationships
- livelihoods
- the local economy
- the environment.

Based on this assessment, we consider that our Partnership Agreement covers the risk of modern slavery in terms of protection against illegal labour, child labour and forced labour – which are the key infringements concerning modern slavery. It does not explicitly include human trafficking, which is instead covered by the more general statement concerning “abuse or exploitation of any persons”, allowing for any staff, partners or members of the public to raise a concern over abuses linked to any aspect of modern slavery.

Addressing the risk of slavery and human trafficking

Protecting vulnerable people and beneficiaries is at the heart of Christian Aid's work. Christian Aid's Staff Code of Conduct requires staff to commit from the outset to safeguarding vulnerable people and reporting abuse. The staff-only intranet system is available for

reporting both security and health and safety incidents. Incidents are investigated and, if appropriate, lessons are learned for the future.

In 2017/18 we committed to ensuring that our policies are up to date in relation to our supply chain management and our partner management. Where a risk is identified, we will put correspondingly greater emphasis on due diligence and risk mitigation.

This approach is already in line with our existing commitments under the Core Humanitarian Principles, where our humanitarian interventions are certified by the Humanitarian Quality Assurance Initiative against compliance with the CHS, which includes fair and equitable treatment of staff in humanitarian situations and focus on accountability to beneficiaries and grievance mechanisms.

In terms of our employment practices and human resources, we are accredited as a UK living wage employer by the Living Wage Foundation. We are committed to seeing that everyone working at Christian Aid's UK offices receives a minimum hourly wage that is significantly higher than the national minimum wage.

Training and capacity building

Christian Aid's rigorous recruitment and selection guidelines are clear about the safeguards that managers and persons involved in recruitment need to be aware of. This covers a number of areas, including child protection, safeguarding and crimes related to modern slavery. The ways in which risk is mitigated include referencing, checking right to work, safeguarding against child abuse and ensuring equal opportunities for everyone.

Staff are trained at different points in the CA career, and reflecting the needs of their role. This begins with their induction, which has mandatory modules on:

- Anti-bribery
- Code of conduct
- Data protection
- Finance
- Gender
- Health and safety
- Risk management

Modern slavery is mostly covered in the code of conduct training. After induction, a number of role-specific training elements relate to procurement, and security issues that reflect specific risks in certain roles within Christian Aid. Further modules also look more deeply into Christian Aid's values and strategy; links are made to modern slavery issues where relevant.

This induction process is being reviewed in 2018/19. Induction materials will be developed so that all relevant staff know how to use the updated procurement policy and practice, and so that key elements of new guidelines are mainstreamed for all staff.

We commit to providing training to appropriate staff during 2018/19 on procurement policy and practices, including the updated supplier code of conduct section concerning issues related to modern slavery.

Endnotes

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