

Christian Aid Statement on Modern Slavery Act

November 2019



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: The people of Nepal who previously lived under the Kamaiya system of bonded labour (a type of modern slavery) have been subjected to inequalities and stigma for a long time. This has not only curtailed their rights and mobility to resources, but also deprived them of a voice in the decision-making process in society. In order to strengthen their livelihood opportunities and empower them, Christian Aid is in partnership with Backward Society Education (BASE). BASE has provided 169 households with livestock support to people previously living under the Kamaiya system in Gulariya, Bardiya. Goats and pigs were distributed to the former Kamaiyas to start their own livelihood enterprise. They were also provided with training on cattle rearing, business development and financial management. This approach has helped them to develop both practical and business skills according to Amit Chakraborty, MEAL officer at Christian Aid. As a result, the former Kamaiyas have now started their own savings group, where they take turns to provide interest-free loans to those in need. The livestock was distributed through a participatory needs-based assessment to ensure meaningful support to the target beneficiaries. This in turn has also helped to foster ownership and economic empowerment to break the chains of modern slavery and enable participants to live with dignity. Words: Ayush Joshi and Amit Chakarwarty, October 2, 2019, Christian Aid Nepal.

Photographs: Ayush Josh / Christian Aid

List of Acronyms

ACT	Action by Churches Together
CA	Christian Aid
CHS	Core Humanitarian Standard on Quality and Accountability
CoC	Code of Conduct
CORE	Corporate Responsibility Coalition
ETI	Ethical Trading Initiative
FY	Financial Year
G20	Group of 20
HAP	Humanitarian Accountability Partnership
HQAI	Humanitarian Quality Assurance Initiative
ILO	International Labour Organisation
POCRA	Partner Operational Capacity and Risk Assessment
SSC	Safeguarding Steering Committee
TNC	Transnational Corporation
UNGP	United Nations Guiding Principles on Business and Human Rights

Foreword

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

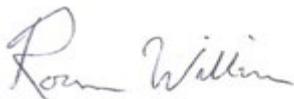
Modern Slavery exists due to systematic marginalisation. Marginalised groups of people are forced into labour and servitude where they are exploited for the purpose of producing goods and services as part of global supply chains. Christian Aid recognises that poverty and marginalisation cannot be eradicated without tackling imbalances of power and having a prophetic voice in order to stand together with those who are the most vulnerable to the abuses of modern slavery.

This year, Christian Aid focused on the gendered impacts of private sector actors working in global supply chains. In particular, we looked at how business practices have a greater negative impact on women and girls. As a result, Christian Aid has started to work towards a United Nations binding treaty on business and human rights concerning the responsibility of Transnational Corporations (TNCs) with our partners who have identified especially gendered human rights impacts.

Over the past financial year, Christian Aid trained all staff to raise awareness about modern slavery across the world. The training has highlighted how our policies and practices can help to reduce the risk of modern slavery in supply chains by focusing on procurement, human resources and partnership management. There is still more to do, especially in terms of building best practice and doing more rigorous risk assessments.

This is the third Modern Slavery Statement produced by Christian Aid. As with the previous two statements, we are outlining how our own labour practices and supply chains align with the 2015 UK Modern Slavery Act. We purchase goods and services as part of both our humanitarian work as well as our longer-term development work. In this Statement, we review the progress from our first statement made in 2017. We also look at setting new targets and commitments for this financial year especially in terms of doing risk assessments of our supply chains, and then integrating the results further into our practices.

This statement has been approved by the boards of directors of Christian Aid and the other entities named 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: 27th November 2019

Executive summary

This statement outlines our continued work in our own supply chains, rooted in our programmatic and policy experience surrounding these issues. The structure of the statement relating to our own operations follows the recommendation from the UK Modern Slavery Act both in terms of 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 concerning our own risk assessment and further commitments which we will report on in next year's statement.

Modern slavery is one of the most heinous crimes of our time, as an estimated 40 million people are trapped in various forms of slavery, including forced labour, debt bondage and human trafficking. Estimates show that 71% of victims of modern slavery are women.

“More precisely, women and girls represent 99 per cent of victims of forced labour in the commercial sex industry and 58 per cent in other sectors, 40 per cent of victims of forced labour imposed by state authorities, and 84 per cent of victims of forced marriages.”¹

Modern slavery is, therefore, gendered and so responses to the problem should adopt an explicit gender lens. In the recent report 'Engendering Business and Human Rights', Christian Aid argued that there should be specific gender guidance for doing risk assessments and due diligence, because our greatest concerns are about the impact of transnational corporations (TNCs) on the lives of women. In addition, we support also a binding treaty on the responsibility of TNCs for human rights abuses to ensure effective access to remedy as a core principle of human rights due diligence.

The negative impact of business activities on women's human rights - and the need for a specific gender lens of analysis - is increasingly recognised and understood. Calls for such an analysis gathered strength after the 2013 Rana Plaza disaster in Bangladesh, one of the largest industrial accidents in history. The disaster led to the deaths of 1,134 workers, most of whom were young women, and a further 2,500 workers were injured.

The gender components of other human rights abuses are equally striking. In 2016, at Marikana in South Africa, 34 striking workers from the Lonmin mining company were shot dead by the police. Those deaths had a wider dimension beyond the immediate personal tragedy. Joseph Mathunjwa, the president of the Association of Mineworkers and Construction Union, states that:

‘one salary in the mining sector actually represents between five and 10 livelihoods of spouses and family members dependent on said salary.’

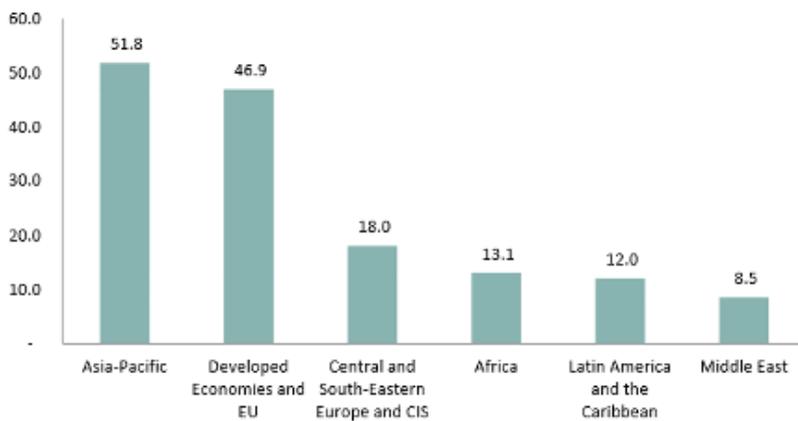
When we confront some of the human rights abuses by TNCs, or other business entities, it is important to understand all of the dimensions of the gendered impact concerning businesses and their human rights impacts. The gendered impact is defined by the UN Working Group on Business and Human Rights as:

- sexual harassment and sexual violence against women
- gender-sensitive human rights due diligence

- economic inclusion and empowerment of women
- impact of trade, investment and tax regimes on women
- women's experiences of accessing effective remedies and defending rights.²

While modern slavery is most prevalent in parts of the developing world, the profits arising from modern slavery are increasingly pocketed by actors in the developed world who employ persons trapped in modern slavery in supply chains. The ILO estimated that, while Asia-Pacific as a region led in terms of the profits generated from Modern Slavery, the high prevalence of slavery and servitude in both EU and other developed countries came second in terms of the economic gain³.

Figure 1: Forced labour generates annual profits of \$150bn



Source: ILO 2014

However, even though the activities generating profits from modern slavery are mostly located in developing countries in the global South, if we take a supply chain perspective we find that most of the products derived from modern slavery are consumed in developed nations in the global North. According to the Global Slavery Index 2018 Report, a total of \$354bn worth of goods imported to G20 countries were at risk of modern slavery, with the top five product lines at risk being laptops (\$200bn), garments (\$127.7bn), fish (\$12.9bn), cocoa (\$3.6bn) and sugarcane (\$2.1bn). As an example, the combined import risk to the UK is estimated at \$18bn from these five product categories alone.

Within the UK, the most recent estimate by UK government in 2017 indicated that there were 5,143 potential victims referred through the national reporting mechanism (NRM) (a 35% increase from 2016), of whom 41% (2,121) were children. In addition, specified public bodies have a duty to notify the Government if they encounter an adult victim of modern slavery. In 2017, 1,694 potential adult victims were referred under the duty to notify, bringing the total number of potential victims identified in 2017 to 6,837.⁴ In terms of our UK operations, we should be careful to track high-risk segments of the UK economy, especially the food and agriculture sector where domestic modern slavery commonly takes place. Unfortunately, 50% of UK food and agriculture sector enterprises had still not published their reports on modern slavery as of August 2018⁵.

Christian Aid, its operations and current work on modern slavery

Christian Aid is a charity headquartered in the UK which has offices in 39 countries in Asia, the Middle East, Latin America, the Caribbean and Africa which work 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 2018/19⁶. This statement covers all of these entities. In 2018/19, we worked with 576 partners in 37 countries on long-term development issues. We have delivered 100 humanitarian projects in over 20 countries in the financial year 2018/19, reaching an estimated 1.7 million people affected by disasters⁷.

In 2018/19, Christian Aid's total income was £120.4 million, composed primarily of donations (£49.7 million) e.g. individual giving, legacies; institutional grants (£62.0 million) e.g. from the UK Department for International Development. 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 of the UK and Ireland, Christian Aid has offices which work mainly through local partner organisations who implement work on the ground. Grants to local partners accounted for almost £45.7 million 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 examining our own operations, supply chains and distribution chains.

In our long-term development work, we work in areas such as supporting farmer-led enterprises and supply-chains. Our work focuses on gender equality by improving the rights of women to health and education. It also promotes advocacy to create universal health systems, linking this to financing from both public and private sources of investment and expenditure.

Grants are made within the agreed strategies of Christian Aid. Grants for development programmes tend to be made on a one-year basis with regards to core funding, but often form part of multi-year partnership agreements which usually covers a three-year period. Institutional funding may vary from this as it is aligned with institutional funding agreements, but again a funding and reporting agreement will only be made on a one-year basis even in the framework of a multi-year institutional project. Partners' own policies and processes are used to monitor grants, while Christian Aid has oversight over key risk areas identified including anti-corruption issues. All projects are systematically monitored for the duration of their existence according to Christian Aid's partner financial monitoring frameworks. All partners are assessed through our Partner Organisational Capacity Risk Assessment (POCRA).

As a founding member of the Ethical Trading Initiative (ETI) and a member of the Corporate Responsibility Coalition (CORE), we have

Working with former bonded labourers in Nepal

Kamaiya is a form of modern slavery that has existed in the far and mid-western part of Nepal. Kamaiyas were freed from the slavery to which they had been subjected to for decades in 2000 following a government decision. The government freed them but did not provide them with land and or means of financial support. Exploitative labour practices have therefore continued in many cases. The Kamaiyas mostly work as agricultural labourers, but also in brick kilns, embroidery workshops, tea shops and small restaurants.

Kamaiya Pratha Unmulan Samaj (KPUS), a local partner of CA Nepal, conducted 5 day REFLECT training to the social mobilisers and staff of the organisation. The staff and board members of KPUS (8 female and 6 male) participated in the training. The major thrust of the Programme was to equip local mobilisers to mobilise community members to raise their voices and issues collectively through REFLECT sessions.

Through the training community members, especially women, will be identifying the key issues that lead to discrimination. They will also be developing a collective action plan for advocacy to achieve change, to include reducing gender-based violence and empowering women in the community.

The community facilitator will form beneficiary groups in the community and develop an action plan for the desired change. Through their activities, the voice of marginalised sections of society will be collectively raised. The REFLECT process empowers ex-bonded labourers to advocate and lobby for their own rights, as well as those of the whole community. This process facilitates the well off and the poorest to support and understand each other's problems and issues.

supported their implementation of the Modern Slavery Act,⁸ including upgrading the Modern Slavery Act to also involve public bodies.

In the sections below, we summarise the steps that Christian Aid has taken since the last statement in November 2018 to work on preventing slavery and human trafficking in our activities and supply chains and the commitments that we make for 2019/20.

Policies in relation to slavery and human trafficking

This section outlines our existing policies which relate to slavery and human trafficking, both in respect to our staff, our partners, our supply chains 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 have to sign the Christian Aid Staff Code of Conduct⁹ to show their awareness of the requirements. The Staff Code of Conduct includes a commitment, amongst other things, to ensure the safety, health and welfare of all Christian Aid employees, volunteers and contractors. Additionally, the Guidance on Whistleblowing also applies to all staff, consultants, contractors or suppliers of services to Christian Aid¹⁰.

Supply chain management is covered in our Procurement Policy and Procedure, which was updated in December 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 and includes a Code of Conduct for Suppliers.

Under our Code of Conduct for Suppliers, we look to work in partnership with suppliers to ensure that:

- Employment is freely chosen
- Freedom of association and the right to collective bargaining are respected
- Working conditions are safe and hygienic
- Children are not exploited
- 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 in place to protect against human trafficking

As part of this update new areas of risk have been identified, including all offences linked to modern slavery.

All procurement decisions valued at £50,000 or over, require approval from the Contracts & Procurement team at Christian Aid's head office, who oversee and approve the supplier selection process. Most

international procurement is conducted by our partners. A £50,000 threshold also applies to procurement by partners for projects funded by Christian Aid. Many partner procurements are small scale and below this threshold and managed locally, with oversight from the Christian Aid programme office. Smaller procurements and supplier relationships may be approved by local teams in accordance with delegated authorities. In addition, we comply with institutional donor procurement rules as these may provide specific requirements in greater detail than our policy. The Christian Aid Procurement Policy is shared with partner organisations to guide their procurement.

The Chief Executive directly oversees the organisation's approach to safeguarding. She leads the directorate meetings which consider Christian Aid's response to safeguarding. She also receives reports on safeguarding incidents and attends all board and sub-committee meetings, including the closed sessions of the Audit and Risk Committee, where case files are reviewed.

During the year, a safeguarding governance group (established in 2018) provided operational oversight of Christian Aid's safeguarding work to strengthen policies and procedures.

We encourage all Christian Aid representatives, partners and beneficiaries to report safeguarding concerns, using a choice of confidential mechanisms. Additionally, we have a whistleblowing policy and a confidential whistleblowing email address accessible through our corporate website. These same channels can also be used to report modern slavery concerns. We have a process for fully investigating all incidents of safeguarding, taking appropriate actions including reporting to statutory agencies and ensuring that lessons are learned.

Safeguarding requirements are included in our Code of Conduct. It is signed by all members of staff, trustees, volunteers and all consultants. The policy is supported by mandatory online training that is completed annually. We require all partners to have an appropriate code of conduct and safeguarding policy.

The full list of Christian Aid policies that relate to safeguarding and modern-day 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 Conduct¹¹
- Recruitment & Selection Policy and Procedure
- Recruitment Information for Candidates (UK and Ireland)¹²
- Guidance on Whistleblowing¹³
- Fraud and Compliance Policy
- Open information policy¹⁴
- Grievance Policy and Procedure – including staff complaints policy and procedures
- Employee Relations guidelines – dealing with problems policy

- Serious Incident Reporting Policy
- Safeguarding Policy¹⁵
- 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
- Christian Aid Volunteering Policy
- CA 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 on Quality and Accountability (CHS), and this is continuously monitored in terms of compliance.

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. A total of 580 people offered their time and skills in roles such as speaking, teaching, helping with administration and fundraising throughout 2018/19, logging around 8,000 hours of their time in our new volunteering portal. Christian Aid Week also involved a total of 57,000 volunteer fundraisers coming together to raise £8.6 million in funds.

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

Managing risk effectively is integral to the achievement of our essential purpose which is eradicating the causes of poverty, striving to achieve equality, dignity and freedom for all, regardless of faith or nationality. Governance structures are designed to ensure the early identification and management of key risks, and to 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. The regular and in-depth review of the risk management process is performed by our Audit and Risk Committee.

We have a standard contract template which provides the default terms and conditions of contract for all significant supplier relationships, and this 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 seeking to deliver programmes directly with the end beneficiaries and communities. This means that partner policies, processes and practices are critical to understanding the impacts and risks associated with Christian Aid's work. 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 including the risk of modern slavery. Partners may lack capacity to monitor compliance of their own suppliers, especially in challenging contexts. We therefore conduct ongoing monitoring of partners to identify risks including the risk of modern slavery.

The Christian Aid Partner Financial Monitoring Policy (updated in June 2016) requires country programmes to carry out a periodic Partner Operational Capacity Risk Assessment (POCRA). The frequency of the assessment varies depending on the circumstances of the partner and the nature of the partnership. A POCRA is undertaken at the start of a new funded relationship and at least once every three years thereafter and following significant events including, but not limited to, major staff changes (e.g. change of director); a rapid onset of an emergency situation in the country; before inclusion of the partner in a project involving a large scale-up of activities; and funding with a complex donor which 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; and interviews with staff. This way we gain 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 with donor compliance requirements. Our Partnership Agreement requires partners to have their own 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)

Our Partner Financial Monitoring is aligned with modern slavery requirement in terms of the risk matrix of the POCRA. We have also

updated Christian Aid supplier standard terms and conditions to include modern slavery as well. The assessment showed that modern slavery risks can be assessed under a number of categories including:

- values and behaviours of the partner, providing indirect assurance regarding modern slavery;
- procurement policies of the partner by ensuring a compatible policy;
- accountability and protection, where essentially partners need to have compliant grievance and whistleblowing and other policies that protect against abuses of power that may include modern slavery; and finally
- policies that related to gender, power and inclusion where assurances are made of the safeguarding policies of the partner organisation in these areas.

Based on the risk assessment, guidance is then given to partners for better aligning their policies and values with those of Christian Aid. Finally, we require partners working in the humanitarian area to agree to the Core Humanitarian Standard on Quality and Accountability (CHS). The CHS includes expected minimum standards such as anti-fraud and anti-corruption practices, the prevention of abuse of power, the avoidance of all forms of exploitation and the avoidance of unethical business practices. The CHS additionally seeks to identify and act upon potential or actual unintended negative effects in a timely and systematic manner, including:

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

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

We commit to commencing a risk assessment of potential risks of modern slavery in our supply chains during the FY 2019/20 based on available benchmarks, data and analysis in terms of both the prevalence per country and prevalence in certain supply chains to engage in enhanced due diligence in higher risk cases.

Addressing the risk of Slavery and Human Trafficking

Christian Aid's Staff Code of Conduct requires staff to commit from the outset to safeguarding vulnerable persons and reporting any abuse. The staff-only intranet system is available for reporting both security and health and safety incidents. Incidents are investigated and lessons learned for the future. Protecting vulnerable people and beneficiaries is at the heart of Christian Aid's work.

In FY 2016/17, we committed to ensuring that our policies are up to date both in relation to our supply chain management and our partner management. In 2017/18, we committed to conducting training, which was completed in 2018/19. Based on these policies and greater awareness, in FY 2019/20 we can start to conduct country and sector specific risk assessments based on available data and benchmarks. Where such risks are identified, there will be 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 (HQAI) against compliance with the Core Humanitarian Standard on Quality and Accountability (CHS). The above include 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. This commitment ensures that everyone working at Christian Aid's UK offices receives a minimum hourly wage significantly higher than the national minimum wage.

Training and Capacity Building

Christian Aid's rigorous recruitment and selection guidelines ensure that managers and persons involved in recruitment know about the risk associated with safeguarding, and also crimes related to modern slavery. Risk mitigation includes referencing, checking the right to work, safeguarding and ensuring equal opportunities for everyone.

Staff receive training at regular intervals throughout their time with Christian Aid. The initial training consists of the staff induction which has a number of mandatory modules including:

- Anti-Bribery
- Code of Conduct
- Data Protection
- Finance
- Gender
- Health and Safety
- Risk Management
- Safeguarding

During the financial year 2018/19, we introduced a new training module on modern slavery and, as from August 2019, it has been completed by 67% of staff (770 individuals out of a total of 1143). A further 11% (125 individuals) have a specific reason for not conducting the training such as, being a contractor, on maternity leave or lacking access to the training system.

Modern slavery is mostly covered in the Code of Conduct training at the moment. After the initial induction, there are a number of role specific trainings that relate to procurement, and security issues that relate to specific risks on certain roles within Christian Aid. After the

initial induction, there are a number of further modules that look deeper into Christian Aid's values and strategy.

The induction process is being reviewed in 2018/19 as a result of the update of the procurement policy and practice, and the supplier code of conduct which will provide guidance on due diligence of modern slavery within our supply chain. Induction materials will be developed so that all relevant staff know how to use the updated procurement policy and practice, and that key elements of new guidelines are mainstreamed for all staff.

End notes

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