Christian Aid Modern Slavery Statement 2020/21

Introduction

Christian Aid 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.

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. Christian Aid recognises that poverty and marginalisation cannot be eradicated without tackling imbalances of power and we stand together with those who are most vulnerable to the abuses of modern slavery.

The most recent estimate from the International Labour Organisation is that 24.9 million people in the world are working under forced labour conditions. However, political instability, widening inequalities and forced migration exacerbated by the effects of climate change and the pandemic could well be forcing more people to become vulnerable, and hence exposed to exploitation.

Covid-19 has continued to impact all aspects of our operations including slowing our work to build a complete picture of modern slavery risk, though we continue to make progress as outlined in this, our fifth, Modern Slavery Statement.

Christian Aid, its corporate structure and our work on modern slavery

Christian Aid is a 75-year-old charity with headquarters in the UK and a presence in 25 countries in Africa, Asia, Latin America and the Caribbean as well as the Middle East, through a combination of country offices and regional programmes. A description of Christian Aid’s corporate group structure and subsidiary undertakings is included in our most recent Annual Report for 2019/20. This statement is made on behalf of all companies and subsidiaries in the Christian Aid corporate group structure.

In 2019/20 (for the year ended 31 March 2020), Christian Aid’s total income was £106 million. Outside of the UK and Ireland, Christian Aid has offices which work mainly through local partner organisations who implement work on the ground. Expenditure on development and humanitarian work in 2019/20 amounted to around £45 million. 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.

Modern slavery is a complex issue and tackling it necessarily involves addressing its root causes. This makes it inextricably linked to our long-term development work. We work with local partners and communities to fight injustice, respond to humanitarian emergencies and help people claim the services and rights they are entitled to, and we campaign to change the economic systems and structures that allow modern slavery and human trafficking to take place.
We seek to address the root causes of discrimination and marginalisation which make people vulnerable to modern slavery, whether as a result of poverty, lack of education, lack of economic opportunity, migration or social status.

We also tackle modern slavery as part of our work on business and human rights. In the UK, Christian Aid is a founding member of both the Ethical Trading Initiative (ETI) and the Corporate Justice Coalition (CJC) and supported both organisations in playing a key role in the development of modern slavery legislation in the UK.

Our ongoing annual contribution to ETI (combined with that of other large INGOs) goes into the Participation Fund for small NGOs working to continually enhance aspects of the ETI Base Code, an internationally recognised code of labour practice founded on the conventions of the International Labour Organisation.

We work with the CJC to press for enhancements to UK’s Modern Slavery legislation to mandate companies to undertake human rights and environmental due diligence and to ensure victims of abuse have adequate access to justice.

We also work internationally advocating for a UN Binding Treaty on Business and Human Rights (a legally binding instrument to better regulate the activities of multinational corporations).

**Policies**

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.

Supply chain management is covered in our Procurement Policy and Procedure, which was updated in December 2018 and translated into French and Spanish in 2020. The Procurement Policy and Procedure specifically references the risk of modern slavery and applies to all expenditure on goods and services purchased directly by the organisation. The Policy promotes ethical and sustainable procurement processes and includes a Code of Conduct for Suppliers.

In addition to our own procurement, the Procurement Policy also applies to any procurement through our implementing partners for donor funded projects. Donor requirements vary and partners will usually be required to use the donor procurement policy if more stringent than the partners. Otherwise, our Procurement Policy requires that partners’ procurement policies are reviewed to ensure that they are consistent with our principles and guidelines. Similarly, we may require partners to use our policy if they do not have adequate policies. In addition, in larger programmes procurement plans must be provided by partners and approved by us.

Following our Procurement Policy, all procurement decisions by Christian Aid or our partners valued at £50,000 or over, require approval from the Procurement team at Christian Aid head office, who will oversee and approve the selection process. Most international procurement is conducted by our partners. Many partner procurements are small scale and below this threshold and managed locally, with oversight from the Christian Aid country office. Smaller procurements and supplier relationships may be approved by local teams in accordance with delegated authorities.
All Christian Aid staff, trustees, volunteers and consultants are required to comply with our Code of Conduct and Safeguarding Policy. The Safeguarding Policy was updated in 2020 to include modern slavery in the definition of safeguarding abuses and also to include our expectation of partners and consortium members to investigate safeguarding breaches. Our Safeguarding Policy is reviewed annually. We also require all partners to have an appropriate Code of Conduct and Safeguarding Policy.

Additionally, we have a confidential safeguarding email address that is included in our Safeguarding Policy which is publicly available on our corporate website. In accordance with our Safeguarding Policy, we encourage reporting of modern slavery concerns using the safeguarding email address. As alternatives, we also have confidential safeguarding trustee and whistleblowing email addresses. We have a process for fully investigating all incidents of safeguarding, including modern slavery, taking appropriate actions including reporting to our regulator and statutory agencies where it is appropriate to do so and ensuring that lessons are learned.

We recognise that volunteers contribute a huge amount of energy, enthusiasm, skills and commitment to our work. Christian Aid’s 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.

In 2020/21, to increase transparency we will be adding to the list of policies we publish on our website, which now include the following:

- Christian Aid Staff Code of Conduct
- Recruitment Information for Candidates (UK and Ireland)
- Guidance on Whistleblowing
- Open Information Policy
- Safeguarding Policy
- Procurement Policy and Procedure
- Code of Conduct for Suppliers
- Core Humanitarian Standard (CHS)

A full list of all Christian Aid policies that relate to safeguarding and modern slavery is available on request.

**Governance and due diligence**

**Governance**

The board of trustees is ultimately responsible for the governance of Christian Aid. The board delegates the day to day running of the charity to the Chief Executive and Executive Directors but retains oversight of our operations through regular board and committee meetings. Governance structures are designed to ensure the early identification and management of key risks and support the delivery of our strategy.

**Mapping and risk assessing our supply chains**

We carry out due diligence checks on our suppliers, particularly our key suppliers at the tender stage which includes a check of their compliance with applicable laws including modern slavery and human trafficking. We adopt a risk-based approach in 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.

**Engagement with partners**

One area of risk for Christian Aid is that we mainly work through independent partners to deliver programmes, rather than implementing programmes directly. This means that partner policies, processes, and practices are critical to understanding both the impact Christian Aid is having and the risks associated with our 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. This includes the risk of modern slavery, as partners may lack capacity to monitor compliance of their own suppliers, especially in challenging contexts. To address this, we use a risk-based approach to support partners where appropriate with due diligence of their suppliers.

The Christian Aid Partner Financial Monitoring Policy requires country programmes to carry out 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 assessment is undertaken at the start of a new funding 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 will cover a range of issues such as recruitment, safeguarding and procurement which are relevant to the risks of modern slavery. 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 provide support to partners, where necessary, including on meeting donor compliance requirements.

Our Partnership Agreement requires partners to have their own Codes of Conduct aligned to Christian Aid’s. Based on the risk assessment, guidance is then given to partners to better align their policies and values with those of Christian Aid. Finally, we require partners working in the humanitarian area to agree to the Core Humanitarian Standards (CHS).

We believe this process covers the risk of modern slavery regarding the prohibition of illegal labour, child labour and forced labour – which are the key infringements concerning modern slavery.

**Addressing the risk of modern slavery and human trafficking**

**Our staff**

Christian Aid’s Staff Code of Conduct requires staff to commit from the outset to safeguarding vulnerable persons and reporting any abuse. The email addresses referenced above are available for
reporting safeguarding incidents. Incidents are investigated and lessons learned for the future. Protecting vulnerable people is at the heart of Christian Aid’s work.

In terms of our employment practices and human resources, we are accredited as a UK real Living Wage Employer by the Living Wage Foundation. This commitment sees that everyone working at Christian Aid’s UK offices receive a minimum hourly wage significantly higher than either the government’s National Minimum Wage (for under 25s) or National Living Wage (for those aged 25 or over).

Christian Aid’s recruitment and selection guidelines mitigate against potential risks including referencing, checking the right to work, safeguarding and ensuring equal opportunities for everyone. Once on board, induction training includes a bespoke module on modern slavery. After the initial induction, there is role specific training covering modern slavery, amongst other risks, in key roles such as procurement.

**Our operations and programmes**

We are committed to ensuring that our policies are up to date in relation to modern slavery risk both in our supply chain management and our partner management. This is a continual process. In 2020/21 we have updated and strengthened our Partnership Agreement to make more explicit reference to modern slavery risk, and the revised Agreement will be rolled out to our partners from the Autumn of 2021.

In 2019/20 we started to conduct country and sector specific risk assessments for our central procurement-based purchases above £50,000. We scored all centrally procured contracts against a UK government procurement guideline. 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 found three areas where modern slavery might exist, including a warehouse and logistics provider, a temporary staffing agency and an IT equipment provider.

We have also begun desk-based research on four of our larger country offices: Nigeria, Kenya, Democratic Republic of Congo and Bangladesh. We studied the larger restricted fund projects. Our analysis showed potential risks included the use of casual labour in warehouses and transport used to distribute food for humanitarian purposes and in the provision of catering services. We are also part of distribution chains of other agencies’ programmes, and we rely on them to do the necessary checks for safeguarding and modern slavery.

We believe these risks are mitigated by ensuring that we follow best practice sourcing and contract management procedures. Additionally, our approach regarding the risks of modern slavery in our humanitarian programmes is in line with our existing commitments under the Core Humanitarian Principles. Our humanitarian interventions are certified by the Humanitarian Quality Assurance Initiative (HQAI) against compliance with the Core Humanitarian Standards (CHS) which includes fair and equitable treatment of staff in humanitarian situations and focuses on accountability to the people we serve.
Increasing transparency

In the past year, using the UK Government’s Modern Slavery Assessment Tool, we have considerably increased our score year on year from 55% to 74%.

We have also now added our Modern Slavery Statement to the UK Government’s Modern Slavery Statement Registry.

Incidents in 2020/21

We have had no reports of modern slavery or human trafficking in our supply chains or operations in 2020/21.

Continued commitment

We are committed to periodically reviewing our governance structure, policies, and processes.

More specifically, in 2021/22 we shall complete our assessment of potential risks of modern slavery in our supply chains for large projects based on available benchmarks, data and analysis in terms of both the prevalence per country and prevalence in certain supply chains, and to begin enhanced due diligence in higher risk cases.

During 2021/22, we will also develop key indicators to help track our performance over time.

Review and approval

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), The British and Irish Churches Trust Ltd, Christian Aid Trading Ltd, Christian Aid Kenya, Christian Aid Zimbabwe and Change Alliance (India)

Date: 14th September 2021