



Modern Slavery Statement 2021/22

This is Christian Aid's sixth modern slavery statement published in accordance with the UK Modern Slavery Act 2015 and it outlines the steps we are taking to identify and prevent modern slavery both in our operations and in our distribution and supply chains.

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. 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 International Labour Organisation estimated that some 25 million people in the world are working under forced labour conditions. Indeed, it is likely that modern slavery is growing with political instability, widening inequalities and forced migration, exacerbated by the effects of climate change and the COVID-19 pandemic, forcing more people to become vulnerable, and hence exposed to exploitation. This is particularly true in low- and middle-income countries.

About Christian Aid

Christian Aid is a 77-year-old charity. We have our registered office in the UK and a presence in 25 countries. We deliver development and humanitarian work in Africa, Asia, the Middle East, Latin America and the Caribbean 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 2020/21. 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, registered in the Republic of Ireland and Northern Ireland.

In 2020/21 (for the year ended 31 March 2021), Christian Aid's total income was £86.4 million. Outside of the UK and Ireland, Christian Aid has offices which work mainly through local partner organisations who implement work on the ground. 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. COVID-19 has severely affected some aspects of our operations throughout 2021/22, and this has slowed down our work to build a complete picture of modern slavery risk, although we have continued to make progress.

Our wider work on modern slavery

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. We also campaign to change the economic systems and structures that allow modern slavery and human trafficking to take place. Protecting vulnerable people is at the heart of our work and 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 using the lived experience of those we seek to help to push for stronger regulation to prevent human rights abuse both at a national and international level. In the UK, our partners, the Ethical Trading Initiative and the Corporate Justice Coalition, played a key role in the development of modern slavery legislation. We continue to press for new legislation to mandate companies to undertake human rights and environmental due diligence and to ensure that victims of abuse have access to justice. Internationally, we support proposals for a new UN Binding Treaty on Business and Human Rights.

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 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 Audit and Risk Committee oversees the risk management process including the work of Christian Aid's Audit, Risk and Assurance function. Senior management ensures that day-to-day risk management processes are embedded across the organisation through the effective implementation of policies and procedures. Risk registers are developed at corporate, national, country and major-project levels. The directorate reviews and updates the corporate risk register three times a year and it is shared with the Audit and Risk Committee at each of its meetings. The Board formally reviews and approves it annually and also considers it as part of the approval of the corporate plan and budget. Both the Audit and Risk Committee and the Board also have oversight of 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.

Policies

The framework for supply chain management is set out in our Procurement Policy and Procedure, which was translated into French and Spanish in 2020. The Procurement Policy covers 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, which sets out the ethical standards we expect of suppliers such as

'employment is freely chosen', 'living wages are paid' and 'safeguards are in place to prevent human trafficking'.

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

All procurement decisions by Christian Aid or our partners valued at £50,000 or over require approval from the central Procurement team, 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 and are monitored by the relevant Christian Aid country office. Smaller procurements and supplier relationships may be approved by local teams in accordance with delegated authority. To support the implementation of the supply chain framework, the central Procurement team provide training and guidance. Additionally, larger country offices typically have a full-time procurement officer and all our country offices are invited to join a quarterly community of practice where procurement best practice is discussed.

All Christian Aid staff, trustees, volunteers and consultants are required to comply with our Code of Conduct and Safeguarding Policy. Our Safeguarding Policy is reviewed annually. 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 Code of Conduct and Safeguarding Policy.

Our Safeguarding Policy includes a confidential safeguarding email address which is publicly available on our corporate website. In accordance with our Safeguarding Policy, we encourage anyone with concerns of modern slavery to report them using the safeguarding email address. As alternatives, we also have confidential safeguarding trustee and whistleblowing email addresses. We have a process to investigate fully all incidents of safeguarding abuse, including modern slavery, and to take appropriate actions including reporting to our regulator and statutory agencies where appropriate and ensuring that lessons are learned.

During 2021/22, we introduced a new Feedback and Complaints Policy which complements many of our existing policies that are relevant to modern slavery. Previously Christian Aid had a policy covering feedback and complaints, but this was UK-facing only and aimed at our supporters and anyone interacting with the organisation. The new Feedback and Complaints Policy takes a global approach and covers our supporters and the communities we serve. The new policy helps to strengthen Christian Aid's accountability ensuring that we are meeting sector standards around feedback and complaints.

We also reviewed and updated our Whistleblowing Policy in 2021/22 following a benchmarking exercise. Our revised Whistleblowing Policy makes it clearer how and when to raise concerns both internally and externally. The Policy now sets out in more detail the protection and support available to those raising concerns.

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. As noted above, all of our volunteers are required to comply with our Code of Conduct and Safeguarding Policy.

One of our ongoing commitments is to transparency and we now publish the following key policies on our website:

- Christian Aid Staff Code of Conduct
- Recruitment Information for Candidates (UK and Ireland)
- Whistleblowing Policy and Procedure
- Feedback and Complaints Policy
- Open Information Policy
- Safeguarding Policy
- Procurement Policy and Procedure
- Code of Conduct for Suppliers

Due diligence

Mapping and risk assessing 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.

Engagement with 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. This means that partners' own policies, processes, and practices are critical to our understanding of both the impact Christian Aid is having and the risks associated with our work. 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 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. Significant events may include, but are 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 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. 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 guidance on meeting donor compliance requirements.

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

We believe these due diligence processes cover 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

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 from the outset to safeguarding anyone coming into contact with the charity in the course of our work and reporting any abuse. The email addresses referenced above are available for reporting any safeguarding incidents or concerns. In terms of our employment practices and human resources, 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. 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 holding responsibility for 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 updated and strengthened our Partnership Agreement to make more explicit reference to modern slavery risk.

We have started conducting 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 undertaken some desk-based research in four 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 believe the risks highlighted above are mitigated by ensuring that we follow our 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.

Measures

A key commitment in our 2020/21 Statement was to consider the development of performance measures. While progress has been slower than we would have liked, we are proposing to establish a baseline for the following measures this year:

- Global completion rate of the core modern slavery training module
- Number of positive responses to the modern slavery related requirements in the annual international Internal Control Self-Assessment
- Confirmation that all necessary risk assessments are being carried out

We shall seek to establish a baseline for these measures this year. We shall also continue to track our progress using the UK Government's Modern Slavery Assessment Tool.

Incidents

We have had no reports of modern slavery in our supply chains or operations in 2021/22.

Continued commitment

We are acutely aware that increasing numbers of people are becoming more vulnerable to the risk of modern slavery and we are committed to looking continually to strengthen our approach. In 2022/23 we shall:

- Progress our assessment of potential risks of modern slavery in our supply and distribution chains for larger projects and begin enhanced due diligence in higher risk projects
- Ensure modern slavery risk is captured explicitly in our Internal Control Self-Assessment process
- Review and refresh relevant organisational eLearning modules (e.g. Safeguarding module) to complement and reinforce our Modern Slavery training
- Review the frequency and completion rates of our online modern slavery training
- Review the use of the above performance measures

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:

A handwritten signature in black ink that reads "J Sentamu". The signature is written in a cursive style with a cross at the beginning of the first letter.

Signed by Dr John Sentamu, Chair of the Christian Aid Board of Trustees and on behalf of Christian Aid Ireland.

Date: