

# Christian Aid

## Statement on Modern Slavery Act

March 2021



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.

**[christianaid.org.uk](https://christianaid.org.uk)**

## Contact us

Christian Aid  
35 Lower Marsh  
Waterloo  
London  
SE1 7RL  
T: +44 (0) 20 7620 4444  
E: [info@christian-aid.org](mailto:info@christian-aid.org)  
W: [christianaid.org.uk](https://christianaid.org.uk)

## Contents

<b>Foreword</b>	<b>5</b>
<b>Executive summary</b>	<b>6</b>
<b>Christian Aid, its operations and current work on modern slavery</b>	<b>6</b>
<b>Policies in relation to slavery and human trafficking</b>	<b>8</b>
<b>Due diligence processes in its activities and supply chains relevant to modern day slavery</b>	<b>10</b>
<b>Addressing the risk of Slavery and Human Trafficking</b>	<b>13</b>
<b>Training and Capacity Building</b>	<b>14</b>

**Cover:** Geeta Devi, 26 years, is a Dalit and mother to 4 year old daughter Priyanka. She is a single mother working as a manual scavenger, like her mother. With the help of Christian Aid partner, ARUN, and their Safai Karmachari Liberation program she has applied for a government compensation grant. Despite manual scavenging being outlawed there are still 1.2 million manual scavengers in India due to poverty and lack of education  
 Photographs: Christian Aid / Emily Garthwaite

## List of Acronyms

<b>ACT</b>	Action by Churches Together
<b>CA</b>	Christian Aid
<b>CHS</b>	Core Humanitarian Standards
<b>CoC</b>	Code of Conduct
<b>CORE</b>	Corporate Responsibility Coalition
<b>ETI</b>	Ethical Trading Initiative
<b>FY</b>	Financial Year
<b>G20</b>	Group of 20
<b>HAP</b>	Humanitarian Accountability Partnership
<b>HQAI</b>	Humanitarian Quality Assurance Initiative
<b>ILO</b>	International Labour Organisation
<b>POCRA</b>	Partner Operational Capacity and Risk Assessment
<b>SSC</b>	Safeguarding Steering Committee
<b>TNC</b>	Transnational Corporation
<b>UNGP</b>	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 most vulnerable to the abuses of modern slavery. This year, Christian Aid focused on the impact of Covid-19 concerning private sector actors working in global supply chains. In particular, we looked at business practices in the ready-made garment sectors in Bangladesh and India and how the large decrease in orders due to the disruption caused by Covid-19 has led to a greater risk of modern day slavery in garment factories employing vulnerable women labourers. We continue to work with many marginalised communities, including manual scavengers in India, a form of bonded labour.

Christian Aid, like many other international non-governmental organisations, has significantly restructured in response to a very challenging environment for international development. This, along with the impact of Covid-19, has caused considerable disruption and slowed our progress in auditing modern slavery risks. In terms of our own supply chains, we have made a risk assessment concerning the largest purchases that we make that are handled by our centralised procurement function. We are seeking to widen this risk assessment of our supply chains further into purchases made in country-based offices during the financial year 2020/21 in order to build a more comprehensive picture of the risks of modern-day slavery in our own operations.

This is our fourth Modern Slavery Statement. As with the previous three 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 long-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 further risk assessment of our supply chains, and then integrating its 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), The British and Irish Churches Trust Ltd, Christian Aid Trading Ltd, and Change Alliance (India)

Date: 26<sup>th</sup> March 2021

## Executive summary

This statement outlines the 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 financial year's statement.

This statement covers both our UK related operations, as well as international operations. Within the UK, the most recent estimate by UK government in for the second quarter of 2020 (April – June) which indicated that there were 2,209 potential victims referred through the national reporting mechanism (NRM) (a decrease of 23% from the previous quarter). This decrease is understood to be due to the Covid-19 pandemic and may not represent a fall in the actual incidence of modern slavery in the UK. In 2019 there was a total of 10,620 referrals, up from 6,986 in 2018. In terms of our UK operations, we need to track high-risk segments of the UK economy, which have been identified to include hand car washes, agriculture, care, construction, hospitality, and warehouses and distribution centres.<sup>1</sup>

According to the most recent 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 and mobile phones (\$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. The main at-risk imported products into the UK include electronics and garments, in both cases China being the greatest risk country of origin, followed by India and Vietnam for garments, and Malaysia for electronics. This is also confirmed by the UN Special Rapporteur's recent report on contemporary forms of slavery, highlighting especially the role of indigenous people, migrant workers, and stateless people in terms of the risk of modern slavery<sup>2</sup>

## Christian Aid, its operations and current work on modern slavery

The year 2019/20 was the first working to our new strategy, Standing Together, with its three pillars of Poverty, Power and Prophetic Voice upholding all our programmes. Following the launch of our global strategy, and to bring our costs in line with income, we made the difficult decision to withdraw from 12 countries: Angola, Bolivia, Brazil, Dominican Republic, Egypt, El Salvador, Ghana, Guatemala, Nepal, the Philippines, South Africa and Zambia. A description of Christian Aid's corporate group structure and subsidiary undertakings where our work takes place is included in our Annual Report for 2019/20<sup>3</sup>.

In 2019/20 (for the year ended 31 March 2020), Christian Aid's total income was £106.0million. £46.4 million was from voluntary income including individual giving and legacies. £52.8 million was from institutional donors such as the UK's Foreign, Commonwealth and

### Supporting manual scavengers in India

Manual scavenging is a form of bonded labour which involves the manual cleaning or removal of human excrement from insanitary latrines or open drains or pits. This work is hazardous, causing many health problems, and is considered demeaning and stigmatising. People enter this work without choice and cannot easily leave if they wish to do so. The workers employed are not given the basic wages provided to other labourers.

Manual scavenging is technically outlawed in India since a ruling by the Supreme Court of India in 2014 that manual scavenging violates international human rights law. Despite this ruling, the Indian government has yet to take any new measures to end manual scavenging and there are still around 1.2 million manual scavengers, of which 95% are women.

According to the International Dalit Solidarity Network (ISDN) Dalits are particularly vulnerable to this type of bonded labour, because of their socio-economic status. They have taken complaints of India's lack of observance of the commitment in ending all forms of discrimination and racism to the UN Human Rights Council 45<sup>th</sup> session in 2020 in Geneva.

Another Christian Aid Partner is ARUN, who support Dalits, women, marginalised people, and was instrumental in the campaign which achieved total ban of manual scavenging across the country. Another partner, Jan Sahas, aims to eradicate all forms of bondage, including manual scavenging and caste-based prostitution. It works to empower adolescent girls and women and helps them to develop skills to lead dignified lives.



Development Office (FCDO), the EU and the UN. The remaining income was from Charitable Activities (£5.9 million) such as our contract work for the FCDO in Sierra Leone and Ghana. 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. This generated £0.8 million in 2019/20. A further £0.1 million resulted from investment income.

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 amount 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.

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 made by Christian Aid on the basis of long-term Partnership Agreements are often from restricted funding, while funding agreements are always made separately on a one-year basis. Where it is core funding, while often also based on 3-year broad agreements, core funds may vary from year to year slightly more based on the thematic or country programme strategy. All projects are systematically monitored for the duration of their existence according to Christian Aid's partner financial monitoring frameworks. All partners are assessed with Partner Organisational Capacity Risk Assessment (POCRA).

Christian Aid is a founding member of the Ethical Trading Initiative (ETI). Christian Aid's contribution (combined with that of other large INGOs) to ETI goes into the ETI Participation Fund for small NGOs working on aspects of the ETI Base Code. Through the Participation Fund, we have supported the **Dalit Solidarity Network (DSN)** for a number of years and **enabled them** to continue to play a role in addressing forced labour in textile mills in Tamil Nadu South India. The DSN is the only NGO in the Rajasthan Stone Working Group (RSWG<sup>4</sup>). In 2019 DSN's work on caste was featured in a submission to the report of the **UN Special Rapporteur on Contemporary Forms of Slavery**. DSN gave one-to-one advice and follow-up to stone companies of the RSWG, which is no longer active. As a result, all RSWG company members now recognise the importance of addressing caste discrimination in their supply chains.

We are also a member of the Corporate Responsibility Coalition (CORE). We have supported CORE's implementation of the Modern Slavery Act,<sup>5</sup> along with advocacy at country level to support the implementation of the UN Guiding Principles on Business and Human Rights, and ETI guidelines. We have also supported CORE's work to reform, strengthen and broaden the UK's Modern Slavery legislation, including a parliamentary briefing on UK legislation concerning the

duty to prevent human rights abuses and negative environmental impacts<sup>6</sup>.

In the sections below, we summarise the steps that Christian Aid has taken since the last statement in November 2019 to work on preventing slavery and human trafficking in our activities and supply chains and the commitments that we are making for 2020/21.

## **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.

Supply chain management is covered in our Procurement Policy and Procedure, which was updated in December 2018 and has been translated into French and Spanish versions in 2020. This update resulted in new areas of risk regarding modern slavery being identified and included where relevant in Christian Aid's policies and practices. The Procurement Policy and Procedure applies to all expenditure on goods and services purchased directly by the organisation or through our implementing partners for donor funded projects where we exercise strong oversight, 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

All procurement decisions 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 partners. A £50,000 threshold also applies to procurement by partners commissioned 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 commercial decisions.

Upon starting at Christian Aid, all staff are required to read, undergo training on and sign our Code of Conduct. The Code is signed by all members of staff, trustees, volunteers and all consultants. It is also compulsory to complete refresher training on the Code and to sign the Staff Code of Conduct<sup>7</sup> every year to confirm 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 Aid<sup>8</sup>.

Safeguarding requirements are included in our Code of Conduct. 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 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 sub-committee meetings, including the closed sessions of the Audit and Risk Committee, where case files are reviewed.

The latest update of the Safeguarding Policy dates back to July 2020<sup>9</sup>. This update has an expanded definition of abuse to include Modern Slavery and Cyber/virtual safeguarding. The update also includes an expectation of partners and consortium members to investigate safeguarding breaches appropriately.

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

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 Conduct<sup>10</sup>
- Recruitment & Selection Policy and Procedure
- Recruitment Information for Candidates (UK and Ireland)<sup>11</sup>
- Guidance on Whistleblowing<sup>12</sup>
- Fraud and Compliance Policy
- Open information policy<sup>13</sup>
- Grievance Policy and Procedure – including staff complaints policy and procedures
- Employee Relations guidelines – dealing with problems policy

- Serious Incident Reporting Policy
- Safeguarding Policy<sup>14</sup>
- 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 (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. Christian Aid will not introduce volunteers to replace paid staff. 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. For instance, we have targeted volunteer positions for young persons via the Prophetic Activist scheme for young persons, who receive mentoring and guidance to working in the NGO sector as part of their volunteering role.

Over the past year over 100 volunteers have supported our teams either behind the scenes or in our offices; over 300 volunteers have represented Christian Aid in the community by speaking in churches; and over 15,500 volunteers have coordinated fundraising and campaigning in their churches. Our office-based volunteers have recorded 7,500 hours of volunteering through our online Volunteer Portal, though we know this is only a fraction of the time actually given and we have more work to do in building up our picture of the true contribution of volunteers. Over 40,700 volunteers raised £7.5 million in 2019, collecting door to door and hosting events.

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

Governance structures are designed to ensure the early identification and management of key risks and support the delivery of our strategy. We carry out due diligence checks on our suppliers, particularly our key suppliers at the tender stage, and monitor their compliance with applicable laws including modern slavery and human trafficking. We

ensure our key suppliers have appropriate policies in place in relation to modern slavery and human trafficking. We continue to review all our suppliers and regularly assess them in more detail to ensure that they have appropriate policies in place to minimise the risk of slavery and human trafficking in their business. The Contracts and Procurement teams work closely with the Audit and Risk team to improve supplier vetting in order to further minimise the range of risks in regard to modern slavery and safeguarding.

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 carried out 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 incorporates the Supplier Code of Conduct.

One area of risk is that Christian Aid primarily works with and through independent partners rather than deliver programmes directly to the end beneficiaries, communities and actors. This means that partner policies, processes, and practices are critical to understanding both to the impact Christian Aid is having and to 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, including modern slavery risk, as partners may lack capacity to monitor compliance of their own suppliers, especially in challenging contexts. We ensure a strong oversight of their processes and procedures, support them with enhanced due diligence of their suppliers and 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 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 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 on donor compliance requirements. Our Partnership Agreement requires partners to have their own Codes of Conduct that (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 Partner Operational Capacity and Risk Assessment (POCRA). We have also updated CA supplier standard T&Cs 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 Standards (CHS). The CHS includes expected minimum standards such as anti-fraud and anti-corruption practice, the prevention of abuse of power, the avoidance of all forms of exploitation and the avoidance of unethical business practices. The CHS in addition 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; and
- 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 – which are the 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. In 2021/22, we will be reviewing our Partnership Agreement and, as part

We commit to doing a comprehensive risk assessment of potential risks of modern slavery in our supply chains during 2020/21 for large projects 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.

of this review, we will consider how we can strengthen our approach to modern slavery risks.

## 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. External reporting is possible via a dedicated email address ([safeguarding@christian-aid.org](mailto:safeguarding@christian-aid.org)) Incidents are investigated and lessons learned for the future. Protecting vulnerable people and beneficiaries is at the heart of Christian Aid's work.

In 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 and continues to be part of the new staff induction process, as well as periodic refresher training requirements.

In 2019/20 we started to conduct country and sector specific risk assessments for our central procurement-based purchases above £50,000. In 2019/20 there were 29 suppliers, 28 of which are based in the UK and one based in the USA. We scored all centrally procured contracts against a UK government procurement guideline<sup>15</sup> of risk rating for modern slavery 2019/20. Out of these contracts only three were within categories of sectors with medium or high level of risk, including a warehouse and logistics provider and a temporary staffing agency. Finally, our IT equipment provider has supply chains that include potential conflict minerals and other risks associated with modern slavery.

We additionally ran a report in our expenditure tracking system for 2019/20 'Grants allocations' for a pilot study of four larger country offices: Nigeria, Kenya, Democratic Republic of Congo and Bangladesh. We studied the allocations to partners for the countries, starting with the largest restricted funded projects in the countries chosen for the pilot study.

The analysis identified that we work with humanitarian food distribution services in DRC in a contract with World Food Programme (WFP). In the budget allocations concerning this project, we identified that we employ casual hired labour in warehouses to distribute this food as well as include transport workers' salaries as part of the contract for transport services overall. The food is given as Gift in Kind, and thus procured by WFP rather than by us, and it is part of their supply chain rather than ours. To us it counts as a charitable gift, this poses further complication in assessing modern slavery risk as we have little or no leverage over gifted items to us.

In Kenya, the analysis into the expenditure of a community health linked project to support Orphaned and Vulnerable Children (OVC) found that most of the budget is spent on activities that benefit directly

the beneficiaries of the project. The main budget line where potential modern slavery risk in this project could be identified is in hospitality services, as well as in catering services that are often linked to hospitality in terms of the events. Most other items are spent in terms of expenses by participants, e.g. reimbursing transport costs, where the decision on choice of transport provider is not a choice that Christian Aid makes.

In Nigeria, DRC and Bangladesh Christian Aid has a large humanitarian portfolio which accounts for a large portion of money from diverse donors and appeals. These are mainly short-term contracts, anywhere from 6 to 12 months. In Nigeria and DRC, there is also a large Gift In Kind (GIK) along with cash income, which relates to food donated to Christian Aid from the World Food Programme (WFP) and as it is given as an in-kind service, it does not go through our normal procurement system. We are rather part of the distribution chain of the WFP's programmes in these countries and so we rely on them to do necessary checks for safeguarding and modern slavery.

In 2020/21 we will widen the risk assessments to our country-based procurements where possible, based on data collected from our expenditure tracking system. Currently our expenditure tracking does not track specific high-risk items or supply chains for modern slavery or other procurement risk concerns. Nevertheless, we ensure that best practice sourcing and contract management procedures are followed. We are currently rolling out our new finance system to our large country programmes (with a new Grant management system at the tender stage) which will automate, as well as promote visibility and transparency in, our expenditure tracking and approval processes.

This approach is already in line with our existing commitments under the Core Humanitarian Principles, where our humanitarian interventions we 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 focus on accountability to beneficiaries and grievance mechanisms.

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 25's) or national living wage (for those aged 25 or over).

## 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 know regarding several areas including under the scope of safeguarding, and crimes related to modern slavery. Risks mitigated include referencing, checking the right to work, safeguarding and ensuring equal opportunities for everyone.

We commit to defining Key Performance Indicators (KPIs) concerning the use of due diligence questions in high-risk countries and supply chains, as well as meeting the target of staff training on modern slavery.



Staff are trained at different stages, the very first one being the staff induction which has several mandatory modules including:

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

The specific training module on Modern Slavery was introduced in 2018/19. During 2019/20, 81% of staff had completed this module (730 individuals out of a total of 899). Of the remaining 19% of staff, 7% (64 individuals) did not have a recognised justifiable excuse for not completing the course (e.g. new starters on probation, on maternity leave, role restricted etc).

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 further modules that look deeper into Christian Aid's values and strategy, with organisational role links being made to modern slavery issues where relevant.

## End notes

- 1 2019 UK Annual Report on Modern Slavery [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/840059/Modern\\_Slavery\\_Report\\_2019.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/840059/Modern_Slavery_Report_2019.pdf)
- 2 Contemporary forms of slavery, including its causes and consequences, Report of the Special Rapporteur on contemporary forms of slavery, including its causes and consequences, Tomoya Obokata, UNGA/A/75/166, see: <https://www.undocs.org/A/75/166>
- 3 Christian Aid Annual Report and Accounts 2019/20, Christian Aid 2020. <https://www.christianaid.org.uk/sites/default/files/2020-10/20201009-Annual-Report-Final.pdf>
- 4 Sandstone from Rajasthan, India, ETI, accessed 4 January, 2020, <https://www.ethicaltrade.org/programmes/sandstone-rajasthan-india>
- 5 Modern Slavery Bill: Submission to the Joint Committee on Human Rights, CORE Coalition, 27 August 2014, [http://corporate-responsibility.org/wp-content/uploads/2014/09/CORE-submission-to-jchr\\_ModernSlaveryBill\\_Aug-2014.pdf](http://corporate-responsibility.org/wp-content/uploads/2014/09/CORE-submission-to-jchr_ModernSlaveryBill_Aug-2014.pdf)
- 6 Parliamentary Briefing: A Corporate Duty to Prevent Negative Human Rights and Environmental Impacts, CORE Coalition, October 26, 2020, [https://corporate-responsibility.org/wp-content/uploads/2020/10/CORE-F2P-General-Parliamentary-Briefing\\_FINAL-6.pdf](https://corporate-responsibility.org/wp-content/uploads/2020/10/CORE-F2P-General-Parliamentary-Briefing_FINAL-6.pdf)
- 7 Code of Conduct – Christian Aid, Christian Aid, <https://www.christianaid.org.uk/sites/default/files/2017-08/code-of-conduct.pdf>
- 8 Guidance on Whistleblowing, Christian Aid, <https://www.christianaid.org.uk/resources/about-us/guidance-whistleblowing>
- 9 Safeguarding Policy – Christian Aid, Christian Aid, <https://www.christianaid.org.uk/sites/default/files/2020-12/Christian%20Aid%20Safeguarding%20Policy.zip>
- 10 Code of Conduct – Christian Aid, Christian Aid, <https://www.christianaid.org.uk/sites/default/files/2017-08/code-of-conduct.pdf>
- 11 Recruitment Information for Candidates: For the UK and Ireland, Christian Aid, <http://www.christianaid.org.uk/images/Recruitment-information-for-candidates-UK-Ireland.pdf>
- 12 Guidance on Whistleblowing, Christian Aid, <https://www.christianaid.org.uk/resources/about-us/guidance-whistleblowing>
- 13 Christian Aid Open Information Policy, Christian Aid, <http://www.christianaid.org.uk/programme-policy-practice/about-us/accountability-transparency/open-information-policy>
- 14 Christian Aid Safeguarding Policy, Christian Aid, [https://www.christianaid.org.uk/sites/default/files/2018-02/Christian%20Aid%20Safeguarding%20Policy%20\\_0.pdf](https://www.christianaid.org.uk/sites/default/files/2018-02/Christian%20Aid%20Safeguarding%20Policy%20_0.pdf)
- 15 Tackling Modern Slavery in Government Supply Chains: A guide for Commercial & Procurement Professionals, Government Commercial Services, 2019, p. 18 [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/830150/September\\_2019\\_Modern\\_Slavery\\_Guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/830150/September_2019_Modern_Slavery_Guidance.pdf)