Modern Slavery Act statement 2021-22

We recognise the devastating impact that modern slavery can have on people's lives. It is estimated that 40.3 million people world-wide are trapped in modern slavery.

At WaterAid we are committed to identifying and eliminating any modern slavery in our own supply chain and in organisations that we work with around the globe. We will not work with any organisation that our ethical checks have caused us to suspect of involvement in modern slavery.

This statement made in relation to the Modern Slavery Act relates to the financial year, ending 31 March 2022. It demonstrates our commitment to the Act and to promote transparency across all areas of our work. It is approved by the Trustees and signed by the Chair of our Board of Trustees, Andy Green, on 12 July 2022. It outlines the work we have done, and will do, to identify and prevent modern slavery in our global operations.

Our organisation's mission and structure

At WaterAid, everything we do is guided by our values:

Respect We treat everyone with dignity and respect and champion the rights and contribution of all to achieve a fairer world.
Accountability We are accountable to those whose lives we hope to see transformed, to those we work with and to those who support us.
Courage We are bold and inspiring in our actions and words, and uncompromising in our determination to pursue our mission.
Collaboration We work with others to maximise our impact, respecting diversity and difference in the pursuit of common goals.
Innovation We are creative and agile, always learning, and prepared to take risks to accelerate change.
Integrity We act with honesty and conviction and our actions are consistent with openness, equality and human rights.

WaterAid UK is an international non-government organisation, part of a global federation of member organisations working in 34 countries worldwide. This statement covers the activities of WaterAid UK and WaterAid Trading Ltd, our trading company which is wholly owned by WaterAid UK.

WaterAid UK employs over 915 staff in 23 countries, 345 of which are based in the UK.

Our work in relation to the Modern Slavery Act

This section outlines our work in relation to the Modern Slavery Act in respect of our policies for staff and partners, and our operations and supply chains. These demonstrate our commitment to this issue and help ensure that appropriate and coordinated action is taken throughout the organisation.

Global Code of Conduct

All existing and new staff, and all those who represent WaterAid, are required to read and sign our Global Code of Conduct. This outlines WaterAid's expectations of staff as well as what they can expect from WaterAid. In signing the Code of Conduct, staff are committing to:

- uphold WaterAid's values
- not take part in exploitative behaviour including child labour and trafficking in persons
- not to abuse the privileged position of a role in WaterAid
- respect people's human rights
- prevent and report any criminal or unethical activities that may impact WaterAid's work

- ensure their actions do not create an unacceptable risk to anyone's health, welfare, safety or security
- report any concerns regarding safeguarding (which includes modern slavery and child labour), fraud, safety and security.

There is also a procedure in place for reporting malpractice and breaches to the Global Code of Conduct. Our organisational policies and the Global Code of Conduct also apply to our volunteers, whose generous support we rely on to achieve our objectives.

Suppliers
For WaterAid to successfully achieve its objectives, it requires the support of third parties. They provide capacity, expertise and added value to enable us to undertake all our operations. WaterAid recognises that slavery and forced labour is present in many supply chains. As WaterAid wants to prevent abuse in our own supply chains, we have due diligence procedures in place for all suppliers. Requirements include: assessing financial stability; reviewing policies including modern slavery; and having a written, signed contract in place which meets regulatory and statutory requirements. Additional requirements are in place for all fundraising suppliers and any suppliers classed as high risk.

Partners
Our programme work in our country programmes is mainly carried out through national partner organisations based in the countries in which we work. This is to ensure that our work is informed by local knowledge and expertise. We always ensure that we follow the local legal system and promote ethical practices throughout our work both in the UK and internationally.

We conduct due diligence on all new partners. We also set financial control and other standards for our implementing partners, and this includes minimum requirements in respect of safeguarding, procurement and contracting. We conduct checks to ensure that our partners do not appear on the list of terrorist groups or other organisations banned under UK law.

Global Ethical Standards and Policy
The Global Ethical Standards and Policy, applied through the ethical checks process, ensures we form financial and non-financial partnerships that do not undermine the achievement of our mission or pose a risk to our reputation, which could lead to loss of support and credibility. The assessment of reputational risks includes consideration of company Modern Slavery Statements, human rights policies and membership of related alliances and accords; compliance with national laws; extent of subsidiary links and supply chains; any regulatory investigations (e.g. linked to labour standards or environmental standards); links to fraud or bribery and other ethical issues that may be in conflict with WaterAid's stated values, aims and objectives. We will not enter into a relationship with another organisation if we are not satisfied that they meet our ethical standards.

WaterAid expects all its partners, suppliers or contractors to commit to adhering to the expectations outlined in WaterAid's Partner Code of Conduct and/or Vendors/Contractors Code of Conduct. In addition, there are clear guidelines (such as WaterAid's partnership toolkit) on how to effectively work with partners and contractors (for both short or long term projects) to mitigate risks. These ensure that the Global Ethical Standards and Policy is considered and always applied.

Risk
International development, by its very nature, carries a degree of inherent risk. For WaterAid to achieve our mission of transforming lives by improving access to safe water and sanitation in the world's poorest communities, it is necessary for us to take managed risks and to capitalise on opportunities.

WaterAid is risk averse when it comes to the safety of our people and the protection of our reputation and will take managed risks in respect of investing in our work and in developing the organisation to have greater impact.

The identification and management of strategic risks would include modern slavery where appropriate. Strategic risks are discussed at meetings of the Board and the Audit Committee.

Quality standards
WaterAid has introduced Quality Programme Standards to ensure we maintain high quality and ethical methods in our programme work, and to inspire and motivate others to adopt good standards in the delivery of water, sanitation and hygiene services. These standards are used at every stage of the planning, monitoring, evaluating and reporting cycle of our projects and programmes.

Training
WaterAid conducts training to raise awareness and ensure staff understand the importance of issues deemed to be of high risk. It also helps staff to understand what they need to do and how to work together internally or externally if they encounter something that raises concerns. The following training courses are mandatory for existing and new staff, which combined, seek to reduce the risk of modern slavery in our work:

- Safeguarding
- Security
- Data Protection
- Cyber Security

Training on fraud, equity, discrimination and inclusion, partnerships, and recruitment is available to all staff. Volunteers are also included in any mandatory or other applicable training. Each of our country programmes has at least one Safeguarding Focal Point. This is an existing member of WaterAid staff who takes on additional responsibilities for safeguarding, for example ensuring that all WaterAid staff have completed mandatory safeguarding training and supporting with the delivery of more in-depth safeguarding training to WaterAid staff, partners and suppliers (where relevant). Our Global Safeguarding Team provides guidance and support to our network of Safeguarding Focal Points.

Policies
We have in place additional policies and procedures, which combined with those referenced earlier, seek to further reduce the risk of modern slavery in our work:

- Global Standard on Safeguarding and Global Safeguarding Policy which aims to protect all individuals who come in to contact with WaterAid.
- Procurement Guidance for Country Programmes, which include due diligence requirements.
- Environmental Statement and Policy and Environmental Group which promotes ethical and sustainable business practices.
- UK and Global Accounts Manuals including procurement requirements.
- Recruitment policy and process and hiring manager guides including Safer Recruitment.
- Grievance Policy.
- Access for staff to a free Confidential Counselling and Advice Helpline in the UK and support and counselling services available to country programme staff.
- Federation Standards including safeguarding, ethical standards, finance and risk.

Any member of the public can make a complaint or raise a concern at any time directly to WaterAid, or through our third party, whistleblowing hotline. Copies of our policies and

procedures, along with details of how to raise a concern can be found on our website wateraid.org/uk/safeguarding-at-wateraid

WaterAid may take steps to terminate, or not renew, contracts with any organisation found to:

- have insufficient safeguarding policies and procedures in place
- have failed to report or investigate any allegations of abuse or exploitation;
- have been found to have treated individuals inhumanely in breach of their human rights
- have been involved in any form of human trafficking, prostitution or production of pornography.
- have been in breach of WaterAid's Global Code of Conduct where it applies

Since our last Modern Slavery Statement for the financial year 2020-21

- As part of a Safeguarding and Security Improvement Plan, we agreed that safeguarding requirements would be included within the Quality Programme Standards.
- All WaterAid Board Trustees across the federation received safeguarding training which included Modern Slavery for WaterAid. There are now 6 Safeguarding Lead Board Trustees across the WaterAid federation.
- We have conducted a global internal audit on safeguarding.
- Updates have been made to the Global Code of Conduct, Global Procedure for Reporting Malpractice and Breaches of the Global Code of Conduct, the Global Safeguarding Policy and the Principles of Child Safeguarding (formerly the Child Protection Procedure).
- WaterAid's Global Code of Conduct Definitions was updated to include reference to trafficking in persons and launched in January with a global staff webinar.
- WaterAid UK continues to be part of the sector working group run by the iNGO network Bond, providing expertise around recruitment, partnership and community awareness.
- In country Safeguarding Focal Points have been provided with continued support and training to build skills and confidence in responding to safeguarding issues such as modern slavery.
- We have delivered safeguarding training to key partners which in some areas, has led to organisational action plans and a personal pledge for ensuring safer communities.
- We have recruited a Global Ethical Checks Manager who has been reviewing and updating our Global Ethical Standards and Policy, and ethical check procedures.
- We have updated our Global Accounts Manual and UK Accounts Manual, strengthening the processes around supplier selection and due diligence.

Moving forward

- To further strengthen our safer recruitment processes, we will implement a Global Disclosure Policy across the federation which will see employees assessed through the highest appropriate levels of background checks possible.
- In 2022-23, we will agree and roll out our updated Global Ethical Standards and Policy, together with new Ethical Check Guidance and training for staff, which will explicitly reference modern slavery and human trafficking.
- Revise current safeguarding training modules to more fully incorporate Modern Slavery and Human Trafficking.
- We will more clearly define Modern Slavery within our Global Code of Conduct Definitions.