

MODERN SLAVERY ACT 2015 (UK) COMPLIANCE STATEMENT

INTRODUCTION

This statement is made pursuant to section 54 of the Modern Slavery Act 2015. It constitutes The Salvation Army International Headquarters' (IHQ) Modern Slavery Act 2015 Compliance Statement for the financial year ended March 2021. This statement covers the activities of IHQ and The Salvation Army International Trustee Company, whose relationship with IHQ is explained further below.

This statement has also been uploaded to the Government's new Modern Slavery Statement Registry located at <https://modern-slavery-statement-registry.service.gov.uk/> so as to further demonstrate IHQ's legal compliance in this area.

THE SALVATION ARMY

THE Salvation Army is an international movement, operating in more than 131 countries whose aim is to continue the advancement of the Christian religion through evangelical outreach. Its message is based on the Bible. Its ministry is motivated by the love of God. Its mission is to preach the gospel of Jesus Christ and to meet human needs in his name without discrimination.

In every country where The Salvation Army is present it seeks to raise awareness of the scourge of human trafficking and modern slavery. As a result, The Salvation Army is very active in bringing practical assistance to those whose lives have been affected by the evil of modern slavery and as such is sensitive to the danger of inadvertently finding itself falling short of its own beliefs and standards in this regard as well as the standards set out in the UK Government's Modern Slavery Act 2015.

The Salvation Army is, for administrative purposes, divided into autonomous Territories (generally by region or country). Each Territory is governed, through local registration(s), in accordance with the applicable local laws. However, The Salvation Army remains under the oversight, direction and control of the General of The Salvation Army¹, as set out in greater detail in The Salvation Army Act 1980. IHQ exists to support the General as he leads the organisation to accomplish its worldwide mission.

THE SALVATION ARMY INTERNATIONAL TRUSTEE COMPANY ('SAITCO')

The General, acting under powers contained in The Salvation Army Act 1980, established The Salvation Army International Trust (the '**Trust**') to further the worldwide work of The Salvation Army. SAITCO, a company limited by guarantee, was formed and appointed as the ordinary trustee of the Trust.

As such, SAITCO provides the following functions for The Salvation Army, in accordance with the general structure of The Salvation Army described above:

- (i) supporting the central functions of The Salvation Army, including the office of the General of The Salvation Army ('**Administrative Function**');
- (ii) providing financial assistance to autonomous, individual Salvation Army Territories across the globe in order to facilitate their local activities and projects in accordance with the aims of The

Salvation Army, such as educational projects and international personnel training and development ('**Assistance to Local Territories**'); and

(iii) working in partnership with Territories to directly impact affected communities through fighting human trafficking, crisis relief, and improving access to quality primary health care services close to family units ('**Direct Action**').

In undertaking its work SAITCO operates under the direction of its board of directors (in accordance with the Companies Act 2006) and the General of The Salvation Army (in accordance with The Salvation Army Act 1980).

ASSISTANCE AND UPDATES TO LOCAL TERRITORIES

SAITCO has again communicated this statement to all Salvation Army Territories to make clear that it:

- (i) expects Territories to have in place appropriate protections against the evil of modern slavery. Indeed, it is noted that other Salvation Army entities such as the Salvation Army Trustee Company (SATCO) in the United Kingdom has also taken a leading role in driving forward this agenda²;
- (ii) offers to provide training/further information in relation to the issue of modern slavery should that be requested by any Salvation Army Territory.

More specifically, in the light of the coronavirus pandemic, the UK Government³ released guidance in April 2020 designed to assist organisations with modern slavery reporting during this period. SAITCo has produced a summary of this guidance and distributed it to all Territories so that they may be made aware of these further recommended reporting and monitoring procedures and of the heightened risk of the occurrence of modern slavery during these difficult times.

SAITCO has considered the latest UK Government guidance in relation to IHQ operations and will continue to work with local Territories to determine whether there are further areas of risk and potential further actions SAITCO might take in order to reduce and remove those risks.

ADMINISTRATIVE FUNCTION AND DIRECT ACTION

The Salvation Army has a prominent role in seeking to alleviate modern slavery and human trafficking and SAITCO recognises the need to continually review and tighten its checks and controls in this regard. In relation to its own work SAITCO has therefore continued to seek to ensure it avoids and reduces the risk of inadvertently supporting modern slavery and human trafficking in any way through a variety of measures:

- (i) the appropriate personnel at SAITCO including its board of directors have reviewed and will continue to monitor the relevant further guidance provided by the UK Government and other international organisations such as the United Nations.
- (ii) ensuring it remains an equal opportunities employer, with a rigorous recruitment process. In compliance with the recruitment process, it seeks to avoid inadvertently engaging those who present as looking for work for themselves but who are in fact 'controlled' by a third person. Where it uses agency workers, these are sourced from reputable agencies whose practices and terms and conditions are verified before workers are accepted.

(iii) in so far as SAITCO instructs its own material suppliers – relating, but not limited to, items such as provision of catering, cleaning and security services to maintain office accommodation – ensuring tendering is conducted according to a strict procurement protocol to provide clear standards and enable reputable purchasing.

However, in the light of The Salvation Army's prominent role in seeking to alleviate modern slavery and/or human trafficking SAITCO recognises the need to continually review and tighten its checks and controls in this regard. As a result, SAITCO:

(i) is continuing to advise all material suppliers that SAITCO expects such suppliers (and supplier subcontractors and group company members) to act in accordance with the Modern Slavery Act 2015, including a link to the government's guidance;

(ii) continues to use its relevant contractual compliance clause in its standard purchase Terms and Conditions and in its contracts with third party suppliers in order to address the issue of modern slavery. All material suppliers submitting tender responses for the provision of goods or services to IHQ continue to have to confirm their agreement and acceptance of the terms and conditions.

(iii) is committed to conducting periodic procurement reviews to ensure SAITCO's supply chains receive further scrutiny to identify any areas of particular risk.

APPROVAL

This statement has been formally reviewed and approved by the Board of Directors of SAITCo and is signed by Commissioner Lyndon Buckingham, the Chief of the Staff of The Salvation Army and the Chair of the Board of Directors of SAITCo, on their behalf.

¹The General of The Salvation Army is a corporation sole

² SATCO's own statement of compliance can be found at the following link:
<https://www.salvationarmy.org.uk/modern-slavery-statement>

³ The UK Government guidance can be found at the following link:
<https://www.gov.uk/government/publications/coronavirus-covid-19-reporting-modern-slavery-for-businesses/modern-slavery-reporting-during-the-coronavirus-covid-19-pandemic>

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