Modern Slavery Statement 2024/25

Introduction

For over 80 years, Christian Aid has provided long-term development support and humanitarian relief worldwide. Christian Aid seeks to tackle the structural causes of poverty, inequality and injustice and to also work for sustainable and long-lasting change. Poverty, discrimination and marginalisation are some of the key factors why modern slavery exists and why addressing it is inextricably linked to our long-term development work.

We also campaign for stronger regulation to prevent human rights abuses both at a national and international level. In the UK, our partner, the Corporate Justice Coalition, played a key role in the development of modern slavery legislation and is leading calls for the UK government to introduce a new legal requirement for UK-based companies and investors to carry out human rights and environmental due diligence of their operations and investments. Internationally, we support proposals for a new UN Binding Treaty on Business and Human Rights.

Christian Aid is committed to improving practices to minimise the risk of modern slavery in our organisation and supply chains. This is Christian Aid's ninth modern slavery statement published in accordance with the UK Modern Slavery Act 2015. In this statement, we outline the steps we are taking to identify and prevent modern slavery in our operations and supply chains. We also explain the progress we have made during 2024/25 and how we plan to further mitigate the risks going forward.

Our organisation

Christian Aid was established in 1945 to provide humanitarian assistance to refugees in Europe following the Second World War. Today Christian Aid delivers development and humanitarian work around the world including over 25 countries in Africa, Asia, the Middle East, Latin America and the Caribbean. We respond in practical ways to alleviate suffering, to expose and eradicate misuses of power, and to provide humanitarian support in crises and emergencies.

Christian Aid is a UK registered charitable company limited by guarantee. Our international programmes are mostly delivered through a network of country offices in the countries where we work and we also have a number of subsidiaries. A description of Christian Aid's corporate group structure and subsidiary undertakings is included in our most recent Annual Report for 2024/25. 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.

The Board of Trustees is 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 Board has oversight of the 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.

Our supply chains

Christian Aid carries out procurement in the UK and internationally to support our operations. Most of our suppliers provide goods and services in connection with our office facilities, recruitment, fundraising, marketing, technology and other professional services. Christian Aid does not engage in any direct retail activities in the UK. Internationally Christian Aid generally works with local partners to deliver our programmes. Our partners are therefore responsible for most of the procurement required for our programmes, following the standards required by Christian Aid to minimise the risk of modern slavery.

The framework for supply chain management is set out in our Procurement Policy. All procurement decisions by Christian Aid or our partners valued at £50,000 or over require approval from the central Procurement team based in the UK, who will oversee and approve the selection process. Our larger country offices typically have a full-time procurement officer and the relevant officer or local team may approve smaller procurements and supplier relationships in accordance with delegated authority. Many partner procurements are small scale and below the £50,000 threshold and these are managed and monitored by the relevant Christian Aid country office. To support the implementation of the supply chain framework, the central Procurement team provide training and guidance. All our country offices are invited to join a quarterly community of practice where procurement best practice is discussed.

Policies

Christian Aid has a range of policies which help to ensure that the risk of modern slavery is minimised in our organisation and supply chains. Most of the policies summarised below are corporate policies which are reviewed regularly by the Board of Trustees or the relevant sub-committee.

Christian Aid has a dedicated **Modern Slavery and Human Trafficking Policy** which summarises all of our policies and procedures which are relevant to addressing the risk of modern slavery. Other policies relevant to modern slavery include:

- The **Procurement Policy** covers the risk of modern slavery and applies to all expenditure on goods and services purchased directly by the organisation or by our partners in Christian Aid funded projects. The Policy sets out the tendering, due diligence and approval levels required depending on the value

of procurement. The Policy promotes ethical and sustainable procurement and includes a **Code of Conduct for Suppliers**, which sets out the ethical standards we expect such as the payment of living wages and safeguards to prevent human trafficking. Our Policy requires that our partners' procurement policies are reviewed to ensure that they are consistent with our principles and guidelines. Subject to any specific donor requirements, we may require partners to use our Policy if they do not have adequate policies. In larger programmes, we also require procurement plans from our partners.

- Our **Safeguarding Policy** applies to all Christian Aid staff, trustees, volunteers and consultants. 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 Safeguarding Policy. Our Safeguarding Policy includes a confidential safeguarding email address which is publicly available on our corporate website. As alternatives, we also have confidential safeguarding trustee and whistleblowing email addresses and an internal reporting form for staff.
- Our **Code of Conduct** also applies to all Christian Aid staff, trustees, volunteers and consultants. We also require all partners to have an appropriate Code of Conduct.
- Our **Feedback and Complaints Policy** complements many of our existing policies which are relevant to modern slavery. The Feedback and Complaints Policy applies globally and covers our supporters and the communities we serve. It helps to strengthen Christian Aid's accountability ensuring that we are meeting sector standards around feedback and complaints.
- Related to the above is our **Whistleblowing Policy** which makes it clear how and when to raise concerns internally and externally. The Policy now sets out in detail the protection and support available to those raising concerns in line with our survivor-focused approach.
- Our **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.

One of our ongoing commitments is to transparency and we now publish many of our key policies on our website.

Identifying and addressing the risk of modern slavery

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.

Our operations

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 are aware that there could be an increased risk of modern slavery and we remain vigilant as to how we can identify and mitigate these risks.

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 to safeguarding anyone coming into contact with the charity in the course of our work and reporting any abuse. In terms of our employment practices, 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. New employee induction training includes a compulsory 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 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.

We have a range of practices and procedures in place to address the risk of modern slavery in working through partners including:

- We carry out **Partner Operational Capacity Risk Assessments (POCRAs)** at the start of a new funding relationship and then again at least once every three years or following any significant events such as major staff changes or the rapid onset of an emergency situation. The POCRA 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.

- Our **Partnership Agreements** include sections on compliance with our Procurement Policy, Safeguarding Policy and the Modern Slavery Act 2015. Our agreements also require partners to have their own Codes of Conduct and relevant policies which are aligned to Christian Aid's policies. Based on the POCRA assessment, guidance is given to partners on how to align better their policies and values with ours.
- We use a **risk-based approach** to support partners where appropriate with due diligence of their suppliers, particularly in challenging contexts where partners may lack capacity to monitor compliance of their own suppliers.
- We also **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.
- Finally, we require partners working in the development and humanitarian area to agree to the **Core Humanitarian Standards (CHS)** which include fair and equitable treatment of staff in humanitarian situations and focus on accountability to the people we serve.

Progress again our three-year action plan

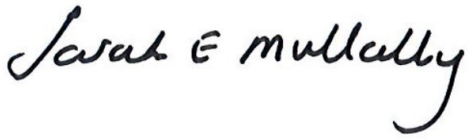
In 2023, we commissioned Anti-Slavery International to review our approach to addressing modern slavery risk in our operations and programmes. Further details about the review and recommendations can be found in our previous Statement.18 We developed a three-year plan in response to those recommendations. To date, we have taken a number of steps to progress the priorities identified including implementing a Modern Slavery and Human Trafficking Policy and increasing staff awareness and engagement around modern slavery through staff meetings and communities of practice. An additional commitment for this year includes carrying out an analysis of how modern slavery risks will be identified and monitored in our new structure. We also intend to build on the work already undertaken in identifying higher risk sectors and regions so that we can develop a more nuanced approach to our risk assessments for procurement based on any higher risk factors.

Incidents

We have had no reports of modern slavery in our supply chains or operations in 2024/25.

Review and approval

This statement has been approved by the board of directors for Christian Aid and also on behalf of all of the connected and subsidiary entities forming part of the Christian Aid group:



Signed by Bishop Sarah Mullally, Chair of the Christian Aid Board of Trustees

Date: 18 September 2025