



Modern Slavery Statement 2025/26

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 tenth 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, and how we plan to further mitigate the risk of modern slavery 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 in approximately 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 delivered through a network of MCC (multi-country sub-cluster) hubs that connect to priority countries. We also have a number of UK subsidiaries through which some of our work is managed. A description of Christian Aid's corporate group structure and subsidiary undertakings is included in our most recent Annual Report for 2025/26. 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 has historically worked primarily with, and through, trusted and competent partners to deliver its programmes. Direct implementation has only occurred in exceptional cases, in a small number of countries, and typically at the request of specific donors. Internationally, Christian Aid has now phased out all direct implementations, with the MCC hubs instead working with local partners to deliver projects. As a result, our partners are responsible for most of the procurement required for our programmes, following standards set by Christian Aid to minimise the risk of modern slavery.

Christian Aid does, however, carry out procurement to support its 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.

The framework for supply chain management is set out in our Procurement Policy. All procurement decisions by Christian Aid valued at £50,000 or over require approval from the central Procurement function based in the UK, who oversee and approve the selection process.

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 Procurement Policy sets

out the tendering, due diligence and approval levels required depending on the value of procurement. The Procurement 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 Procurement 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 Procurement 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** 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 explains how and when to raise concerns internally and externally. The Policy also 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. As good practice, we 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 suppliers

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 follows stringent recruitment global practices and rigorous selection guidelines to mitigate potential risks. These include vetting, right to work checks, background reference checks, counter terrorism checks, reviewing social media footprints and induction training, which includes compulsory modules on modern slavery.

These checks are not restricted to new employees; vetting is revisited and enhanced checks are conducted for risk related roles. Christian Aid also provides ongoing training, including role specific training on modern slavery. Safeguarding is a mandatory element of compliance, adding an additional layer of risk mitigation across our organisation.

Our partners

Christian Aid works through independent partners to deliver programmes, rather than implementing programmes directly. Our MCC hubs work with local partners to deliver projects, with those partners taking responsibility for most of the procurement required for our programmes. 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 when 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 five 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. Since 2025 we also accept due diligence passporting from trusted peer agencies (such as ACT Alliance or Charter for Change members) usually via the C4C passporting tool template, which covers all the same mentioned areas and is very comparable to the POCRA.
- Our **Partnership Funding and Reporting 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 better align their policies and values with ours.
- We use a **risk-based approach** to support partners where appropriate with due diligence of their suppliers, particularly where partners may lack their own capacity to monitor compliance of their suppliers.
- We also **monitor** our funded projects and provide **feedback** to partners. If issues are identified, these 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 and commitments

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 2022/23 Modern Slavery Statement. We developed a three-year plan in response to those recommendations, and, over the last three years, 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.

Our key commitment for the next three years is to further improve the identification and monitoring of modern slavery risks within our current operating structure with a clear plan identified in the next twelve months. 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. Christian Aid is fully committed as a global organisation and will look to prevent, identify, respond to, mitigate, remediate and report all modern slavery risks within our operations, supply chains and wider operating environments. We aim to bridge a gap between policy and practice with measurable actions to combat modern slavery.

Christian Aid will continue to take a holistic people focused approach through key areas such as leadership and commitment, governance and accountability, roles and responsibilities and transparency and reporting.

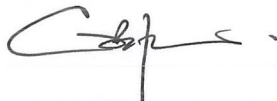
Incidents

We have had no reports of modern slavery in our supply chains or operations in 2025/26.

Review and approval

This statement has been approved by the board of directors for Christian Aid and members of the Christian Aid group:

Signed by Carol Wai Wing Hui, Vice-Chair of the Christian Aid Board of Trustees



Date: 23rd June 2026