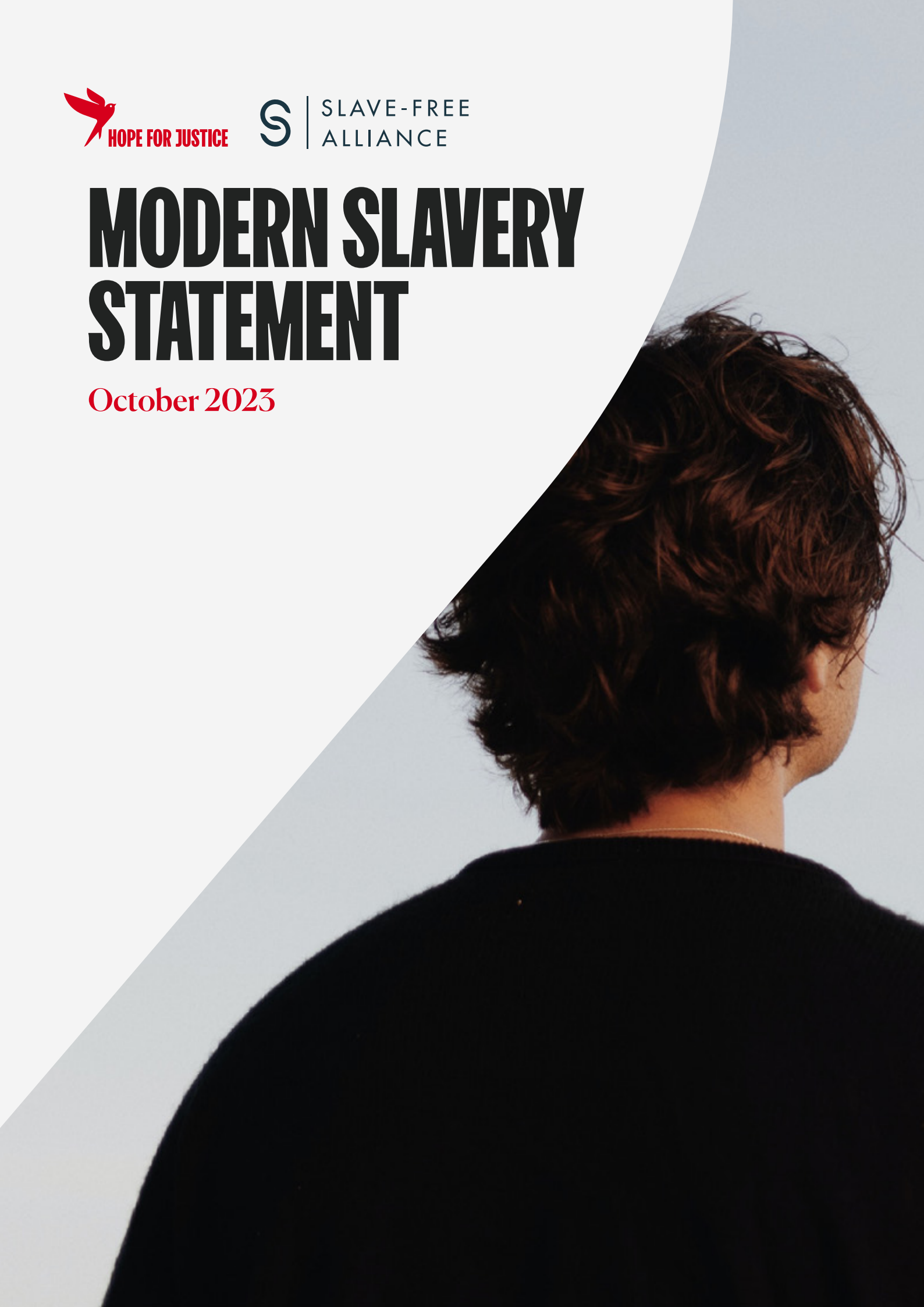
HOPE FOR JUSTICE

SLAVE-FREE ALLIANCE

MODERN SLAVERY STATEMENT

October 2023



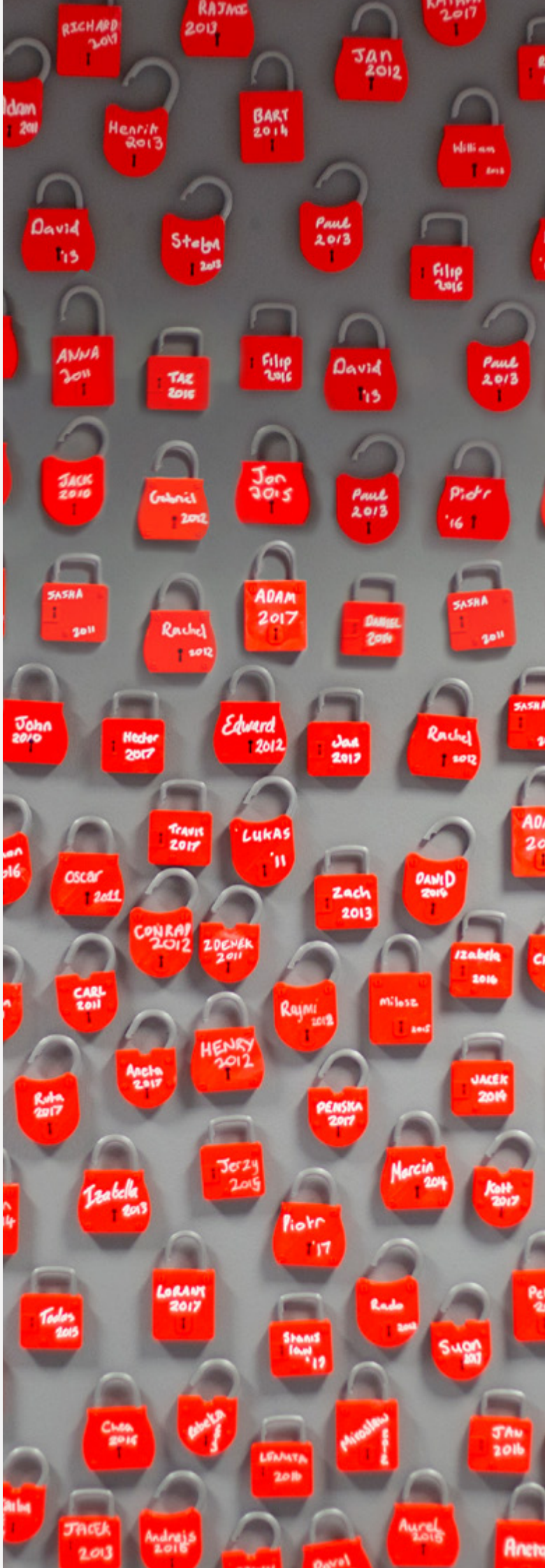
INTRODUCTION

Hope for Justice is a global charity founded in the UK in 2008. We work to end modern slavery and human trafficking with an effective, proven multi-disciplinary model that is replicable, scalable, and widely admired (our work).

Hope for Justice owns and runs an innovative social enterprise, **Slave-Free Alliance** (www.slavefreealliance.org), founded in 2018, which provides services to businesses seeking to protect their operations and supply chains from modern slavery.

UK, Norway and Australia each have legal provision for companies over a certain threshold to report annually on their modern slavery mitigations. Hope for Justice remains under the threshold for the reporting requirements, but we choose to publish this statement to demonstrate transparency, to be accountable to our members, donors and the public, and as part of our commitment to end slavery and change lives.

This is our sixth Modern Slavery statement, covering the period 1st April 2022 to 31st March 2023. It has been a challenging year with significant cost increases and tightening economic factors reducing our cash reserves and leading us to make cuts across the organisation. This has occurred in line with best practice as we ensure beneficiaries in our care are safely reunited with families or placed into appropriate forward programmes with continued follow-up.



STRUCTURE - BUSINESS, SUPPLY CHAIN, OPERATIONS

Responsibility for overseeing our modern slavery risk is with the CEO and our trustees. Implementation of our Modern Slavery strategy is the remit of our Executive Sponsor, the Chief Financial Officer.

During 2022-23, the Hope for Justice family (www.hopeforjustice.org/what-we-do) has employed staff across eight countries in four continents, including:

- The Global North (UK, US, Norway, Australia) where we have a combination of rescue hubs, fundraising staff, training, outreach and advocacy programmes, including our head office functions.
- The Global South (Ethiopia, Uganda and Cambodia) where we run Lighthouses for rescued child victims of modern slavery, providing short-term residential care, clothing, counselling, and enabling prevention, rescue, restoration and reintegration of children. We also perform work in the area of safe migration.

Many of our programmes are run in partnership with other NGOs that we support and with which we work in order to reach more vulnerable people.

Our supply chain consists of IT and office provisions, promotional materials, IT support, car hire, flights, clothing, food and provisions for Lighthouses and long-term residences for victims. Waste services are provided by the owners of buildings that we lease.

Due to financial pressures in the organisation, we made the difficult decision to close our Cambodia programme, along with two Lighthouses in Ethiopia and Uganda. By restructuring, we ensure we can continue to provide quality care for beneficiaries and continue to operate programmes to prevent exploitation. All children in our care directly impacted by the closures were transitioned to either our restoration programmes or alternative partner-care provision.

We have continued to develop a more open and responsible culture, prioritising employees' wellbeing and input into the organisation by:

- Enacting the results of our first employee engagement survey, which was run in 2022 and achieved a response rate of 89%. The overall Engagement score was also 89%, which ranks us among the top NGOs surveyed.
- Continuing to operate our People and Culture Committee, which takes a lead on behalf of the board for people strategy, including their wellbeing, and other HR issues. They are also responsible for driving the Equity, Diversity and Inclusion (EDI) initiative that will develop an International EDI policy to govern the organisation's approach. Our Staff Advisory Council is an employee-elected forum with representation from across the international organisation to speak and act on behalf of the staff.
- Continuing to operate our Modern Slavery Working Group (MSWG) which has improved our supply chain and procurement process with increased scrutiny. There is an updated global procurement policy and weekly procurement meetings in Uganda and Ethiopia to ensure spend is appropriate and monitored.
- Continuing to operate our Risk & Compliance Committee to mitigate potential risks to the operations and reputation of the organisation.

SLAVE-FREE ALLIANCE

Slave-Free Alliance (SFA), a wholly-owned subsidiary of Hope for Justice, is a social enterprise providing consultancy services to support businesses in understanding and mitigating modern slavery risks in their organisation and supply chain through a membership scheme model. We recognise the need to do the same within our own organisation.

We have seen SFA grow significantly during 2022-23, to 100+ members. More members means more work but also involves us in greater exposure to modern slavery risk through launching into other countries including Norway, the US and Australia, with a greater opportunity to effect change. Our relationship with members is advancing, as is their understanding. As such, so we have more opportunities to complete more in-depth work to uncover issues and highlight risks.

We are learning and improving our approach, expertise and processes as SFA grows and as we gain more members.

We have an SFA Alert log – an internal referral mechanism to flag modern slavery concern cases and we provide training for our clients to spot indicators, and reporting.

The Norwegian Transparency Act is now in force. The Act requires companies to promote respect for human rights and working conditions (including the provision of a living wage) across their operations and supply chains. This will act as an additional lever to encourage Norwegian companies to take action.

SFA now has its own executive steering board to ensure the right level of leadership and management with the intention to have greater involvement with trustees.



SLAVE-FREE
ALLIANCE

MODERN SLAVERY WORKING GROUP

The Modern Slavery Working Group (MSWG), created in 2020, is led by an executive sponsor (the Chief Financial Officer) and has the remit to define our global strategy for addressing potential slavery within the organisation and suppliers.

Members of the group include:

- Head of Risk and Operations
- Slave-Free Alliance Senior Advisor, Human Rights in Supply Chains
- Risk and Operations Manager

The group undertakes a number of activities:

- Examine our external supply base
- Examine areas of risk in our own operations
- Drive a systematic approach of internal scrutiny
- Create action plans and KPIs to report to the executive board and trustees

Prioritising the MSWG activities has been challenging in the face of financial pressure and staff reductions, but the team has been able to oversee:

- Updating procurement policy to clarify spending limits, due diligence requirements on suppliers, and required authorisations.
- Launching quarterly procurement meeting for country-level modern slavery working groups.
- Integrating our purchase order system as part of our new finance system to improve visibility of suppliers and the enacting of due diligence requirements.
- Further updating our Supplier Code of Conduct



POLICIES

We have reviewed and archived many legacy policies to reduce the number of overall policies from 130 to 54, improving clarity for staff. We have also started to review our entire policy database by restructuring the documents to separate high-level policy set by the trustees from procedures that are led by staff. Those most relevant to modern slavery are:

- Safeguarding Policy (Children and Adults)
- Equity, Diversity & Inclusion
- Recruitment
- Conflicts of Interests
- Incident Reporting
- Whistleblowing
- Anti-Bribery
- Risk Management
- Supplier Code of Conduct
- Modern Slavery Policy
- Criminal Practices and Anti Money-Laundering
- Staff Code of Conduct

Hope for Justice runs international anti-modern slavery programmes designed to ensure that we prevent vulnerable individuals from being trafficked, rescue individuals from trafficking situations, take care of their immediate needs and recover them to situations where they will remain free. This programme work constitutes some 75% of our global staff.

All staff are subject to formal background checks prior to hiring. We are also members of the Inter-Agency Global Misconduct Scheme. We have comprehensive and regularly updated Standard Operating Procedures (SOPs) to support our work, including for our:

- Lighthouse programme
- Community prevention programme
- Family reintegration
- Foster care
- Outreach policy
- Rescue hubs global policy
- Advocacy procedures
- Our SOPs include risk assessments, as we are working with vulnerable individuals.



DUE DILIGENCE

Supply chain and procurement processes have been improved with weekly procurement meetings in Uganda and Ethiopia to identify spend and areas of risk.

Recruitment for all personnel in the UK, Norway, Australia and the USA is managed by our central HR team and includes a process of application forms followed by face-to-face interviews. Identification, basic security and right-to-work are checked, including by being member of the Inter-Agency Global Misconduct Scheme. New starters undertake an embedded onboarding programme using our HR system, Cezanne.

Senior Africa and Asia-based directors and staff are also engaged via Head Office processes, whilst operational staff in those areas are employed by local management, again including a process of application forms, vetting and referees as appropriate to the position.

Cleaning at offices is managed by local management or landlords at each site.

For procurement, we finalised a Supplier Code of Conduct in 2022 to support the existing Modern Slavery Supplier Questionnaire that is sent to third-party providers of goods & services.

We began migrating onto a new finance system which will digitally consolidate the financial management across the organisation onto a single system including better visibility and control of new suppliers.

We use our resources to monitor performance and influence best practice and these actions, combined with checking the Modern Slavery Statements of our larger branded suppliers, enable us to make more informed choices of suppliers and facilitate a level of risk assessment.

We are improving due diligence of businesses. Under Charity Commission legislation, we have to be aware of where funds are coming from. This is relevant to our corporate partnerships and their activities. A major gifts policy is in place for managing large donations.



APPROACH TO MERGERS/ PARTNERSHIPS

Hope for Justice & Slave-Free Alliance are aware of their specific roles in the field of modern slavery and therefore approach any mergers or partnerships mindful of the obligations that this carries. We have identified mergers and partnerships as a risk area through which issues of worker exploitation could be absorbed into Hope for Justice. We collaborate with reputable and recognised NGOs who have appropriate governance. We undertake our own thorough due diligence prior to undertaking new partnerships or mergers. We have rejected two opportunities for mergers in the past 12 months resulting from our own due diligence processes.



IDENTIFYING RISK

The highest risk of modern slavery occurring in our operations is:

- Within our rescue and aftercare programmes (which is what the programmes are intended to find and remedy).
- Among lower-skilled workers in our organisation such as domestic and security guards at our Lighthouses
- Waste management provision for offices, hubs and residential units (and cleaning services)
- In lower tiers of suppliers of goods and services

To date we have not identified any actual or suspected cases of modern slavery in our operations or supply chain.

In the event of any incident or suspected incident, we have a detailed, numbered Incident Report system, which includes corrective actions and an impact assessment as well as preventative actions to ensure learnings are captured. All incident reports are reported to our board of trustees. We have close relationships with Police and the National Crime Agency in the UK, as well as our own investigators from senior police backgrounds.



EFFECTIVENESS

The expertise of our internal personnel, combined with our daily focus on the issue of modern slavery serves to ensure that this topic is always front and centre in our undertakings.

We have strong processes in place for recruitment of all staff and a team that is equipped to spot the signs of slavery.

We are continuing to map our suppliers and continuing to introduce the Supplier Code of Conduct.

TRAINING

Training is at the forefront of our programme so all staff remained well-trained on identifying signs and dedicated teams understand how to respond.

Our employees have qualifications and experience across business, law enforcement and advocacy. Colleagues input into development of policy and law, liaising with government in this regard.

Internally we provide mandatory safeguarding training and complete DBS checks for all employees whether involved in projects or administrative roles. This is updated frequently.

All staff and trustees are expected to complete mandatory safeguarding training on a regular basis.

FUTURE INITIATIVES

Initiatives to reduce modern slavery risk in our organisation and improve mitigations are constantly ongoing across the organisation. The following initiatives are either already completed or due to complete in Financial year 23/24:

SFA is broadening its global reach with client projects and new partners in Africa, USA and Malta. This is expanding our scope and reach to prevent modern slavery. Aldi Australia is already a member.

Enacting the outputs from the employee engagement survey and ensuring we maintain staff morale in spite of challenging circumstances.

Utilising Slave-Free Alliance to complete an internal gap analysis of the organisation, seeing Hope for Justice as an external client and undergoing a review of the modern slavery risk in a formal and structured manner.



HOPE FOR JUSTICE

This Modern Slavery Statement was approved by the Board on 14 October 2023 and signed by:



Tim Nelson, CEO

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