

## **Our organisation**

Tearfund is an international Christian relief and development agency committed to eradicating poverty. Tearfund is a company limited by guarantee incorporated in England and Wales, and a charity registered with the Charity Commission of England and Wales and with the Office of the Scottish Charity Regulator.

Tearfund is not required to prepare a slavery and human trafficking statement as we do not meet the threshold requirements under the Modern Slavery Act 2015. However, we recognise the inherent dignity and worth of all people and take seriously our obligation to seek to prevent slavery and human trafficking.

Slavery and trafficking is a global problem which is estimated to affect almost 40 million people worldwide.<sup>1</sup> Tearfund exists to support those in greatest need, therefore the Board welcomes the Modern Slavery Act and is pleased to set out in this statement the steps we have taken to prevent modern slavery in our organisation and supply chain in the 2018/19 financial year.

## **Our approach to modern slavery and human trafficking**

We value each individual we work with as made in the image of God. We expect the highest standards of personal and collective behaviour across all of our work. In upholding our core values we stand against all forms of exploitation, abuse, fraud, bribery and any other conduct which is incompatible with them.

We strive to transfer power to the people we serve; to transform our own, our partners' and communities' attitudes and behaviours on inclusion, participation, accountability, gender and learning.

Moving beyond our own supply chain, we have the opportunity to proactively seek to prevent and respond to issues of modern slavery through our Partners. This is through our work with communities in some of the highest risk countries for slavery in trafficking in the world, as well as using our expertise on sexual and gender based violence,.

We have in place a robust set of policies and procedures aimed at preventing abuse and harm and to ensure that the partners we choose to work with understand our approach to safeguarding. We work with partners to build their capacity in these areas and to have effective processes to ensure beneficiaries are protected against exploitation.

In addition, in 2018/19 we reviewed our safeguarding, whistleblowing and personal conduct policies to further embed best practice, in accordance with our policy review schedule. We also introduced mandatory e-learning on child and adult safeguarding for all staff and Board members globally. This training will be refreshed annually and is recorded for audit purposes. We have set up a network of country, cluster and directorate 'focal points' who have received additional in-depth training, and we have a three-year rolling plan to ensure that the partners with whom we work receive training too.

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<sup>1</sup> <https://www.theguardian.com/news/2019/feb/25/modern-slavery-trafficking-persons-one-in-200>

Because we recognise that humanitarian emergencies create instability and therefore offer greater opportunities for human trafficking, we are developing new training modules for Tearfund staff and professionals currently enlisted on our Emergency Response Register (ERR) to ensure best practice in humanitarian programming. Over the past year we've continued to train and equip members of our ERR to make sure they're prepared and equipped to provide the best support during humanitarian crises. This included our response to the earthquake and tsunami in Indonesia where we deployed an initial response team. They assessed affected areas, coordinated with others to engage new response partners, initiated the set-up of an operational base and took a lead in developing safety and security plans.

In the year ahead we will continue to build the capacity of those on our ERR to ensure that we are providing high-quality assistance while protecting our teams. This includes revising how we provide training to Tearfund's staff across the regions. We're also in the process of strengthening our online training courses to ensure that all Tearfund staff members can access training and support wherever they are in the world.

### **Our supply chain**

Whilst seeking to prevent and work alongside those who are victims of slavery and human trafficking we are also committed to ensuring that it is not taking place in our own supply chains or in our organisation. Tearfund works in over 50 countries, primarily through local churches or Christian partners. We use suppliers across all of our work to enable us to carry out our charitable activities. We are not involved in manufacturing, agriculture or retail activities which are typically at the highest risk of modern slavery occurring. However, we do recognise that our supply chain is complex and that we work in some of the highest risk countries for slavery in the world.

Tearfund's supply chain comprises of:

1. UK-sourced goods and services for use in the UK (including utilities to professional advisors and contracting with construction companies).
2. UK-sourced humanitarian supplies for use overseas (including equipment and vehicles).
3. Overseas procurement of goods and services managed from the countries where we work (including food and fuel). This includes sourcing items for our emergency response work.
4. Funding overseas partners to allow them to procure goods and services directly with local suppliers and professional advisors.

Our Global Logistics team have focussed on the higher risk activities outside of the UK associated with international development and relief. To strengthen our approach to procurement, from June 2018, Global Logistics assumed responsibility for UK procurement.

### **UK**

In the UK we work to ensure that any suppliers are aligned to our environmental policies and ethical standards. We review our larger suppliers every three years. Any significant funding partnerships we engage in are reviewed through our Funding Sources Policy, where due diligence is carried out.

## **International**

We are fully aware that the nature of international development and relief work makes it difficult to guarantee that any products or services come from totally ethical sources.

One way in which we aim to address this is through The Partner Capacity Enhancement in Logistics (PARCEL) project. Tearfund participated in the consortium which developed the PARCEL Logistics Standards, which are measurable, minimum requirements that logistics processes and procedures must meet. These standards reflect best practice within the sector.

Tearfund follows documented procurement procedures to ensure that all goods, services and construction works are sourced (either directly or goods in kind) in compliance with donor policies and all applicable laws.

As a member of the Inter-Agency Procurement Group (IAPG), we aim to purchase goods and services in the supply chain that prioritise Corporate Social Responsibility elements.

Our standard contractual terms follow the IAPG code of conduct, covering the following:

- Goods and services purchased are produced and developed under conditions that do not involve the abuse or exploitation of any persons.
- Goods produced and delivered by organisations subscribe to no exploitation of children.
- Goods produced and manufactured have the least impact on the environment.

We ask suppliers to sign up to a code of conduct which confirms that goods and services are produced and delivered under conditions where:

- Employment is freely chosen.
- The rights of staff to freedom of association and collective bargaining are respected.
- Living wages are paid.
- There is no exploitation of children.
- Working conditions are safe and hygienic.
- Working hours are not excessive.
- No discrimination is practised.
- Regular employment is provided.
- No harsh or inhumane treatment of staff is allowed.

Additionally, our contracts can be terminated immediately should the above have been breached. IAPG members will seek alternative sources where the conduct of suppliers demonstrably violates anyone's basic human rights, and there is no willingness to address the situation within a reasonable timeframe. Where companies in the supply chain are involved in the manufacture of arms or the sale of arms to governments systematically violating the human rights of their citizens, members will seek different options.

Where speed of deployment is essential in saving lives, IAPG members will purchase necessary goods and services from the most appropriate available source.

## **Policies**

The following policies were reviewed and updated, as necessary, in the 2018/19 financial year and expressly contain provisions on modern slavery/human trafficking:

- Personal Conduct Policy and Code of Conduct for all staff.
- Whistleblowing Policy.
- Fraud, Loss and Bribery policy.

Our Safeguarding (Children and Vulnerable Adults) Policy was substantially updated in 2017/18 and will be further reviewed and updated in financial year 2019/20.

Our whistleblowing procedures already define clear processes for reporting concerns relating to fraud, abuse, human trafficking, illegal action and exploitation. This includes Safecall, a 24/7 independent whistleblowing mechanism, to ensure that any concerns about Tearfund staff (including those relating to modern slavery) can be effectively and, where appropriate, anonymously raised by staff, partners and members of the public.

Our Funding Sources Policy sets out that any donation of more than £10,000 will go through an ethical screening process and we will reject any donation that would compromise our ability to speak out on issues that exacerbate global poverty or limit our strategic effectiveness in reaching the world's poorest.

Tearfund is an accredited London Living Wage employer and ensures that anyone working for us in the UK, whether directly employed or engaged through a contract for cleaning or security services, is paid at this level or above.

Any allegations of breaches of the above policies or whistleblowing reports raised are taken very seriously by Tearfund. Such incidents would be notified to our Audit, Risk and Finance Board Committee and, where appropriate, to the Board of Tearfund.

## **Training**

Tearfund's values, quality standards and policies are clear that any exploitation or abuse by staff or anyone connected with our staff (partners, suppliers, people benefiting from our work) is unacceptable. We are committed to ensuring that these values and quality standards are not just words on paper but are known, understood and part of the way that Tearfund staff and partners work globally.

Our corporate commitment is that, vision and values will form a core part of Global Induction which includes explaining our zero tolerance for all forms of exploitation and abuse, fraud, bribery and any other conduct which is incompatible with these values.

E-learning training on Tearfund's core policies (whistleblowing, safeguarding, fraud awareness, anti bribery and corruption, data protection and conflicts of interest) is mandatory for all staff, regular volunteers and consultants. Tearfund's core policies are applicable to staff, consultants, volunteers and others who represent Tearfund. In addition, partners are also required to adopt policies in these core areas.

## **Due diligence**

We carry out due diligence on key suppliers and monitor compliance with applicable law, including modern slavery and human trafficking.

## **Looking Ahead**

In the 2019/20 financial year, Tearfund is committed to the following activities to continue to strengthen and develop its governance to ensure that modern slavery is not taking place in our own supply chains or in our organisation:

- We are currently in an audit process for Level 1 certification from Keeping Children Safe, an organisation specialising in advising safeguarding best practice for International NGOs. This will give us an independent assessment of the quality of our policies and practices.
- We are introducing a new procurement system which will provide much greater visibility and tracking of our suppliers. This will be rolled out in test countries in 19/20 before being fully implemented in 20/21.
- Strengthening our compliance resource.
- Ongoing capacity building of partners to develop, implement and respond appropriately to these issues.
- Standardising procurement procedures and templates (tender and contract templates) in the UK and overseas.
- Review of our Safeguarding (Children and Vulnerable Adults) Policy.

Further resource, new procurement systems and greater standardisation of contract and review templates will give us a sound basis to enhance our oversight of this critical area.

## **Approval**

This statement has been approved by the Board of Tearfund, and is signed on behalf of the Directors by:

A handwritten signature in black ink, appearing to read 'Anna Laszlo'.

Anna Laszlo, Chair

Date: 24th February 2020