



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2020

Introduction

This statement is made annually to demonstrate Compassion UK's (CUK) commitment to uphold high standards of accountability and transparency to ensure slavery and human trafficking is not taking place within our organisation or our supply chains.

The summary below covers progress made during the financial year (1 July 2019 to 30 June 2020). To date, we have found no evidence of modern slavery in our organisation or supply chains.

The unforeseen circumstances of the COVID-19 pandemic has resulted in key actions planned for the year to be delayed or deferred. A risk-based approach is applied consistently in the prioritisation of activities required for the fulfilment of our commitments.

1. Structure and supply chains

Global Structure

CUK has maintained its independence within the global partnership-based structure of Compassion International (CI). Funds raised by Compassion UK and other fundraising Compassion entities globally, are disbursed through Compassion International. The day to day responsibilities for the selection, management and monitoring of overseas downstream partners is delegated to Compassion International under a Master Agency Agreement. Compassion has rigorous systems and process for appropriate and proportionate due diligence and management of risks associated with operating internationally.

Employees and Volunteers

In the financial year 19-20, CUK had an average full time equivalent (FTE) of 124 employees as well as 457 volunteers who are based in the United Kingdom and Northern Ireland.

Suppliers

CUK has implemented a new contract management system that will strengthen the efficiency and effectiveness of procedures for robust supplier management and accountability.

The accreditation process to be certified by the Living Wage Foundation as an Accredited Living Wage Employer is in progress. However, continues to CUK pays its employees at or above the London living wage.

2. Policies on Modern Slavery

An update of the existing Safeguarding Policy was ratified by the Board of Trustees and now includes guiding principles for the protection from modern slavery and human trafficking. All staff completed the annual requirement to sign the Statement of Commitment to Child Protection and Code of Conduct.

The Procurement Policy is under review and will include the requirements for supplier code of conduct (where relevant) which has been developed, pending approval. This will be applied to all new contracts and as part of a variation to the terms of existing contracts (as appropriate). Furthermore, contracts will include specific termination clauses where CUK become aware of or have reasonable grounds to believe any form of modern slavery is taking place.

3. Due Diligence Processes

CUK continues to act prudently when applying appropriate and proportionate due diligence processes for prospective suppliers and partners. A comprehensive review was conducted of 'live' contracts and a new contract management system put in place to strengthen supplier management and accountability. CUK also now has a dedicated Contract Manager role responsible for maintaining an effective contract management service including supporting to ensure suppliers fulfil contractual terms and obligations.

The Enhanced Supplier Due Diligence Checklist for CUK has been developed and will be rolled out once approved to further strengthen due diligence processes.

4. Risk Assessment

The trustees review the risk register annually as a standing agenda item and have delegated the regular review and update of the risk register to the Finance and Audit Committee (FAC) with a specific focus on the top and moderate risks. This is a standing agenda item for all FAC meetings. However, significant risks are brought to the attention of the Board as necessary during the year.

To ensure effective internal governance, and consistency in the prioritisation of risks that have a global impact for Compassion in the fulfilment of its charitable purposes, a representative sample of Compassion entities collaborate annually on the risk assessment process.

The findings from the review of global risks will be incorporated in CUK's risk register, in particular any risk related to modern slavery in the supply chain.

5. Measuring Effectiveness

The board continues to review progress against our previous Modern Slavery and Human Trafficking statements as an annual standing agenda item in the first meeting after year end.

6. Training for Staff

Annual refresher training was given to all staff on child protection, as well as whistle-blowing in January 2020. A survey was conducted that demonstrated levels of understanding of whistle-blowing procedures and the extent to which staff feel confident and protected from unfair treatment by the whistle blowing process. All Trustees also completed a refresher Child Protection training in March 2020.

Procedures for the recruitment of independent contractors have been updated and relevant teams adequately trained on the requirements.

Board Approval

This statement has been approved by the organisation's Board of Trustees, who will review and update it annually.

Designated member's signature:



JON TOOHEY (Chair of the Board of Trustees)

16 October 2020