

Modern Slavery Statement

October 2021





Introduction

Hope for Justice is a global anti-slavery 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.

*In 2018 Hope for Justice founded an innovative social enterprise, **Slave-Free Alliance**, to provide services to businesses seeking to protect their operations and supply chains from modern slavery.*

Whilst not required to produce a Modern Slavery Statement under the requirements of Section 54 of the Modern Slavery Act 2015, 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 changing lives and ending slavery.

This is our fourth Modern Slavery statement, covering the period 1st April 2020 to 31st March 2021, against a backdrop of the global COVID-19 pandemic, staff placed on furlough during mid-2020 and ongoing organisational restructuring. While progress was therefore somewhat limited in this period, we continue to treat this work as a priority. Our new structures will enable strengthened governance, including a strategic approach to develop our internal systems, policies and practices to improve due diligence and prevent, mitigate and manage risks of modern slavery in our supply chains and operations globally.



Structure - Business, Supply Chain, Operations

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

The Hope for Justice family employs staff across eight countries on five continents, including:

- The Global North (UK, US, Norway, Australia) where we have rescue and community engagement 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 run in partnership with other NGOs that we support and work with in order to reach more vulnerable people.

Slave-Free Alliance, a 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. We recognise the need to do the same within our own organisation.

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.



Creation of Modern Slavery Working Group

We have created a Modern Slavery Working Group (MSWG) led by an executive sponsor, the Chief Finance Officer.

The remit of this group is 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 Technical Services Manager*
- *Risk and Operations Manager*

The group will undertake 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.*

Developing the MSWG was delayed due to staff being on furlough, as well as organisational and structural challenges. However, we are treating this as a priority and have started to map our supply chain, examined areas of key spend, and reviewed key internal policies.

Aspirations for the coming financial year are to further expand the group to comprise staff across the international organisation, and across many disciplines, to be a key part of our risk evaluation and mitigation improvement.

We plan to involve country-level stakeholders to review their local supplier base and enact mitigating actions, and will utilise survivors' experience in our locations to support our initiative.



Policies

We have developed global policies to set consistent standards throughout our operations, and those most relevant to modern slavery are:

- **Outreach Policy**
- **Safeguarding (Children and Adults)**
- **Equality & Diversity (including recruitment)**
- **Lighthouses Global Policy & Guidelines**
- **Rescue Hubs Global Policy & Guidelines**
- **Reintegration Policy**
- **Conflicts of Interests**
- **Incident Reporting**
- **Reporting Wrongdoing (Whistleblowing)**
- **Anti-Bribery**
- **Risk Management**
- **Supplier Code of Conduct**
- **Modern Slavery Policy**
- **Criminal Practices and Anti Money-Laundering**





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 which have appropriate governance, and we undertake our own thorough due diligence prior to undertaking new partnerships or mergers.

Due diligence

Recruitment for all personnel in the UK, Norway 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.

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 have introduced a Supplier Code of Conduct to support the existing Modern Slavery Supplier Questionnaire that is sent to all third party providers of goods & services.

We use our resources to monitor performance and influence best practice, and check the Modern Slavery Statements of our larger branded suppliers. This enables us to make more informed choices of suppliers and facilitate a high level of risk assessment. We are conducting a review of our current processes, including developing our own risk map. This will help us prioritise our actions in the next year.



Identifying Risk

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

- *In domestic and guarding functions at our global facilities for victim rehabilitation (Lighthouses)*
- *Waste management and cleaning services provision for offices, hubs and residential units*
- *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.

We have close relationships with Police and National Crime Agency, as well as having our own investigators from senior police backgrounds.



Effectiveness

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

We have robust processes in place for recruitment of all staff, and a team that we proactively train to spot the signs of slavery.

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



Training

As an organisation, we provide training on the risks of modern slavery to our members and clients.

Our employees have qualifications and expertise across business, law enforcement and advocacy. Our team inputs 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. DBS checks are updated frequently.

This Modern Slavery Statement was approved by the Board on 28th October 2021 and signed by:

A handwritten signature in white ink on a red background. The signature is stylized, starting with a long horizontal line that slopes downwards to the right, followed by the letters 'T-Nelson' in a cursive script.

Tim Nelson, CEO



HOPE FOR JUSTICE