



# MODERN SLAVERY STATEMENT

December 2022



# INTRODUCTION

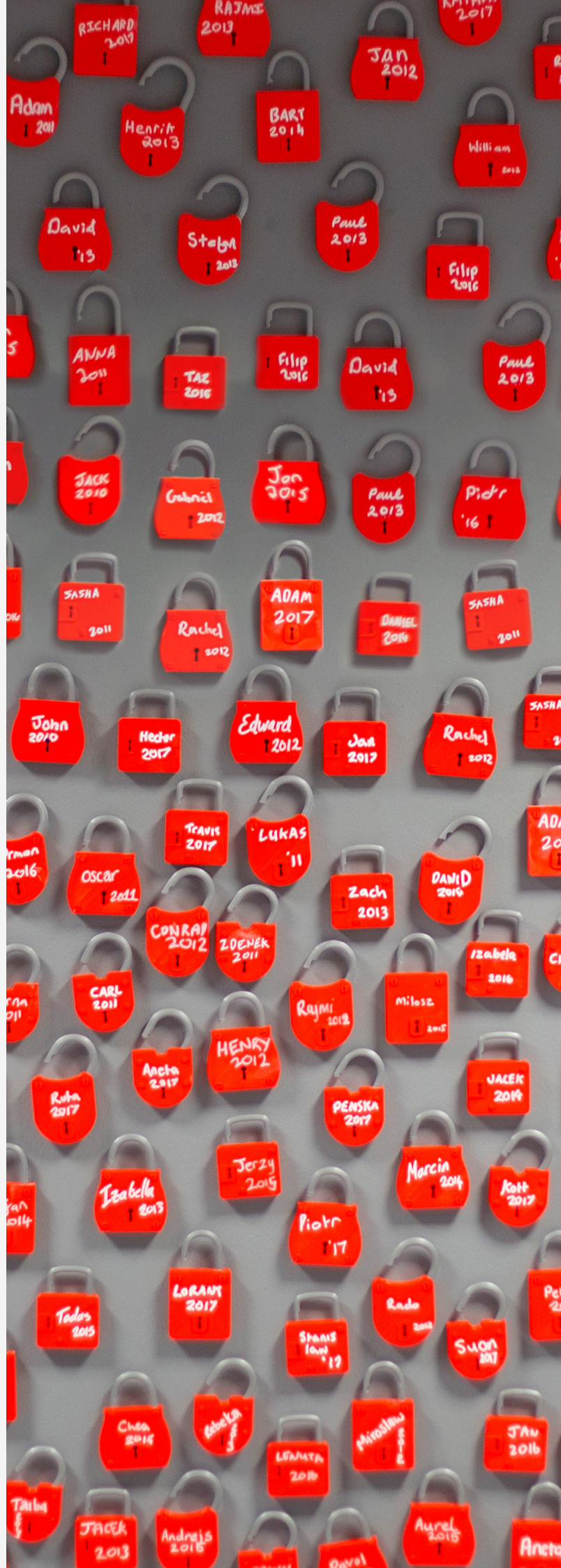
**Hope for Justice** is a global charity founded in the UK in 2008. We work to end modern slavery and human trafficking with an effective, proven multi-disciplinary model that is replicable, scalable, and widely admired.

Hope for Justice owns and runs an innovative social enterprise, **Slave-Free Alliance**

<https://www.slavefreealliance.org>, founded in 2018, which provides services to businesses seeking to protect their operations and supply chains from modern slavery.

The 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 remain 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 fifth Modern Slavery statement, covering the period 1st April 2021 to 31st March 2022. Our new structures will enable strengthened governance, including a strategic approach to develop our internal systems, policies and practices to improve due diligence; and to prevent, mitigate and manage risks of modern slavery in our supply chains and operations globally.



# STRUCTURE - BUSINESS, SUPPLY CHAIN, OPERATIONS

In May 2021, Hope for Justice appointed Tim Nelson as the new global CEO. As part of developing a more open and responsible culture, prioritising employees' wellbeing and input into the organisation, we have started a number of initiatives including:

Engaged external Equity, Diversity and Inclusion (EDI) expertise to complete baselining across the organisation and develop an International EDI policy to govern the organisation's approach.

Addition of a People and Culture Committee, a committee of the board of trustees to take lead on behalf of the board for overall staff wellbeing, reviewing exit surveys and other HR issues.

Created the Staff Advisory Council, an employee-elected forum with representation from across the international organisation to act as a staff voice into the organisation.

Ran our first organisation-wide Employee Engagement Survey achieving a response rate of 89%. The overall Engagement score, which measures employees' pride in the organisation, was also 89%, which ranks us amongst the top NGOs surveyed.

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.

The Hope for Justice family ([www.hopeforjustice.org/what-we-do/](http://www.hopeforjustice.org/what-we-do/)) employs staff across eight countries in four continents, including:

- The Global North (UK, US, Norway, Australia) where we have 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 run in partnerships 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.



# MODERN SLAVERY WORKING GROUP

The Modern Slavery Working Group, 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 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

Creating action plans and KPIs to report to the executive board and trustees

Developing the MSWG was delayed due to COVID as well as organisational and structural challenges, however we have started to map our supply chain, examined areas of key spend, and reviewed key internal policies. Aspirations for the coming year are to:

*Update our procurement policy to clarify spending limits, due diligence requirements on suppliers, and required authorisations.*

*Launch of quarterly procurement meeting for country level modern slavery working groups.*

*Integrate 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*



SLAVE-FREE  
ALLIANCE



# POLICIES

**We have a comprehensive suite of global policies to set consistent standards throughout our operations. Those most relevant to modern slavery are:**

- Safeguarding Policy (Children and Adults)
- Equity, Diversity & Inclusion
- Recruitment
- 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
- Staff Code of Conduct

Our programme work constitutes some 75% of our global staff. Our international anti-modern slavery programmes are 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. We have comprehensive and regularly updated Standard Operating Procedures (SOPs) to support our work which include:

- 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.





# APPROACH TO MERCERS/ 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 and 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. 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 have introduced a Supplier Code of Conduct to support the existing Modern Slavery Supplier Questionnaire that is sent to third-party providers of goods & services.

We completed the design, choice and vetting of a new finance system to enable better visibility and control of suppliers. Migration of all finance data into the new system is ongoing.

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 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 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. We have close relationships with Police and the UK National Crime Agency, 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

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

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 CRB checks for all employees whether involved in projects or administrative roles and 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 22/23:

The all-staff Employee Engagement survey was launched in September and achieved an 89% response rate. We worked with every team to ensure that the survey was accessible in local languages and providing alternatives for those without computer literacy as a key skill. With all feedback now shared transparently across the organisation we are working to collaboratively plan and rollout a roadmap of change.

We have launched a new Staff Code of Conduct to ensure that our values and expectations are clearly communicated. We ask all colleagues and our Trustees to sign this in acknowledgement of their understanding and commitment to these standards.

Greater engagement from countries outside the global headquarters in our monthly staff meetings. Whilst the meeting is still conducted in English, we have input from global teams in different languages to increase engagement and inclusivity.







**This Modern Slavery Statement was approved by the Board on 07 January 2023 and signed by:**

**Tim Nelson, CEO**