Trócaire

COUNTER MODERN SLAVERY AND TRAFFICKING IN PERSONS STATEMENT 2021 (GLOBAL)

TABLE OF CONTENTS

POLICY MANAGEMENT INFORMATION 2
DECISION-MAKING IN RELATION TO THE POLICY 2
KEY MESSAGES 3
1. Introduction 4
2. Definitions 4
3. Scope 4
4. Organisation Structure 5
5. Implementation 5
6. Supply Chains 6
7. Due Diligence 6
8. Reporting 7
9. Training 7
10. Commitment 7

POLICY MANAGEMENT INFORMATION

Title:	*Counter Modern Slavery and Trafficking in Persons Statement*
Author (Responsible):	*Compliance Officer*
Owner (Accountable):	*Director of Corporate Services*
Division:	*Corporate Services*
Contact:	*Compliance Officer*
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Reviewed by (Consulted):	*Policy Steering Committee (PSC), Executive Leadership Team (ELT), Board (Republic of Ireland & Northern Ireland), Head of Safeguarding, Supply Chain and Logistics Manager*
Approved by:	*Trócair Board; ELT & PSC*
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Related policies & procedures:	*UK Modern Slavery Act 2015* , *Irish Criminal Law (Human Trafficking) Act 2008*, *Irish Criminal Law (Human Trafficking) (Amendment) Act 2013*, *Global Code of Conduct* , *Child Safeguarding Policy International* , *Child Safeguarding Policy Ireland and Northern Ireland* , *Global Safeguarding Policy* , *Trócaire's Supplier Code of Conduct*

DECISION-MAKING IN RELATION TO THE STATEMENT

Responsible (Author)	*Compliance Officer*
Accountable (Owner)	*Director of Corporate Services*
Consulted	*Policy Steering Committee, ELT, Board (ROI & NI), Head of Safeguarding, Supply Chain and Logistics Manager*
Informed	*All staff*

This statement was made pursuant to section 54 (1) of the UK Modern Slavery Act 2015 and constitutes Trócaire's slavery and human trafficking statement for the financial year ending 28th February 2021.

KEY MESSAGES

Why do we have this statement?	Trócaire considers that modern slavery and trafficking in persons both abuses and exploits an individual and will therefore not tolerate this within any of our programmes or activities or by any person representing Trócaire, including partner organisations whether within or external to our programmes and activities.
Who does this statement apply to?	All Trócaire staff, volunteers, Board members, suppliers (including consultants and other contractors) and visitors.
What are the key things I need to know?	Trócaire's policies provide the framework for the organisation's responsibility to keep people within our programmes safe from exploitation and abuse, ensuring that no person comes to harm as a result of their engagement with us, whether that is via their interaction with staff and those who represent us, or their participation in our programmes and/or activities. Trócaire views both modern slavery and trafficking in persons as abusive and exploitative and this falls within the scope of our safeguarding policies. More broadly our approach to safeguarding is about ensuring that our staff and others who work on our behalf do not abuse or exploit other people in any setting (within or outside of work).
What are the key things I need to do?	You need to familiarise yourself with the statement and suite of policies relevant to this statement.
Where can I find more information?	*UK Modern Slavery Act 2015* , *Irish Criminal Law (Human Trafficking) Act 2008*, *Irish Criminal Law (Human Trafficking) (Amendment) Act 2013*, *Global Code of Conduct* , *Child Safeguarding Policy International, Child Safeguarding Policy Ireland and Northern Ireland* , *Global Safeguarding Policy* , *Trócaire's Supplier Code of Conduct*

1. Introduction

Trócaire's Vision, Mission and Values state that we believe in the intrinsic dignity of every person, celebrate difference and aim to create relationships of mutual respect wherein the rights and dignity of every person are respected. Trócaire's work is inspired and informed by Catholic Social Teaching, one of the fundamental principles of which is the dignity of each individual. The right to freedom from all forms of exploitation and abuse is implicit in this principle.

Trócaire considers that slavery and trafficking in persons both abuses and exploits an individual, and will therefore not tolerate this within any of our programmes or activities or by any person representing Trócaire whether within or external to our programmes and activities.

Trócaire is also committed to ensuring our business and dealings with our suppliers, service providers and contractors reflect our values, and both prevent and deter any form of slavery and human trafficking from occurring anywhere in our supply chain.

Trócaire welcomes international efforts in relation to preventing human trafficking and modern slavery - including the UK Modern Slavery Act 2015, the Irish Criminal Law (Human Trafficking) Act 2008, and other relevant legislation in Ireland and the countries where we work - and the duty that is placed on organisations, including Trócaire, to disclose publicly the steps they are taking to prevent modern slavery in their own organisations and in their supply chains.

2. Definitions

Trócaire adopts the definition for trafficking in human beings as set out in the protocols to the UN Convention against Trans-national Organised Crime. According to this Convention, this is:

> *The recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation. Exploitation includes, at a minimum, the exploitation or the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs.*

Trócaire does not distinguish between severe and non-severe forms of Trafficking in Persons activities, and therefore its staff (and third-party representatives) are held to the highest standard of not engaging in or supporting any form of trafficking.

3. Scope

This statement applies to all those involved with Trócaire, including paid staff, volunteers, board members, trustees, suppliers (including consultants and other contractors), and visitors to our programmes, both

overseas and in Ireland. Trócaire equally requires partners to share this commitment and have this articulated either as a standalone policy or with their safeguarding policy.

4. Organisation Structure

Trócaire is a social justice organisation working in partnership with local organisations and communities to tackle the root causes of poverty, injustice and violence. Trócaire has adopted a partnership approach to its work since its foundation in 1973. Trócaire's work is underpinned by the core values of solidarity, courage, participation, perseverance and accountability, inspired by Catholic Social Teaching.

Partnership with locally based organisations is central to Trócaire's programme work. Much of Trócaire's direct advocacy, campaigning and development education work is also undertaken in close collaboration with partners in Ireland and Europe.

Working with a global network of local partners, Trócaire focuses on the areas of human rights, climate and environmental justice, women's protection, voice and influence, and humanitarian response. Trócaire's work is funded through a combination of institutional funding grants and public donations.

5. Policies and Implementation

Trócaire's policies provide the framework for the organisation's responsibility to keep people within our programmes safe from exploitation and abuse, ensuring that no person comes to harm as a result of their engagement with us, whether that is via their interaction with staff and those who represent us, or their participation in our programmes and/or activities. Trócaire views both modern slavery and trafficking in persons as both abusive and exploitative and this falls within the scope of our Safeguarding policies.

Trócaire's Safeguarding policies provides the framework for the organisation's responsibility to keep people within our programmes safe from exploitation and abuse, ensuring that no person comes to harm as a result of their engagement with us, whether that is via their interaction with staff and those who represent us, or their participation in our programs and/or activities.

Trócaire's Procurement Procedures provide a framework for ensuring that all contractors and consultants operate in accordance with Trócaire's principles and values for keeping people safe from exploitation and abuse and that they do not engage in any systems or activities that contravene international or national legislation.

Below lists our key policies in areas potentially impacted by modern slavery and trafficking and/or relevant to ensuring any concerns that may arise regarding modern slavery or trafficking in persons are addressed.

Trócaire Policies

- Global Code of Conduct
- Fraud, Theft, Corruption and Bribery Policy
- Grievance Procedure
- Global Safeguarding Policy

- Safeguarding Policy – Ireland and Northern Ireland
- Child Safeguarding Policy – International Programmes
- Commitment Statement to Safeguarding Children and Adults
- Complaints Policy
- Whistle Blowing (Protected Disclosures) Policy
- Conflict of Interest Policy
- Supplier Code of Conduct
- Stakeholder Accountability Framework
- Recruitment Policy and Procedures
- Dignity at Work Policy
- Investigation Procedures

6. Supply Chains

Trócaire's Procurement Procedures provide a framework for ensuring that all contractors and consultants operate in accordance with Trócaire's principles and values for keeping people safe from exploitation and abuse and that they do not engage in any systems or activities that contravene international or national legislation.

In keeping with this statement all Trócaire representatives are prohibited from:

- Engaging in trafficking in persons
- Procuring commercial sex
- Using forced labour in the performance of any work undertaken
- Directly supporting or advancing trafficking in persons

Trócaire expects all of its suppliers to adhere to the standards set out in the *Supplier Code of Conduct*, which is publicly available on Trócaire's website under the supply chain section. This Supplier Code of Conduct sets out Trócaire's expectations of suppliers' conduct with regards to labour and human rights, workplace health and safety, environmental sustainability and a number of other ethical practices. It is based on the Principles of the UN Global Compact, the UK Modern Slavery Act 2015 and Trócaire's own safeguarding standards.

7. Due Diligence

Below are some detailed steps taken to improve our processes and prevent and detect modern slavery and trafficking in persons within our supply chains, in line with the UK Modern Slavery Act and relevant legislation in Ireland and the countries where we work. Trócaire is committed to continually assess and improve our processes to ensure that slavery and human trafficking play no part in our operations or supply chain.

- ✓ The Supplier Code of Conduct has been revised to include a more explicit reference to the UK Modern Slavery Act 2015 as well as our suite of Safeguarding Policies;
- ✓ As part of the contracting process, all suppliers must sign up to the Supplier Code of Conduct;
- ✓ A reference to the Supplier Code of Conduct is included in supplier contracts and/or purchase orders;

- ✓ In high-risk countries where we work, Trócaire actively engages with suppliers and partner organisations on this issue in order to risk assess suppliers.

8. Reporting

Any staff member or third-party representative who becomes aware of an incident or has a concern in relation to potential modern slavery and/or trafficking in persons due to Trócaire's activities has a duty to report this immediately to the Head of Safeguarding and/or the Country Director (international) and Designated Officer (Ireland/Northern Ireland). The management of a report of an incident or an allegation of trafficking in persons will follow the procedures for reporting and investigating allegations of abuse as set out in Trócaire's Complaint's Policy and Trócaire's Safeguarding Policies.

9. Training

Training on preventing, reporting and responding to potential modern slavery and trafficking in persons in our work will be conducted through our ongoing code of conduct and safeguarding training, which is delivered to our overseas offices, partner organisations and head office in Ireland on a regular basis.

10. Commitment

Trócaire considers that modern slavery and trafficking in persons both abuses and exploits an individual and will therefore not tolerate this within any of our programmes or activities or by any person representing Trócaire, including partner organisations whether within or external to our programmes and activities.

Trócaire recognises there is more work to be done. We are committed to continuing to review, monitor and evaluate our policies, procedures, agreements and training to ensure modern slavery and trafficking in persons does not occur in Trócaire's work and supply chain.