

# CAFOD MODERN SLAVERY STATEMENT



## **Organisational structure, its business and its supply chains**

The Catholic Agency for Overseas Development (CAFOD) is an international development charity and the official aid agency of the Catholic Church in England and Wales. We are part of the global Caritas confederation.

CAFOD is registered as a charity with the UK's Charity Commission (No. 1160384), and as a not for profit company limited by guarantee, with Companies House (09387398). The organisation is governed by a Board of trustees and led by our Chief Executive, Dr. Christine Allen.

The bulk of CAFOD's income comes from donations and legacies from the Catholic community in England and Wales, supplemented by funding from institutional and other donors. In the financial year 2024-25, CAFOD's income was £56.2 million, 66% of which came from donations and legacies.

Our work since 2020 has been guided by our Strategy, Our Common Home, which challenges us to 'focus on the interconnected cry of the earth and the cry of the poor, prioritising those who experience poverty, especially women and girls.'

### **Our mission statement is:**

- Inspired by Gospel values and as part of the Catholic community, we come together in partnership with others, locally and globally, of all faiths and none:
- To reach those in greatest need, save lives and relieve suffering
- To support and enable people, communities and our local partners to be artisans of their own destiny
- To challenge and transform the structures and behaviours that drive poverty, vulnerability, inequality, injustice and exclusion, and which harm the natural world
- To educate, enable and inspire the Catholic community of England and Wales to act in solidarity for the common good.

We are headquartered in the UK and operate through partners – locally based civil society organisations – in 34 countries across Africa, Asia and the Middle East, Latin America and Caribbean, and Eastern Europe. Alongside supporting our partners to deliver our international programme, our activities also include advocacy and campaigning, and supporter engagement work, primarily with Catholic schools and parishes in England and Wales.

## **Our approach to tackling modern slavery**

Drawing from Catholic Social Teaching, we believe that each and every person is made in the image and likeness of God, imbued with an innate dignity. Modern slavery is an attack upon this dignity. In solidarity, we are called to work with hope and compassion to

transform our common home, to ensure that people, communities and the earth may flourish - free from exploitation.

CAFOD takes an integrated approach to tackling modern slavery, encompassing the following activities:

### **Working towards an end to poverty and injustice**

Modern slavery is at the end of a spectrum of violations of human rights and labour rights, and often it is people from poor and marginalised communities who are most at risk of exploitation. We are therefore very concerned to note that the most recent [global estimates](#) of the numbers facing modern slavery continued to rise to 50 million in 2021 – one in 150 people globally – an increase of 10 million between 2016-2021.

Our work on tackling slavery sits within a broader mandate of working to achieve the Sustainable Development Goals – of which ending modern slavery is a key part ([goal 8.7](#)), and of addressing a wider range of human rights and environmental harms linked to an organisation's business activities and supply chains, in line with the [UN's Guiding Principles for Human Rights Due Diligence](#).

CAFOD's programme work includes supporting partners working with workers at risk of forced labour – for example, migrant workers in Bangladesh who often migrate to the Gulf states for work, and garment workers in Export processing zones in Sri Lanka – as well as local communities adversely impacted by industries including mining and agribusiness – for example, indigenous people defending the Amazon rainforest, whose health, local environment and livelihoods have been harmed by pollution from nearby mines. We also support partners responding to humanitarian crises in both DRC and South Sudan, two conflicts driven by competition for access to valuable mineral resources.

### **Campaigning for changes to law and policy**

CAFOD campaigns to change the economic systems and structures that allow modern slavery and human trafficking to continue, alongside other human and labour rights abuses and environmental harm. We also recognise that the adverse impacts of climate change are contributing to increases in Modern Slavery, as traditional agricultural livelihoods are undermined, driving people to consider migrating in search of safety and security,

CAFOD successfully lobbied for the 2015 Modern Slavery Act in the UK, to incentivise corporate action on modern slavery in supply chains. Through the Corporate Justice Coalition, we helped to write guidance materials, to help companies report effectively on their actions. In recent years CAFOD has joined with other organisations to call on the UK government to strengthen the Modern Slavery Act and to go beyond its limited reporting requirements, to protect the world's poorest people and our planet from the wide range of human rights and environmental harms caused by [British businesses operating overseas](#).

We therefore welcome the recent introduction of much improved Statutory Guidance for companies on best practice for their reporting on Modern Slavery but concur with the

findings of the 2024 Modern Slavery Act Committee, that the legislation still falls short of internationally accepted standards on Business & Human Rights regulation.

For many years, CAFOD has supported calls for a Business, Human Rights and Environment Act in the UK, and for a UN Binding Treaty on Business and Human Rights, to help the UK fully realise its commitments to the UN Guiding Principles on Business and Human Rights and the OECD Guidelines on Multinational Enterprises.

### **Policies in relation to slavery and human trafficking**

CAFOD is committed to preventing modern slavery, human rights abuse and environmental harm in our supply chains and other private sector engagements and partnerships, as part of our organisational approach to institutional integrity, and in line with our existing commitments under the UN Global Compact.

CAFOD has been a signatory to the UN Global Compact since 2019, committing to abide by their '[ten principles](#)' in the areas of human rights, labour, environment and anti-corruption. We published our first Modern Slavery Statement in 2019, as required under the Modern Slavery Act.

In 2022 CAFOD adopted a set of key principles for engagement with the private sector, including fundraising and advocacy work as well as procurement. Since then, we have taken steps to implement our commitment to ethical sourcing, by explicitly referencing the UK's MS legislation in our Procurement Policy, and adopting several other complementary policies, including Conflict of Interest and Financial Integrity Policies.

CAFOD now has a detailed Supply Chain Manual and a Procurement Intranet Site, which together provide guidance on procurement of goods and services across the organisation, alongside complementary guidance relating to our International Programme, covering CAFOD's grant making with civil society partners in the global South.

Our commitment to ethical sourcing is also gradually being integrated into these resources as well, with the next phase of this process to be completed in 2026.

Nevertheless, as Modern Slavery is found in many supply chains and locations, we recognise that a risk remains that CAFOD's operations may be linked in some way to modern slavery. The organisation, led by the Board of Trustees and CAFOD Executive team, is resolutely committed to reducing this risk, and also to responding promptly to situations where modern slavery is identified, to provide remediation for those affected. Our Modern Slavery statement is signed off each year by our Board of Trustees and now contains a clear plan of action to address the issue, to be led by CAFOD's Director of Finance, IT and Infrastructure, who is a member of the Senior Leadership Team.

### **Risk assessment and management**

CAFOD's approach to Modern Slavery is based on the principles of 'human rights due diligence' as set out in the UN Guiding Principles on Business & Human rights, which extends beyond forced and bonded labour to include the full range of human rights abuses

linked to business operations. The UNGPs require companies and other organisations to firstly to map their supply chains, then to identify and prioritise potential risks within them, and to take action to mitigate those risks, starting with those assessed to be most 'salient'. Further stages involve a commitment to ensuring remedy for negative impacts on workers or communities harmed by CAFOD's activities (including procurement), to monitoring the effectiveness of this due diligence process and to transparent reporting and continuous improvement.

Although CAFOD has always been committed to behaving responsibly and ethically, its procurement processes are not centralised, and as a result it is not currently possible to document all its supply chains in a systematic way. In addition, the organisation is committed to buying goods and services directly within the countries or regions that we work whenever possible, to maximise the secondary benefits of our procurement to the local economy. This commitment to local procurement is an important ethical principle, but it also adds an extra layer of complexity to the task of documenting our supply chains.

The organisation remains committed to this process, albeit respecting the parallel constraints within which staff are operating. Senior administrative staff are taking steps to address this challenge, starting by exploring existing systems that are already gathering some of this information, such as our accounting software and GDPR processes. We hope to make significant progress on this activity in 2026.

As mentioned above, CAFOD is systematically strengthening its Procurement processes, with the adoption of clear procedures for assessing suppliers and awarding contracts, starting with the largest contracts. CAFOD has also introduced an electronic 'app' that if rolled out systematically, could provide a comprehensive list of all UK based suppliers.

Ethical and environmental standards are gradually being integrated into these processes – for example, suppliers on contracts over £5000 are required to complete questionnaires with questions on human and labour rights and environmental issues.

### **Overview of CAFOD's Expenditure**

CAFOD spent £50.6 million in the financial year until 31st March 2025, £25.8 million of which was spent directly on 561 grants to our partner organisations, £17.6 million on CAFOD staff salaries, and £7.3m on products and services purchased in pursuance of our charitable work and objectives including raising funds

We work with over 300 local civil society organisations in 34 countries, through which CAFOD delivers its programme work, supported by over 369 CAFOD staff operating from 14 countries.

CAFOD is committed to operating to high standards; we follow [Caritas Internationalis' management standards](#) and our humanitarian and development work is accredited by the [Core Humanitarian Standards](#) and the [Grand Bargain](#) to ensure effectiveness and accountability.

Across our initiatives, colleagues continue to carry out screenings against sanctions lists, participating in numerous audits and facilitating partner safeguarding and financial and organisational health check assessments. In the UK, we follow [the Fundraising Code of Practice](#), ensuring that fundraising practices are ethical, transparent, and accountable to

the public. We welcome feedback and complaints, providing clear instructions on our website for raising concerns, including anonymous reporting.

Our grant making process involves a comprehensive Partner Assessment and Due Diligence process, managed through an online database Webpromise. This process verifies that each CAFOD partner is a legitimate organisation with the skills and capacity necessary to deliver the project CAFOD is funding. A brief overview of our programme spend, including development activities and budgets of the largest programmes (extracted from Webpromise) is uploaded each quarter, onto the International Aid Transparency Initiative (IATI) registry ([accessible via d-portal](#)).

Our partner assessment process seeks to ensure that our civil society partners share our commitment to poverty alleviation, environmental sustainability and justice and peace. It also includes due diligence covering their organisational status, governance and safeguarding systems and their environmental responsibility. CAFOD's SADI programme framework (Safe, Accessible, Dignified and Inclusive programming) is an integral part of this process, and our Partner Safeguarding Profile already includes a question about 'trafficking, sexual exploitation and abuse, including child abuse.' We will review this process in the coming year, with a view to strengthening it in future years; our priority for 2025-26 is to focus on our own supply chains.

### **Direct Procurement of Products and Services**

As mentioned above, less than 20% of CAFOD's expenditure goes through our direct procurement process, which covers goods and services purchased by CAFOD staff, both for activities directly related to our mission (e.g. advocacy and campaigning, development education), and those related to support services (e.g. finance and governance functions), as well as fundraising.

These costs include CAFOD's expenditure on infrastructure (e.g. office costs) and IT (e.g. laptops and mobile phones for staff, running a website etc). We also buy resources (e.g. banners and posters) used for fundraising, supporter engagement and development education activities, alongside a limited range of products sold in the UK.

Many of these purchases will be covered by our existing procurement processes, but we need the systematic mapping of expenditure to help us determine – and then prioritise and address – any human rights risks that may exist. Steps are being taken to progress it – both through strengthening our procurement processes and developing training and help sheets for relevant staff.

Comprehensive supply chain mapping enables an organisation to publish its supplier list, which in turn, makes it possible for workers or communities who have been negatively impacted by their supply chain activities, to contact the parent company. The process also makes it possible to identify and prioritise potentially risky areas of procurement, and thus to move to the next stage of due diligence – taking action to mitigate these risks.

CAFOD recognises the importance of improving transparency in relation to our supply chains and are committed to steadily increasing the amount of information we publish, whilst taking account of any data protection and security considerations.



## **Due diligence in relation to modern slavery (including approach to remediation)**

During 2024-25, we have continued to strengthen our supply chain and procurement policies and procedures, expanding the Supplier Questionnaire to include specific questions related to labour practices and modern slavery, to align with CAFOD's Supplier Code of Conduct. In the coming year, insights identified through these Questionnaires will be integrated into CAFOD's overall Supply Chain Manual, which will then be rolled out across the organisation, alongside a procurement app, that has the potential to also keep a record of large purchases across the organisation.

In recent months we also carried out an internal audit of compliance within our UK operations with existing procurement processes, the results of which will be available shortly.

## **Specific identified risks**

CAFOD is committed to moving forward with its human rights' due diligence. We have begun our supply chain mapping and identified some specific areas of risk, for which we are now determining mitigation strategies.

The main risk that was flagged in our last MS report: as part of our commitment to reduce CAFOD's own carbon footprint, our regional offices are installing roof top solar panels, prioritising offices in Africa where the existing electricity supply is more likely to be coal powered and is often backed up by diesel powered generators. During 2023, our existing ethical procurement processes identified a significant risk in one completed purchase, as we were not able to demonstrate that these panels had not been sourced from the Xingiang region of China, where the risk of state sponsored forced labour against the Uighur minority is very high.

In response, before purchasing further solar panels, we have commissioned an external study on the ethical procurement of solar panels in general and how these practices could be implemented in a specific country office location. This remains a work in progress, but the consultants have identified several alternative suppliers. Further intra-organizational discussions will be forthcoming on how this type of methodical learning could be replicated in other high-risk procurements.

## **Access to Remedy**

In the UN Guiding principles on Business & Human rights, access to remedy is included as a key stage of the due diligence process. This is clearly crucial in ensuring the victims of a harm or damage can raise their concerns and seek remediation, but also because in receiving complaints, a company is also made aware of previously hidden risks and can take further action to address these.

CAFOD has in place an independent reporting system - CAFOD EthicsPoint - that is available on our website, for use by anyone connected to CAFOD's work: this includes, but is not limited to, suppliers, staff, volunteers, consultants, supporters, partners' staff and volunteers and the people and communities CAFOD works to support.

CAFOD EthicsPoint is an independent system to assist CAFOD in receiving and addressing any concerns, allegations (including any reports of modern slavery or other human rights abuse), complaints, or receiving general feedback about how our values or commitments are upheld. Once a report is received it is managed in accordance with the appropriate CAFOD policy and procedures. The system is hosted by Navex Global, a third-party company and managed internally by the Ethicspoint Systems Administrator.

### **Key performance indicators to measure effectiveness of steps being taken**

CAFOD has established processes to monitor and track the effectiveness of its grant making – and also advocacy - processes, to understand what difference they are making and how they could be improved. These include specific Goals on Business and Human Rights Advocacy, both within the UK and within the countries where our programme partners are working, with appropriate performance measures and KPIs to demonstrate progress towards achieving these.

CAFOD is also strengthening its existing Programme Monitoring processes; all core programmes are required to develop Monitoring Frameworks, which incorporating advocacy and influencing outcomes and measures, as appropriate.

As explained above, our procurement processes have been developed over time and are subject to further development, informed by a recent internal audit of our UK suppliers and contracts. This is helping to provide a base line for monitoring of future implementation of our processes. The findings were discussed with teams who have material UK supplier purchases, with engagement around the need for material spend areas to be further reviewed and contracts updated where necessary.

### **Our continued commitment**

During 2025-26 we commit to:

- Creating a Working group on HRDD, involving procurement, internal audit, governance and policy staff, to meet regularly to progress these objectives, reporting to the Senior manager who is now leading on this process
- Exploring different options to produce a more comprehensive map of CAFOD's diverse suppliers
- Integrating procedures firstly to identify and then address risks of modern slavery or other human rights (or environmental) issues into CAFOD's on-going review and capacity strengthening process of procurement
- Including within this, appropriate steps to be taken once concerns are identified, that minimise the risk to workers and communities involved in particular situations
- Develop training on these new procurement processes, including appropriate due diligence with regard to the risks of modern slavery and wider human rights issues, to colleagues involved in procurement across the organisation



- Consider the feasibility of extending this to partners (likely in future years), so they can monitor their supply chains (for the purposes of this report, focussing on those which include significant expenditure on resources in their CAFOD-funded projects)
- Integrate human rights due diligence issues (starting with modern slavery) into CAFOD's existing programme management systems, liaising closely with the ongoing internal process to streamline these systems
- Use notes from regular monthly meetings as a system for monitoring the progress of the measures we are taking to strengthen CAFOD's human rights and environmental due diligence.

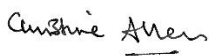
### **Training on modern slavery and trafficking**

CAFOD is committed to:

- Integrating ethical and environmental issues into planned training for procurement staff in the next two years (to include 'Tipsheets' on for example, conversations with suppliers).
- Integrating ethical and environmental issues into existing programme quality/design training for programme staff
- Developing a short briefing session for all staff on human rights due diligence and MS, to be delivered at a future CAFOD-wide online Staff meeting.

### **Review and approval**

This statement has been approved by the CAFOD Member Trustees on 12th July 2025 and Christine Allen, CAFOD's Director is authorised to sign on their behalf.



Dr Christine Allen  
Executive Director of CAFOD