



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

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POLICY MANAGEMENT INFORMATION

Title:	<i>Counter Modern Slavery and Trafficking in Persons Statement</i>
Author (Responsible):	<i>Compliance Officer</i>
Owner (Accountable):	<i>Director of Corporate Services</i>
Division:	<i>Corporate Services</i>
Contact:	<i>Compliance Officer</i>
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DECISION-MAKING IN RELATION TO THE POLICY

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

KEY MESSAGES

<p>Why do we have this policy?</p>	<p>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.</p>
<p>Who does this policy apply to?</p>	<p>All staff, Partners, Consultants, Volunteers, and Suppliers etc.</p>
<p>What are the key things I need to know?</p>	<p>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. 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).</p>
<p>What are the key things I need to do?</p>	<p>You need to familiarise yourself with the statement and suite of policies relevant to this statement.</p>
<p>Where can I find more information?</p>	<p><u>UK Modern Slavery Act 2015</u> , <u>Irish Criminal Law (Human Trafficking) Act 2008</u>, <u>Irish Criminal Law (Human Trafficking) (Amendment) Act 2013</u>, <u>Global Code of Conduct</u> , <u>Child Safeguarding Policy International</u> , <u>Child Safeguarding Policy Ireland and Northern Ireland</u> , <u>Global Safeguarding Policy</u> , <u>Trócaire's Supplier Code of Conduct</u></p>

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 welcomes The UK Modern Slavery Act 2015 and the duty it places 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 modern slavery and trafficking in persons as set out in the UK Modern Slavery Act 2015. According to the act:

Slavery, servitude and forced or compulsory labour

(1) A person commits an offence if—

(a) the person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude, or

(b) the person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.

(2) In subsection (1) the references to holding a person in slavery or servitude or requiring a person to perform forced or compulsory labour are to be construed in accordance with Article 4 of the Human Rights Convention.

(3) In determining whether a person is being held in slavery or servitude or required to perform forced or compulsory labour, regard may be had to all the circumstances.

(4) For example, regard may be had—

(a) to any of the person's personal circumstances (such as the person being a child, the person's family relationships, and any mental or physical illness) which may make the person more vulnerable than other persons;

(b) to any work or services provided by the person, including work or services provided in circumstances which constitute exploitation within section 3(3) to (6).

(5) The consent of a person (whether an adult or a child) to any of the acts alleged to constitute holding the person in slavery or servitude, or requiring the person to perform forced or compulsory labour, does not preclude a determination that the person is being held in slavery or servitude, or required to perform forced or compulsory labour.

Human trafficking

- (1) A person commits an offence if the person arranges or facilitates the travel of another person (“V”) with a view to V being exploited.
- (2) It is irrelevant whether V consents to the travel (whether V is an adult or a child).
- (3) A person may in particular arrange or facilitate V’s travel by recruiting V, transporting or transferring V, harbouring or receiving V, or transferring or exchanging control over V.
- (4) A person arranges or facilitates V’s travel with a view to V being exploited only if—
 - (a) the person intends to exploit V (in any part of the world) during or after the travel, or
 - (b) the person knows or ought to know that another person is likely to exploit V (in any part of the world) during or after the travel.
- (5) “Travel” means—
 - (a) arriving in, or entering, any country,
 - (b) departing from any country,
 - (c) travelling within any country.
- (6) A person who is a UK national commits an offence under this section regardless of—
 - (a) where the arranging or facilitating takes place, or
 - (b) where the travel takes place.
- (7) A person who is not a UK national commits an offence under this section if—
 - (a) any part of the arranging or facilitating takes place in the United Kingdom, or
 - (b) the travel consists of arrival in or entry into, departure from, or travel within, the United Kingdom.

3. Scope

This statement applies to all those representing Trócaire, including partner organisations, throughout our supply chain both overseas and in Ireland.

4. Organisation Structure

Trócaire has adopted a partnership approach to its work since the organisation was founded in 1973. The decision to work in partnership with other organisations rather than taking a directly

operational approach, was based on the core values of solidarity, participation¹ and subsidiarity² from Catholic Social Teaching, and also reflects the approach of Trócaire's sister agencies in the CIDSE and Caritas networks.

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.

Trócaire focuses on the areas of human rights, resource rights, women's empowerment and humanitarian response, working in partnership in over 20 countries worldwide. Trócaire's work is funded through a combination of institutional funding grants and public donations.

5. 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. 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).

Policies³

- Trócaire Commitment Statement to Safeguarding Children and Adults
- Trócaire Global Safeguarding Policy
- Trócaire Child Safeguarding Policy – Ireland and Northern Ireland
- Trócaire Child Safeguarding Policy – International Programmes
- Trócaire Supplier Code of Conduct
- Trócaire Stakeholder Accountability Framework
- Trócaire Global Code of Conduct
- Recruitment Policy and Procedures
- Dignity at Work Policy
- Discipline and Grievance Procedures
- Complaints Policy
- Investigation Procedures
- Whistle Blowing Policy
- Fraud, Bribery and Corruption Policy

¹ The values section of the strategic plan states that: 'we will work in partnership with colleagues and partners, involving and consulting with them and listening and responding to their needs, based on a foundation of mutual understanding, respect and responsibility'.

² The principle of subsidiarity in Catholic Social Teaching refers to the need to implement programmes / activities in society at the lowest possible level and closest to the people, rather than dictated from above.

³ Note, this is not an exhaustive list of all Trócaire policies, but rather those which are key to preventing Modern Slavery and Trafficking in Persons.

- Conflict of Interest Policy

6. Supply Chains

Trócaire's Procurement Procedures provide a framework for ensuring that all contractors and consultants operate in accordance within 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. 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.

1. 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;
2. As part of the contracting process, all suppliers must sign up to the Supplier Code of Conduct;
3. A reference to the Supplier Code of Conduct is included in supplier contracts and/or purchase orders;
4. 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 mandatory duty to report this immediately. 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 Child 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 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.