



AMNESTY INTERNATIONAL

MODERN SLAVERY ACT 2015

STATEMENT

FOR THE FINANCIAL YEAR 1 JANUARY TO 31 DECEMBER 2017

Amnesty International is a global movement of more than 7 million people who campaign for a world where human rights are enjoyed by all.

Our vision is for every person to enjoy all the rights enshrined in the Universal Declaration of Human Rights and other international human rights standards.

We are independent of any government, political ideology, economic interest or religion and are funded mainly by our membership and public donations.

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**AMNESTY
INTERNATIONAL**



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FOREWORD

The UK Modern Slavery Act 2015 ('Act') came in to force on 31 July 2015. However, the section 54 reporting requirement to detail transparency in supply chains was not enacted until 29 October 2015.

Section 54 of the Act requires organisations doing business in the UK with a total turnover of £36m or more to report on the steps that they are taking to ensure that modern slavery is not taking place in their global supply chains.

Amnesty International, as part of a coalition with other NGOs, successfully lobbied for the inclusion of this provision, along the model of the California Transparency in Supply Chains Act 2010.

When the Act came in to force Amnesty International argued that the provisions are a step in the right direction, but do not go far enough¹. The provisions do not specify the steps that organisations should take to ensure that modern slavery is not in their supply chains. They only amount to a reporting requirement, allowing organisations to simply declare that they have not taken any steps to look for abuses. In addition, there is no enforcement mechanism for non-compliance and therefore insufficient incentives for companies to comply.

CORE (a UK civil society coalition on corporate accountability, of which Amnesty International is a part) report that it is "estimated that only 2,000 statements out of around 15,000 have been published. Many of these have failed to meet the basic requirements of the law and too many are cut-and-paste jobs that don't say anything meaningful."²

Progress can be made if companies take the requirements of the Act seriously. CORE have noted that "responsible companies are using their statements to drive change in their companies and in their supply chains and see the legislation as a 'game changer'".

Amnesty International reiterates the call for the UK Government to strengthen section 54 in a way that would help create a corporate culture in the UK that will be intolerant of modern slavery and enable it to be rooted out of the labour market.

Amnesty International is working with other bodies to strengthen implementation of section 54. Through our involvement in the CORE coalition of NGOs, we contributed to research published in October 2017 exploring whether and how companies are including information on particular raw material and sector-specific risks in their statements. This study, "Risk Averse?", generated considerable media coverage³. We also supported the guidance on section 54 produced by CORE in 2016 and a follow up series of briefings⁴ for companies and investors published in 2017⁵.

We have had several meetings with government officials to discuss improvements in implementation of section 54 and we responded to the Government's consultation on an effective labour market enforcement strategy.

We gave written and oral evidence to the Joint Committee on Human Rights (Parliamentary Select Committee) for their inquiry into business and human rights. Their report and recommendations published in March 2017 reflected our concerns⁶.

In July 2017, Amnesty International UK, as part of the NGO coalition Anti-Trafficking Monitoring Group, published a report entitled 'Brexit a threat to Britain's fight to tackle modern slavery'. This report concluded that Brexit poses an 'existential threat' to UK's co-operation with European

1 <https://www.amnesty.org.uk/blogs/yes-minister-it-human-rights-issue/uk-modern-slavery-act-2015-business-supply-chains>

2 <http://corporate-responsibility.org/news/events/good-bad-ugly-modern-slavery-statements-one-year/>

3 <http://corporate-responsibility.org/risk-averse-company-reporting-raw-material-sector-specific-risks-transparency-supply-chains-clause-uk-modern-slavery-act-2015/>

4 <http://corporate-responsibility.org/mini-briefings-modern-slavery/>

5 http://corporate-responsibility.org/wp-content/uploads/2016/03/CSO_TISC_guidance_final_digitalversion_16.03.16.pdf

6 <https://publications.parliament.uk/pa/jt201617/jtselect/jtrights/443/443.pdf>

countries that is essential to tackle modern slavery'. The report makes the following recommendations⁷:

- “The UK Government must pursue access to European criminal justice and security measures to the greatest extent possible, and continue to prioritise law enforcement co-operation as part of the Brexit negotiations.
- To the extent that it allows such continued cooperation, the UK must accept some measure of the jurisdiction of the Court of Justice of the European Union. Prior to the UK exiting the EU, primary legislation must be introduced which transposes the rights of victims to support and assistance, as detailed in the EU Trafficking Directive, into domestic law in England and Wales.
- The UK Government should introduce primary legislation which transposes EU labour law that protects worker’s rights.
- The UK Government must undertake an impact assessment for any new proposed law and policy related to immigration to assess its likely impact on efforts to tackle modern slavery, including whether migrants will be made more vulnerable to exploitation because of these changes, and/or less willing/able to seek protection and justice should they suffer abuse.”

It is vital that these EU mechanisms are protected as Amnesty International believes the Modern Slavery Act does not go far enough to protect the victims of abuse on its own.

In addition, Amnesty International is still calling on the UK Government to demonstrate at least the same level of commitment in its own supply chains. Embedding anti-slavery requirements in public procurement policy would send very strong signals to companies to undertake appropriate and effective human rights due diligence or face the risk of being excluded from all public contracts.

Our research also continues to uncover labour rights abuses around the world. In 2017 we reported on labour abuses concerning migrant workers in Qatar and Nepal⁸, child mining labour in the Congo⁹, and abuse of palm oil plantation workers in Indonesia¹⁰, amongst others.

In November 2017 we released a report which assessed and rated 29 companies’ cobalt human rights due diligence practices against various criteria.¹¹ Cobalt is an element used in the manufacture of rechargeable batteries - an energy source in increasing demand. In our report, we rate a company’s performance against each criterion as: no action, poor, moderate or adequate. No company demonstrated adequate performance for all five of the indicators for identifying, preventing, addressing and accounting for human rights abuses linked to its cobalt supply chain. The findings of our report demonstrate the inherent difficulty in sourcing suppliers who can prove they are taking adequate steps to tackle abuse throughout their complex supply chains.

7 <https://www.antislavery.org/brexit-modern-slavery/>

8 <https://www.amnesty.org/en/documents/asa31/6206/2017/en/>

9 <https://www.amnesty.org/en/latest/news/2017/09/democratic-republic-of-congo-government-must-deliver-on-pledge-to-end-child-mining-labour-by-2025/>

10 <https://www.amnesty.org/en/latest/news/2017/03/indonesia-government-must-investigate-wilmar/>

11 <https://www.amnesty.org/en/documents/afr62/7395/2017/en/>

EXECUTIVE SUMMARY

This statement is made pursuant to section 54 of the UK Modern Slavery Act 2015 in respect of Amnesty International Limited¹², the principal operating entity for Amnesty International's International Secretariat which conducts operations in London, UK and 19 other office locations worldwide.

OUR KEY FINDINGS ARE AS FOLLOWS:

- As we identified in our 2016 statement our suppliers consist predominately of professional consultancies and service providers to support both our substantive human rights work and the operations which support that work. These services are provided almost exclusively by way of direct service provision without extensive supply chains. As such we consider that the modern slavery risks arising out of our operations are generally low.
- In our last statement we identified higher risk suppliers which required further investigation. Some investigations were completed but our main focus has been on updating our wider procurement policy and processes.
- Last year we recognised that our internal working practices represent a large potential risk area due to the fact that our staff carry out the majority of our work. As a result, this year we completed a full review of our people management policies and processes. This concluded that we were managing associated risks effectively but recommended updates to be made to a number of policies.
- As part of our updated approach to ethical procurement, we developed and issued a questionnaire to suppliers to ensure that those who fulfil the criteria to report under section 54(5) of the Modern Slavery Act are doing so and have undertaken proper due diligence.
- We consider that our updated ethical procurement policies and processes represent a strong basis to manage risks associated with modern slavery however we recognise that further improvements are needed. In 2018 we will further develop our approach by taking the following steps:
 1. implement our updated procurement policy consistently across all the International Secretariat's global offices, with a focus on raising staff awareness on ethical procurement issues including on modern slavery;
 2. implement a more targeted approach to investigating suppliers in high risk areas;
 3. review the responses to our supplier questionnaires and consider whether updates to the questionnaire and/or our wider approach are needed; and
 4. complete two outstanding actions identified in 2016:
 - the development of key performance indicators; and
 - the review of our internal grant procedures.

¹² Registered in England and Wales under the UK Companies Acts as a company limited by guarantee (registered number 01606776) with registered office at 1 Easton St, London WC1X 0DW.

INTRODUCTION

Amnesty International is a global human rights movement. Our vision is of a world in which every person enjoys all the human rights enshrined in the Universal Declaration of Human Rights.

Our mission is to secure throughout the world the observance of the provisions of the Universal Declaration of Human Rights by undertaking research and action focused on preventing and ending grave abuses of these rights.

Our core values are of an organisation that forms a global community of human rights defenders based on the principles of international solidarity, effective action for the individual victim, global coverage, the universality and indivisibility of human rights, impartiality and independence, and democracy and mutual respect.

Our methods are to address governments, intergovernmental organizations, armed political groups, companies and other non-state actors. We seek to expose human rights abuses accurately, quickly and persistently.

We systematically and impartially research the facts of individual cases and patterns of human rights abuses. These findings are publicized, and members, supporters and staff mobilize public pressure on governments and others to stop the abuses.

In addition to our work on specific abuses of human rights, we urge all governments and all relevant powers to observe the rule of law, and to ratify and implement human rights standards; we carry out a wide range of human rights educational activities; and we encourage intergovernmental organizations, individuals, and all organs of society to support and respect human rights.

1.1 AMNESTY INTERNATIONAL'S INTERNATIONAL SECRETARIAT, ITS ORGANISATIONAL STRUCTURE AND ITS SUPPLY CHAINS

1.1.1 MAIN PRODUCTS/SERVICES/CUSTOMERS

See the Introduction (above) for a description of Amnesty International's activities. Amnesty International's International Secretariat is responsible for:

- co-ordinating and conducting Amnesty International's global human rights work in research, campaigning, communications, advocacy, policy, legal, fundraising, education and other functions as necessary;
- developing global strategy, policies and standards;
- representing the Amnesty International externally through the Secretary General;
- ensuring Amnesty International speaks with one voice globally about the whole range of human rights themes and situations and their impact on people and communities;
- providing expert legal analysis of research data, forming the basis for expert lobbying of international government organisations; and
- supporting Amnesty International's global governance, growth and development and its financial health.

The International Secretariat's major area of supplier engagement is in the form of consultancies and professional services to cover (a) the substantive human rights work; and (b) the operations which support that work. Suppliers therefore vary from experts who assist with human rights

research, to photographers who provide audio visual content for our publications, to IT services suppliers which support our global operations.

1.2 COMPANY OUTSIDE THE UK

1.2.1 ORGANISATIONAL STRUCTURE:

The work of Amnesty International's International Secretariat is organised into two legal entities, in compliance with the law of England and Wales:

- (i) Amnesty International Limited, a not for profit company registered in England & Wales, limited by guarantee (no. 01606776), with registered office at 1 Easton Street, London WC1X 0DW; and
- (ii) Amnesty International Charity Limited, a not for profit company registered in England & Wales, limited by guarantee (no. 02007475) and a registered charity (no. 294230), with registered office at 1 Easton Street, London WC1X 0DW.

This statement is made in respect of Amnesty International Limited, the entity which employs the staff of Amnesty International's International Secretariat and conducts its global operations (referred to hereafter as the 'International Secretariat'). As part of a recent move to distribute the human rights research and campaigning to the relevant geographical regions where we work, the International Secretariat now has offices in 20 locations worldwide set up by way of branch or subsidiary of Amnesty International Limited.

To complete the picture of how Amnesty International operates globally: Amnesty International is a global movement made up of over 60 membership organisations, in the form of Amnesty International sections and structures which carry out Amnesty International work at a national level. They are responsible for:

- lobbying government on our calls for human rights change;
- campaigning/fundraising/communications within their country/region;
- working with local members, supporters and activists to bring about human rights change;
- conducting research projects focusing on local human rights abuses.

1.3 STRUCTURE AND COMPLEXITY OF SUPPLY CHAINS

The International Secretariat's suppliers can be split broadly into two categories: substantive human rights work and operations.

As in 2016, it is still the case that the majority of supply chains for the International Secretariat's substantive human rights work are simple direct services, such as consultancy and research engagements. For example, we engage individual expert consultants to carry out human rights research on the ground that feeds into our public reporting and campaigns.

We also have one-off contracts with hotels / conference centres in various locations across the world which we engage when organising large conferences such as our annual General Assembly. These hotels are subject to the same organisational procurement policy as a normal regular supplier. Recognising the higher level of risk associated with these suppliers, moving forward they will be required to fill in our newly developed supplier questionnaire and sign up to our supplier code of conduct (as well as the usual checks through our procurement policy).

On the operational side, the main areas of spend still relate to the provision of direct services to support our global operations and offices such as IT services, office rental and professional services such as insurance. However, there are some areas of greater complexity in the supply

chains for the procurement of goods, in particular the sourcing of essential IT equipment, printing and stationery supplies to support the International Secretariat's business requirements.

As in 2016, a very limited number of goods are sold to the public, namely copies of hard copy publications such as the Amnesty International Annual Report, the Combating Torture Manual and the Fair Trials manual, and some subscriptions to the International Secretariat magazine, WIRE. Currently the majority of the transactions are selling or distributing to other parts of the Amnesty International movement. The International Secretariat also procures a range of merchandise to support Amnesty International's global campaigns. This includes items such as badges, stickers, t-shirts, tote bags, pens and USB flash memory sticks. These items are distributed to other parts of the Amnesty International movement.

1.4 LOCATION OF COMPANY OPERATIONS AND COUNTRIES THAT THE COMPANY IS SOURCING FROM (INCLUDING LIST OF PRODUCTS OR PRODUCT CATEGORIES BY COUNTRY).

As outlined in our 2016 statement - the International Secretariat carries out operations from its London office, as well as through a number of international offices which represent Amnesty's regional office network as follows: Bangkok, Beirut, Brussels, Colombo, Dakar, Geneva, Hong Kong, Jerusalem, Johannesburg, Kiev, Lima, Madrid, Mexico, Moscow, Nairobi, New York, Paris, Tunis and Washington DC ('Regional Offices'). The International Secretariat also carries out operations to translate and distribute Amnesty International publications through entities in Paris and Madrid.

An analysis of global spend by supplier conducted in 2016 revealed that the top suppliers are service providers which support our global operations. These include services relating to IT, insurance, recruitment, pensions, administration and office rental. Those suppliers were UK-based with the exception of office rental. Our global spend analysis will be updated in 2018.

We monitor the supply chains of our higher risk suppliers such IT equipment, hospitality and catering contracts, printing and merchandise. To provide an example, the location of our printing and merchandise suppliers are as follows:

- The USB sticks are supplied by a UK supplier and manufactured in Shenzhen, China.
- The t-shirts and bags are supplied by UK-based suppliers.
- The pens are manufactured in Germany.
- The badges and stickers are UK-manufactured.
- Books are printed by a book printer in the UK.

These are the same suppliers we engaged in 2016. In 2017 we investigated using other suppliers but after risk analysis decided to stay with suppliers based in the UK who we have worked with and have passed our ethical checks and signed up to our supplier code of conduct. We are of course aware that the fact a supplier is based in the UK this does not rule out the risk of modern slavery in their supply chains¹³ and recommend more thorough due diligence checks for all higher risk suppliers as detailed at section 4.4.1 below.

1.5 A SEASONAL BASIS AND PERCENTAGE OF EMPLOYEES ON TEMPORARY/SEASONAL CONTRACTS

The International Secretariat's suppliers do not change on a seasonal basis.

¹³ <https://www.jrf.org.uk/report/forced-labour-uk>

The International Secretariat employs staff on permanent and temporary (fixed term) contracts and, in limited cases, via agencies. It also engages volunteers and interns. The policies which apply to these engagements are dealt with in more detail below.

In 2016, we employed 91 fixed term employees out of a total of 551 employees which amounts to 17%. We currently have 11 agency workers.

In comparison in 2017, we employed 102 fixed term employees out of a total of 600 employees which amounts to 17%. We currently have 11 agency workers.

1.6 INTERNAL PROCEDURES TO ENSURE ADEQUATE PROCUREMENT PRICING, PROMPT PAYMENT AND GOOD PLANNING

The International Secretariat procurement policy was updated since last year's statement and now operates to achieve the following objectives:

- 1) Ensure correct authorisation procedures are followed;
- 2) Obtain best value for money;
- 3) Apply ethical procurement practices in accordance with AI's human rights and environmental standards;
- 4) Minimise the associated financial, reputational and legal risks;
- 5) Obtain optimum performance from supplier relationships; and
- 6) Provide transparency and accountability.

The policy contains a flowchart outlining the steps to be followed to ensure the required process is undertaken, with timeframes to be planned accordingly. The total value of the proposed procurement determines the applicable supplier selection process and the level of financial authority required to approve and sign the contract.

TOTAL VALUE	SUPPLIER SELECTION PROCESS	CONTRACT SIGNATORY	SINGLE TENDER AWARD APPROVALS
Contract value less than £1,000	Two quotes preferred	Budget Holder	N/A
Contract value over £1,000 and up to £5,000	Minimum two written quotations	Budget Holder	Programme Director
Contract value over £5,000 and up to £50,000	Minimum three written quotations and a proposal to Programme Director	Programme Director	Procurement & Senior Director
Contract value over £50,000	Formal competitive tender process, minimum of three proposals and a proposal to Senior Director	Senior Director	Procurement & Senior Director

Payment of suppliers is managed by the finance team through an electronic payment requisitioning system. Requisitions are raised and approved to generate a Purchase Order (PO), which is sent to the supplier to reference on the invoice. Goods and services are receipted on IPOS as soon as they have been delivered. The financial accounting team will only pay invoices that have approved and receipted POs and will aim to pay all invoices within 30 days of the invoice arriving with the finance team. The 30 day payment term is included in all contracts as standard.

The finance department is responsible for the purchasing and payment policies in this area; each relevant organisational function is in charge of implementation. The International Secretariat's board of directors, working with its Finance and Audit Committee approves amendments to the financial policies and procedures. Financial policies are reviewed and updated at least every two years. The financial control framework has been designed to reduce the risk of fraud and error and to ensure that assets are safeguarded; as such there are finance policies relating to:

1. purchases – purchasing and procurement policy, operating and capital expenditure policy, headcount policy;
2. payments – expenses policy, travel policy; and
3. assets – treasury policy, reserves policy

2 AMNESTY'S POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

The following policies are relevant to the issue of modern slavery in terms of (i) procurement of goods and services; and (ii) our internal labour practices.

2.1. PROCUREMENT POLICY

As explained above, the International Secretariat procures a wide range of goods and services to support all aspects of its work. The organisation has recently revised its procurement policy to ensure direct reference is made to the Modern Slavery Act and introduced a new policy of sending existing and potential suppliers a targeted Modern Slavery Act questionnaire. This updated policy also applies to all staff across the Secretariat's global operations who are responsible for purchasing goods or services from third party suppliers including consultants. The revised list of procurement policy objectives is set out at section 1.6 above, and includes as a key objective the application of ethical procurement practices in accordance with Amnesty International's human rights and environmental standards.

Before entering into any contractual relationship with a supplier, the following steps must be followed:

STEP 1: FORMAL ETHICAL/DUE DILIGENCE CHECKS (SEE SECTION 3 BELOW FOR MORE DETAIL)

- For contracts greater than £50,000 in value, an external ethical check is commissioned.
- We also conduct financial checks via an external credit agency as well as checking Companies House for background information. Suppliers are asked to submit their accounts with bid responses and our Finance department will check over the accounts for a determination of financial stability.
- Additional checks, searches or enquiries of potential suppliers and third parties based on findings from the steps above can be undertaken as necessary.

STEP 2: SUPPLIER CODE OF CONDUCT (SEE SECTION 2.3.2 BELOW FOR MORE DETAIL)

- Reference made to the supplier to the Code of Conduct during the supplier selection process. Obtain written confirmation that the supplier has read and will comply with it.
- Reference made to the Code is included in the written contract (it is included by default in the International Secretariat's standard terms and conditions). The Code of Conduct is a minimum standard for all supplier engagements, with the right to terminate in case of breach of the Code.

STEP 3: MODERN SLAVERY ACT QUESTIONNAIRE (SEE SECTION 3 BELOW FOR MORE DETAIL)

- For contracts greater than £50,000 in value which supply goods or services or building related works, carry on part of their business in the UK and have a total turnover of £36,000,000 or more.
- The questionnaire identifies policies, procedures and reporting mechanisms

- Procurement team will review and monitor questionnaire responses to check for any issues that point to potential concerns surrounding modern slavery and inform decisions on updating the questionnaire content including whether it should apply to all suppliers.

2.2. POLICIES RELATING TO INTERNAL PEOPLE-MANAGEMENT

The staff of the International Secretariat conduct the vast majority of our work directly. For that reason, our internal employment practices are relevant to the risks associated with modern slavery.

Detailed information in relation to each of our people management policies was provided in our [2016 Modern Slavery Act statement](#) and so an overview of each policy is not duplicated in this report. Details of our volunteer policy are detailed below due to the higher risk.

In 2017 a review of our internal human resources policies, and policies in relation to agency staff, consultants and volunteers was carried out. As part of this review the question as to whether we should issue a standalone policy for this area was considered. The review concluded that Amnesty International's policies and procedures cover the risks of modern slavery effectively and comprehensively and a standalone document was not necessary. However a number of recommendations on updates to existing policies were made which will be implemented in 2018.

2.2.1. PRINCIPLES OF VOLUNTEERING AND INTERSHIPS

Amnesty International as a global not for profit movement would be unable to carry out its human rights work without the time, energy and financial resources which millions of members, supporters, activists and volunteers generously give. We recognise that the contributions of our volunteers has enabled the remarkable work of our movement throughout our history and should be held central to our values as a fundamental for achieving the success of our human rights mission.

THE PRINCIPLES OF VOLUNTEERING AND INTERSHIPS GUIDELINES:

- confirm the terms of volunteering arrangements, and paid internships;
- distinguish between these two types of arrangements;
- clarify supervisory obligations for managers and supervisors;
- provide clarity to volunteers and interns on the nature of their relationship with the International Secretariat and the benefits, protections and opportunities afforded to them;
- ensure that the International Secretariat's engagement with volunteers and interns is fair and consistent, supportive and responsible
- ensure that the International Secretariat's practices are in accordance with good practice and employment law.

Volunteers and interns are encouraged to ensure that they understand the nature of their engagement and flag any concerns they have relating to tasks, support or overall engagement to their supervisor or HR as appropriate. Volunteers are not covered by the International Secretariat's policies and procedures such as they relate to employees but standards of management, equality, treatment and values are upheld. Interns, as employees, are covered by relevant policies and procedures and benefits.

We have reviewed this policy since our last statement was released and have concluded it is robust enough to ensure that duties and obligations are not imposed on volunteers. The policy sets time limits for the duration of roles and our policy adheres to the Charity Commission's guidance on the subject of volunteers.

2.2.2 POLICIES RELATING TO STAFF TRAINING AND INCREASING AWARENESS OF MODERN SLAVERY

All new staff are subject to an induction programme, the objective of which is to communicate the International Secretariat's culture, values and policies. A general induction training is given to new starters run by different programme teams including Workplace, Finance and HR. The new starters are also directed to key policy documents, which are available on the internal staff intranet page. It is the immediate line manager's responsibility to ensure that a specific induction programme is implemented for new and transferred employees.

Specific training sessions on business ethics are provided to relevant staff groups and include reference to the Procurement Policy. Sessions on the procurement policy are also run as part of finance meetings with budget holders.

Online training for all managers and staff in risk areas has been introduced to cover 'anti- fraud, bribery and corruption' issues. This training touches on supply chains and issues surrounding modern slavery. In 2018 the aim is to expand this training to include the steps the organisation is taking in relation to modern slavery and employees responsibilities, such as always implementing all steps in the procurement policy and reporting any concerns in relation to modern slavery of any form in our supply chains.

2.3. POLICIES THAT CONCERN BUSINESS RELATIONSHIPS

2.3.1. ETHICAL PROCUREMENT

See section 2.1 above for details of the process under the Procurement Policy.

2.3.2. SUPPLIER CODE OF CONDUCT

Our Supplier Code of Conduct includes specific obligations on suppliers to respect the fundamental labour rights set out in the eight International Labour Organisation core conventions, including ensuring living wages are paid. For suppliers based in Greater London, the Code requires that workers under the suppliers' control receive a minimum of the Living Wage, or the London Living Wage. The full text of the Code, published on our website, is as follows:

Amnesty International is committed to ensuring that its mission and values are reflected in its approach to buying goods and services. In addition to complying with all applicable statutory and legal requirements, Amnesty International's suppliers must comply with the human rights, labour and environmental standards set out in this Code as an absolute minimum, and take reasonable steps to ensure that those with whom they have a business relationship do likewise. Amnesty International reserves the right to terminate its relationship with a supplier in the case of breach of this Code. Amnesty International keeps this Code under ongoing review and may amend or add to this Code at any time.

1. Overall Statement of Human Rights Compliance

- Suppliers must respect the rights set out in the International Bill of Human Rights
- Suppliers must also respect the fundamental labour rights set out in the eight International Labour Organisation core conventions. Key principles of these conventions as they relate to working practices are set out within the Ethical Trading Initiative Base Code, in summary as follows:
 - employment is freely chosen
 - freedom of association and the right to collective bargaining is respected
 - working conditions are safe and hygienic
 - no child labour

- living wages are paid
- working hours are not excessive
- no discrimination is practised
- regular employment is provided
- no harsh or inhumane treatment

2. Specific Human Rights Compliance

Suppliers must:

- take reasonable steps to ensure that they do not profit directly or indirectly from the exploitation of child labour or that of other vulnerable groups, from bonded labour, indentured labour or any other form of servitude
- take reasonable steps to ensure that any goods that they produce, trade or deal in are not, and have not been, implicated in human rights abuses by military, security or police forces or other state agents or by non-state actors, including equipment which may be used in relation to the death penalty
- not cause or contribute to the commission of serious human rights abuses, whether by state agents or by non-state actors, including torture, cruel, inhuman or degrading treatment, and gross abuses amounting to crimes under international law including war crimes and crimes against humanity

3. Statement of commitment by Suppliers

- Suppliers must exercise human rights due diligence – that is take reasonable steps and make good faith efforts – to avoid causing or contributing to any adverse impact on human rights
- Suppliers must demonstrate an on-going commitment to respect human rights and, appropriate to their size and circumstances, have in place policies and processes that enable them to identify, prevent, mitigate and remedy any actual or potential adverse human rights impacts on individuals, communities or society they cause or contribute to through their activities and relationships
- Suppliers must disclose to Amnesty International information on human rights abuses that has come to their attention both in respect of themselves and along their supply chain, including the names of suppliers associated with these risks, and any risk management plans that have been put in place. Such information must be provided both before contracting with Amnesty International, and during the contractual relationship, and within 14 days of the information having come to the supplier's attention

4. Environmental Standards

Amnesty International strives to reduce its use of energy and other non-renewable resources by complying with the following principles; as part of this effort Amnesty

International will give preference to suppliers who do likewise:

- Keep waste to a minimum and work to the maxim reduce, re-use and recycle
- Minimize the use of substances hazardous to health or the environment and responsibly manage hazardous waste
- Avoid unnecessary use of materials and use recycled materials and materials from sustainable and local sources where possible
- Maximise efficient energy use and minimise harmful emissions

5. London Living Wage

Amnesty International is accredited by the Living Wage Foundation as a Living Wage Employer. Suppliers must ensure that workers under their control receive a minimum of the Living Wage, or the London Living Wage where those suppliers conduct business within Greater London.

2.4. DETAILS OF ANY MECHANISM BY WHICH STANDARDS OR POLICIES ARE ENFORCED

Details of the method of enforcement are contained within each individual policy. All policies are regularly reviewed and updated as required by the assigned policy owner. The implementation of the new procurement policy, modern slavery questionnaire and existing supplier code of conduct is supervised by the Procurement and Contracts team which consists of two permanent staff members.

The permanent staff members based in the UK are responsible for publishing guidance and delivering training for all International Secretariat offices.

2.4.1. WHISTLE-BLOWING POLICY

This policy and procedure is still in place and enables staff to use internal mechanisms for reporting serious concerns they may have regarding wrongdoing, illegal acts, omissions, or serious malpractice by people who work for the organisation. As malpractice is not easily defined, the following list is given, which is not intended to be exhaustive:

- Fraud;
- Financial irregularities;
- Corruption;
- Bribery;
- Dishonesty;
- Acting contrary to the Amnesty values.

Individuals are encouraged to notify their manager or another senior manager (as appropriate) within the International Secretariat as soon as they have a concern or become aware of a potential occurrence covered by this policy. The policy also provides suggestions for other protected routes for a staff member to make disclosures externally as necessary.

3. AMNESTY'S DUE DILIGENCE PROCESSES IN ITS BUSINESS AND SUPPLY CHAINS RELEVANT TO MODERN SLAVERY

As detailed above, the International Secretariat has a range of procurement and purchasing policies and controls in place which go some way to managing the risk of modern slavery in our business and supply chain, in summary:

- Inclusion of the Supplier Code of Conduct as a minimum standard for all supplier engagements, with the right to terminate in case of breach of the Code (see section 2.3.2 above). We will implement improved monitoring systems for supplier compliance with the Code going forward ; this area is now bolstered by the new Modern Slavery Act supplier questionnaire.
- Ethical screening reports are run on all high value (over £50k) and high-risk suppliers through an external provider. These reports investigate a range of high risk ethical areas, including human rights, worker's rights, and supply chain management. Specifically under worker's rights, the following sub categories are investigated (not exhaustive): payment of wages below that necessary for an adequate living, provision of an inadequate or dangerous working environment, enforcement by a company of a working week over 48 hours, use of forced or slave labour.
- The newly introduced Modern Slavery Act questionnaire will ensure that we are informed of the steps our suppliers are taking to ensure there is no modern slavery in their supply chains and should flag areas of concern that require further investigation and clarification.
- In 2017 a review was conducted of our people management policies and processes in relation to modern slavery. This review included our human resources policies, (including recruitment, the work environment and employee rights) and policies in relation to agency staff, consultants and volunteers. It was concluded that a standalone policy was not required but a number of recommendations were made for updates to existing policies which will be implemented in 2018.

4. RISK OF SLAVERY AND HUMAN TRAFFICKING AND STEPS TAKEN TO MANAGE IT

4.1. AN ASSESSMENT OF THE RISK FACTORS RELATING TO MODERN SLAVERY OUTLINED IN RELATION TO THE COMPANY'S SUPPLY CHAIN.

In 2016 in addition to the analysis of specific suppliers set out at section 1.4 above, we conducted a risk assessment of our suppliers to inform areas of focus for further investigation and due diligence. Suppliers were categorised based on the level of spend (suppliers with proportionately higher spend were prioritised) and by applying our knowledge of areas of 'high risk' in supply chains. Follow up actions were recommended for each group and progress is detailed in the table below. The wider risk assessment will be repeated in 2018.

We do continue to consider the risk factors identified in the CORE guidelines¹⁴, including:

Business Models:

- Subcontracting and complex supply chains
- Extended or complex employment relationships
- Presence of labour recruiters in supply chains
- High flexibility and low profit margins

Operating context

- Lack of government regulation and/or poor enforcement of labour standards
- Presence of cheap labour and high numbers of vulnerable workers
- Absence of effective and representative workers organisations/collective agreements

Nature and location of work:

- Reliance upon low-skilled or unskilled labour
- Workforces with high numbers of temporary, seasonal or agency workers
- Work of a dangerous or physically demanding nature
- Worker isolation and lack of access to information
- Home-based workers and workers employed in informal enterprises

¹⁴ CORE, *Beyond compliance: effective reporting under the Modern Slavery Act: a civil society guide for commercial organisations on the transparency in supply chains clause*, 7 March 2016, http://corporate-responsibility.org/wp-content/uploads/2016/03/CSO_TISC_guidance_final_digitalversion_16.03.16.pdf

TABLE SHOWING CATEGORIES INTERNATIONAL SECRETARIAT ACTIVITY AND ASSOCIATED RISK ASSESSMENT

INTERNATIONAL SECRETARIAT ACTIVITY	LIKELIHOOD/RISK ASSESSMENT	ACTIONS IDENTIFIED IN 2016 STATEMENT	PROGRESS MADE
Non-standard employee engagements (short term contracts, interns, volunteers)	Low	Review related policies and processes to ensure risks of modern slavery are addressed	A review of the relevant policies has been undertaken. As an organisation, we are satisfied that the risks are sufficiently addressed in our current policies; the review identified some recommendations which will be implemented in 2018.
Consultancies	Low	Monitor supplier relationships to ensure application of key policies and principles.	Consultancies with high value contracts with our organisation now have to complete our modern slavery questionnaire even if they are not classed as a high-risk organisation.
Venue/Conferences/Hotels/Catering	Medium/High	Review due diligence processes for venue engagements.	We have expanded our due diligence process to include hotels and venues for high value spend at international events. Specific training and support will be provided to the organization's international events team to address specific risks relating to this area.
IT Equipment	High	Investigate current suppliers; Develop action plan if modern slavery risks identified.	All suppliers must sign up to the supplier code of conduct and agree to the terms. All high value suppliers must now complete the supplier questionnaire to show the policies they have in place to tackle modern slavery in their supply chains. A key aim for 2018 is to implement a more targeted approach to investigating suppliers.
Stationery	Medium	Investigate current suppliers; Develop action plan if modern slavery risk identified.	We are satisfied that we are engaging ethical suppliers and have not identified any instances of modern slavery.
Printing and Promotional Items	Medium	Further develop screening and monitoring process for printing suppliers; Develop and implement due diligence reporting procedures for Regional Offices.	Formal guidance has now been introduced for print buying. This is also regularly distributed to our regional office. The guidance includes how to ensure the printing is ethically produced.

International operations – Regional Offices	Medium	Develop and implement monitoring processes to ensure that procurement policies and processes are consistently applied across all Regional Offices	This is an ongoing project. Now the revised procurement policy has been finalised, training will be rolled out to our regional offices. An action plan will then be drafted to ensure that the regional offices are consistently applying the appropriate policies and processes with a focus on ethical procurement compliance measures.
Provision of grant funds to other parts of the Amnesty International movement	Low	Review potential risks and implement additional controls within grant procedures as required.	This was not completed in 2017 and will be a priority for 2018. This exercise can serve as a useful method to improve awareness and compliance relating to modern slavery on across the Amnesty International global movement.

4.2. DETAILS OF SOCIAL AUDITING AND/OR OTHER RISK MANAGEMENT PROCESSES, INCLUDING WHETHER RISK ASSESSMENT PROCESSES COVER HUMAN TRAFFICKING AND ANY OTHER LABOUR ISSUES DEALT WITH IN THE COMPANY'S POLICY STATEMENTS

Ethical screening reports are run on all high value (over £50k) and high-risk suppliers through an external provider (see section 3 above).

The Supplier Code of Conduct requires suppliers to respect the fundamental labour rights set out in the eight International Labour Organisation core conventions, including ensuring living wages are paid (see section 2.3.2 above).

The newly introduced Modern Slavery Act supplier questionnaire will ensure that we are informed of the steps our suppliers are taking to ensure there is no modern slavery in their supply chains. The comprehensive questionnaire will also flag any areas of concern that require further investigation and clarification.

4.3. IMPACT ASSESSMENTS UNDERTAKEN INCLUDING EVIDENCE OF, AND FINDINGS FROM ENGAGEMENT WITH RIGHTS HOLDERS

Every two years the International Secretariat runs an internal employee engagement survey to gather views on all aspects of working life – including internal culture, leadership, management, learning and development, performance and the office space. It also allows the progress made in response to feedback in the previous survey to be measured. All employees are encouraged to complete the survey. Feedback and comments are submitted and recorded anonymously. The follow up discussions, actions agreed at all levels of the organisation are an integral part of the ongoing engagement process.

The last survey was conducted in 2016 so our next one is due later this year in September 2018. From this survey we identified four priority areas to strengthen within the organisation. These are: Leadership, Behaviours, Wellbeing and Learning and Development. These areas have since been built into a wider 'Dignity, Diversity and Inclusion' strategy to ensure that we live our purpose internally and nurture a rights-based approach to our people practices.

4.4. ACTION PLANNED AND ACTION TAKEN (INCLUDING HOW ACTIONS HAVE BEEN PRIORITISED) TO:

4.4.1. EMBED RESPECT FOR HUMAN RIGHTS AND ZERO TOLERANCE OF MODERN SLAVERY ACROSS THE BUSINESS

Amnesty International's core values are of an organisation that forms a global community of human rights defenders based on the principles of international solidarity, effective action for the individual victim, global coverage, the universality and indivisibility of human rights, impartiality and independence, and democracy and mutual respect. Although substantial progress has been made since the last statement, we acknowledge that we can do more in key areas, such as the steps to investigate suppliers in high risk areas. The following actions are therefore proposed in 2018:

- implement our updated procurement policy consistently across our global offices, with a focus on raising staff awareness on ethical procurement issues including modern slavery;
- implement a more targeted approach to investigating suppliers in high risk areas including IT hardware and hospitality and catering;
- review the responses to our supplier questionnaires and consider whether updates to the questionnaire and/or our wider approach are needed; and
- complete two outstanding actions identified in our previous statement:
 - the development of key performance indicators and related monitoring in the area of modern slavery
 - the review of our internal grant procedures (as a method to improve awareness and compliance across the Amnesty International global movement).

4.4.2. ADDRESS ANY RISKS OF MODERN SLAVERY

- we will review all responses to our supplier questionnaires and will follow up on any concerns directly with the relevant suppliers and take necessary action to address the supply relationship;
- we will repeat the 2016 supplier risk assessment and take steps to address risks which emerge;
- we will act on the results of our further investigations with high risk suppliers.

4.4.3. SUPPORT BROADER EFFORTS TO ELIMINATE MODERN SLAVERY

As mentioned in our 2016 report, and the Foreword to this report, Amnesty International has undertaken substantive human rights research and advocacy work on slavery and human trafficking and will continue to do so.

5. ITS EFFECTIVENESS IN ENSURING THAT SLAVERY AND HUMAN TRAFFICKING IS NOT TAKING PLACE IN ITS BUSINESS OR SUPPLY CHAINS, MEASURED AGAINST SUCH PERFORMANCE INDICATORS AS IT CONSIDERS APPROPRIATE

Since our 2016 reporting period the organisation has focused on reviewing the policies we had in place to ensure we have robust protections in place to prevent any form of modern slavery in our supply chains. This led to the implementation of an updated procurement policy which strengthened our protections in this area and will allow a systematic approach to how we engage new suppliers and perform effective risk assessments. The results from the updated policy implementation (including answers from the supplier questionnaires) will inform future steps to address steps to further update our processes or relationships with specific suppliers in order to manage modern slavery risks.

We have ongoing challenges to implement consistent procurement processes across our global offices and this is a key focus for the next period. An example of progress in this area is the issue of a guide on ethical print buying which was issued to staff globally. In 2018 we will provide support to staff in the regional offices to ensure they understand our updated ethical procurement practices and can implement them consistently.

5.1. DISCLOSURE OF ANY IDENTIFIED INSTANCES OF MODERN SLAVERY AND OF RESULTS OF ANY CORRECTIVE ACTION PLANS.

No specific instances of modern slavery have been identified. We await all the responses from our supplier questionnaires which may highlight issues of which we were previously unaware.

5.2. COMPANY-LEVEL GRIEVANCE MECHANISMS IN PLACE, NUMBER OF COMPLAINTS MADE THROUGH THESE MECHANISMS AND THEIR RESOLUTION.

As in 2016, no grievances or complaints have been received in relation to modern slavery.

Internally, Amnesty International staff have a number of mechanisms, including the Grievance and Whistleblowing policies to report practices or incidents of concern (see above). None have been reported in 2017.

Externally, our suppliers are obliged under the Supplier Code of Conduct to report instances of human rights abuse (see section 2.3.2 above). Our supplier questionnaires should also provide further relevant disclosures. No relevant disclosures have been provided to date.

5.3. REMEDY AND COMPENSATION PROVIDED FOR LABOUR RIGHTS ABUSES.

None

5.4. THE PUBLICATION OF ANY PERFORMANCE INDICATORS USED, INCLUDING DETAILING IF AND HOW BUSINESS DECISIONS ARE INFORMED BY PERFORMANCE INDICATORS.

We have not yet developed a set of performance indicators; this is a priority for 2018. Our actions this year have been focused on reviewing and updating our procurement policy and engaging existing suppliers via the questionnaire; these developments will help inform the content of performance indicators.

5.5. EVALUATIONS OF THE EFFECTIVENESS OF TRAINING, FORMALLY

We are considering the best approach to monitor the outcomes of staff engagement with the updated procurement policy, including our existing training.

6. TRAINING

The International Secretariat delivers a wide array of internal face-to-face training, which is compulsory to new starters and also available to existing employees. In addition, the organisation also has an online learning platform which allows people to access training remotely and at a time suitable to them.

The induction programme communicates the International Secretariat's culture, values and policies and includes an introduction by Finance and HR teams which directs staff to the key policy documents available on the internal staff intranet page.

Training on business ethics is provided on a targeted basis and includes a presentation of the procurement process and associated ethical procurement and related staff conduct.

The organisation has recently introduced online 'anti- fraud, bribery and corruption' training which includes a summary of our procurement policy and process.

Clear guidance to the application of our procurement policies is available on the staff intranet, this represents an easily accessible method for staff implementation of our ethical procurement policy.

In 2018 we will consider how best to improve staff engagement with ethical procurement including the risks associated with modern slavery; we will explore the potential for a bespoke online training module or alternatively look to incorporate a stronger focus on ethical procurement within the existing online training.

This statement is approved by and on behalf of Amnesty International Limited

Mwikali Nzioka Muthiani

Chair of the Board of Directors, Amnesty International Limited

Date: _____

**AMNESTY INTERNATIONAL
IS A GLOBAL MOVEMENT
FOR HUMAN RIGHTS.
WHEN INJUSTICE HAPPENS
TO ONE PERSON, IT
MATTERS TO US ALL.**

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AMNESTY INTERNATIONAL

MODERN SLAVERY ACT 2015 STATEMENT

FOR THE FINANCIAL YEAR 1 JANUARY TO 31 DECEMBER 2017

Around the world millions of people are victims of modern slavery. The complexity of today's global supply chains means that consumers are often unknowingly contributing to the exploitation of others. Modern slavery is therefore an urgent challenge, which is why Amnesty International worked to help bring about the transparency in supply chain provisions under the UK Modern Slavery Act 2015. The Act requires organizations doing business in the UK with a total turnover of £36m or more to report on the steps that they are taking to ensure that modern slavery is not taking place in their global supply chains.

This is a statement made by Amnesty International's International Secretariat on its own compliance with the requirements of section 54 of the Act. It is our second statement and it sets out steps that Amnesty International's International Secretariat has taken to ensure that modern slavery is not taking place in our supply chains and any part of our own business. The statement follows the framework prescribed by the CORE coalition of NGOs to which Amnesty International contributed, as well as covering all the areas set out at section 54(5) of the Act.

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