



---

# MODERN SLAVERY STATEMENT

June 2022 – June 2023  
(reviewed June 2022)

## Siren Associates' Structure, Business and Supply Chains

---

Siren Associates works in fragile states to improve people's safety, access to justice and freedom to participate fully in the life of society. Our motivation is simple: to help lay the foundations for societies to prosper and for people to realise their full potential. We adopt a social contract based-approach to building prosperous societies, working with our partners to promote responsive and accountable public institutions, political and economic inclusion, and robust state-society and society-society relations.

Siren is a not-for-profit company managed by a board of four directors which employs close to 140 people from various nationalities. We are registered in the UK (Northern Ireland) and headquartered in Beirut, Lebanon, with operations currently in Lebanon and Jordan. We are a project-based organisation which delivers capacity and capability building interventions funded by various donors, including the CSSF, the Dutch Ministry of Foreign Affairs, the World Bank and UN agencies.

To successfully implement projects, Siren partners with public institutions, civil society organisations and private companies. We work with approximately 20 suppliers, including:

- ICT service providers
- Cleaning and maintenance services
- Building contractors
- Utility service providers
- Furniture and stationery service providers
- Human resources agencies

## Siren Associates' policies in relation to modern slavery and human trafficking

---

Our policies and procedures in relation to modern slavery and human trafficking are fully documented and are approved, endorsed and kept under review at Board level.

We strive to prevent slavery and human trafficking through specific provisions included in our human resources policies, code of conduct and procurement manual, as well as through clauses included in contracts signed with suppliers. More generally, we recognise and address the issue through our underpinning principles and activities, and proactively through developing people within and beyond our organisation. Our key areas of interest are outlined below.

## People risks

**Siren Associates' Human Resources policy** safeguards employees' rights, ensuring fair recruitment and treatment of staff. This comprehensive policy specifies that the recruitment of employees will be undertaken in a manner which best meets the organisation's needs, international best practices, the labour laws of the local jurisdiction in which the individual is being hired, and the interests of the people applying – forbidding any recruitment fees and preventing any form of debt bondage for Siren's direct employees.

The policy ensures freedom of workers to terminate employment, freedom of movement, freedom of association as well as prohibiting any threat of violence, harassment and intimidation, compulsory overtime, child labour, discrimination and confiscation of workers' original identification documents. While no formal internal social audit has been carried out, a number of internal workshops have taken place to collect staff feedback to measure the extent to which the organisation lives up to the shared values and objectives – as part of the strategy development process (October 2020 to March 2021).

**In our code of conduct**, we promote “whistleblowing”, encouraging staff to come forward and raise good faith concerns of possible misconduct, fraud, corruption, harassment, abuse, discrimination or other wrongdoing. The code of conduct also provides that reports will always be treated confidentially and personnel providing information or otherwise assisting in an inquiry or investigation of potential misconduct will be protected against retaliation.

## Procurement risks

**As a UK-registered company**, Siren defaults to UK Government standards and principles. Recognising that procurement is a key risk area, we have embraced the principles set out in the UK Government Commercial Function document “Tackling Modern Slavery in Government Supply Chains”. As an organisation focused on international development, we also draw on relevant elements of other guidance (including the UN Guiding Principles and relevant recommendations published by Anti-Slavery International).

**Our procurement manual** specifies that all companies that have been found guilty of forced labour, child labour or other forms of human trafficking are excluded from participation in procurement procedures. The manual also requires that each invitation to tender is first risk assessed in terms of the likelihood of modern slavery in contract delivery (a process which includes dialogue with local NGOs and other potentially knowledgeable entities) and that a proportionate approach, informed by this assessment, is followed thereafter. Siren's procurement processes are designed to minimise the risk of modern slavery issues arising – these include setting realistic lead times (we allow at least two weeks to bid) – but also to ensure that any additional burden these place on potential suppliers is not unnecessarily onerous.

**As part of the tendering process**, firms are required to sign a statement to the effect that they are aware of the issues around modern slavery and child labour. They are also asked to confirm that they do not use or rely on these types of labour and, as far as they are able to establish, nor do their supply chains and any subcontracting arrangements. Depending on the nature of the procurement and the associated identified risk, we may also ask for a description of the recruitment processes for the staff who will be involved in delivering the products or services to which the procurement activity relates, and how the firm exercises due diligence to mitigate against the risk of modern slavery occurring within its sphere of influence.

**Bidders' responses** in relation to their efforts to address modern slavery are examined and rated as part of the bid evaluation process. Depending on the level of risk identified, the requirements made during the tendering process may also form part of the contracting process and require the firm to demonstrate to Siren what activities it undertakes, on an ongoing basis, to identify and address modern slavery issues. Our procurement manual describes this in more detail.

### **Contract management risks**

**Modern slavery also features** in our ongoing contract management processes. All of our contracts with suppliers include specific clauses which are designed to mitigate and manage modern slavery risks. These specify that the supplier should investigate and document all cases, or potential cases, of serious misconduct and take appropriate corrective action to reduce the risk and/or eliminate serious misconduct being committed. Contracts signed with suppliers further stipulate that they are expected to comply with the relevant parts of all applicable laws, legislation, codes of practice and government guidance in the UK and additionally, in the territories where the services are being performed, those relevant to safeguarding and protection of children and vulnerable adults. We constantly review these policies in order to further prevent any risks.

Part of the management process involves regular open-source checks of our suppliers, seeking any information which indicates that they have been convicted of crimes or offences relating to modern slavery, or are suspected of these sorts of crimes.

**Our project work** can include working with construction contractors to build state of the art facilities for various public institutions. Although we have not, to date, encountered instances of modern slavery, we recognise that this aspect of our supply chain presents the highest risks of it being encountered. Our contracts with this type of supplier have until recently provided safeguarding measures against serious misconduct and abuse of vulnerable individuals, but we are exploring what additional clauses need to be incorporated in future to mitigate modern slavery risks more specifically. We are also actively exploring the development of a specific code of conduct for suppliers with provisions that relate to workers' (including migrant workers) wages, welfare and living standards.

Project Managers perform unannounced visits to construction sites to check for any signs of modern slavery of forced labour. In addition, site visits by non-Siren staff (architects, for example) are used for the same purpose.

## Our Underpinning Principles and Activities

---

Siren strives to prevent modern slavery and human trafficking and, to this end, we evaluate the recruitment agencies and labour providers we work with as well as monitoring them to ensure ethical behaviour. We work with a limited number of suppliers, none of which are located in countries currently considered to demonstrate a high risk of modern slavery. Nevertheless, we are cognisant of the continuing risk and have due regard for the US Department of State list of goods considered at higher risk of being produced by children (and also the risk associated with different source countries).

Since 2018, to better prevent any instances of modern slavery or human trafficking, Siren has been party to the **United Nations Global Compact** and committed to implementing the Compact's ten principles. In 2021, for the third year in a row, Siren prepared a report presenting the organisation's progress regarding the implementation of the ten principles. The report is publicly available on the Global Compact website.

We also actively address modern slavery issues through our non-contract activities. For example, stateless people in Lebanon form a vulnerable group which is at risk of exploitation. Siren is currently promoting their right to nationality by undertaking field research into the scale and causes of statelessness in Akkar, north Lebanon. This has already shone a light on the lived reality of being stateless, and the particular obstacles men, women, girls and boys from different ethnographic groups face in exercising their rights and gaining employment – and the vulnerability to exploitation which accompanies this.

Siren has recently undertaken the Modern Slavery Assessment on the UK Supplier Registration website. This assessment enabled us to identify some of our shortcomings with regards to modern slavery and we plan on taking the necessary steps to better prevent instances of forced labour, especially improving our vetting process of suppliers and investigating working conditions in our supply chain.

## Additional Mitigation Measures

---

Siren operates an ongoing set of processes to embed conflict sensitivity across the organisation. As a first step, we created a range of regular and one-off analytical products to help staff to grasp, and take into account, relevant conflict dynamics, and adjust / focus their programmes accordingly. These provide insights into the power relations and interests of different actors, and potential conflict dynamics that might be negatively triggered by our programming. To further assess the impact of our interventions, Siren's dedicated conflict sensitivity advisor has supported delivery staff in identifying the risks to project implementation. Importantly, this also develops the ability to recognise potential human rights violations to historically marginalised groups in Lebanon.

Siren's work on conflict sensitivity is a first step towards understanding the risks involved in supporting reform in fragile states. Follow up work planned will include the creation of analytical and data collection tools to help staff assess, escalate and action issues relating to the programme's impact on the conflict context. Monthly conflict-sensitivity meetings will be also be held going forward, where the evidence collected using the tools will inform any necessary changes in programme to limit harm to marginalised communities.

To further mitigate risks, Siren will aim at strengthening staff and long-term suppliers' understanding of modern slavery and how to counter it. By September 2022, we will have begun a process of training for staff, partnering with a local NGO with expert knowledge of the subject matter and the local contexts. This investment, coupled with clear reporting processes, should help ensure that modern slavery is effectively targeted, regardless of staff turnover or changes in the supply chain.

## How Well Are We Doing?

To monitor progress against set objectives, we will design Key Performance Indicators to track our activities in this important area. We are, as an organisation, sceptical of the use of performance indicators which simply count things and instead seek out measures which add real value to our activities. Our performance is therefore likely to include a focus on staff awareness and training, active management of modern slavery-related corporate risks, and the impact of revised procurement requirements on suppliers in potential risk supply areas.

Siren recently appointed a dedicated Risk and Compliance Manager who will lead on the development and implementation of effective measures which enable Siren to discharge its legal and ethical responsibilities in relation to this important issue.

Mark Maouad  
Chief Executive,  
June 2022