

# COMMUNICATION ON ENGAGEMENT (COE)

## Trócaire

Period covered by this Communication on Engagement:

From: June 2021

To: May 2023

### Part I. Statement of Continued Support by the Chief Executive or Equivalent

27th May 2023

To our stakeholders:

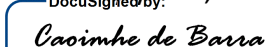
I am pleased to confirm that Trócaire reaffirms its support to the United Nations Global Compact and its Ten Principles in the areas of Human Rights, Labour, Environment and Anti-Corruption. This is our Communication on Engagement with the United Nations Global Compact, covering the period June 2021 to May 2023.

In this Communication of Engagement, we describe the actions that our organisation has taken to support the implementation of the ten principles and to engage with the UN Global Compact. We welcome any feedback on its content.

Trócaire remain concerned at the actions of irresponsible businesses that are resulting in the displacement of communities, violent evictions, pollution of land, destruction of livelihoods and loss of shelter, with a disproportionate impact on women and indigenous communities. Killing of land/ environmental and indigenous defenders continue to increase year on year and human rights defenders are increasingly being labelled as terrorists and criminals. The principles of the Global Compact stand in opposition to this corporate impunity.

There is a need for a fundamental shift in corporate accountability in order to address the adverse impacts of corporations and this requires a multi-faceted approach. Trócaire believes that, alongside implementation of the Global Compact and its principles, it is necessary to develop a legally binding treaty on the activities of transnational corporations and other business enterprises and to implement existing human rights obligations in relation to corporate activities. Stronger regulation is needed internationally to provide a legal framework to ensure corporations do not violate human rights in their operations.

Sincerely yours,

  
Caoimhe de Barra

DocuSigned by:  
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Caoimhe de Barra  
Chief Executive Officer  
Trócaire

## Part II. Description of Actions

Actions taken over the last two years by Trócaire in support of the UN Global compact and its principles include the following:

- Engage companies in Global Compact-related issues
- Provide commentary to companies on Communications on Progress

Below we provide an update on the five specific commitments made by Trócaire in our Letter of Commitment in 2019:

### 1. Develop guidance on implementing human rights due diligence in Ireland:

In 2021 Trócaire continued to work with legal experts and human rights defenders as part of the Irish Coalition on Business and Human Rights to publish the report entitled "[Make it Your Business: How Ireland can ensure businesses respect and human rights and the environment](#)." The report calls for legislation to ensure corporations protect human rights and the environment in their operations overseas.

In 2022 Trócaire worked with the Irish Coalition on Business and Human Rights to publish a paper on "[How do we improve the EU Corporate Sustainability Due Diligence Law](#)" and used this as the basis for engaging policy makers, campaigners and media about the need to strengthen the proposed legislation in the context of the ongoing negotiation of the [EU Directive on Corporate Sustainability Due Diligence \(EUCSDD\)](#).

In 2022, Trócaire also worked with the Irish Coalition on Business and Human Rights to publish "[Time for a Treaty](#)" a paper which outlined the need for a binding UN Treaty on Business and Human Rights, and the principles behind a comprehensive Treaty, ahead of the October 2022 negotiations session on the Treaty at the UN Human Rights Council in Geneva.

2. Promote the values of human rights, gender equality and indigenous rights in business activities:

Trócaire, our civil society partners, human rights defenders, and the advocacy networks with whom we collaborate held regular meetings with decision-makers and political representatives throughout 2021 and 2022 including Cabinet Ministers, Irish parliamentarians, Irish Members of the European Parliament, and Irish civil servants to seek to advance improved regulation of corporate practice with respect to human rights, gender equality, indigenous rights, and environmental protections.

This included [Trócaire presenting to the Oireachtas Irish Parliamentary Committee on Foreign Affairs](#) as a representative of the Irish Coalition on Business and Human Rights in December 2021 and [Trócaire presenting to the Oireachtas Irish Parliamentary Committee on Enterprise Trade and Employment](#) in October 2022. Both hearings focused on recommendations for effective human rights and environmental due diligence for businesses.

Trócaire continued highlighting the cases of human rights defenders who are being attacked and criminalised across the world and supporting these activists. For example, some of the human rights defenders we are acting in solidarity with are included in the following article, "[Struggle of the Guapinol and San Pedro Water Defenders far from over](#)".

Throughout 2021 and 2022 Trócaire and our campaigners also highlighted the necessity of human rights, gender equality and indigenous rights in business activities through engagement in a number of festivals, including the [Belfast One World Festival](#) and the Front Line Defenders Arts and Human Rights Festival

Trócaire also produced a "[Make it Your Business](#)" documentary and facilitated [screenings of the documentary across Ireland](#), as well as a [Threads for Corporate](#)

[Justice'](#) tapestry making project and exhibition, and a photo exhibition titled ['Face of Resistance'](#).

These resources and accompanying outreach were used to explain the issue of corporate accountability to a wide audience and mobilise support for human rights due diligence legislation.

3. Provide guidance and recommendations to ensure human rights are embedded in corporate practice, through research, briefing papers and advocacy:

Trócaire, as part of the advocacy networks we work within, continued to support the development and publication of a series of reports focused on making recommendations for improved regulation of corporate practice with respect to human rights and the environment. This included:

- [“EU and UN Instruments must work in tandem to guarantee justice”](#)
- [“Make it Your Business: How Ireland can ensure businesses respect and human rights and the environment”](#) which has a strong focus on gender responsive human rights and environmental due diligence
- [“How do we improve the EU Corporate Sustainability Due Diligence Law”](#)
- [“Time for a Treaty: Will Ireland support a UN Binding Treaty to tackle corporate impunity”](#)

4. Consider how the principles can be further applied within our supply chains, with particular regards to modern slavery and trafficking in persons:

Safeguarding people from exploitation and abuse caused by our representatives, programmes or activities remains a core commitment for Trócaire. Trócaire recognises that modern slavery and trafficking in persons is both exploitive and abusive. We focus on measures to prevent abuse from occurring (including screening of organisational

representatives). This equally applies to any independent consultants that we hire. Trócaire has a case management process in place to respond to safeguarding concerns.

[Trócaire's Counter Modern Slavery and Trafficking in Persons Statement](#) is updated and approved by the Board on an annual basis and published on our website as well as referenced in both the organisational Code of Conduct and Global Safeguarding Policy. In addition, Trócaire includes an awareness and scenario-based exercise on modern slavery in Code of Conduct training.

Trócaire's also supports partners to build capacity in preventing and responding to abuse and exploitation. Trócaire has signed up to membership of [CoatNet](#), working alongside other organisations to create greater awareness of detection, prevention and responding to modern slavery and human trafficking. As part of our annual safeguarding week, we are hosting a session on 01 June 2023 entitled 'Breaking the Chains 2023 - Counter Trafficking and Modern Slavery, Presentation & Q&A' Trócaire staff and partner organisations have been invited to join us. We will continue to build on our awareness raising initiatives.

Trócaire engages with suppliers and contractors through a [Supplier Code of Conduct](#) which includes a specific reference to the UN Global Compact. The Supplier Code of Conduct is primarily used as a tool for briefing and educating suppliers. Trócaire also performs a screening on all its suppliers, by means of the Bridger Insight XG software, against the most comprehensive collection of risk profiles from World Compliance Data to enable us to easily and effectively implement sanctions programs with 100% coverage of publicly available sanctions lists.

5. Continue our commitment to creating equality of opportunities and to eliminating all forms of discrimination in the workplace.

Over the past two years we have continued to build on the principles of fairness in aid remuneration particularly with regards to Sustainable Development Goal (SDG) 8 (decent work and economic growth), which calls for “equal pay for work of equal value” and SDG 10 (reduced inequality), which calls for “equal opportunity and reduced inequalities of outcome” through the benchmarking of our reward frameworks and actively sought feedback through external employee engagement surveys.

In 2022, Trócaire received a Certificate of Compliance against the Core Humanitarian Standards, CHS, following a global review carried out by the Humanitarian Quality Assurance Initiative, HQAI. The certification demonstrates Trócaire’s commitment to aligning our own internal procedures to the CHS framework, notably Standard 8 (“staff are supported to do their job effectively and are treated fairly and equitably”) and Standard 3 (“humanitarian response strengthens local capacities and avoids negative effects”).

In 2022 Trócaire continued to work with our voluntary external Advisory Group on Equality, Diversity and Inclusion which supported the organisation on strengthening our HR policies and recruitment practices so as to promote greater equality, diversity and inclusion both within the organisation and with respect to our communications with the public and key stakeholders across the island of Ireland.

In recognition of the importance of equality and opportunity, HR engaged with an external subject matter expert who audited and made recommendations on global recruitment practices to align with hybrid working. This resulted in a training programme for hiring managers in HQ during which unconscious bias was discussed and a new job description format was created. More importantly the organisation attraction strategy was reviewed through the EDI lens in order multiply channels and give access to a diverse pool of talent globally.

### Part III: Measurement of Outcomes

In 2021 and 2022 Trócaire had 584 engagements with policy contacts on business and human rights.

We engaged in outreach and had over 64 events with supporters and volunteers throughout Ireland on business and human rights, with 14,381 engagements with campaigners over 2021 and 2022.

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