

# The Modern Slavery Act 2018

## A statement from the British Red Cross

Over the past year estimates of people living in modern slavery globally have grown to 40 million. Of these, 71% are women and girls, and one in four victims is a child.

At the British Red Cross, our vision is of a world where everyone gets the help they need in a crisis, without discrimination. Our mission is to mobilise the power of humanity so that individuals and communities can prepare for, deal with and recover from crises. Just under 17,000 volunteers and over 4,000 staff work together to fulfil our vision and mission, both in the UK and overseas.

We operate both in our own right and as part of the International Red Cross and Red Crescent Movement (“the Movement”), the world’s largest independent humanitarian network. The Movement comprises:

- The International Committee of the Red Cross (ICRC);
- The International Federation of Red Cross and Red Crescent Societies (IFRC); and
- 192 National Red Cross and Red Crescent Societies around the world, including the British Red Cross.

As part of our membership of the Movement, the British Red Cross is committed to and legally bound by its seven Fundamental Principles which guide all that we do.

As a humanitarian organisation, our aim is to help anyone, in the UK and around the world, get the support they need if a crisis strikes.

This document fulfils the British Red Cross’ reporting obligation, in line with the Modern Slavery Act 2015 (“the Act”), to provide a slavery and human trafficking statement covering activities for the financial year ending 31 December 2018. At the British Red Cross, we have called our programmes ‘anti-trafficking’ to encompass all our work in relation to modern slavery.

We have set out the work we carried out in 2018 as part of our continuous improvement plan to ensure we are working to reduce any risk of modern slavery in our supply chains. This statement outlines our governance structures and efforts with regards to our suppliers and partners, and our work on improving our safeguarding processes. It also includes work we have done to improve the capacity of our own staff and volunteers to spot the signs of trafficking and know the appropriate and safe way to respond. It also highlights the work we are doing both in the UK and overseas to ensure that survivors of trafficking receive the support and care they need to recover from trauma and make informed choices about their futures.

Since the last statement, our Modern Slavery in Supply Chains Working group has been leading the developments across the organisation and will continue to do so.

This statement was approved by the Board of Trustees at its meeting on 9 April 2019.



**Mike Adamson**  
Chief Executive Officer



**David Bernstein**  
Chair, Board of Trustees (on behalf of the Board)



**Paul Amadi**  
Chief Supporter Officer (on behalf of Britcross Limited)

# Our Governance

The British Red Cross has its head office in London. In 2018, our total annual income was **£243.3 million**.

The British Red Cross operates in nine British Overseas Territories, and in accordance with our Royal Charter, these entities are known as Overseas Branches. Our group accounts include the accounts of Britcross Limited, a wholly-owned trading subsidiary which donates its trading profits from **340 retail shops** to the British Red Cross. This statement covers all of our activities, including Britcross Limited.

The British Red Cross is governed by a board of trustees. The board's purpose is to ensure that as an organisation we are effective in working towards achieving our vision, using our resources to maximum effect and upholding our Fundamental Principles and organisational values.

The board can comprise up to seven elected members (chosen from our active volunteer base) and up to six co-opted members appointed by the board. The board's role and functions are laid out in our Royal Charter, and supplemented by Standing Orders which set out our rules of governance.

The board is supported by committees working with delegated decision-making authority in specific areas, and includes the Ethical Fundraising and Quality Assurance (EFQA)

Sub-Committee which has oversight of our ethical partnerships procedure and decides on any potential partnerships referred to it. As part of our due diligence for significant donations, we will check a company has its own Modern Slavery Act Statement, if applicable, and this will form part of the decision making on accepting the gift.

The executive leadership team (ELT) is responsible for the day to day management of the organisation, and is led by the chief executive. The chief executive works closely

with the board to agree a clear direction for the organisation and supports ELT to give effect to that direction and be accountable for its delivery.

Together the board and ELT approve and oversee the implementation of our group corporate strategy. The board and ELT also manage the governance of the organisation through policies and procedures, which set out a clear framework for our activities and services.

Policies and procedures are instrumental to achieving our strategy to support people in crisis, as well as ensuring that the work we do meets clear internal and external standards. We are committed to the prevention of modern slavery or human trafficking in our supply chains or in any part of our operations. We have a comprehensive corporate policy framework in place to ensure our people understand what is required of them, to capture the specific risk of modern slavery and trafficking in our work, and promote awareness amongst our people of their responsibilities in this regard.

Our corporate policy framework is well established and our initial work when the Act was first introduced focused on updating the policies and procedures for our people, including as examples the employee handbook for staff; ensuring our raising a concern (whistleblowing) policy made reference to the Act and how colleagues can report any concerns related to the direct activities or supply chains of the organisation; and our recruitment policy, which confirms our commitment to maintaining the highest standards of conduct and ethical behaviour.

One example of this is in the area of apprenticeships. We are committed to supporting people into the workforce and as a result have chosen to pay as, a minimum, the National Living Wage, regardless of age. Apprentices, appointed through external application, will receive in their first year either the national living wage or 70% of the minimum salary for the role for which they are being trained, whichever is the greater.

## Progress in 2018

In the spirit of continuous improvement, over the past twelve months we have made additional changes which have further strengthened our policy framework. We provide updates to our staff and volunteers to keep them updated on these changes:

- We released a British Red Cross **Code of Conduct**, which applies to all staff and volunteers, that confirms we will not tolerate exploitation (including sexual exploitation), abuse or violence.
- In December 2018, the board approved a new, combined **Corporate Safeguarding Policy** (replacing the previously separate adults and children policies); and we revised our safeguarding procedures. Together, these set out how we fulfil our obligations to safeguard adults and children at risk of abuse or harm. This includes people to whom we provide services, staff and volunteers, and retail customers.
- Our updated safeguarding procedures provide information for our people about how to respond to and report a concern about an adult, child or young person at risk – including the risks of modern slavery and trafficking and guidance on referral to our anti-trafficking team.
- We also developed and began rolling out a basic online safeguarding awareness course for all our UK-based people, which includes references to modern slavery and anti-trafficking.
- We have introduced a new Supplier Code of Conduct, which is discussed in detail below.

All safeguarding concerns are recorded on Datix (internal electronic incident reporting tool). This captures safeguarding concerns across all our work at the British Red Cross. Introduced in 2016, Datix enables our people to report safeguarding concerns, incidents, accidents and near misses quickly so that we can follow up and investigate concerns, any necessary changes can be made and services improved. In 2018, the number of modern slavery and trafficking concerns logged on Datix (across adults and children) was 38. The total number of safeguarding concerns logged on Datix in 2018 was 1412. Trafficking and modern slavery cases reported on Datix were therefore equal to 2.69% of all safeguarding Datix reports logged in 2018. These are concerns encountered in the UK during the course of our work. We have responded to all safeguarding issues raised, and continue to do so.

## Relationships with our suppliers and partners

We are committed to recognising and responding to trafficking if we do encounter it as part of our work – including in our supply chains, as well as in any part of our operations.

In 2018, our corporate procurement processes were updated to take account of the Act, and the risk of Modern Slavery incorporated in due diligence process for key suppliers. Our International and UK programmes are becoming more aligned as part of one unified approach to due diligence of all suppliers managed by UK and International procurement. Our focus in 2019 will be on how we roll this out wider.

Since the end of 2018, the Supplier Code of Conduct has been part of the requirement for due diligence process for all new key suppliers; and in early 2019 all existing key suppliers will receive the Code of Conduct to sign. Currently our due diligence, including the Code of Conduct, relies on supplier self-certification; so in 2019 we are looking at ways to ensure this process is sufficiently robust.

We are a member of Supplier Ethical Data Exchange (Sedex), a not for profit membership organisation focused on ethical and responsible business practice in global supply chains. Our membership of Sedex provides us with the opportunity to assess our supply chain to scope the risk of modern slavery, and our response to that risk. In 2019 we are undertaking a supply base-wide action to ensure we use this opportunity in the most efficient way.

In December 2018, our International management team approved our approach to ensure safeguarding<sup>1</sup> is appropriately considered, embedded and addressed in our international projects and our work with partners. As a result, in 2019 we will continue the process of reviewing international projects directly assisting people in crisis, as part of our International Quality Methodology, against our safeguarding standards. We will not fund projects with too high a safeguarding risk without appropriate mitigating actions in place. We offer support to help partners strengthen safeguarding and protection of people and communities in crisis.

Any member of the public can make a complaint or raise a concern at any time. Information on how to do this can be found on our website: [redcross.org.uk/feedback](https://www.redcross.org.uk/feedback)

<sup>1</sup> Includes PSEA, SGBV and other forms of abuse and harm

## Responding through our operations

We are committed to recognising and responding to trafficking not only where we encounter it in our supply chains, but also as a key part of our service operations.

Since 2009 the Red Cross has supported survivors of trafficking and modern slavery. Our focus is on ensuring that our staff and volunteers are able to recognise the signs of trafficking in the people we work with and that survivors of trafficking are provided with the support they need to recover from the trauma they have experienced, and enabled to make informed choices about their futures. Anti-Trafficking remains a core priority of the Red Cross strategy for our work in the UK and overseas, and a major area of our operational delivery.

Since 2014 the British Red Cross has increased its capacity to recognise and help people who have been trafficked by ensuring all frontline staff and volunteers receive mandatory training to enable them to confidently respond to any signs of trafficking that they may come across as part of their role. In recent years the British Red Cross has been at the forefront of strengthening the Red Cross Movement response to trafficking, working with Red Cross staff and volunteers across the world to deliver training and develop projects that put the unique vulnerabilities of trafficked people at their core.

We believe that by providing the right information at the right time, survivors of trafficking can be empowered to make informed choices about their futures. Therefore, our programmes in the UK and abroad focus on ensuring survivors have access to the support and protection they need to recover, including psychological support and access to justice.

More recently, the British Red Cross has placed a great emphasis on the importance of co-production and has developed a collaborative approach that includes the development of services in partnership with people with lived experience of trafficking and modern slavery.

Some of our work in 2018 included:

- The development of a Safer Women in Migration project to advance our response to trafficking for women on migratory trails who have experienced or are at risk of gender-based violence. This encompassed developing content for training on gender-based violence and trafficking.
- In Liverpool a Law Clinic has been developed in partnership with the University of Liverpool to meet a gap in provision of legal advice for trafficked people. Lack of quality advice to people who have been trafficked can have a prolific impact on their future support and recovery. A key area of significance is the nexus between the asylum system and the National Referral Mechanism (NRM).
- Working with the Human Trafficking Foundation, the Anti-Trafficking Monitoring Group, and Anti Trafficking and Labour Exploitation Unit (ATLEU) we developed 'Principles that underpin early support provision for survivors of trafficking' which are central to supporting people in the first stages of recovery from exploitation.

## Training and guidance

Our training objective is to ensure that more of our people are aware of trafficking, equipped to spot signs and know the internal referral pathway if they want to raise or report a concern.

We have two specific training modules:

- Module 1 was made available in 2015 on the IFRC learning platform for the IFRC and all 192 National Societies. Module 1 provides a basic introduction and response to trafficking and is designed for all British Red Cross staff and volunteers. In 2018, over 170 learners completed this emodule. We also held 5 face-to-face learning sessions for Emergency Response volunteers, utilising emodule 1 material.

In 2018 we began updating emodule 1 to make it relevant to staff working internationally. We also delivered a short training session to International Safeguarding Officers to ensure they are aware of trafficking when responding to international safeguarding concerns.

- Module 2 is specifically aimed at Refugee Support service caseworkers. This blended learning package provides additional information and advice about how to specifically address the needs of trafficked people and help them to navigate often very complex systems. Our independence and neutrality helps us to provide non-directive information enabling people to make their own informed choice. In 2018, over 100 learners completed emodule 2 and we trained over 90 people face-to-face.

All our international staff, including consultants and representatives, are required to complete training which supports:

- Awareness of expected standards of behaviour, including mandatory reporting of concerns;
- Understanding of different types of abuse and harm, including modern slavery; and
- Our procedures for raising a concern.

The suite of training modules is available on the IFRC learning platform and covers:

- Introduction to Safeguarding
- Introduction to Protection from Sexual Exploitation and Abuse (PSEA)
- Child Protection at the IFRC
- Principles and Rules for Red Cross and Red Crescent Humanitarian Assistance

Moving forward, we will utilise the new British Red Cross learning platform, Fuse, to continue to promote these training modules to increase awareness amongst our staff and volunteers of the signs of trafficking, the internal referral pathways, and safeguarding procedures.

We believe that we need to provide clear frameworks that enable our people to respond consistently and appropriately every time they are concerned about human trafficking. To support our frontline staff in meeting this responsibility, we have developed internal anti-trafficking guidance documents targeted at various audiences within our organisation, such as:

- The caseworker field guide, which is specifically tailored to caseworkers who will be supporting trafficked people to make their next steps.
- Our anti-trafficking pocket-guide, which is available to all of our people. This provides a reminder of the key signs and indicators of trafficking, and the internal colleagues they should get in touch with if they want to raise a concern.
- We have also produced specific guidance in relation to Section 52 of the Act, which covers the duty to notify the Home Office of potential victims of modern slavery.
- We developed a Toolbox for frontline workers who work with Trafficked Asylum Seekers in order to understand their specific needs and tailor support accordingly. This toolbox was funded through the TRACKS EU funded project and is available for the wider asylum sector in the UK and is not limited to use only by the Red Cross.

We will keep our guidance documents under active review to ensure they are up-to-date and address any new needs and emerging trends within the anti-trafficking sector.

## Our commitment to people in crisis

The objective for our anti-trafficking work is that any person who is trafficked and exploited will be recognised, supported and protected.

In recognition of our commitment to supporting people in crisis through our anti-trafficking work, one of our key 2018 delivery pledges in our Corporate Business Plan was to see reduced destitution and distress for displaced people. As part of our commitment to delivering this outcome, we developed bespoke and enhanced support for people who have been trafficked or subjected to modern slavery. We continue to be committed to this pledge and will grow this work in 2019 to branch our UK and overseas operations.

In the UK our volunteers and staff work alongside civil society, police and local authorities to help people who have been trafficked. In the work that we do in response to trafficking, we have a number of guiding principles which we focus on:

- The provision of care and support to trafficked people, and encouraging the sector to focus on the protection of trafficked people and putting their needs at the centre of any response;
- Filling gaps in the provision of statutory support, and advocate for continuous improvements to ensure that trafficked people receive the support they need;
- Working in partnership and through partners to strengthen the sector's response to trafficking and supporting other organisations to carry on their important work; and
- Empowering trafficked people to make their own informed choices, and supporting them in the choices they make.

## Core services

Our core services run across the organisation and are embedded within our UK and Overseas operational programmes. They are both mainstreamed into existing work, and are also stand-alone specific programmes.

## Specialist Trafficking Support in the UK

We provide specialist anti-trafficking casework and support services through a small team of anti-trafficking officers, one in London, one in the North West and one in the East Midlands who deliver some core services:

- Your Space – Initial (pre-NRM) support

We operate a model of support for survivors of trafficking at the point of identification, working with local statutory and non-statutory stakeholders. This support programme is called Your Space, whereby potentially trafficked people (identified by police and other frontline professionals) can be provided with accommodation, material support and a caseworker. The aim is to provide information and support so that they understand the choices and options available to them, and receive necessary support to act. This project was developed because first responders often found that they did not have an appropriate space to accommodate the potentially trafficked person, nor to provide them with time and information they needed to decide what they would do next.

Based on our experience of delivering this service, together with ATLEU, Human Trafficking Foundation and Anti-Slavery International, we developed Principles for Early Support which can be found [here](#).

- Longer term support

We have been running an integration pilot in collaboration with Hestia and Ashiana. Using three innovative models of support the partners are providing medium-to-long term care to survivors of trafficking exiting the NRM provision. Qualitative data will be gathered consistently so we can measure the impact of this support model.

- Support to people who are outside of key systems

Our anti-trafficking team provides support to trafficked people who have either chosen not to enter the NRM, or who have received their reasonable or conclusive grounds decisions and are no longer within the NRM. The team are working hard to respond to survivors at any point where a survivor may encounter a crisis and need additional support. We offer casework support and destitution assistance.

- Second tier advice across the organisation

Our team also provides advice to other internal colleagues responding to trafficking around the UK, enabling them to appropriately and sensitively respond to trafficking.

We are working to expand this specialist support all around the UK, so that more survivors of trafficking can benefit from non-directive information to make choices about their next steps.

### **Refugee Support provision**

Our refugee support teams come across people who have been trafficked into or around the UK or are vulnerable to being trafficked. We support people with subsequent issues, as well as their need for protection and asylum. We offer psychosocial support, referrals and signposting, destitution assistance, and access to English classes and other support groups. Some of these services will vary around the UK depending on local need and gaps in provision.

As the largest independent provider of support to asylum seekers and refugees in the UK, the British Red Cross has specific speciality in the trafficking and asylum nexus, and how both these systems and experiences can impact the person.

### **Connecting with family**

People who are trafficked are often separated from their families, and sometimes unable to find them. If they choose to re-connect with their families, we can help them look for their loved ones through our Restoring Family Links service, which helps people look for family members, restore contact, and reunite families and which seeks to clarify the fate of those who remain missing.

### **Reception Centres**

Our emergency response teams often set up reception centres for exploited and potentially trafficked people, once local police or the National Crime Agency (NCA) conduct anti-trafficking operations. These are open 24 hours a day for a short-term period. Inside, we provide emergency provisions, such as food, clothes and blankets; offer a listening ear and emotional support; and can also administer first aid.

### **Support to Red Cross and Red Crescent actors**

The British Red Cross is committed to using its learning and experience to support the wider Red Cross and Red Crescent Movement by providing guidance, funding and technical expertise in order to strengthen National Societies' capability to prevent, identify and respond to trafficking, whether through specialised programmes or mainstreaming it into other ongoing activities, and promote policy change. We are keen to learn from our sister National Societies to improve our own response and channel this more broadly. The support to the Movement is now part of our core offer.

We are currently working closely with Movement components in the Asia Pacific region, both through the International Federation and directly with some National Societies, to share learning and develop improved services. We are doing the same in West and North Africa region, specifically through our work along migratory trails.

We co-chair the European Red Cross Action for Trafficked Persons Network ("ATN"), which is focused on providing practical support to our fellow European National Societies, prompt collaboration and share practice.

In addition, at the Movement's 2015 Statutory Meetings we signed the joint pledge on responding to human trafficking of migrants in Europe. This pledge commits us to respond better to trafficking and exploitation along migratory trails and affirms that we will look to provide individuals with appropriate support and protection as part of our humanitarian mission.

### **Projects**

We are part of a range of different projects, connected to strengthening and supporting British Red Cross' core work, focused on building improved evidence of the needs and solutions in order to inform advocacy on the issue of trafficking. More information about Red Cross projects can be found on our website [here](#).

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## Spotlight on our response internationally

The British Red Cross began its international anti-trafficking work in 2017 within the context of large-scale movement of migrants, refugees and people seeking asylum in Europe. We received funding from DFID to deliver the MMPAT (Mediterranean Migration: Protection and Anti-trafficking) Project, on which we worked with the Italian Red Cross to provide essential humanitarian support to migrants arriving in Italy by boat from Libya, as well as strengthening their response to trafficking through training staff and volunteers, and raising awareness of the risks of trafficking and available support. Although the MMPAT Project ended in December 2017, in 2018 we continued to provide technical advice to the Italian Red Cross in order to develop more advanced training and resources and continue to raise awareness of trafficking amongst vulnerable migrants.

The MMPAT Project also included funding for the IFRC to develop the Trainer Toolkit on Human Trafficking in the Context of Migration. As part of the European Action for Trafficked Persons Network and thanks to funding provided by the British Red Cross MENA and Mediterranean Region, we co-delivered a Training of Trainers for 14 European National Societies and provided ongoing technical support to National Societies following the training.

In 2018 we also hosted the Network's annual meeting and welcomed 12 National Societies to London. Furthermore, we have engaged with other Movement networks, such as the Gender and Diversity Network and the Asia-Pacific Migration Network to share information, resources, best practice and prompt cooperation between regions and National Societies.

In 2018 the British Red Cross was granted funds from DFID to implement the AMiRA (Action for Migrations: Route-based Approach) Programme.

The British Red Cross partners with IFRC, Danish Red Cross and Spanish Red Cross to implement a multi-country migration programme working across migratory trails across West, Central, East and North-East Africa, focusing on 6 countries (Guinea, Burkina Faso, Niger, Mali, Sudan and Egypt). The programme employs a Red Cross Red Crescent Movement-wide, regional, route-based approach to address the humanitarian and protection needs of vulnerable migrants and host communities. Within this programme the British Red Cross provides advisory support on protection and anti-trafficking to the country and programme teams.

In Asia-Pacific, British Red Cross' work is based on the commitment from the June 2018 high level RCRCM Middle East and Asia Conference to increase efforts to reduce the risks and address the consequences of human trafficking and is built upon successful National Societies' programmes to improve safe labour migration and reduce the risk of exploitation. In 2018 the British Red Cross scoped funding opportunities to strengthen the capability of some National Societies in the region to recognise and respond to trafficking and raise awareness of the risks, by providing technical advice and guidance and scoping funding opportunities.

British Red Cross were asked to support the Population Movement Operation's protection response in relation to anti-trafficking in the camps south of Cox's Bazar, Bangladesh. In partnership with the ICMPPD, at the end of 2018 we conducted an assessment aimed at analysing the trafficking phenomenon and identifying gaps within the existing response in terms of prevention and protection of trafficked people. The assessment will be finalised in 2019 and, as an initial rapid assessment of the trafficking situation and of the response, will provide a basis for designing services and initiatives, such as capacity-building and awareness-raising.

## Using our Voice – Advocating for improvements to the protection for survivors of trafficking

The goal of British Red Cross advocacy in terms of trafficking is for fewer people to be exploited, and for survivors to be protected from further exploitation, know where to seek help, have access to end-to-end support and have their humanitarian needs met. We want people to know how to spot the signs of exploitation and respond.

In October 2018 the British Red Cross submitted written evidence to the Home Affairs Select Committee (HASC) inquiry into modern slavery. This was the first time the British Red Cross had formulated public advocacy positions on the issue, building upon private diplomacy with key parliamentarians and officials over the last few years. Drawing on existing evidence from our operational work, the submission brought to light a number key points:

- The British Red Cross supports many people who are simultaneously in both the asylum system and the National Referral Mechanism (NRM). Often, exactly how these two systems interlink in terms of provision of support and decision-making processes is unclear.
- Those we support are often not given the opportunity or requisite information to explore all of their options, and are unable to make an informed decision before entering the NRM.
- Delays in receiving conclusive grounds decisions are making the NRM unworkable for many of the trafficked people we support.
- Current support for people who have exited the NRM following a conclusive grounds decision is wholly insufficient to allow a person rebuild their lives and recover from their trafficking experiences.

We also made a number of policy recommendations based on our operational work and the experience of the people we support:

- Leave to remain (LTR) of at least 12 months should be granted to people who have received a positive conclusive grounds decision and are recognised as a trafficked person, in line with the Modern Slavery (Victim Support) Bill, to give people time, space and support to make decisions about their future.
- Firewalls must be implemented between support for trafficked people and immigration enforcement to ensure that fear of removal does not prevent those without legal status from reporting abuse and exploitation, or from receiving support.
- Pre-NRM places of safety for trafficked people must provide independent, specialist and flexible support to allow space to make informed decisions and take control of their lives.
- Consent to enter the NRM must be fully informed, including through exploring alternative options, explaining the benefits and risks of entering the system, and that legal advice is available if required.
- Decisions within the NRM should be made as quickly as possible, while ensuring the trafficked people have time to recover.
- The links between the asylum and trafficking systems should be acknowledged and both systems must interact in a way that is tailored to the needs of trafficked asylum seekers.

Throughout 2018 the British Red Cross also participated in consultations and negotiations during the drafting of the Global Compact for Migration, where we were able to share our key priorities on trafficking and access to basic services.

In January 2018 we issued seven British Red Cross recommendations for a Global Compact that would place human life and dignity at the centre including a recommendation to champion the rights and needs of victims of trafficking and modern slavery.

Throughout the process British Red Cross worked closely with the UK Government and others in the sector, through our participation in the Human Trafficking Foundation International Policy Working Group, to raise recommendations aimed at strengthening parts of the text covering trafficking (Objective 10). We were pleased that the final text contains several key commitments reflecting our recommendations. In particular, we were pleased to see key provisions added in revisions emphasising: access to justice

and safe reporting without fear of detention, deportation or penalty; provision of appropriate protection and assistance, (such as measures for physical, psychological and social recovery), not conditional upon cooperation with authorities; and commitments to avoid criminalization of migrants who are victims of trafficking in persons for trafficking-related offences.

The Compact was adopted in December 2018 and the final text of the Compact outlines clear provisions for the protection and assistance of survivors of trafficking. We will continue to work with UK Government on the effective implementation of the Compact, including components focused on trafficking, throughout 2019 and beyond.

## Next steps

We will look to continue to build on these existing strands of our work over time. We have identified the following key priorities for the year ahead:

### **Corporate Governance and Relationship with Suppliers and Partners**

- Continue our work with International partners and suppliers to support them to develop safeguarding responses and consider due diligence in their own supply chains.
- Roll out the Supplier Code of Conduct to our existing key suppliers throughout 2019.
- Roll out our International Supplier and Partner Due Diligence process, with the view to rolling this into all BRC suppliers and partners by 2020.
- Appropriately deploy SEDEX and other tools to conduct due diligence checks on suppliers, both in the UK and internationally.
- Explore improvements to our current due diligence processes.

### **Training**

- Continue to roll out tailored training for staff and volunteers to ensure trafficked people are appropriately recognised and supported in our international and UK programmes.
- Harness the opportunities that the new online learning platform, Fuse, provides as it is rolled out, in order to raise awareness of modern slavery across the workforce.

### **Anti-Trafficking Programmes**

- Evaluate progress at the end of 2019 against the delivery pledge stated in the Corporate Business Plan in relation to support for people who have experienced trafficking and modern slavery in the UK and overseas.
- Continue to develop partnerships in the UK in order to strengthen the sector and improve collaboration.
- Continue to strengthen our International Directorate's processes and procedures to ensure increased consideration of anti-trafficking in international programmes.

- Seek further funding opportunities to develop anti-trafficking projects or embed anti-trafficking considerations within existing services in partnership with other National Societies and the International Federation of Red Cross and Red Crescent Societies.
  - Continue to engage with Movement and non-Movement networks to ensure a coordinated approach and strengthen the sector.
  - Support the Movement to enhance services and provisions for trafficked people. In particular, work with key National Societies in the context of migration and displacement in key geographical regions, to strengthen the understanding and awareness of trafficking, provide pre-departure information, enhance the ability to identify and respond to people who have been trafficked or are at risk of exploitation, and develop referral pathways to ensure that individuals identified are able to access the specialised support and assistance they need.
- Using our Voice:
    - Continue to develop our advocacy and policy work relating to trafficking in the UK, building on our operational work to inform our public messaging. We will carry out research where required to add to our evidence base, including relating to pre-NRM support as relevant to the national roll out of support.
    - Work with UK Government on the effective implementation of the Global Compacts including components focused on trafficking.

An internal working group meets quarterly to monitor our progress in relation to our commitment to tackle modern slavery and the actions we have set out.

Any member of the public can make a complaint or raise a concern at any time using our Comments, Complaints and Compliments system. Information on how to do this can be found on our website:

**[redcross.org.uk/about-us/contact-us/complaints-and-comments](https://www.redcross.org.uk/about-us/contact-us/complaints-and-comments)**

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