

# The Modern Slavery Act

## A statement from the British Red Cross

At the British Red Cross, our vision is of a world where everyone gets the help they need in a crisis. Our mission is to mobilise the power of humanity so that individuals and communities can prepare for, deal with and recover from crises. More than 19,600 volunteers and 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
- > 191 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 always to prevent and alleviate human suffering in the UK and throughout the world, to protect life and health, and ensure respect and dignity for all people.

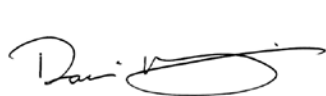
Pursuant to the Modern Slavery Act 2015 (“the Act”), this document fulfils the British Red Cross’ reporting obligation to provide a slavery and human trafficking statement covering activities for the financial year ending 31 December 2017. At the British Red Cross, we have called our programmes ‘anti-trafficking’ to encompass all of our work in relation to modern slavery.

This statement sets out our governance and structure; the corporate policies we have in place; measures we have put in place to mitigate the risk of trafficking and modern slavery in our supply chains; how we equip our people to support individuals at risk through training and guidance; the work that we do in the UK and internationally to support those who have been or are at risk of trafficking and modern slavery; and our related efforts within the Movement.

Since the last statement, we have continued to roll out internal training to our staff and volunteers, increasing their ability to spot the signs of trafficking and respond appropriately. To date, over 200 learners have completed the introductory module.

We continue to develop and update our referral pathways and guidance documents so that our people know what they should do if they encounter trafficking in their work. Our operational footprint has expanded and we are now delivering more targeted support initiatives in more parts of the UK and internationally. We have agreed and will introduce a Supplier Code of Conduct, making our scrutiny over our suppliers more rigorous. Responding to modern slavery and expanding our support for trafficked people remains a key priority in our corporate business plan for 2018.

This statement was approved by the Board of Trustees at its meeting on 11 April 2018.



**David Bernstein**

Chair, Board of Trustees  
(on behalf of the Board)



**Rebecca Mauger**

Executive Director Fundraising  
(on behalf of Britcross Limited)

# Our Governance

The British Red Cross has its head office in London. In 2017, our total annual income was £251.7 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 (which includes the roles of chair and treasurer).

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 meets four times a year, and is supported by committees working with delegated decision making authority in specific areas (emblem; ethical fundraising and quality assurance; finance and audit; governance and nominations; health, safety and security; investment; remuneration; service quality and assurance movement policy).

The Ethical Fundraising and Quality Assurance (EFQA) sub-Committee has oversight of our donation acceptance and refusal process 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.

# Our Policies

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. Updates to our policies and procedures are signed off by the board and/or ELT.

We are committed to the prevention of modern slavery or human trafficking in our supply chains or in any part of our operations. Pursuant to the Act, we reviewed our corporate policies and made enhancements to capture the specific risk of modern slavery and trafficking and promote awareness amongst our people of their responsibilities in this regard.

The following provides a snapshot of the aspects of our corporate policy framework which are most relevant to the Act:

- > We make clear to employees the actions and behaviour expected of them when representing the organisation through the **Employee Handbook**.
  - > We strive to maintain the highest standards of employee conduct and ethical behaviour when operating both in the UK and abroad.
  - > The Employee Handbook includes reference to management of our supply chains, stating our commitment to preventing slavery and human trafficking in our corporate activities and to ensuring our supply chains are free from slavery and human trafficking.
- > **The procurement policy** confirms that robust due diligence is undertaken in furtherance of our commitment to ethical purchasing and the Act.
  - > We require our suppliers to certify that they comply with the Act as part of their tender responses; all suppliers are required to self-certify that they audit their supply chains; and we incorporate a specific clause within our terms and conditions in relation to modern slavery.
- > The **raising a concern** (whistleblowing) policy sets out how we encourage all our employees, volunteers, service users and stakeholders to report any concerns related to the direct activities, or the supply chains of, the organisation. The policy explicitly states Modern Slavery and Human Trafficking as one of the concerns that can be raised.
  - > The procedure is designed to make it straight forward for anyone to make disclosures, and to find out where to get external advice. It includes provisions to raise concerns in a confidential or anonymous way, if preferred.
- > The **recruitment and selection** policy refers to Modern Slavery and Human Trafficking, as well as the Act, and confirms our commitment to maintaining the highest standards of employee conduct and ethical behaviour in our operations as well as managing our supply chains, with a commitment to preventing slavery and human trafficking in our corporate activities and ensuring supply chains are free from slavery and human trafficking in adherence with the spirit and purpose of the Modern Slavery Act.
  - > It states that we use only specified, reputable employment agencies to recruit staff and always verifies the practices of any new agency we use before accepting workers from that agency, ensuring they meet the requirements of our Preferred Suppliers List.

## Safeguarding policies and procedures

- > Both our safeguarding policies and procedures set out how we fulfil our safeguarding obligations. This includes people to whom we provide services, staff and volunteers, and customers with whom we interact in our retail shops.
- > The procedures provide information about how to handle a concern about an adult, child or young person at risk – including the risks of modern slavery and trafficking – and make reference to how they can contact colleagues to seek support and guidance.

- > Modern slavery and trafficking is listed as a key safeguarding concern. We have internal guidance that details how to refer to the anti-trafficking team if concerns are reported to us.
- > All safeguarding concerns are recorded on an electronic reporting tool called 'Datix' as per below.

### Incident reporting

In recognition of the importance of swiftly responding to and managing safeguarding concerns, accidents, incidents and near misses, an electronic reporting system (Datix) was introduced in 2016. This system 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, we will look to continue to embed Datix and continuing to improve the reporting culture in all areas of the organisation.

### Ethical policy

- > The **overarching ethical policy** sets the ethical standards for our organisation, promoting a consistent ethical approach across all of our operations as we deliver on our mission to support people in crisis. All of our activities are undertaken to high ethical standards, which is integral to maintaining high levels of trust and integrity.
- > Decisions taken in these areas will be informed by applying sophisticated due diligence assessments. If due diligence assessments present an ambiguous situation, these can be escalated as appropriate to the relevant board-level Committee for decision.

## Relationships with our suppliers

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.

Our corporate procurement processes were updated to take account of the Act, and the risk of modern slavery more broadly including the specification, terms and conditions and tender response and evaluation documents.

We have arrangements in place to help the suppliers we work with understand and meet our corporate standards. We have zero tolerance of slavery and human trafficking. We expect all those in our supply chain and contractors to behave in a manner consistent with our organisational values.

Supplier due diligence will be undertaken periodically including an annual report to ensure that supply chain risk is managed in accordance with our risk management framework. Should they be required to publish

a slavery and human trafficking statement in accordance with the Act, we expect our partners to fully meet their responsibilities.

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 requires that we assess our supply chain annually to scope the risk of modern slavery occurring in our supply chain, and our response to that risk.

In 2018, we will take forward implementation of the Supplier Code of Conduct we developed in 2017.

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/About-us/Contact-and-help/Comments-or-complaints](https://www.redcross.org.uk/About-us/Contact-and-help/Comments-or-complaints)**.

# Responding through services

We are committed to recognising and responding to trafficking if we do encounter it in our supply chains and in our service operations.

We have been developing support services for survivors of trafficking since 2009. Our focus is on ensuring we recognise trafficking in the people we are already working with and that trafficked people are supported and enabled to make informed choices about their own lives.

Since 2014 we have been training our frontline staff and volunteers to recognise and help trafficked people through the PROTECT (Persons at risk of trafficking in Europe: Capacity to identify and assist potential victims of human trafficking) project. At the same time we established the Anti-Trafficking Team, which works across the organisation supporting all frontline teams and support functions within the organisation to better understand and respond to trafficking. The team works to build the Movement's response to trafficking by developing internally focused training and the required systems to provide assistance to people who have been trafficked, to empower them to enact their rights and to make informed decisions. We work both in the UK and internationally to increase the care and support available to trafficked people.

We believe that by providing the right information people can, with enough time and in an appropriate space, make informed choices about their next steps. Therefore our programmes are focused on empowering and enabling people to take control of their own reintegration and recovery.

## 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.

Through the PROTECT project we developed two specific training modules:

- > Module 1 was made available on the IFRC learning platform for the IFRC and all 191 National Societies. Module 1 provides a basic introduction to trafficking and is designed for all staff and volunteers to complete. We commenced roll out of the training in 2015. In 2017 over 200 learners completed this module.
- > Module 2 is specifically aimed at the Refugee Support service caseworkers. This 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 2017 we trained over 130 people and provided casework support to over 100 people.

Moving forward, we will continue to roll out these training modules and use embedded learning techniques to promote awareness amongst our staff and volunteers of the signs of trafficking and understand the internal referral pathways and safeguarding procedures.

In 2016 we also partnered with Forum Refugies (France) who are leading on the TRACKS (identification of TRafficked Asylum seeKers' Special needs) project. In 2017 this included running capacity building sessions and developing a toolbox to help frontline practitioners (both internal and external to the British Red Cross) to identify the specific needs of trafficked people within the asylum system.

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 project.

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 in the anti-trafficking work that we do is that any person who is trafficked and exploited will be recognized, supported and protected.

In recognition of our commitment to supporting people in crisis through our anti-trafficking work, one of our key 2017 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, building our work through the PROTECT project. We continue to be committed to this pledge and will grow this work in 2018.

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 around anti-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 aiming to strengthen the sector 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

### Specialist Trafficking Support

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.

#### > Longer term support

We are running a 12 month 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.

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 trafficked people 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.

### 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) identify them. 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 administer first aid.

## Targeted initiatives

We are the largest non-statutory provider of support to refugees and asylum seekers in the UK. This makes us uniquely placed to respond specifically to the needs of trafficked asylum seekers and we are increasingly seeing asylum seekers who have been trafficked. We identify trafficking survivors as a specific, vulnerable group within the asylum process and seek to provide them tailored support and to have special measures in place to ensure that they are properly protected, supported and not re-traumatised as a result of seeking asylum.

### **TRACKS project: improving support**

We have partnered with Forum Refugies (France) on the TRACKS Project, which is co-funded by the European Commission. In the UK, we are working closely with the Human Trafficking Foundation, UNHCR, and AIRE Centre.

The TRACKS Project aims to improve the support to trafficked asylum seekers in the asylum process (e.g. procedural and reception conditions) primarily by researching and mapping national legislation, regulations, case-law, good practice and gaps in relation to the assessment of specific needs of trafficked people in the asylum process. We interviewed trafficked asylum seekers and conducted focus groups with key service providers, and developed recommendations which are informed by the needs of trafficked asylum seekers. The result of this has been the production of a UK Report and frontline worker Toolbox (which will be released in 2018) and the delivery of capacity building sessions in 2017.

## Migratory Trails and Post-NRM Support

We are also leading a project called STEP (Sustainable integration of Trafficked human beings through proactive identification and Enhanced Protection), which is co-funded by the European Commission Asylum and Migration Integration Fund.

This Project works on achieving three key objectives:

- > to foster collaboration on a pan-European level to share practice and work together on support programmes for trafficked people;
- > to create ways to sensitise asylum seekers and migrants in transit across Europe about the risks of trafficking and exploitation, including how to seek assistance if they are being exploited; as well as to enable frontline humanitarian workers to better recognise and respond to the signs of trafficking in those they are supporting; and
- > to pilot a post-NRM support programme in the UK and Croatia, to evidence how longer term support can be provided to trafficked people.



## Our response internationally

Within the context of the large scale movement of refugees and asylum seekers through Europe, we identified a specific protection need in relation to trafficking, and wanted to enhance the Movement's ability to recognise and respond to trafficking in these contexts. We therefore designed a programme to address this need, for which we sought funding from DFID.

In 2017, we ran this programme which was called MMPAT (Mediterranean Migration: Protection and Anti-Trafficking) Project, focusing on vulnerable migrants arriving in Italy by boat from Libya. We also worked with the Italian Red Cross to provide essential humanitarian support to vulnerable migrants, as well as strengthening their response to trafficking among migrants. In particular, we:

- > trained staff and volunteers to identify and respond to trafficked people and those at risk of exploitation, through an e-module based on our own PROTECT training, adapted to the Italian language and context;
- > engaged with anti-trafficking networks in Italy, including NGOs and other agencies, and developed procedures for the Italian Red Cross to refer any individuals identified to receive specialised support; and
- > ran awareness sessions with migrants and developed awareness materials, in a number of languages and formats, to inform migrants of the risk of trafficking and the support they can access through the Italian Red Cross.

The MMPAT project also supported work with vulnerable migrants in Egypt and Sudan, again by providing humanitarian assistance to vulnerable migrants and identified trafficked people, as well as training of staff and volunteers, and raising awareness among migrant populations, of the risks of trafficking and how to access support in situations of exploitation.

We have also been scoping for other ways to support the movement, and have developed partnerships and new project ideas to provide awareness raising and support to people along particular migratory trails. We hope to see these come to fruition in 2018.

### Support to the Movement

In addition to our work in the UK, we want to enable the wider network of National Societies to respond to trafficking within their own contexts. 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.

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 the migratory trail and affirms that we will look to provide individuals with appropriate support and protection as part of our humanitarian mission.

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

2017 was an important year for the British Red Cross in relation to using our voice to influence external audiences. We gathered evidence throughout 2017 to demonstrate the key issues and concerns facing trafficked people.

We have been delivering the Your Space pre-NRM programme since 2016 and evidencing the need for this service. In October 2017 the Home Office announced that pre-NRM support will now become a statutory provision. We are now working on compiling our findings and recommendations from our work in order to make recommendations for the way this could be rolled out nationally.

We also compiled research and evidenced the needs of trafficked people within the asylum system, and throughout 2017 held capacity building sessions and meetings to build the sector's awareness of how these two groups intersect and the issues this presents. We're now in a position in 2018 to launch our report and findings and make concrete recommendations for ways to improve the situation for this group.

We conducted extensive engagement throughout 2017 with the police, Home Office, Anti-Slavery Commissioner and key charities and we contributed to multiple briefing papers highlighting the key issues and challenges faced by trafficked people.

We continue to engage with the UK Government on the Global Compact for Safe, Orderly and Regular Migration and the Global Compact on Refugees. The British Red Cross advocates for international frameworks that put the protection and needs of victims of trafficking and modern slavery at the centre. The British Red Cross led the development of the draft of a statement presented for the Fifth Thematic Consultation on the Global Compact for Safe, Orderly and Regular Migration, on behalf of the International Federation of Red

Cross and Red Crescent Societies, which focused on smuggling, trafficking and other forms of slavery. We continue to champion person-centred approaches as our engagement with the Compact development processes continue.

We presented in Istanbul at the Statutory Meetings' Forum Session, 'The future of migration'. This focused on the Movement's responsibility to ensure that trafficked people, and vulnerable migrants, are supported wherever they find themselves in the world, and that minimum standards of protection and anti-trafficking are provided across all National Societies.

In November 2017, we supported a Movement consultative meeting on Migratory Trails in Tunis, attended by 25 National Societies from North Africa, West, Sahel, Horn of Africa, and Europe. Trafficking and modern slavery were among protection challenges discussed. The meeting culminated in a joint work plan, which committed to activities along African trails to ensure anti-trafficking referrals in host and transit countries, and sensitisation for communities in countries of origin to key risks.

## 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:

- > Keep our policy and guidance documents under review to ensure they remain fit for purpose, and that our people understand how to report any concerns.
  - > 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.
  - > Continue to develop partnerships in the UK in order to strengthen the sector and improve collaboration.
  - > 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.
  - > 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 in partnership with other National Societies, including two-year funding to support safe houses for trafficked people in Sudan.
  - > Engage with other Red Cross and Red Crescent Networks to strengthen collaboration with other Movement actors.
  - > Support the Movement along migratory trails and in situations of protracted conflict to enhance services and provision for trafficked people. In particular, work with key National Societies on the migratory trails in North and West Africa to strengthen their understanding and awareness of trafficking, enhance their 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.
  - > Continue to engage closely with the Global Compact process, ensuring the needs of trafficked people remain at the forefront.
  - > Evaluate progress at the end of 2018 against the delivery pledge stated in the Corporate Business Plan in relation to support for people who have experienced trafficking and modern slavery.
  - > Implement the supplier Code of Conduct.
- 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-and-help/Comments-or-complaints](https://redcross.org.uk/About-us/Contact-and-help/Comments-or-complaints).

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